

To: Councillor McEwan (Chair)
Councillors Terry, Ennis, Keane, Mpofu-
Coles and Nikulina

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8 July 2026

Your contact is: **Richard Woodford - Committee Services**

NOTICE OF MEETING - PERSONNEL COMMITTEE 16 JULY 2026

A meeting of the Personnel Committee will be held on Thursday, 16 July 2026 at 6.30 pm in Committee Room 1, Civic Offices, Reading. The Agenda for the meeting is set out below.

	<u>WARDS AFFECTED</u>	<u>Page No</u>
1. DECLARATIONS OF INTEREST		
2. MINUTES OF PREVIOUS MEETING		3 - 4
3. PROCEEDINGS OF LOCAL JOINT FORUM		5 - 8
4. REVIEW OF COUNCIL'S EMPLOYMENT POLICIES	BOROUGHWIDE	9 - 124
5. RBC STAFF SURVEY ACTION PLANS	BOROUGHWIDE	125 - 128
6. RETURNING OFFICER SCALE OF FEES FOR LOCAL GOVERNMENT ELECTIONS	BOROUGHWIDE	129 - 242
7. EXCLUSION OF PRESS AND PUBLIC		

At this point, the following motion will be moved by the Chair:

"That, pursuant to Section 100A of the Local Government Act 1972 (as amended) members of the press and public be excluded during consideration of the following item on the agenda, as it is likely that there would be disclosure of exempt information as defined in the relevant Paragraphs of Part 1 of Schedule 12A (as amended) of that Act"

8. REDUNDANCY AND SPECIAL SEVERANCE BOROUGHWIDE 243 - 246
PAYMENT COSTS – 1 OCTOBER 25-31 MAY 26

PERSONNEL COMMITTEE MINUTES – 12 MARCH 2026

Present: Councillor Emberson (Chair);
Councillors Ennis, Keane and Terry.

Apologies: Councillor Mpofu-Coles

Also Present: Kathryn Cook, Louise Duffield, Kieran McGee, Alison McNamara and Miriam Palfrey.

12. MINUTES

The Minutes of the meeting held on 20 November 2025 were confirmed as a correct record and signed by the Chair.

13. UPDATE ON THE IMPLEMENTATION OF THE EMPLOYMENT RIGHTS ACT 2025

The Committee considered a report, that provided an update on the implementation of the Employment Rights Act 2025.

The report explained that the Employment Rights Act had become law on 18 December 2025 and would progressively introduce additions and amendments to existing legislation including the Employment Rights Act 1996. The employment law changes included in the Act would happen in 2026 and 2027. The provisions in the Act would have an impact on a number of current HR Policies and these would be revised as set out in the Act. However, not all the provisions in the Act would apply to the Council.

A headline summary of the anticipated provision of the Act and the amendments required to be made to the Council's Policies including delivery timescales was attached to the report at Appendix 1 and a single 'master-tracker' had been developed to ensure the timely amendment of policies. This would be reviewed actively to ensure compliance and management of risk.

Resolved: That the implementation plan for the provisions of the Employment Rights Act be noted.

14. CONFLICT OF INTEREST – POLICY

The Committee considered a report that introduced a standalone Conflict of Interest Policy that had been developed in response to the recently introduced Failure to Prevent Fraud offence under which the Council might be held criminally liable if it failed to prevent fraud that had been committed by employees or associated persons. The Draft Conflict of Interest Policy was attached to the report at Appendix 1.

The report explained that under the Failure to Prevent Fraud offence, that had been introduced in September 2025, the Council might be held criminally liable if it failed to prevent fraud that had been committed by employees or associated persons, unless it could demonstrate that reasonable and proportionate fraud prevention procedures were in place. This included having clear governance frameworks, effective monitoring and documented controls to mitigate the risk of prosecution and reputational damage. A key area of concern had been the management of employee conflicts of interest. Currently, staff Declarations of Interest were not renewed annually. This created a risk that new business interests, secondary employment, or personal relationships might go undisclosed, leaving the Council exposed to allegations of bias or impropriety. Without regular updates it would become

PERSONNEL COMMITTEE MINUTES – 12 MARCH 2026

difficult to evidence compliance with statutory requirements and to defend decisions if challenged. To address this a standalone Conflict of Interest Policy, that built on current expectations in the Code of Conduct, had been created to reflect the Council's obligations under the Failure to Prevent Fraud offence. Declaration of Interest submissions would be mandatory on an annual basis for all staff, regardless of whether circumstances had changed or not. Staff would also be required to update their declaration immediately if a new interest arose. This would enable the Council to demonstrate proactive compliance with the new legislation, strengthen transparency and reduce the Council's exposure to fraud, corruption and procurement risks. It would also create a clear audit trail evidencing that the Council had taken reasonable steps to prevent conflicts and misconduct, thereby protection both staff and the organisation.

Finally, the report stated that process changes would be made upon approval of the Policy by Personnel Committee and a communications campaign was under development to ensure its implementation.

Resolved: That the creation of a standalone Conflict of Interest Policy that built on the current provision in the Code of Conduct, to reflect recent legislative changes, be noted.

(The meeting commenced at 6.30pm and closed at 6.35 pm).

PROCEEDINGS OF THE LOCAL JOINT FORUM – 9 MARCH 2026

Present:

Councillors Emberson (Chair), Ennis, Goss, McGrother and Terry.	
K Magee	Unite
K Gumbrell	National Education Union (NEU)
A McNamara	National Education Union (NEU)
M Palfrey	Unison
Kathryn Cook	Assistant Director of HR and Organisational Development
Simon Hill	Committee Services

Apologies:

Councillors

1. PROCEEDINGS OF THE LOCAL JOINT FORUM MEETING HELD ON 8 OCTOBER 2024

The proceedings of the Local Joint Forum meeting held on 8 October 2024 were confirmed as a correct record.

2. MINUTES OF OTHER BODIES

The Minutes of the following meeting were received:

- Joint Trades Union Committee - 11 February 2026

3. UPDATE ON THE IMPLEMENTATION OF THE EMPLOYMENT RIGHTS ACT 2025

The Forum received a report, which was due to be considered at Personnel Committee on 12 March 2026, that provided an update on the implementation of the Employment Rights Act 2025.

The report explained that the Employment Rights Act had become law on 18 December 2025 and would progressively introduce additions and amendments to existing legislation including the Employment Rights Act 1996. The employment law changes included in the Act would happen in 2026 and 2027. The provisions in the Act would impact on a number of current HR Policies and these would be revised as set out in the Act. However, not all the provisions in the Act would apply to the Council.

A headline summary of the anticipated provision of the Act and the amendments required to be made to the Council's Policies including delivery timescales was attached to the report at Appendix 1 and a single 'master-tracker' had been developed to ensure the timely amendment of policies. This would be reviewed actively to ensure compliance and management of risk.

It was noted that further details were awaited on the introduction and operation of the School Support Staff Negotiating Body (SSSNB) for school support staff and that there would be engagement with the Unions when these were available.

PROCEEDINGS OF THE LOCAL JOINT FORUM – 9 MARCH 2026

AGREED: That the report be noted and endorsed for onward submission to Personnel Committee on 12 March 2026.

4. CONFLICT OF INTEREST - POLICY

The Forum received a report, which was due to be considered at Personnel Committee on 12 March 2026, that introduced a standalone Conflict of Interest Policy that had been developed in response to the recently introduced Failure to Prevent Fraud offence under which the Council might be held criminally liable if it failed to prevent fraud that had been committed by employees or associated persons. The Draft Conflict of Interest Policy was attached to the report at Appendix 1.

The report explained that under the Failure to Prevent Fraud offence, that had been introduced in September 2025, the Council might be held criminally liable if it failed to prevent fraud that had been committed by employees or associated persons, unless it could demonstrate that reasonable and proportionate fraud prevention procedures were in place. This included having clear governance frameworks, effective monitoring and documented controls to mitigate the risk of prosecution and reputational damage. A key area of concern had been the management of employee conflicts of interest. Currently, staff Declarations of Interest were not renewed annually. This created a risk that new business interests, secondary employment, or personal relationships might go undisclosed, leaving the Council exposed to allegations of bias or impropriety. Without regular updates it becomes difficult to evidence compliance with statutory requirements and to defend decisions if challenged. To address this a standalone Conflict of Interest Policy, that built on current expectations in the Code of Conduct, had been created to reflect the Council's obligations under the Failure to Prevent Fraud offence. Declaration of Interest submission would be mandatory on an annual for all staff, regardless of whether circumstances had changed or not. Staff would also be required to update their declaration immediately if a new interest arose. This would enable the Council to demonstrate proactive compliance with the new legislation, strengthen transparency and reduce the Council's exposure to fraud, corruption and procurement risks. It would also create a clear audit trail evidencing that the Council had taken reasonable steps to prevent conflicts and misconduct, thereby protection both staff and the organisation.

Finally, the report stated that process changes would be made upon approval of the Policy by Personnel Committee and a communications campaign was under development to ensure its implementation.

AGREED: That the report be noted and endorsed for onward submission to Personnel Committee on 12 March 2026.

5. OTHER BUSINESS

(a) Staff Club

K Magee noted that there had been representations from staff about the decision to end funding for the Staff Club administrator post. Councillors Emberson and Terry outlined the context and reasons for the decision and the process which had been followed. It was noted that similar clubs were supported on a voluntary basis in other authorities as were the other Staff networks. A meeting of the Club to discuss its future was due to be held on 10 March 2026.

PROCEEDINGS OF THE LOCAL JOINT FORUM – 9 MARCH 2026

AGREED: That the position be noted.

(b) Inclusion and Change

K Gumbrell asked about wider staff input into change processes to ensure that accessibility issues were not overlooked, for example in the procurement of IT systems or the design of new facilities. It was noted that this could be picked up in work on the Inclusion Strategy.

AGREED: That K Cook follow up the suggestion about wider staff input into change processes.

(The meeting opened at 5.00 pm and closed at 5.31 pm).

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Personnel Committee

16 July 2026



Reading
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Title	Review of Council's Employment Policies
Purpose of the report	To make a decision
Report status	Public report
Report author	Kathryn Cook – Director of Human Resources and Organisational Development
Lead Councillor	Cllr Ruth McEwan – Lead Councillor for Corporate Services and Resources
Corporate priority	Our Foundations
Recommendations	That: • Personnel Committee approves the new/amended HR policies as attached in Appendices A-H of this report. • Personnel Committee agrees to delegated authority being given to the Head of Paid Service in conjunction with the Leader and Lead Councillor if changes are required to HR policies as a result of the EHRC guidance on single sex spaces if required ahead of the next Personnel Committee (in November).

1. Executive Summary

- 1.1. The Council's employment policies are regularly reviewed to ensure that they are clear, easy to understand and up to date. Where new HR policies are required, these are presented to Personnel Committee for approval along with any changes required to existing policies. This report presents Personnel Committee with one new policy and seven amended policies– these have been reviewed and agreed with the Joint Trade Unions. The report also requests delegated authority for changes to HR policies following the implementation of EHRC guidance on single sex spaces if this is required prior to November's Personnel Committee meeting.

2. Policy Context

- 2.1 Good employment policies should support a culture based on trust, fairness, and inclusion. They can also speed up the decision-making process by ensuring that clear guidance is readily available to cover a range of employment issues. Further, they can assist in avoiding tribunal claims by providing guidance for managers that reflects accurately current employment law and good practice. It is therefore important that employment policies are clear, easy to understand and through regular review remain current.
- 2.2 ACAS Codes of Practice give authoritative advice in key areas of employment practice. A failure to follow the Code does not make a person or organisation liable to proceedings. However, employment tribunals will take the Code into account when considering relevant cases. Tribunals will also be able to adjust any awards

made in relevant cases by up to 25% for unreasonable failure to comply with any provision of the Code (by an employer or an employee).

3. Principles for the review of existing policies/creation of new policies:

3.1 When existing policies are reviewed or new policies are created, the following principles apply:

- They must reflect current employment law and the ACAS Codes of Practice and/or guidance where relevant.
- They must be easy to understand and written in plain English
- They should be concise. Any information which is not germane to the policy itself should be removed. For example, management guidance notes should not be included in the policies, but available separately.
- They should be consistent across related policies (where relevant)
- They should use gender neutral language

3.2 Prior to the creation of new policies or amendments being proposed to existing policies (other than where these changes are required as a result of changes to legislation), they are discussed with relevant subject matter experts and with the joint trade unions at a series of workshops. The specific policies covered by this paper have been discussed with the trade unions at a series of workshops over the past two months. The proposal for a new Suicide Prevention Policy has been contributed to by Public Health.

4. KEY ISSUES AND CHANGES PROPOSED

4.1 The table below sets out in summary terms the proposed changes made to seven existing policies. It also sets out in broad terms the content of the new proposed policy on suicide prevention. The policies themselves are attached as appendices. Once Personnel Committee has agreed them, referenced links will be added to each policy (where appropriate) and they will be lodged on the intranet and referenced in all staff communications. Where required, references will be made in relevant learning and development programmes.

Issues addressed:
DBS policy
As part of the TUPE transfer of Brighter Futures for Children back into Reading Borough Council in late 2025, a review was undertaken to assess differences between HR policies across the two organisations and the impact on transferring BFFC (now DOCS) staff. This review identified a small number of areas where amendments to existing RBC policies were required. For example, updates to the Fostering Friendly Policy were considered at the most recent Personnel Committee meeting. There are strict restrictions around the use of DBS checks and criteria that govern which roles they can be applied to. Blanket requirements for DBS checks cannot be mandated, instead we are required to evaluate the need for DBS checks on a role specific basis – this applies even where the role title appears to be similar eg social worker. Similar requirements apply to the need for DBS rechecks. The proposed amendment to the RBC DBS Policy reflects an operational requirement within DOCS for certain roles to undergo DBS re-checks on a three-year cycle.
Time off for Public Duties Policy

RBC is seeking to achieve Silver accreditation under the Armed Forces Covenant (currently held at Bronze level). The proposed changes to the Time Off for Public Duties Policy reflect the enhanced provisions required to meet Silver standards.

These include:

- up to five days' additional leave (either unpaid or from annual leave) for reservists; and
- up to five days' additional paid leave per leave year for Adult Cadet Force Volunteers to support attendance at essential annual training.

Recruitment Policy

RBC is seeking to achieve Silver accreditation under the Armed Forces Covenant (currently held at Bronze level). The proposed changes to the Recruitment Policy support this application, including provisions such as guaranteed interviews for veterans who meet the essential criteria.

In addition, a small number of minor amendments have been made to the policy following feedback from the Trade Unions.

Sickness Absence Policy

The Managing Sickness Absence policy has been updated in line with the requirements of the 2025 Employment Rights Act and to ensure that sickness is managed effectively. The key policy changes include SSP being paid from the first day of employment in line with the Employment Rights Act; requirements to co-operate with the sickness absence management process, procedural clarifications including absence review triggers in light of sickness related to disability and how disability sickness is recorded and addressed, changes to how concerns about the abuse of long term sickness absence will be managed; the use of first and final warnings as part of Attendance Review meetings and clarity about the opportunity to complete overtime following prior sickness absence.

Managing Poor Performance

A minor amendment has been made to this policy to reference that where an employee requests that a formal meeting under this policy is rearranged that this is within five working days of the original date.

Disciplinary

Changes to this policy include standardising the required timescales for action/response (including the provision of documents that the employee wishes to be considered as part of the process) and amendments to the requirements for referrals to external professional bodies

Grievance

Changes to this policy include standardising the required timescales for action/response and additional references to reasonable adjustments as well as responsibilities in respect of all parties involved in the case (not just the person taking out the grievance).

Supporting the Prevention of Suicide Policy – NEW POLICY

This policy sets out the Council's approach to supporting the prevention of suicide, identifying and supporting individuals at risk, and responding effectively to suicide-related incidents affecting staff. This policy aims to create a safe and supportive workplace where staff feel able to seek help and support others. It sets out clear roles and responsibilities including those for leaders/managers and employees.

It was created following input from Public Health and the trades unions. The policy will be scheduled for early review – six months after adoption. Guidance will be produced to sit alongside the policy, along with an 'easy read' version

and a flowchart setting out responsibilities etc. A bespoke version will be co-produced with head teachers for Schools.

4.2 Personnel Committee will be aware of recent EHRC advice about single sex spaces – this is expected to need to be implemented quickly although the date for this has yet to be confirmed. It is currently expected that this may have an impact on a number of current HR policies and given that the required implementation date may be prior to the next meeting of Personnel Committee (in November), delegated authority is requested from the Committee if changes are required to be made to HR Policies. As with previously delegated authorities from the Committee, this request is for the Head of Paid Service in conjunction with the Leader and Lead Councillor to agree policy changes if they are required.

4.3 A communications plan is in place to communicate the policy changes to managers and employees. This will include:

- News items on the intranet and iTrent Employee Self Service/Manager Self Service (the HR system used by all staff to book leave, submit mileage claims etc) to highlight the revised policies and who to speak to about any queries (i.e. their line manager or HR)
- Highlighted in the weekly email to all staff
- Strategic HR and OD Business Partners/HR Advisers highlight the revised policies and their implications (for staff and managers) when they attend department management team meetings and 1-1 meetings with managers.

5. Contribution to Strategic Aims

5.1 The new/revised HR policies help to ensure that the Council can meet its Corporate Plan priorities, specifically ensuring that the Council is fit for the future.

6. Environmental and Climate Implications

6.1 There are no environmental or climate change implications

7. Community Engagement

7.1 The Joint Trade Unions have been consulted on the policies covered by this report.

8. Equality Implications

8.1 Under the Equality Act 2010, Section 149, a public authority must, in the exercise of its functions, have due regard to the need to:

- eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under this Act;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

7.2 An Equality Impact Assessment (EIA) has been carried out (see Appendix I) and has found no differential impact on any groups with protected characteristics. Some positive impacts have been identified.

9. Legal Implications

- 8.1 Certain employment policies and procedures are specifically needed to comply with legal requirements, for example, a written health and safety policy. Even where a policy or procedure is not specifically required by law, employers often find it helpful to have a policy in place to provide clear guidance that reflects the legal framework for handling the issue in question and it also helps employees to be clear about the organisation's stance on a particular subject. The proposed policies presented in this review reflect current employment law and ACAS Codes of Practice and/or guidance where relevant.

10. Financial Implications

- 9.1 There are no known financial implications arising from this report.

11. Background Papers

- a. There are none.

Appendices

The report includes the following appendices:

- Appendix A: DBS Policy
- Appendix B: Time off for Public Duties Policy
- Appendix C: Recruitment Policy
- Appendix D: Sickness Absence Policy
- Appendix E: Managing Poor Performance Policy
- Appendix F: Disciplinary Policy
- Appendix G: Grievance Policy
- Appendix H: Supporting the Prevention of Suicide Policy (new)
- Appendix I: EIA

Equality Impact Assessment

A. Information about the policy

Policy title	• DBS Policy • Time off for Public Duties Policy • Recruitment Policy • Sickness absence Policy • Managing Poor Performance Policy • Disciplinary Policy • Grievance Policy • Supporting the Prevention of Suicide Policy
Lead officer	Kathryn Cook, Director HR&OD
Date of assessment	16/6/26
Summary of the policy	Changes to each policy as set out in paragraph 4.1 of the covering paper. Provisions of the proposed new policy on suicide prevention are as also set out in paragraph 4.1

B. Initial assessment

	Assessment
PSED Aim 1 (unlawful behaviour): • Could your policy lead to direct or indirect discrimination, harassment, victimisation, or any other conduct prohibited by the Equality Act 2010?	no
PSED Aim 2 (equal opportunities): • Could your policy affect how service users or employees access services or participate in activities relevant to your policy area? • Could it impact people with particular protected characteristics who have a disproportionately low level of access to services, participation in public life, or other activities?	no

• Could it create or worsen disadvantages and inequalities in your community? • Could it remove or minimise disadvantages and inequalities in your community?	
PSED Aim 3 (good relations): • Could your policy affect how people perceive or interact with others? • Could it help tackle prejudice and promote understanding between people with different protected characteristics? • Could it lead to prejudice, community tensions, conflicts, isolation, or segregation?	no

C. Full assessment

i. Impact on protected characteristics

Protected characteristic	Expected impact	Evidence
Age	None	
Disability	None	
Gender reassignment	None	
Pregnancy and maternity	None	
Race	None	
Religion or belief	None	
Sex	None	
Sexual orientation	None	
Marriage and civil partnership	None	
Membership of the armed forces community*	Improved provisions for veterans and reservists and cadet forces volunteers	Policy proposal meets the requirements of the 'Silver' standard for the Armed Forces Covenant
Socio-economic disadvantage*	None	
Experience of care*	None	

*Additional characteristics identified by the Council to be considered in Equality Impact Assessments.

ii. Mitigating Actions

Negative impact	Mitigating action
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None identified	

iii. Monitoring and Review

There are formal review periods for each HR Policy and once agreed by Personnel Committee, each of the amended policies will be added to the regular review schedule. The Suicide Prevention Policy will be reviewed after six months in operation at the request of the trades unions.

A regular workforce report is provided to Personnel Committee which monitors whether there is any adverse impact on employees with protected characteristics.

D. Approval

Approving officer (name and role)	Date
Kathryn Cook, Director HR&OD	16/6/2026

Disclosure and Barring Policy

July 2026



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Document History	
Version	1.0 (see below)
Status	Draft
Date	July 2026
Target audience	All employees of Reading Borough Council with the exception of staff working term time only, teaching or school based staff and casual staff for whom alternative procedures apply
Ratification	None
Author	Ben Morgan

Version control	Reviewers
Version 1.0	Draft March 2026
Version 2.0	Reviewed by TUs June 2026

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1. Introduction

- 1.1 Reading Borough Council is committed to safeguarding the welfare of people who access our services. One aspect of this is the effective use of the criminal record checking process for all relevant groups of staff and volunteers.

2. Scope

- 2.1. This policy refers to staff, casual staff/workers, and volunteers working for Reading Borough Council. A separate Safer Recruitment and Employment Policy is in place which applies to those working in Reading Borough Council maintained schools.
- 2.2. The principles of the policy equally apply to agency and contingent labour workers. However, it is the responsibility of the agency concerned to undertake the necessary DBS checking and ensure that all necessary checks are completed before the worker commences work.
- 2.3. As an employer, Reading Borough Council may request a DBS check as part of their recruitment process. These checks are processed by the Disclosure and Barring Service (DBS).
- 2.4. All information related to DBS is sensitive and should be dealt with appropriately in line with GDPR and with the Council's Data Protection Policy and relevant associated policies and stored in line with the Council's Record Management Policy.
- 2.5. For certain roles, the check will also include information held on the Children's and Adults' Barred Lists, alongside any information held by local police forces, that is considered relevant to the applied-for post.
- 2.6. DBS checks assist us in making safer recruitment, however a check is just one part of recruitment practice. When a check has been processed by DBS, a DBS certificate is produced and issued to the applicant.
- 2.7. The DBS is also responsible for placing or removing people from the DBS children's barred list and adults' barred list for England, Wales and Northern Ireland.
- 2.8. Certain areas of employment are exempt under the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (ROA), and employers may ask about spent convictions - this is known as asking an exempted question. When answering, the applicant has a legal obligation to reveal spent convictions.

- 2.9. All staff and volunteers currently working in Reading Borough Council undertaking “regulated activity” must have an enhanced DBS check plus a relevant barred list check. Details of Regulated Activity are set out in the Appendix to this policy.
- 2.10. There are also a limited number of roles and circumstances in which it may be appropriate to request other levels of check. Further information is provided below.

3. Types of Criminal Record Checks and eligibility

3.1 Determining whether a role requires a DBS check

Reading Borough Council applies DBS checks only where they are lawful, proportionate and necessary to safeguard the people who use our services.

A DBS check must not be requested as a default requirement. Whether a role requires a DBS check, and the level of any such check, is determined by the duties and responsibilities of the role, not the job title, work location, or the personal circumstances of the postholder.

In determining eligibility, consideration will be given to:

- Whether the role involves regulated activity with children and/or adults
- The nature, frequency and supervision of contact with children or adults
- The degree of trust, authority or power exercised by the role
- Access to vulnerable groups, sensitive environments or decision-making affecting wellbeing
- Whether the role meets the legal criteria for a DBS check under relevant legislation

Where a role does not meet the legal criteria for a DBS check, one must not be requested.

The different types of check that can be completed are described below.

3.2. Enhanced Check for Regulated Activity (Children and / or Adults)

Used when someone is undertaking regulated activity relating to children, adults or both. This check is a legal requirement and involves a check of the police national computer, police information and the children’s and / or adult’s barred list.

3.3. Enhanced DBS Check

To be eligible for an enhanced level DBS check, the position must be included in both the Rehabilitation of Offenders Act (ROA) 1974 Exceptions) Order 1975 and in the Police Act 1997 (Criminal Records) regulations. This may be appropriate, for example, for roles which would be regulated activity but are not because they do not work unsupervised with children or do not do so on a regular basis. This level of check involves a check of the police national computer and police information. Human

Resources (HR) can advise as to the appropriateness of this for particular roles as necessary.

3.4. Standard DBS Check

To be eligible for a standard level DBS check the position must be included in the Rehabilitation of Offenders Act (ROA) 1974 (Exceptions) Order 1975. This would include people entering professions such as law and accountancy. The Standard check contains details of all convictions held on the PNC including current and 'spent' convictions as well as details of any cautions, reprimands or final warnings and does not include a check of local police information or the children's or adults barred lists.

3.5. Basic Check

Anyone can apply for a Basic Disclosure in their own name. The check is not job-specific or job related and may be used more than once. Disclosures contain only convictions considered unspent under The Rehabilitation of Offenders Act (1974). This could be used for roles who have access to sensitive data for vulnerable groups; this is called a controlled activity.

3.6 Where it is unclear whether a role undertakes regulated activity or whether a DBS check is legally justified, managers must seek advice from HR and Organisational Development.

Where a higher level of check is being considered outside of clear regulated activity, a written risk assessment will be required. HR and Organisational Development will confirm whether the check is permissible and appropriate.

DBS checks that cannot be justified within legislation and DBS regulations will not be processed.

3.7. The HR and Organisational Development team will hold the evidence of a DBS completion in the form of the summary memo from the online service. This also contains details of any trace found by the check.

4. Pre-Employment checks

4.1. Reading Borough Council uses the DBS check as one of a range of measures for assessing the suitability of preferred prospective employees, casual staff/workers, self-employed contingent workers, volunteers and agency workers. These checks include verifying an individual's identity, checking gaps in employment history, references, work health checks, eligibility to work in the UK and professional registration and qualification checks. Only where managers take this holistic approach can they ensure effective and safe recruitment practices.

4.2. Prior to a recruitment campaign taking place, the hiring manager, with advice from HR and Organisational Development if required, must determine whether there is the need to request a DBS check. If a DBS check is considered necessary for a post, then this should be clearly stated on the advert and job description and must be undertaken following a conditional offer of employment and prior to starting work.

5. Overseas workers

- 5.1 Whilst a DBS check is a check of a criminal record in the UK, this cannot currently assess criminal records held overseas. Consequently, if an applicant/employee lives or has lived outside of the UK for a continuous period of more than 6 months in the past 5 years a criminal record check should be sought from the country/countries the individual resided in. This is commonly referred to as a Certificate of Good Conduct. Overseas workers must still apply for a DBS check. HR and Organisational Development will provide advice as to how to obtain a certificate of good conduct. For more information please see the following Home Office guidance: [Criminal records checks for overseas applicants](#).

6. Transgender process for DBS checks

- 6.1 DBS offers a confidential checking process for transgender applicants. This process is for transgender applicants who do not wish to reveal details of their previous identity to the person who asked them to complete an application form for a DBS check.

7. Employment prior to a satisfactory check being completed

- 7.1 Every effort should be made to ensure that a DBS Disclosure has been received prior to the commencement of an individual's employment. Although the usual timescale for this to happen is no more than five working days, it is recognised that there may be occasions where it is necessary for an individual to commence their employment before a Disclosure has been received. In exceptional circumstances and if it is clear that there is no alternative action which can be taken to avoid this, the following steps should be taken:
- HR and Organisational Development must confirm that they are in receipt of all other pre employment checks and are able to confirm that these are satisfactory;
 - The DBS Disclosure has been correctly completed and sent to the DBS;
 - HR and Organisational Development have checked the individual against the relevant barred list(s);
 - The relevant Director has approved a risk assessment of the situation, is satisfied that sufficient safeguards are in place and that the individual will not have unsupervised access to children or vulnerable people.

8. DBS rechecks

- 8.1 There is no legal requirement to renew DBS checks and Reading Borough Council will only conduct a recheck in the following circumstances:

- Where the individual has transferred to a post requiring a higher level of DBS check
- Where concerns exist about an individual's suitability to continue working within a regulated activity. (see Concerns during employment below)
- Where a role involves substantial contact with children and/or adults at risk, in accordance with section 8.2 below

8.2 For roles involving substantial and ongoing contact with children and/or adults at risk, Reading Borough Council will normally require a DBS recheck every three years as part of its safeguarding arrangements.

Substantial contact may include, but is not limited to:

- Roles involving regular, direct, and meaningful interaction with children or adults at risk
- Roles involving unsupervised or one-to-one contact
- Roles exercising a significant degree of trust, responsibility, or decision-making affecting the safety, wellbeing, or care of service users

The requirement for a three-year recheck will be determined based on the nature of the role, not the individual postholder, and must be lawful, proportionate, and consistent with DBS eligibility criteria.

Where an individual is subscribed to the DBS Update Service, periodic status checks may be undertaken instead of requesting a new DBS certificate, provided the level and scope of the original check remain appropriate.

HR and Organisational Development will maintain oversight of roles subject to periodic rechecking and advise managers when a recheck is due.

9. DBS update service & portability of DBS checks

- 9.1 Any DBS applicant can apply to join the update service. If the applicant/employee is subscribed to the Update Service, employers can undertake a status check on their DBS certificate free of charge to establish whether the individual's current certificate remains valid or if there is new information present which will make it necessary to request a new Disclosure certificate.
- 9.2 Applicants can register online as soon as they have an application form reference number when submitting a DBS online application or applicants can wait and register within 19 days of their DBS certificate being issued.
- 9.3 Criminal convictions are immediately added to DBS record. "Soft information" from police intelligence is updated every 9 months.
- 9.4 Employees and volunteers requiring an enhanced check are strongly encouraged to register to join the Update Service to avoid the requirement for future DBS applications;

information is provided direct to applicants when they apply. There is an annual charge for membership of this service (£13 as at 2021), which is payable by the individual applicant/employee. Employees can reclaim the cost as a work expense via iTrent. Membership of this scheme is free of charge for volunteers.

- 9.5. Employees must inform HR and Organisational Development that they have joined the update service when they are notified that a DBS check is required. If responsibilities have changed and a higher level of check is required, the full process will need to be followed.
- 9.6. If an external applicant informs HR that they belong to the Update Service, if the level of check is appropriate to the role and the current certificate remains valid, it will be accepted as a portable check. However, HR and Organisational Development will undertake a further status check after 9 months so that any changes can be picked up.

10. Declaration of criminal convictions

- 10.1 A DBS Disclosure is only valid on the day on which it is issued. In addition to periodic rechecking to ensure that individuals in relevant roles are continuously assessed for their suitability. It is a requirement that employees and other types of worker inform their manager of any cautions, charges or convictions at the earliest opportunity. Please note this includes motoring offences other than those dealt with by fixed penalty notices'. Failure to do so may result in disciplinary action. Managers should contact HR for further guidance if necessary.

11. Responding to positive DBS disclosures

- 11.1 Reading Borough Council actively promote equality of opportunity for all with the right mix of talent, skills and potential. Having a criminal record alone should not automatically bar an individual from a role. The disclosed information should be fully risk assessed by managers in a timely manner to identify and consider any potential risks of hiring or continuing the employment of an individual.
- 11.2. There are a number of factors that should be considered when undertaking the risk assessment before a final decision can be made. These include:
 - The seriousness of the offence/concern raised and the subsequent impact for those who use Reading Borough Council services
 - The relevance of the offence to the individual's role
 - Statutory requirements, for example, complying with the Barred Lists
 - When the offence was committed/time elapsed since
 - Any further explanation regarding the offence provided by the individual
 - Whether the individual declared the offence on their self-declaration
- 11.3. The manager should send the risk assessment to their Director for endorsement

12. Concerns during employment

- 12.1 If there are concerns about an individual's suitability to continue working with children or adults then there is the discretion to undertake a further DBS Disclosure. Due to the requirements of the DBS Disclosure process, the individual concerned must give their consent for the DBS Disclosure to be obtained. HR and Organisational Development should be contacted in this situation. If the DBS Disclosure identifies a concern, the manager should adopt the same process as that outlined for positive disclosures above, undertaking a thorough risk assessment of the situation.

13. Roles and responsibilities

- 13.1. The Director of HR and Organisational Development is responsible for ensuring that processes and systems are established and maintained to undertake vetting checks and for ensuring the policy is updated in response to any changes in government policy and DBS regulations which occur.
- 13.2. Directors are responsible for ensuring that:
- Appropriate consideration is given to which other roles should have vetting checks and that advice is sought from HR
 - For all employees in their workforce, vetting checks consistent with the activities they are undertaking and with this policy have been completed and risk assessments have been completed and approved.

14. Regulated Activity

- 14.1. Regulated Activity is work that a barred person must not do. Any individual listed on the Disclosure and Barring Service (DBS) barred lists cannot work in such roles. It is a criminal offence for a barred person to seek work, or work in, activities from which they are barred. It is also a criminal offence for employers to knowingly employ a barred person in regulated activity.
- 14.2. Regulated Activity – Children
Regulated activity in respect of work with children is:
- Unsupervised activities on a frequent basis; teaching, training or instruction; care or supervision; advice or guidance on well-being; or driving a vehicle for children.
 - Work in a 'specified place' on a frequent basis with opportunity for contact including; schools, children's homes, childcare premises. This does not include work by supervised volunteers. Schools need to refer to guidance on supervision of children as published by the Department for Education.
 - Relevant personal care, for example washing or dressing; or health care by or supervised by a professional. This activity does not need to meet the frequency threshold.

- Registered child minding and foster carers. This activity does not need to meet the frequency threshold.

14.3 Further details can be found here: <https://www.gov.uk/government/publications/dbs-guidance-leaflets/regulated-activity-with-children>

14.4 Frequency

Frequent' is once a week or more often; or on four or more days in a 30 day period (or overnight).

14.5 Regulated Activity – Adults

The legal definition of regulated activity for adults no longer uses the term 'vulnerable adults' and no longer requires the activity to meet a minimum frequency threshold. The definition now focuses on the nature of activities, which if required by an adult, will define them to be at risk from abuse or neglect. Staff and managers of staff providing the following activities will be conducting regulated activity:

- Health care – any health care professional providing health care to an adult or anyone who provides health care to an adult under the supervision of a health care professional.
- Personal care – providing assistance, supervision or advice in relation to activities including eating and washing.
- Social care
- Assistance with cash, bills or shopping
- Assistance in the conduct of a person's own affairs
- Transporting an adult because of their age, disability or illness to or from their home and a place where they will receive health care, personal care or social care.

14.6 Further details can be found here: <https://www.gov.uk/government/publications/dbs-guidance-leaflets/regulated-activity-with-adults-in-england-and-wales>

Related Policies

[Data Protection Policy](#)



Time Off for Public Duties, Jury Service and Employing Reservists Policy

July 2026

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Owner

Version or draft

3.1

Date

July 2026

Review Date

2 years

1. Objectives and Scope

- 1.1. The Council recognises the value to the local communities and the organization of the employees undertaking public duties outside of work.
- 1.2. The Council recognises that many of the skills gained while carrying out public duties, such as leadership and team working, are transferable to the workplace.
- 1.3. This policy applies to all those employed by the Council, including those on permanent, temporary or part-time contracts, job sharers, and employees on non-standard terms of employment.
- 1.4. This policy does not apply to
 - Agency workers or interim staff
 - Schools based staff who may be covered by separate procedures
- 1.5. The policy sets out when employees can request time off work to perform these duties and the process for doing so.

2. Definitions

- 2.1. Public duties are when employees are Justices of the Peace (also known as magistrates) and officials or members of certain public bodies. Public bodies include local authorities, statutory tribunals, health and education bodies. There is a legal right to reasonable time off work to carry out these functions.
- 2.2. Jury service is when an employee is called up (by court summons) to sit on a jury.
- 2.3. Reservists can be
 - Volunteer reservists - recruited into the Reserve forces
 - Regular reservists - ex-military who may retain a statutory liability to be mobilized
 - The Reserve Forces Act 1996 also provides for other categories, such as:
 - **Full Time Reserve Service** - Reservists who wish to serve full time with regulars for a predetermined period in a specific posting
 - **Additional Duties Commitment** - part-time service for a specified period in a particular post
 - **Sponsored Reserves** - These are personnel employed by a contractor to provide a service to the Ministry of Defence
 - **High Readiness Reserves** - These are Reserves, usually with a particular skill set, that are available at short notice (with written agreement from their employer)

- 2.4. Cadet Force Adult Volunteers (CFAVs) are adult volunteers who support Ministry of Defence-sponsored cadet organisations (including the Army Cadet Force, Sea Cadet Corps, Royal Air Force Air Cadets and Combined Cadet Force). These roles are voluntary and involve supporting the development, training and wellbeing of young people.
- 2.5. Reservist Mobilisation is when a reservist is called out for military operations and can last up to 12 months.
- 2.6. Reservist Demobilisation is when the reservist's deployment or task finishes.
- 2.7. Reservist Training is typically 19 to 27 days each year, or 24 to 40 days for specialist skills. Training is one evening a week, several weekends training and one 15 day continuous training course (may also be called annual camp).
- 2.8. The leave year is 1 April to 31 March.

3. Informing the Council

- 3.1. Employees should inform their manager when they are considering undertaking public duties or becoming a reservist.
- 3.2. Employees who are already performing these activities should inform their manager when they start in their post.
- 3.3. Employees should inform their manager as soon as they receive the court summons for jury service.

4. Pay during the time off

a) Public Duties

Employees will continue to be paid at their normal rate of pay while performing their duties, subject to the deduction of any payments received from the public body.

Employees are required to declare all such earnings on completion of the public duty.

b) Jury Service

Employees will continue to be paid at their normal rate of pay during jury service. If an employee is paid an allowance by the court, Payroll should be informed so that it can be retrospectively offset against salary.

c) Reservists

During mobilisation there is no requirement for the Council to pay the reservist. The reservist receives service pay from the Ministry of Defence and a standard award to make up any difference (up to the statutory limit) between their service pay and normal average earnings. The reservist is responsible for applying for the award.

The Ministry of Defence will pay the Council's contributions towards the reservist's occupational pension scheme as long as the reservist agrees to continue paying their own contributions to the scheme.

If the employee decides to join the Reserve Forces Pension Scheme, they will not accrue reckonable service for the Local Government Pension Scheme during the period of mobilisation.

5. Time off and recording leave

- 5.1. Employees should provide their manager with evidence of appointments for public duties, a copy of the court summons and any other documentation for jury service and evidence (such as a letter from the commanding officer) for reservists.

5.2. **Public Duties**

Justices of the Peace (magistrates) can use time off for public duties to perform any of the duties of their office. 13 working days will be given in each leave year. Any additional working days needed to fulfil the duties of the office must be taken from annual leave, flexidays, compressed days or time off in lieu (TOIL).

Officials or members of the prescribed public bodies (see 2.1 above) can take time off to attend meetings of the body or any of its committees or subcommittees, and to do anything to carry out the functions of the body or any of its committees or subcommittees.

5.3. **Jury Service**

The employee should provide their manager with a copy of the court summons and any other relevant documentation as soon as possible after they receive the summons.

Jury service normally lasts 10 working days but can sometimes be longer. If an employee's services are not required for any part of or a whole court day they will be expected to return to work for the remainder of the day, if it is practical to do so.

If the jury service ends before the 10 days, the employee must inform their manager as soon as possible and return to work the day after the jury service ends.

Where the manager considers that an employee's absence on jury service could cause substantial impact on service delivery, the employee will be asked to make an application to be excused (courts will only allow it in exceptional circumstances or if the employee has been on jury service in the last 12 months) or deferred, as appropriate. When this applies, the employee should only submit the application when they have a letter (and any other relevant evidence) from the manager to support the application. Employees can also ask to have the date changed to another one in the next 12 months if, for example, they are sitting an exam or having an operation.

5.4. **Reservists**

Employees should provide their manager with evidence that they need to take time off. The Council is committed to granting additional paid leave of 15 days each year to Reservists specifically to enable them to attend the 15 day continuous training course.

Additional unpaid leave or annual leave from the Council's normal annual allocation of up to 5 days will be granted for short periods of training provided adequate notice is given and where such training cannot be undertaken in off-duty time. Attendance at weekend camps which cannot be undertaken during off-duty will be subject to the same arrangements.

Employees who need time off for activities as reservists are expected to use annual leave and the additional leave. The Council will do its best to accommodate these requests but cannot guarantee that they will be given priority.

Leave must be requested using Employee Self Service (iTrent). The application for leave should be made as soon as possible after the reservist has been informed that they need time off for activities. The manager will review the leave to ensure that it is not impacting on the needs of the service and not having an adverse effect on colleagues. The request and decision will be recorded, with the reason for declining the leave being recorded.

If the Council believes that, under the Reserve Forces (Safeguard of Employment) Act 1985, the employee's absence on military service could cause considerable impact on service delivery, it may apply for an exemption, deferral or revocation of mobilisation. This would be in exceptional circumstances. This must be done within 7 days of receipt of the employee's notice of mobilisation.

If there is untaken annual leave at the end of the leave year, iTrent automatically carries over a maximum of 1 week's contractual working week. All employees can request carry over annual leave and buy additional annual leave in accordance with the Council's Annual Leave Policy.

All employees can request to work flexibly as outlined in the Council's Flexible Working Policy.

Unauthorised absence may be treated as a disciplinary matter as outlined in the Council's Disciplinary Policy.

5.5. **Adult Cadet Force Volunteers (CFAVs)**

Employees who are Cadet Force Adult Volunteers (CFAVs) should provide their manager with appropriate evidence of their role and any training requirements.

The Council recognises the contribution made by CFAVs and the transferable skills gained through their volunteering activity.

The Council will grant up to 5 days' additional paid leave per leave year to support CFAVs in attending essential annual training.

Where additional time is required, employees are expected to use annual leave, flexi leave, time off in lieu (TOIL), or unpaid leave, subject to managerial approval.

Requests for leave should be submitted through Employee Self Service (iTrent) as early as possible. Managers will consider requests in line with service requirements and ensure decisions are recorded.

5.6. Reservist Mobilisation

Mobilisation is when reservists receive a 'call out' notice for full-time service. The maximum period of mobilisation is typically no longer than 12 months.

When the call out notice is issued, the reservist and their manager will receive the call out pack. There will usually be a minimum of 28 days' notice. A call out notice can be appealed if it is considered to cause serious harm to the Council. Details of how to appeal will be in the call out pack.

The reservist's manager will record leave in iTrent using Manager Self Service (MSS) and meet with the reservist to discuss handover of work and return of equipment, ensure any necessary paperwork has been completed, make a claim for financial assistance as appropriate and how they will keep in touch.

Reservists should be encouraged to take any accrued annual leave before mobilisation. Annual leave is not accrued while mobilised because the reservist accrues annual leave with the Ministry of Defence while they are in full-time service and it is factored into the mobilisation period and taken before the last day of mobilisation. However, during mobilisation, the reservist continues to accrue sick pay entitlement. If the Reservist become sick or injured during mobilisation, they will be covered by MoD's healthcare arrangements (including pay) until they are demobilised. If the sickness or injury continues and this results early demobilisation, they will remain covered by MoD arrangements until the last day of paid military leave. After the last date of mobilisation, the reservist will be covered by the Council's sickness policy.

If there is a restructure during the mobilisation time, the reservist should be included in consultation in the same way as any other employee who is not in work. They will be treated equally throughout the process, using the Employment Stability Agreement, in the same way as their colleagues. The reservist continues to have access to the Council's Employee Assistance Programme (EAP), which provides free, confidential telephone counselling and support and is available 24/7. The number to call is 0800 028 0199. Support is also available online at: <https://healthassuredeap.co.uk/>

(Username: Wellbeing; password: MindTestWorm20).

They will also have access to other staff benefits.

There is financial assistance for the employer to cover costs such as overtime, temporary replacement, clothing and training. Details are available in the Ministry of Defence Handbook.

5.7. **Reservist Demobilisation (end of period of active service)**

After service, the reservist has checks and briefings including medical and welfare.

Reservists are entitled to a period of post-operational leave. During this period, they will continue to be paid by the MoD.

A reservist cannot be forced to return to work before their leave finishes.

Both the Reservist and the Council have obligations under The Reserve Forces (Safeguarding of Employment Act) 1985 regarding the return-to-work process.

a) Reservist

The reservist has the right to return to work within 6 months of demobilisation. This is to their former post or a post on terms and conditions that are no less favourable. If they fail to return within 26 weeks, they forfeit the right to return. The reservist must write to their manager no later than the third Monday after the last day of full military service (demobilisation), requesting to return to work and suggesting a date which should be within 13 weeks of their last day of service.

Once reinstated the reservist will continue to be employed for:

- At least 13 weeks, if employed for up to 13 weeks before mobilisation
- At least 26 weeks, if employed between 13 weeks and 51 weeks before mobilisation
- At least 52 weeks, if employed 52 weeks or more before mobilisation

b) Council

The Council has an obligation under Reserve Forces (Safeguarding of Employment) Act 1985 to reinstate the reservist, where possible to their former role, and if not, to a mutually acceptable role on the same terms and conditions prior to mobilisation.

On returning to work the manager will make sure the reservist is updated on any changes, offer training and support, as appropriate, and discuss any health concerns.

The following should be considered as part of the process of reintegration into the team:

- The need to update on changes and developments in the Council.
- The need to offer specific refresher training where it is sought/considered necessary.
- Where the job duties have changed since mobilisation a period of skills training may be required to assist with new aspects of the job.
- Whether the reservist can meet up with colleagues informally or socially before or after return to work to prevent any feeling of dislocation, if this is sought.

- Reasonable time off to seek therapeutic treatment if required.

Appraisals

Managers who carry out Annual Reviews and 1-1 meetings with a reservist should be aware that Reserve Forces activities undertaken by an individual (either through training or mobilisation) bring essential skills into the workplace such as leadership, communication, team working and organisational ability, which can ultimately lead to improved performance in the workplace

Continuity of Service

Continuity of service is not broken by a period of mobilisation provided the reservist is reinstated within 6 months.

Reservists and Unfair Dismissal

Reservists have access, without a statutory qualifying period, to an Employment Tribunal for unfair dismissal if the dismissal is for the reason of, or is connected with, the employee's membership of the Reserve Forces.

Under the Reserve Forces (Safeguarding of Employment) Act 1985, it is a criminal offence for an employer to terminate a reservist's job without their consent solely or mainly because they have a liability to be mobilised.

6. Data protection and retention of employee records

- 6.1. The Council processes personal data collected in connection with this policy in accordance with its data protection policy. Such data is held securely and accessed by, and disclosed to, individuals only for the purpose of responding to requests to work flexibly. It will be held on an individual's personal record file which is retained for seven years after their date of leaving the Council. Inappropriate access or disclosure of employee data constitutes a data breach and should be reported in accordance with the data protection policy immediately. It may also constitute a disciplinary offence, which will be dealt with under the Council's Disciplinary Policy

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Recruitment and Selection Policy

May 2026

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Owner

Ben Morgan, Head of HR Operations

Version or draft

V1.4

Date

July 2026

Review Date

July 2028

1. Introduction

- 1.1. The Council is committed to providing efficient and effective services to the diverse communities of Reading Borough Council (RBC). However, in order to achieve this, the Council recognises that it is crucial to recruit the right people with the right skills and values to the right job and that these individuals should reflect, as far as possible, the diversity of the local community it serves.
- 1.2. This policy provides a framework to ensure the Council has a fair, objective, consistent and transparent recruitment and selection process that promotes good practice and a positive approach to equality and diversity. As it only sets out the broad principles, recruiting managers should read it in conjunction with the more detailed guidance relating to each stage of the process published on the Intranet. Managers should also be familiar with the separate Guidance on Recruitment and Retention of Disabled People.

2. Scope

- 2.1. This policy applies to all Reading Borough Council recruitment.

3. Aims

- 3.1. This policy aims to
 - Ensure the Council has a talented, skilled, flexible and motivated workforce that can deliver effective, value-for-money services in line with the organisation's strategic priorities, both now and in the future
 - Set out the standards to ensure that the Council's recruitment processes are fair, consistent, transparent and comply with relevant legislation and good practice
 - Increase the diversity of the workforce through the attraction and recruitment of high-quality candidates from across the community, particularly from under-represented groups
 - Balance the benefits of recruiting externally with the aspirations of existing staff to develop and progress within the organisation
 - Ensure that new recruits are assessed not only on their technical ability, but also for their compatibility with the Council's Team Reading values and behaviours
 - Promote a positive image of the Council as an employer

4. General Principles

The following principles will apply:

- The recruitment and selection process must be appropriate to the job concerned and be able to deliver a quality candidate for the job at a reasonable cost.
- It must be fair but not overly bureaucratic or daunting to potential applicants.
- [Safer recruitment](#) practices must be employed for all posts involving contact with children and/ or vulnerable adults
- Council Redeployees (e.g. staff who are at risk of redundancy) will be given prior consideration if the minimum criteria for the role are met (refer to the Employment Stability Agreement for more detail)
- Applicants with a disability, RBC Care Leavers, Armed Forces veterans and people who have completed the New Directions Work Experience Programme and who meet the minimum criteria for the job will be guaranteed an interview (see also the Guidance on Recruitment and Retention of Disabled People)
- No job will be advertised without having been job evaluated
- All appointments must be made on merit following assessment against clearly defined criteria
- The process should be undertaken by competent managers who have received appropriate training
- The process must be transparent and auditable with detailed written evidence available to support the decision made in respect of each applicant
- The required pre-employment checks must be carried out on all preferred candidates
- No appointee can start work before receipt of satisfactory pre-employment checks

5. Responsibilities

5.1. **Executive Directors and Directors** are directly responsible for ensuring that:

- This policy is followed within their own service areas,
- Their managers attend recruitment and selection training, including refresher training
- Their managers are held accountable for their practices

5.2. **Recruiting managers** are responsible for:

- Familiarising themselves with, and adhering to this policy
- Adhering to the Council's recruitment and selection processes, including safer recruitment practices where appropriate to the job role. Safer Recruitment Guidance
- Carrying out recruitment fairly, transparently and without prejudice in accordance with Council procedures
- Maintaining their technical knowledge and skill levels by undertaking recruitment and selection training, including refresher courses, as required

5.3. Human Resources are responsible for:

- Ensuring all required pre-employment and other suitability checks are carried out
- Providing specialist advice to managers
- Ensuring that monitoring of recruitment and selection activity is carried out
- Providing briefings and corporate training for staff involved in the process according to their needs
- Providing guidance and advice on statutory requirements and best practice in the protection of people in vulnerable groups –
- Investigating any complaints from applicants, managers or trades union representatives
- Work with managers and trade unions to implement any changes to the policy

6. Recruitment and Selection Process

6.1. Reviewing the Vacancy

Before beginning the process to fill any vacant post, managers should review it against their service area's strategic plans to make sure there is still a need for the role in its current form and consider potential redeployment (to this role) opportunities for staff under the Employment Stability Agreement.

6.2. Vacancy Control Procedures

Managers must follow the vacancy control procedures in place at the time they propose to recruit.

6.3. Opportunities for Young People

The Council is committed to helping young people get into work through its work placements and apprenticeships. Managers are, therefore, encouraged to consider creating suitable opportunities that would enable young, unemployed people to gain valuable work experience and skills. Managers should contact their HR Partner in the first instance if they are interested in taking on an apprentice.

6.4. Use of Agency Workers

The Council aims to fill all vacant posts with directly employed staff. The use of agency workers should therefore be kept to a minimum and at all times subject to vacancy control procedures. The use of agency workers will also be reviewed at Directorate Joint Forum meetings with trade unions.

6.5. Job Descriptions and Person Specifications

All posts must have an up-to-date, accurate job description/ person specification or job role profile.

6.6. Customer Facing Roles

When recruiting to roles where the employee is required, as a regular and intrinsic part of the job, to speak to members of the public, either face-to-face or over the telephone, managers must have regard to the guidance within the "[Code of](#)

[Practice on the English Language Requirement for Public Sector Workers](#)". This means that they must ensure that employees in such roles, irrespective of their nationality or origins, have a command of spoken English which is sufficient to enable them to perform the role effectively. The level of fluency required must be appropriate to the demands of the role and this must be specified in the person specification or job role profile. Fluency does not relate to regional or international accents, dialects, speech impediments or the tone of conversations.

6.7. Advertising the Vacancy

The Council is committed to 'simultaneous advertising' where all posts will be advertised internally and externally at the same time except where Council policies, procedures and agreements with the Trades Unions provide otherwise.

6.8. Advertising Media

Advertising will be designed to ensure that job opportunities are accessible to as wide and diverse an audience as possible and that they attract the strongest possible field of candidates.

6.9. Adverts

Recruitment advertisements should reflect the realistic requirements of the job with regard to skills, qualifications and experience and shall not include any unjustifiable or discriminatory requirements

6.10. Executive Search

For a limited number of senior management positions or hard-to-fill professional posts, it may be appropriate to use a consultancy firm to assist with finding potentially suitable candidates. This approach may be used to complement advertising on the open market to attract a wide pool of suitable candidates. The approval of the Director of HR and Organisational Development is required in all cases where it is proposed to use executive search techniques and the company to be used must be selected in accordance with the Council's procurement rules

6.11. Selection Process

Only those managers who, as a minimum, have undertaken the Council's recruitment and selection and equalities training can be involved in the recruitment and selection process. Normally all members of the recruiting panel should shortlist and it will be usual for the same managers who were involved in shortlisting to also sit on the interview panel. It is not permitted for a manager to interview alone. An interview must form the core part of every recruitment and selection process and, for a large number of posts, it will be sufficient to use it as the sole method of assessment. For more senior or technical roles, a more challenging selection process involving some form of testing might be appropriate. Care must be taken to ensure that tests do not unfairly discriminate. Where a candidate is known to have a disability that may put them at disadvantage, the panel should make reasonable adjustments to enable the candidate to participate fairly. All proposed tests should be discussed with HR. At the beginning of an interview the chair of the panel must check with all candidates that their access needs have been met.



Under no circumstances must an individual who is a friend, family member or has, or has had, a personal relationship with a candidate, participate in shortlisting or sit on an interview panel. The same would apply if an individual's knowledge of an applicant is such that their objectivity may be compromised. In these circumstances an individual must declare an interest and withdraw from the process. If a panel member has any concerns about this then they must seek advice from the Council's Resourcing team well before the interviews are due to take place.

6.12. Involvement of clients/service users

Where the successful candidate will have to work extensively and closely with children or vulnerable adults, it may be desirable to involve representatives of the clients/service users in the recruitment and selection process.

6.13. Post Selection Checks

The Council reserves the right to undertake such pre-employment checks as are necessary to ensure the suitability of the applicant for the job in question. This means that before a conditional offer of employment is confirmed, a number of pre-employment checks must be carried out and the outcomes considered satisfactory. These include:

- appropriate written employment references
- health clearance
- verification of qualifications and/or professional registration where appropriate
- Disclosure & Barring Service check where appropriate
- Right to Work in the UK check
- Driving licence check where appropriate to the post

6.14. Record Keeping

Recruiting managers must keep accurate and detailed records of the recruitment and selection process in order to be able to provide feedback to unsuccessful candidates and as evidence in case the appointment decision is challenged. All records must be kept confidential and stored securely in accordance with the Data Protection Act.

6.15. Feedback

Applicants will always be notified by email of the outcome of their application at every stage of the process. Recruiting managers should always offer to provide feedback as soon as reasonably practicable to candidates on the outcome of their application.

Feedback given must be accurate and any comments must be able to be substantiated by documentary evidence if required. Feedback must relate specifically to the individual's personal application and must not include comments about the specific performance of other applicants.

6.16. Complaints



The Council operates a right of complaint for applicants who feel their applications have not been fairly considered. Applicants may complain in writing to the Director of HR and Organisational Development at any stage in the recruitment process. This must be within 5 working days of the alleged act complained of. All complaints will be dealt with through the Council's Corporate Complaints Procedure.

The recruitment process will normally be halted at the point that the complaint is received.

6.17. Monitoring

In order for the Council to ensure that recruitment and selection practices are undertaken in accordance with the principles set out in this policy, HR will monitor and review arrangements through any of the following:

- Structured telephone discussions with recruiting managers prior to, and on completion of, the recruitment process
- Random scrutiny of individual recruitment exercises
- Manager surveys to review the ongoing effectiveness of the recruitment and selection procedures
- Ad hoc surveys to review the candidate experience
- Production and analysis of recruitment and selection statistics for the purposes of equalities monitoring
- Through trade union representatives observing a random sample of shortlisting meetings and interviews

Managing Sickness Absence Policy

July 2026



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Document History	
Version	1.7 (See below)
Status	draft
Date	March 2026
Target audience	All Council employees with the exception of employees in their probationary period of service and staff employed by schools
Ratification	None
Author	HR Employment Services Team

Version control	Reviewers
Version 1.1	Initial draft - January 2018
Version 1.2	Draft incorporating HR Professionals feedback - March 2018
Version 1.3	Second draft incorporating Head of HR and Organisational Development's comments – August 2018
Version 1.4	Final version agreed with Joint Trade Unions in December 2018
Version 1.5	Section 15 of Trigger points updated (Next review is due August 2021 or sooner if required by legislation)
Version 1.6	Agreed with Trade Unions – March 2021. Approved by Personnel Committee on 17 March 2021.
Version 1.7	Initial updated draft March 2026. Agreed by TUs June 2026. Next review is due in March 2028 or sooner if required by legislation.

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Additional Guidance

- [Guidance on conducting a return to work interview](#)
- [Guidance on making reasonable adjustments and evaluation form](#)
- [Guidance on the menopause and work](#)
- [Guidance on the process to be followed at an appeal hearing](#)

(The additional guidance is not part of the policy but is available to assist those involved in the policy. It can be found on the intranet or by clicking on the links above)

1. Objectives and Scope

- 1.1 The Council recognises that there will be occasions when individuals will be prevented from attending work through ill health. By implementing this policy, the Council aims to strike a balance between the pursuit of its operational needs and the genuine need of employees to take time off work because of ill health.
- 1.2 The objective of this policy is to ensure that sickness absence is managed in a timely, effective, fair and consistent manner across the Council. It aims to encourage all employees to maintain good attendance at work, and for managers to provide a supportive work environment.
- 1.3 This policy applies to all those working for the Council, including those on permanent, temporary or part-time contracts, job sharers, and individuals on non-standard terms of employment. The policy does not apply to:
 - employees in their probationary period of service (covered by the Probation Scheme)
 - staff employed by schools who may be covered by separate terms and conditions relating to their employment.
- 1.4 If the Council suspects there to be misconduct then the Council's Disciplinary Policy will apply. For example if:
 - the absence is not genuine or not for the reason provided;
 - the employee is undertaking inappropriate activities while off sick, such as carrying out work for another organisation; or
 - the correct sickness absence notification and evidence procedure has not been followed.
- 1.5 The Council reserves the right to amend, remove or replace this policy at any time after effective and meaningful consultation with the recognised trade union
- 1.6 The following important principles are encompassed within this policy:
 - it is based on established case law and has been agreed between the Council and the recognised trade unions
 - it will not contradict any current or future national agreement
 - employees will be informed of the Council's policy, in particular through the induction process.
 - employees will be informed of the standards expected of them
 - employees will be given an opportunity to state their case before any decision is reached
 - the informal process will have been exhausted before the formal procedure is initiated
 - an employee may be accompanied by a trade union representative or a work colleague
 - there will be a right of appeal against formal action taken

2. Responsibilities

2.1 Employees should:

- if they are unable to attend work because of ill health, notify their manager preferably by telephone, or alternatively by text or email, as soon as reasonably practicable and continue to notify and keep in touch with their manager while unable to attend work;
- attend a return to work interview with their manager each time the employee returns from a period of sickness absence or absence due to treatment related to a disability;
- be open with their manager about the reasons for their absence, to give the manager the opportunity to provide support where possible;
- tell their manager of any extenuating circumstances, for example personal or family problems or an unmanageable workload;
- bear in mind that the Council may seek a medical report, for example from the employee's doctor or the Council's Occupational Health Adviser; and
- cooperate with the Council with regard to the possible implementation of any adjustments to job duties, hours or working conditions, particularly those suggested by a doctor or Occupational Health.

2.2 Line managers should take responsibility for managing their employee's attendance and absence, and;

- ensure employees understand who they should notify about sickness absence and when, and maintain a proper record of each employee's sickness absences;
- conduct a return to work interview each time the employee returns from a period of sickness absence or absence due to treatment related to a disability;
- speak to the employee about the absence and the reason for it in a fair and factual way;
- be supportive towards the employee and, where appropriate, seek to identify ways in which to assist the employee to improve their attendance in the future, making it clear that continuing frequent absences from work are unacceptable;
- be alert to patterns of absence, for example frequent absences on Fridays or Mondays, before or after rest days for shift workers, or immediately before or after public holidays;
- try to establish any underlying reasons for frequent absences and, where the underlying cause is identified, take steps to help the employee to manage the cause;
- Conduct a risk assessment to review any adaptations needed by the employee for those on Long Term Sickness
- [Access to Work: get support if you have a disability or health condition: What Access to Work is - GOV.UK](#)
- be sensitive when absences are caused by personal or family problems;
- check whether or not the employee's absences are in any way work related, for example as a result of workplace stress;

- ensure that confidential records of all absences, including discussions and medical certificates are entered onto iTrent so that they can be accurately reported on;
- be aware of the potential for discrimination when managing absence, particularly where the employee's ill health is related to pregnancy, disability, the menopause or to a terminal illness (see sections 9 to 12);
- consult with HR and Occupational Health if unsure about anything or special circumstances arise, for example if it appears that the employee may have a disability and keep in mind the Council's duty to make reasonable adjustments for disabled people when managing absence (see section 10);
- be alert to signs of mental ill health which may present as physical symptoms and take appropriate advice; and
- take responsibility for the wellbeing of their employees.

3. Health and Wellbeing

- 3.1 The Council recognises its responsibility for employee wellbeing as detailed in the [Employee wellbeing in the workplace policy](#).
- 3.2 The Council seeks to support and encourage employees to take responsibility for their own health and wellbeing and provides a number of resources to support this.
- 3.3 The Council also recognises that mental wellbeing is a significant cause of absence and acknowledges the need for a clear corporate approach to supporting this. The Council has a number of resources on its [Stress and Well-Being Resources for Individuals](#) intranet pages. Employees should speak to their manager or HR if they do not have access to these pages at work.
- 3.4 Information on a number of health and wellbeing initiatives can be found on the [Health and Wellbeing Pod](#) intranet pages. These pages include a comprehensive list of external links to health organisations, links to fitness apps and health information web sites, information on the cycle to work scheme and a calendar of regular healthy events across the Council such as five-a-side football, fitness classes and running groups.
- 3.5 In addition to health and wellbeing initiatives, the Council encourages a healthy work-life balance and offers various options with regards to flexible working (where possible) to those who request it. Further information is available on the [Work life balance Pod](#)
- 3.6 The Council's Employee Assistance Programme (EAP) provides free, confidential telephone counselling and support. You can contact them 24/7 on 0800 028 0199 or by clicking <https://wisdom.healthassured.org/login>. Support is also available online at www.workplaceoptions.com

4. Notification and evidence of sickness

- 4.1 On the first day of sickness absence, the employee must inform their manager as soon as reasonably practicable and ideally prior to their start time, that they will not be working because of illness or injury.
- 4.2 The employee should provide a clear reason for the absence and the likely duration. The employee should also be prepared to discuss briefly any consequences of their absence, for example if customer appointments need to be cancelled or any essential work needs to be covered. The frequency of updates after the first day of absence will be subject to agreement between the manager and the employee depending on the reason for the absence and the likely duration.
- 4.3
- 4.3 If an employee comes to work, but needs to leave during the day because of ill health, they should inform their manager before leaving work. If the manager is unavailable, the employee should inform the next most appropriate person within the department.
- 4.4 Sickness absence that begins part way through the day will count as one full day's sickness absence if the employee leaves before completing 50% of their working day. Where sickness absence begins after the employee has completed 50% of their working day, this should be recorded as half a day's absence.
- 4.5 The first seven calendar days of sickness can be self-certificated. If the employee's sickness lasts for eight calendar days or more, the employee must provide a fit note from their doctor as soon as possible. A doctor's fit note may state that the employee:
 - is "not fit for work", in which case the employee should remain off work; or
 - "may be fit for work", if the doctor's recommendations are followed (for example, a phased return, amended job duties, altered hours of work, or workplace adaptations).
- 4.6 The manager should take what the employee's doctor has written seriously and it give fair consideration - in consultation with the employee, HR and Occupational Health - as to whether or not any of the changes recommended by the doctor can be accommodated.

5. Sick pay

- 5.1 The Council operates a contractual sick pay scheme that is more generous than statutory sick pay (SSP which is paid from the first day of employment. The amount of sick pay that employees receive will be based on their length of continuous local government service as follows:

During 1 st year of service	1 month's full pay and (after completing 4 months' service) 2 months' half pay
During 2 nd year of service	2 months' full pay and 2 months' half pay
During 3 rd year of service	4 months' full pay and 4 months' half pay
During 4 th & 5 th years of service	5 months' full pay and 5 months' half pay
After 5 years' service	6 months' full pay and 6 months' half pay

- 5.2 . The Council reserves the right to withhold or suspend sick pay under its contractual sick pay scheme under the following circumstances: the employee has failed to comply with the Council's sickness absence notification and evidence requirements;

- the employee refuses to attend an Occupational Health appointment at the reasonable request of the Council based on advice from an HR professional;
- the employee's incapacity has been caused by any other occupation they have;
- the employee makes or produces any misleading or untrue statement or document concerning their fitness to work;

The employee refuses to engage in the sickness management process (please refer to the Sickness Guidance regarding welfare checks)5.3 The employee will normally be entitled to receive SSP when contractual sick pay is withheld or suspended, although the Council can withhold or suspend SSP if it is not satisfied that the employee is ill, and no evidence of sickness is provided. Employees will be given written notice if their SSP or contractual sick pay is being withheld or suspended. In such cases the [Disciplinary Policy](#) may also need to be followed.

- 5.4 If the employee is absent due to sickness in the week(s) before they are due to work overtime, the manager reserves the right to revoke that overtime,
- 5.5 Sick pay under the Council's scheme is subject to the usual deductions for PAYE, national insurance, pension contributions, etc.
- 5.6 If an employee is absent from work due to illness caused by a disability, this will be known as Disability Sickness and will be not count towards their sickness absence record, and will be paid at full pay

6. Sickness absence and annual leave

6.1 Employees who are absent due to illness continue to accrue holiday entitlement whilst off work. Employees have the right to request a period of paid leave during their sickness absence requests must be approved by the manager as usual.

6.2 It is up to the employee to request annual leave while off sick and the manager cannot force an employee to take holiday while of sick. An employee's period of incapacity for work is not interrupted if they take annual leave during this time. Sickness entitlements resume at the same level as before the annual leave period, they do not reset.

6.3 Where an employee falls sick or is injured while on holiday (whether in the UK or overseas), the Council will allow the employee to transfer to sick leave and take replacement holiday at a later time. This policy is subject to the following conditions:

- The total period of ill health must be fully certificated by a qualified medical practitioner. The cost will be borne by the Council
- The employee must contact their line manager (by telephone if possible) as soon as they know that there will be a period of sickness during a holiday.
- The employee must submit a written request no later than ten days after returning to work setting out how much of the holiday period was affected by sickness and the amount of leave that the employee wishes to take at another time. This should be discussed at the Return to Work meeting.

6.4 Where the employee fulfils all of the above conditions, the Council will grant the employee the same number of days' replacement annual leave as the number of leave days lost due to sickness or injury.

6.5 if an employee does not take their contractual leave entitlement due to being on sick leave the amount of annual leave that can be carried forward to the next leave year will not be capped at the number of hours equivalent to the employee's one working week, i.e. 37 hours for full-time staff.

6.4 .

7. Medical appointments

7.1 Employees should wherever possible try to arrange medical appointments in their own time (e.g. outside flexi time core hours of 10am to 12pm and 2pm to 4pm). If this is not possible, employees should try to make appointments at times that will cause the minimum amount of absence from work or inconvenience to the Council. However, it is recognised that where hospital or treatment appointments are needed this might not be possible.

7.2 Provided that the employee gives their line manager reasonable notice of the date and time of an appointment, time off with pay will normally be granted.

- 7.3 Employees must obtain approval from their line manager in advance of any appointment wherever possible. The line manager may also, at their discretion, ask the employee to produce confirmation of the appointment.
- 7.4 Employees who are pregnant have the statutory right not to be unreasonably refused paid time off work for antenatal appointments. See section 9 for more detail.
- 7.5 A prospective father, or partner of a pregnant person has the statutory right to take unpaid time off to attend up to two antenatal appointments. In some instances there may be a need for more appointments and in these cases the employee should agree this with their manager and will not be unreasonably refused.

8. Return to Work Interview

- 8.1 On the first day back at work after any period of sickness absence, the employee's line manager will arrange to meet informally with the employee. Guidance on conducting a return to work interview is available on the intranet or by clicking [here](#).
- 8.2 If this is not possible on the employee's first day back (for example, for operational reasons or because the manager is not available), the informal meeting should take place as soon as reasonably practicable.
- 8.3 The return to work interview should take place in a private place, and all discussions between the employee and the manager should be private and confidential.
- 8.4 The line manager should:
- welcome the employee back to work;
 - explain to the employee that the purpose of return to work interview is to manage and monitor employees' absence and attendance to identify any problem areas and offer support where appropriate;
 - update iTrent with the employee's last day of sickness absence
 - ask the employee about the reasons for their absence, ensuring that the question is asked in a supportive way without any suggestion that the employee is "to blame" for the absence;
 - ask the employee whether or not they have consulted a doctor or attended hospital;
 - if the employee's sickness lasts for eight calendar days or more, ensure that the employee has provided a fit note from their doctor, and this has been passed on to HR; and
 - inform the employee if they have hit a trigger point, and the consequences of having done so (see section 15 below).
- 8.5 The line manager should complete the return to work interview section of the [sickness report form](#) and ask the employee to sign and date it also. The completed form should be uploaded by the line manager onto the employee's iTrent record. It is very important that the manager completes this form each time the employee returns to work so that the Council can keep track of the employee's pattern of absence.

- 8.6 There may be occasions when the underlying reasons for the employee's absence are not easily classifiable. For example, the employee may have more than one health condition, or the employee may have been feeling unwell because of a bereavement. If there is any doubt as to the reasons for the employee's absence, the manager should consult HR to determine the most appropriate reason for the absence record.

9. Pregnancy-related absences

- 9.1 Pregnant employees who are off work because of pregnancy-related ill health must abide by the Council's sickness absence reporting procedure. For example, a pregnant employee is subject to the usual notification and evidence requirements, and will be asked to attend a return to work interview when returning to work. (link to mat policy)
- 9.2 However, any sickness absence by a pregnant employee for a pregnancy-related reason should not be included when checking to see if the need for formal action under this policy has been triggered.
- 9.3 If the manager is in any doubt as to whether or not a pregnant employee's absence is related to her pregnancy, the manager should contact HR or Occupational Health for clarification.

10. Disability-related absence

- 10.1 Where an employee gives as the reason for absence an underlying health issue that could amount to a disability under the Equality Act 2010, the manager must seek advice from HR, who may advise that referral to Occupational Health is appropriate. Disability is defined as a physical or mental impairment that has a 'substantial' and 'long-term' negative effect on a person's ability to do normal daily activities. 'Substantial' is more than minor or trivial, e.g. it takes much longer than it usually would to complete a daily task like getting dressed. 'Long-term' means 12 months or more.
- 10.2 Managers should remember that the Council is under a duty to make reasonable adjustments for disabled employees. Access to time off for medical attention (treatment, assessments and tests, respite, recuperation etc in connection with support and / or treatment of an illness or condition) can be regarded as a reasonable adjustment under the Equality Act. Such time off will not be included for the purposes of assessing performance, promotion, attendance, or selection for redundancy. It will not count as sick leave, but as paid leave of absence, to be reviewed on a regular basis. Where the absence is wholly or partly for a disability-related reason, the trigger points referred to in this policy may need to be modified to take proper account of the employee's disability.
- 10.3 Guidance on making reasonable adjustments and an evaluation form for recording adjustments made and considered is available on the intranet or by clicking [here](#). Managers should contact HR for advice and clarification regarding disability-related

conditions. Managers need to review absence triggers in light of the disability but should discuss this with HR

11. Absence related to the menopause

- 11.1 The changing age of the UK's workforce means that between 75% and 80% of menopausal women are in work. 25% women experience symptoms that are serious and have a significant impact on their lives, such as hot flushes, night sweats, insomnia, anxiety and poor concentration which can also impact on work. Yet research shows that the majority of women are unwilling to discuss menopause-related health problems with their line manager, nor ask for the support or adjustments that they may need.
- 11.2 The Council has produced guidance for use by employees and managers to help ensure that women receive the right support to manage menopausal symptoms at work. The guidance is available on the intranet or by clicking [here](#). Managers must ensure that menopausal-related sickness absence is treated and recorded as an ongoing health issue rather than as repeated short-term absence (see section 16).

12. Absence related to a terminal illness

- 12.1 A terminal illness is a disease that cannot be cured or adequately treated and there is a reasonable expectation that the person will die within a relatively short period of time. Usually, but not always, they are progressive diseases such as cancer or advanced heart disease.
- 12.2 Sometimes the nature of the illness is such that the person is unlikely to be able to work again. In other cases, a person may decide that they do not want to work anymore and would rather spend their remaining time with their family and friends, getting their affairs in order, or simply doing what they want. However, a lot of workers with a terminal diagnosis decide that they want to continue working as long as they can, either because they need the financial security or because they find that their work can be a helpful distraction from their illness.
- 12.3 The Council will support employees who are diagnosed with a terminal illness and provide them with the security of work, peace of mind and the right to choose the best course of action for themselves and their families which helps them through this challenging period with dignity and without undue financial loss. The Council's Employee Assistance Programme (EAP) can provide support to any person with a terminal illness, including access to counselling and financial advice. Managers are also able to contact the EAP for support and advice.

13. Occupational Health

- 13.1 Occupational Health (OH) is a branch of medicine which specialises in the relationship between work and health. It is an advisory service and provides advice to both employees and employer. Its main objectives are:

- To identify and help prevent illness caused by work
- To advise on the fitness of an employee to do their job
- To improve and maintain the health of the workforce to the mutual benefit of both employee and employer

13.2 The OH Adviser is an independent, objective specialist assessing and advising on what appears best for both employee and employer in relation to an individual's health and their work. They will sometimes seek a report from the employee's GP before offering advice.

13.3 It may be appropriate to seek OH advice in the following circumstances:

- Where an employee advises their manager that they have been diagnosed with a condition or disability that may impact on their attendance or performance at work
- If an individual has been or is likely to be unable to work for a period of four weeks or more and there is a need to understand from a medical perspective the likely duration and prognosis, and if any adjustment would facilitate a return to work.
- If an individual has had frequent short term periods off work and agrees at an Attendance Review Meeting with the manager to a referral to OH. The purpose of the referral would be to understand if there are potentially any underlying medical conditions which could affect attendance.
- If an individual produces a Fit Note for a return to work with adjustments recommended by their GP and the manager needs advice and guidance on the adjustments.
- In cases of long term ill-health OH can advise on the appropriateness of medical retirement.

13.4 Ultimately it is a matter for the responsible manager, with support from HR, to decide how the Council responds to OH advice and whether any advice is implemented, particularly in relation to determining job adjustments.

13.5 Where an individual refuses to attend a medical assessment, or refuses to give consent for the Council to receive a summarised report of the medical assessment, a decision will be made on the basis of the information available. The Council reserves the right to stop sick pay if the employee refuses to reasonably co-operate with the sickness management process.

14. Formal sickness absence

14.1 Many of the mechanisms for managing sickness absence are common to both short and long term sickness. Some actions like ill-health retirement apply only to long term sickness absence, as outlined in section 22.

14.2 Almost all individuals will be absent at some point in their employment for short periods due to colds, seasonal flu, viruses, etc. and these will be assessed on a case by case basis. However, these periods should be recorded in the normal way (see section 4) and a return to work meeting should still be held and uploaded onto iTrent.

- 14.3 Managers are responsible for recognising when repeated short bouts of absence are impacting on service provision and they must address the potential underlying issues in a timely manner. This should be managed in a systematic and professional way escalating to each stage where appropriate. To facilitate this, managers will need to be pro-active and attentive to the reasons for absence and ensure adequate Return to Work Interviews are held each time the employee returns to work (see section 8).

15. Triggers

- 15.1 The following triggers should prompt the manager to examine an employee's absence record and consider if an Attendance Review Meeting should be held:
- Ten or more days absence in the last 12 months
 - Three or more occasions of absence in the last three months
 - Other patterns e.g. on Fridays/Mondays or before or after bank holidays or regularly after rest days for those who work shifts.
- 15.2 Managers should give full consideration to each individual's circumstances and the nature of their absences. For example, once having discussed with HR, managers may modify these triggers having reviewed an individual's personal circumstances..
- 15.3 These triggers should be pro rata for part time staff. For example, if someone works 2 days a week, the trigger would be 4 days which equates to two working weeks which is comparable to someone who works 5 days and the trigger is 10 days.

16. Attendance Review Meetings

- 16.1 Attendance Review Meetings are formal meetings with the line manager and the employee to discuss absence. They are common to both managing short and long term absences. During long-term sickness absence (including absence related to a disability or a chronic illness) an Attendance Review Meeting should be arranged every four to six weeks, keeping particular medical/personal needs in mind.
- 16.2 An Attendance Review Meeting should be held where a pattern of short term absence has become a cause for concern or if there has been no improvement since the last such meeting. It is also the place to formally consider reasonable adjustments, medical reports or other matters which directly or indirectly impact the attendance of an employee.
- 16.3 An invite to an Attendance Review Meeting as soon as practically possible and it must be in writing giving a minimum of five working days' notice, with the letter setting out the date, time and location of the meeting and it must state that the employee has the right to be accompanied by a Trade Union representative or workplace colleague. It is the responsibility of individual employees to arrange representation and if this cannot be arranged within the timescales set out above, and there are no extraordinary or mitigating circumstances, then the line manager should proceed with the scheduled meeting. Reasonable adjustments may be needed for a worker with

a disability (and possibly for their companion if they are disabled). For example, the provision of a support worker or advocate with knowledge of the disability and its effect, in addition to the right to be accompanied by a fellow worker or a trade union representative. The employee must tell the manager whether they will be accompanied at least three working days before the meeting.

- 16.4 The employee and their companion should make every effort to attend the meeting. Where the employee is unable to attend and provides a good reason for this, the hearing will be rescheduled to a later date. Unless there are special circumstances mitigating against it, if the employee is unable to attend the rearranged hearing, it will take place in the employee's absence. The employee will also be encouraged to make written submissions in such a situation which can be submitted in advance.
- 16.5 Where the chosen companion is unavailable on the day scheduled for the hearing, it will be rescheduled, provided that the employee proposes an alternative time within five working days of the scheduled date. If an alternative date is proposed by the employee, it will not be unreasonably refused.
- 16.6 The Attendance Review Meeting will always be held somewhere private and enough time should be scheduled to discuss the issues at hand. The manager will be advised by an HR professional.
- 16.7 As appropriate during the Attendance Review Meeting the line manager will:
- explore reasons for absence or insufficient improvement in attendance
 - identify any work related or personal issues that the employee may have which are impacting on their attendance
 - explain the impact of absence on service delivery and emphasise the importance of good attendance
 - review issues discussed at previous Attendance Review Meetings, if appropriate
 - review the medical advice
 - establish if the reason for absence falls within the provisions of the Equality Act 2010 and consider recommendations for reasonable adjustments or support if relevant
 - review support/reasonable adjustments already provided
 - identify the improvement in attendance needed
 - Warn of possible consequences if there is no improvement in attendance (this would not be appropriate if absences are related to pregnancy or disability or to a terminal illness – see sections 9, 10 and 12)
- 16.8 The following are possible outcomes of an Attendance Review Meeting:
- identify the improvement needed within a specific timescale
 - if attendance has not met the improvement target set since the previous Attendance Review Meeting, issue a first written warning or final written warning (see section 17)
 - In light of the discussion seek further medical advice

- establish if the reasons for absence may be due to a disability make recommendations for adjustments or support if needed
- referral to Occupational Health to investigate current medical conditions further
- take no further action if the terms of the improvement target have been met.

- 16.9 One possible outcome of this meeting could be a first written warning or final written warning (see section 17)

16.9 The manager will write to the employee, usually within five working days of the meeting, confirming the points discussed and actions identified. The line manager must ensure that any actions identified are implemented as soon as possible and relevant persons/departments are notified of any resulting actions/modifications and adjustments i.e. to triggers, core working hours etc.

N.B: additional meetings (which must be documented) can be held at any stage with the employee, outside of the formal Attendance Review Meeting, to discuss support mechanisms etc.

17. Attendance Warnings

17.1 An attendance warning is a formal, written, cautionary notification given following an Attendance Review Meeting to an employee on the basis of a sustained period of unsatisfactory attendance. There are two levels of warnings; a first written warning and a final written warning. A final written warning is given where there has been no satisfactory improvement after a first written warning is issued. These warnings will remain on the employees file for a set period of time and will be taken into account at a Attendance Review Hearing, which may result in the dismissal of the employee.

17.2 Attendance warnings will not be issued in the case of pregnancy related absence. In the case of disability, attendance warnings will only be issued where the level of absence cannot be sustained, after first carefully considering reasonable adjustments (including allowing a higher absence rate where absence is related to the disability)..Where long-term sickness absence is being abused, misrepresented, or forms part of a concerning pattern of absence, the employee may be issued with warnings prior to an absence hearing which may then result in the employee being dismissed under the Disciplinary and Conduct policy (link).

17.3 A first written warning will usually remain live for six months. A final written warning will usually remain live for 12 months. If further absence occurs whilst there is a live warning on file, the manager will move to the next stage of the process. It will be confirmed in writing within three working days of the Attendance Review Meeting and will confirm the employee's right to appeal (see section 19). The letter will also confirm that if satisfactory attendance is not achieved and sustained, then a further Attendance Monitoring Review may need to be held and the possible outcome of this (i.e. issue of a final written warning or dismissal).

18. Attendance Management Hearing

18.1

18.2 In short term sickness it takes place where there has been no improvement in an employee's attendance in the subsequent 12 month period after a final written warning has been issued.

18.3 An invite to an Attendance Management Hearing must be in writing giving a minimum of five working days' notice, setting out the date, time and location of the hearing and the reasons for holding it. It must also confirm that the employee has the right to be accompanied by a Trade Union representative or workplace colleague. The employee must tell the manager chairing the meeting whether they will be accompanied at least three working days before the meeting. Additionally, the written notification should advise the employee that the hearing may result in a decision to dismiss them with notice. The employee will also be sent copies of any documentation that will be relied upon at the hearing with the written notification.

18.4 The employee and their companion should make every effort to attend the hearing. Where the employee is unable to attend and provides a good reason for this, the hearing will be adjourned to a later date. Unless there are special circumstances mitigating against it, if the employee is unable to attend the rearranged hearing, it will take place in the employee's absence. The employee's fellow worker or trade union official may attend in such circumstances and will be allowed the opportunity to present the employee's case. The employee will also be allowed to make written submissions in such a situation.

18.5 Where the chosen companion is unavailable on the day scheduled for the hearing, it will be rescheduled, provided that the employee proposes an alternative time within five working days of the scheduled date. If an alternative date is proposed by the employee, it will not be unreasonably refused.

18.6 The Attendance Management Hearing will always be held somewhere private and enough time should be scheduled to discuss the issues at hand.

18.7 The hearing will be chaired by an appropriate manager from the employee's service who has the authority to dismiss (see paragraph 4.2 of the Disciplinary Policy for further details). The manager chairing the meeting will be advised by an HR professional and a note taker will also be present.

18.8 The management case will be presented to the manager chairing the hearing together with all documents relevant to the employee's health and attendance. Any representation made by the employee or the employee's representative, or any written submission made in the employee's absence will be given due consideration before any decision is taken.

18.9 The hearing manager will consider:

- the employee's overall absence record
- the impact of the level of absence on the Council
- representations from the employee

- whether the reason for any of the absence(s) falls within the provisions of the Equality Act 2010
- the support/reasonable adjustments provided, including their effectiveness and whether further support/adjustments could be put in place
- the management of the case
- the medical advice received, ensuring that up to date medical advice is available
- any further action that can be taken by the employee or the manager
- options for redeployment on medical grounds as an alternative to dismissal (long term absences only)
- whether ill health retirement has been considered (long term absences only)

18.10 Possible outcomes of an Attendance Management Hearing include:

- adjournment while further medical advice or evidence is sought
- consideration of further reasonable adjustments
- consideration of alternative employment
- dismissal with notice or pay in lieu of notice
- ill health retirement (see section 22)

18.11 The outcome of the Attendance Management Hearing will be confirmed in writing within three working days of the hearing. Where a decision to dismiss is made, the dismissal will be with appropriate contractual notice. The employee will have a right to appeal against a decision to dismiss them.

19. Appeal

- 19.1 An employee who is given a warning or is dismissed under this policy has the right of appeal. The appeal should be sent in writing to the manager who made the original decision and set out the grounds on which the employee believes that the decision was flawed or unfair. The appeal must be made within five working days of receiving written confirmation of the written warning or dismissal.
- 19.2 The appeal will be heard by a senior manager who has not been involved in the decision to impose a warning on the employee, in line with the authority to take disciplinary action, as detailed in paragraph 4.2 of the Disciplinary Policy. If the appeal is against dismissal, the appeal will be heard by a panel chaired by a senior manager who has not been involved in the decision to impose dismissal on the employee, together with the Chair of Personnel Committee and one other member of Personnel Committee or their substitute(s). The hearing manager/panel will be advised by an HR professional and a note taker will also be present.
- 19.3 Appeal hearings will normally take place within 14 days of receipt of the employee's written notice of appeal. The employee will be entitled to be accompanied by a fellow employee or a trade union official. A guidance note for the process to be followed at the appeal hearing is available on the intranet or by clicking [here](#).

- 19.4 The appeal manager/panel will consider any representations made by the employee and the employee's fellow employee or trade union official. They must also consider representations made by the manager who conducted the final Attendance Management Hearing and imposed the written warning/dismissal.
- 19.5 At the hearing, the decision made at the Attendance Management Hearing will be reviewed and the employee will be entitled to make representations about the appropriateness of that decision.
- 19.6 Upon completion of the appeal, the appeal manager/panel will convey their decision to the employee. The decision will be confirmed in writing within three working days.
- 19.7 The outcome of the appeal is final. There is no further right of appeal.

20. Managing long term sickness

- 20.1 Absence is considered long term where an employee is absent for 20 consecutive working days or more (or the equivalent for part-time staff). Where an employee indicates their absence will be long-term, Occupational Health advice should be obtained as soon as is practical to gain an indication of the type of illness/potential timeframes involved in recovery, the support required and adjustments needed.
- 20.2 Managers should be proactive in maintaining contact, providing support and assessing the needs of employees to facilitate a successful return to work. Managers are responsible for keeping in contact with an employee who is absent long term via regular Attendance Review Meetings (see section 16). Employees also have a responsibility to facilitate contact including participating in Attendance Review Meetings and keeping their manager informed of their condition.
- 20.3 Where an employee is returning from a period of long term sickness, Occupational Health can advise on any adjustments or working patterns that should be implemented. Wherever possible the Council will try to accommodate a phased return to work or a return on 'light duties' but this may need to be a period of redeployment in another team depending on the requirements of the service.
- 20.4 Where adjustments are identified to accommodate the needs of a disabled employee returning from long term sickness absence, a monitoring period should be established to ensure timely implementation and assessment of adjustments.
- 20.5 Where long term sickness is continuous, despite the implementation of support or adjustments, and medical reports indicate that it is unlikely the employee can return to their original role, consideration will be given to redeployment to an alternative role where possible (see section 21).
- 20.6 Where long term sickness absence continues and there is no prospect of a return to work within a reasonable timeframe, consideration will be given to escalation to an Attendance Management Hearing which may result in the employee's dismissal (see

section 18). Advice from an HR professional must be sought before such action is taken. The hearing will need to review whether all reasonable adjustments have been considered and whether an alternative role has been found/cannot be found/is not considered suitable.

- 20.7 If long term absence is the result of a terminal illness then the employee must be given the right to choose the best course of action for themselves and their families which helps them through this challenging period with dignity and without undue financial loss (see Section 12). Advice from HR and Occupational Health must be sought in such situations.

21. Redeployment on medical grounds

- 21.1 Finding alternative employment will only be considered where it is necessary for medical reasons, in instances of long term sickness and disability related absence, and recommended by Occupational Health. The initial search for an alternative role should be explored within the service and/or directorate prior to considering a move across the Council. If an alternative role is found then regular Attendance Review Meetings (see section 16) must take place, at least initially, to review the role, any adjustments made and any other matters which may impact on the attendance of the employee.
- 21.2 Individuals must be aware that there may be occasions where alternative roles cannot be sourced or would not be suitable. In those instances, where relevant, ill health retirement will be considered or ultimately dismissal with notice.

22. Ill Health Retirement

- 22.1 Retirement on the grounds of ill health can only be considered after all other options have been exhausted, and where an independent registered medical practitioner (IRMP), qualified in Occupational Health medicine, has determined that an employee meets the criteria for ill health retirement, in accordance with the Local Government Pension Scheme (LGPS) Regulations* (see guidance)
- 22.2 LGPS Regulations require the following criteria have to be satisfied before an ill health retirement can take place:
- At the date of termination the member must be under their Normal Pension Age in the 2014 scheme.
 - At the date of termination the member must have met two years' qualifying service in the LGPS.
 - The member must, as a result of ill health or infirmity of mind or body, be permanently incapable of discharging efficiently the duties of the employment the member was engaged in and;
 - The member, as a result of ill health or infirmity of mind or body, must not be immediately capable of undertaking any gainful employment. (Gainful employment is defined as paid employment for not less than 30 hours in each week for a period of not less than 12 months).

*Other pension's schemes including the Teachers' Pension Scheme will have broadly similar requirements.

22.3 Where ill health retirement is an option because an employee is deemed to be permanently incapable of doing their job, one of three tiers of benefit can be awarded. Each tier looks at the employee's capacity to carry out gainful employment in the future.

22.4 The different levels of benefit are:

Tier 1 - if an employee is unlikely to be capable of gainful employment before their Normal Pension Age.

Tier 2 - if an employee is unlikely to be capable of gainful employment within three years of leaving, but is likely to be capable of undertaking such employment before their Normal Pension Age.

Tier 3 - if an employee is likely to be capable of gainful employment within three years of leaving, or before their Normal Pension Age if earlier.

(Gainful employment means paid employment for not less than 30 hours in each week for a period of not less than 12 months).

22.5 An IRMP, who has had no previous dealings with the case, will be engaged by the Occupational Health provider to carry out an ill health retirement assessment. This will be organised through HR.

22.6 The employer, after obtaining a certificate from an IRMP, will discuss with the Pension provider about the next steps to be taken, and a final meeting will be arranged (where appropriate)

23. Data protection and retention of employee records

23.1 The Council processes personal data collected during informal and the formal Managing Sickness Absence Policy in accordance with its data protection policy. Such data is held securely and accessed by, and disclosed to, individuals only for the purpose of the Managing Sickness Absence Policy. It will be held on an individual's personal record file which is retained for seven years after their data of leaving the Council. Inappropriate access or disclosure of employee data constitutes a data breach and should be reported in accordance with the data protection policy immediately. It may also constitute a disciplinary offence, which will be dealt with under the Council's Disciplinary Policy.

MANAGING SICKNESS ABSENCE POLICY

Agreed between the Council and the recognised trades unions.

Signed:



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Director for HR and Organisational Development

Miriam Palfrey

Staff Side and Branch Secretary for Unison

Kieran Magee

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Managing Poor Performance Policy

July 2026



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Document History	
Version	5.0
Status	Final
Date	July 2026
Target audience	All employees of Reading Borough Council with the exception of employees in their probationary period, Schools-based staff, the Head of Paid Service, Section 151 Officer and the Monitoring Officer for whom alternative procedures apply
Ratification	None
Author	HR Advisory team
Version control	Reviewers
Version 1.4	Final version agreed with Joint Trade Unions in December 2018
Version 2.0	Agreed with Trade Unions – March 2021. Approved by Personnel Committee on 17 March 2021.
Version 3.0	Draft. Next review is due in July 2027.
Version 4.0	Agreed with the trade unions April 2026. Approved via delegated authority April 2026.
Version 5.0	Agreed with the trade unions June 2026 and agreed by Personnel Committee July 2026

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Additional Guidance

1. [Guidance on the process to be followed at an appeal hearing.](#)

(The additional guidance is not part of the policy but is available to assist those involved in the policy. It can be found on the intranet or by clicking on the links above)

1. Objectives and scope

- 1.1 Reading Borough Council encourages all of its employees to maintain high standards of performance at work, and managers to manage the performance of staff proactively.
- 1.2 The purpose of this policy is to ensure that poor work performance is managed in a timely, effective, fair, consistent and supportive way in order to help employees achieve the required standard. This policy provides a constructive and standardised framework to support managers in intervening where poor performance has been identified.
- 1.3 The following important principles are encompassed within this policy:
 1. it is based on established case law and has been agreed between the Council and the recognised trade unions
 2. it will not contradict any current or future national agreement
 3. employees will be informed of the Council's policy, in particular through the induction process.
 4. employees will be informed of the standards expected of them
 5. employees will be given an opportunity to state their case before any decision is reached
 6. the informal process will have been exhausted before the formal procedure is initiated
 7. an employee may be accompanied by a trade union representative or a work colleague
 8. there will be a right of appeal against formal action taken
- 1.4 The Council's objective is to ensure that employees are given the opportunity to improve and are provided with support and training, where appropriate, to help them reach the required level of performance.
- 1.5 All members of staff should understand what is expected of them in their role and have clear objectives set at their performance review meetings, as well as regular feedback on their performance at 1-1s/supervision meetings throughout the year.
- 1.6 The Council defines poor performance as the gap between the Council's expectations of the job holder in respect of their job role, as defined by the job description, person specification and objectives, and the employee's actual performance in their job.
- 1.7 Where poor performance is due to behaviour which indicates a deliberate or wilful lack of care and attention, or negligence, the Disciplinary Policy should be followed. Concerns about an employee's capability as a result of sickness absence or related to a long term health condition should be dealt with under the Managing Sickness Absence Policy.

- 1.8 This policy applies to all employees of the Council, including those on permanent, temporary, full-time, part-time or fixed-term contracts, job sharers, and those on non-standard terms of employment, with the exception of those below.
- 1.9 This policy does not apply to:
- the Head of Paid Service, the Section 151 Officer or the Monitoring Officer.
 - employees in their probation period (covered by the Probation Scheme).
 - agency workers.
 - staff employed by schools who are covered by separate terms and conditions relating to their employment.
- 1.10 The Council reserves the right to implement this policy at any stage as set out below, taking into account the alleged poor performance of an employee. Employees will not ordinarily be dismissed for a first poor performance matter.
- 1.11 Where time limits are referred to in this policy, there will be a commitment to honouring them and proceeding without unreasonable delay, however, they may need to be extended, depending on the circumstances, due to the Council's operational requirements or the absence of any relevant individuals. The employee will be kept informed of any extensions to time limits.
- 1.12 The Council reserves the right to amend, remove or replace this policy at any time after effective and meaningful consultation with Joint Trade Unions.

2. Responsibilities

2.1 Employees should:

- ensure that they perform the tasks and responsibilities of their role to the best of their ability seeking to achieve the standards of performance required by the Council.
- bring to their managers attention any issues which may affect their performance as soon as they occur, so support, if appropriate, can be given.
- raise training and development issues with their line manager as part of their appraisal and one to ones.
- speak to HR if they do not receive regular 1-1s or an annual appraisal.
- co-operate with any discussions or reviews into their poor work performance.
- co-operate with any training or support offered to assist in bringing their performance up to the standard required.

2.2 Managers should:

- ensure that new staff are properly inducted into the Council and service area.
- make rigorous use of the Probation Scheme to ensure new employees have the right capabilities, attitudes and behaviour;
- ensure that all staff have a job description, which reflects what is required of their role and is reviewed and updated as necessary.

- where necessary, if employees do not have internet access, inform them where hard copies of the Managing Poor Performance Policy and any other relevant policies, rules and standards are kept in their workplace for reference without having to ask anyone for a copy.
- ensure that any reasonable adjustments are agreed with the employee and confirmed in writing by HR to both the employee and manager regarding the provision of information or instructions. Any adaptations to the role or working arrangements, have been implemented and accurately recorded in the employee's Health and Wellbeing Passport, with ongoing ownership and review by the employee and manager.
- ensure that all staff are regularly appraised with a concluding annual performance review with clear SMART (specific, measurable, achievable, realistic, time bound) objectives and have a Personal Development Plan which supports their development.
- ensure that staff have regular feedback on their performance through 1-1s and that the standards expected are clear, have been effectively communicated and are consistent with other like roles.
- bring any concerns about an employee's performance to their attention as soon as the issue becomes apparent.
- establish the reasons for the poor performance, and where an investigation is required, ensure this is undertaken in a fair and timely manner.
- ensure that corrective informal action is taken where appropriate.
- seek advice from HR where it is likely that formal action will be taken under this policy.
- understand their duty of care to all staff, including the importance of recognising and appropriately managing situations where a colleague's performance may impact others.

3. Informal management of poor performance

- 3.1 Informal action should be used in the first instance to improve performance before formal action is considered. It is anticipated that the majority of poor performance issues can be dealt with informally. The exception will be where unsatisfactory performance is sufficiently serious to warrant bypassing informal action altogether.
- 3.2 Line managers are best placed to talk to their employees, to listen to their concerns, coach and support them, and check they meet their targets, as well as ensuring they are engaged and committed.

4. Considerations before formal performance action

Before initiating formal action in relation to poor performance, managers should ensure that all relevant contextual factors have been explored and addressed.

4.1 Role clarity and expectations

Managers should consider whether the individual clearly understands their job duties and responsibilities, and whether the workload, duties and level of responsibility are within

reasonable expectations for the role. Where concerns about workload or role scope have been raised, these should have been given proper and reasonable consideration. Managers should also ensure the individual has reviewed and understands any relevant organisational policies, such as the Workload Policy.

4.2 Work environment and organisational factors

It is important to consider whether external factors within the work environment may be impacting performance. This may include organisational change, team dynamics, poor working relationships, or lack of access to appropriate equipment, resources or facilities necessary to carry out the role effectively.

4.3 Health, wellbeing and personal circumstances

Managers should reflect on whether there are any personal or health-related issues that may be temporarily affecting performance. Where health issues are identified or suspected, Occupational Health advice should have been sought where appropriate. In addition, any suitable reasonable adjustments should have been identified, implemented and monitored in line with organisational and statutory requirements.

4.4 Support, development and supervision

Consideration should be given to whether the individual has received adequate support to perform their role. This includes access to relevant training, learning and development opportunities, and on-the-job coaching. Managers should also ensure that appropriate levels of supervision have been provided, alongside regular, constructive feedback. Annual appraisal discussions should have taken place, with clear, realistic SMART objectives agreed and documented.

4.5 Performance feedback and awareness

Before progressing to formal action, managers should ensure that the individual has been made aware that their level of performance is considered unsatisfactory and understands the areas of concern. This includes having had opportunities to discuss performance issues informally and to understand what improvement is required.

4.6 Distinguishing capability from conduct

Finally, managers should consider whether there is evidence that the poor performance arises from a lack of capability, support or understanding, or whether it appears to be the result of a lack of motivation, poor attitude, or a deliberate choice not to perform. In cases where the issue is more appropriately characterised as a conduct matter, consideration should be given to whether it should instead be managed under the Disciplinary Policy.

4.7 Resolution

Having considered the potential causes of poor performance, managers should remedy any issues within their control that are impacting on performance and escalate any issues to a more senior manager for resolution if required. This should be formally recorded at the next 1-1 and appraisal and as appropriate in an email to the individual.

4.8 Right to be accompanied

Informal action is part of the normal routine discussion between an employee and their line manager and not part of formal action. Individuals are not statutorily entitled to be accompanied by a workplace colleague or a trade union representative/official at any meetings to discuss their performance at the informal stage. They may nevertheless find it helpful to seek advice and support from a colleague or trade union representative if they wish to do so.

5. Formal management of poor performance

5.1 Initial meeting

- 5.1.1 If, having taken reasonable steps to investigate and address the performance issues through informal action, performance still remains poor, the line manager must arrange a formal meeting with the employee to discuss their performance. The manager will submit the [Poor Performance Form](#) to HR in order to seek HR advice and attendance at meetings under the formal stage.
- 5.1.2 Where this policy is to be applied to accredited trade union representatives, no formal action should be taken until the case has been discussed, with the employee's prior consent, with a full-time trade union representative of the recognised trade union who is employed by the Council, or a trade union official employed by the recognised trade union. If the employee does not consent to such a discussion taking place, formal action will be initiated.
- 5.1.3 An invitation to an initial meeting under the formal stage of this policy must be in writing, setting out the date, time and location of the meeting, giving a minimum of five working days' notice. It should also set out a clear explanation of the reasons for calling the performance meeting, what has already been discussed informally and the possible outcomes.
- 5.1.4 The letter must also state that the employee has the right to be accompanied at the meeting by a trade union representative or a workplace colleague. Reasonable adjustments may be needed for a worker with a disability (and possibly for their companion if they are disabled), for example the provision of a support worker or advocate with knowledge of the disability and its effect, in addition to a companion. The employee must tell the manager by whom they will be accompanied at least three working days before the meeting. The employee should contact the trade union as soon as possible to allow for representation.

- 5.1.5 The employee and their companion should make every effort to attend the meeting. Where the employee is unable to attend the meeting and provides a good reason for this, the meeting will be rescheduled to another day providing the employee requests the meeting be arranged giving an alternative time which is reasonable and within five working days of the original date. If a reasonable alternative date is proposed by the employee, it will not be unreasonably refused. Unless there are special circumstances mitigating against it, if the employee is unable to attend the rearranged meeting, it will take place in the employee's absence. In exceptional circumstances the employee's companion may attend and will have the opportunity to speak on the employee's behalf in their absence. The employee may also make written submissions provided these are received prior to the start of the meeting.
- 5.1.6 Where the companion is not available to attend the meeting, it will be rescheduled provided the employee requests the meeting be rearranged giving an alternative time which is reasonable and within five working days of the original date. If a reasonable alternative date is proposed by the employee, it will not be unreasonably refused. The meeting will only be rescheduled for the unavailability of the companion once. If the companion is subsequently unable to attend the rearranged meeting, the manager can proceed with the meeting on that date. The employee may choose an alternative companion provided that the alternative companion is available to attend the rescheduled meeting.
- 5.1.7 The Council considers it is good practice to allow the companion to participate as fully as possible in the meeting. However, the companion is not allowed to answer questions put to the employee on the employee's behalf or address the meeting if the employee does not wish it.
- 5.1.8 If the employee has not requested to be accompanied to the meeting, the manager will check at the start of the meeting that they understand they have the right to be. If they decline to be accompanied, a note will be made to that effect.
- 5.1.9 The intent of the initial meeting is to try and understand why the problem exists and what the trigger, if any, was for the poor performance. The tone of the meeting should be consensual and supportive, seeking to understand the situation and to come up with a joint solution. The manager will clearly explain the issues/problems and consequences of poor performance. This will include clear specific examples of where the performance has not met the required standard. This meeting will not be recorded and a notetaker will not attend the meeting. The manager, HR, the employee or their companion may take their own notes using the 1:1 form if they wish to do so.
- 5.1.10 The employee will be given an opportunity to respond to any criticisms of their performance and to put forward any explanation they may have for the matters identified by the manager as poor performance including their current workload. The outcome of the initial meeting may be:
- a decision to take no further action.
 - the implementation of an improvement plan, designed to bring the employee's performance up to an acceptable level, and the possible issue of a first written warning.

- a decision to consider flexible working to assist the employee, on either a temporary or permanent basis under the Flexible Working Policy
- a decision to refer the matter for investigation under the Disciplinary Policy.

5.1.11 The outcome of the meeting will be confirmed in writing to the employee within five working days of the meeting. If appropriate, it will include a first written warning that performance is currently not acceptable and warn of the possible consequences of failure to reach the satisfactory improvement level/standards (i.e. progression to the next stage of this policy which could result in a final written warning and ultimately to dismissal). Usually, the first written warning will remain live for six months from the date it is issued although there may be occasions where it is appropriate to shorten or lengthen this six-month period. If appropriate, the letter will also confirm the employee's right of appeal against the decision to issue a first written warning.

5.1.12 If appropriate, the letter will include details of the improvement plan which will set out:

- the improvement required and timescale within which it is to be achieved i.e. 8 – 12 weeks.
- any further investigation into health issues and any reasonable adjustments that may assist improvement which may necessitate a referral to Occupational Health.
- the support arrangements agreed including the additional supervision and/or training which will be provided during the review period.
- a first written warning.
- the time and date of the first review meeting to discuss the improvement plan.

5.2 Review meeting

5.2.1 At the end of the period of time set out in the improvement plan, a review meeting will be held to consider if the employee has reached the required standard of performance. The invite to the review meeting must be in writing, setting out the date, time and location of the meeting, giving a minimum of five working days' notice. It should also set out a clear explanation of the possible outcomes of the meeting. The employee will have the right to be accompanied to the review meeting by a workplace colleague or a trade union representative. The provisions in paragraphs 5.1.2 to 5.1.10 will also apply when arranging the review meeting.

5.2.2 The outcome of the first review meeting may be:

- a decision to take no further action.
- a decision to refer the matter for investigation under the Disciplinary Policy
- a further period of monitoring/adjustments to the improvement plan
- the issue of a final written warning where appropriate
- a decision to explore opportunities for redeployment to an alternative role.

5.2.3 If the performance has reached a satisfactory standard no further action will be taken. However, it may be appropriate to set a further review date to ensure that performance is maintained. The first warning remains live for six months and any further poor performance in that period will be considered and may lead to a final written warning being issued.

- 5.2.4 It is possible that the employee may be making a concerted effort to improve and has the potential to perform the job satisfactorily but has not quite reached the standard required. In these circumstances it may be reasonable to review the targets and whether these are achievable and consider extending the duration of the period set for the employee to reach the required standard, and the period of the first written warning, and adjust timescales and review dates accordingly. Please see timescales in 5.2.3.
- 5.2.5 The outcome of the meeting where there has been limited and/or insufficient improvement will be a further period of monitoring, adjustments to the improvement plan as appropriate and the issue of a final written warning. The final written warning will be live for 12 months from the date it is issued although a longer period may be given in certain circumstances. The letter confirming the final written warning will make it clear that failure to reach an acceptable standard of performance within the additional monitoring period, may lead to a capability meeting at which the employee may be dismissed.
- 5.2.6 Usually the outcome of the second review meeting will be confirmed in writing to the employee within five working days of the meeting. If appropriate, the letter will also confirm the employee's right of appeal against the decision to issue a final written warning.

5.3 Alternatives to dismissal

- 5.3.1 If, after a final written warning, the individual has still failed to make sufficient improvement despite being given a reasonable opportunity and support to do so, the possibility of transferring the individual to another job that is more suited to their capabilities should be explored. The employee will need to consent to redeployment and to any possible reductions in grade and salary.
- 5.3.2 If it becomes clear that there are no suitable alternatives or the employee rejects the offer, a capability meeting should be arranged.

5.4 Capability meeting

- 5.4.1 If an employee has been issued with a final written warning under this policy that remains live and the employee's manager believes that their performance is still not acceptable, the matter will be referred to a capability meeting. The capability meeting will be chaired by a manager who has not been involved in the matter (Chair). The Disciplinary Policy provides more information. The Chair will be advised by an HR professional.
- 5.4.2 The notice to attend a capability meeting must be in writing, with the letter setting out the date, time and location of the meeting, giving a minimum of five working days' notice. It should also set clearly an explanation of the reason for calling the meeting and possible consequences, which include the employee's dismissal. It must also state that the employee has the right to be accompanied by a trade union representative/official or a workplace colleague. The provisions applying to the companion in paragraphs 5.1.4 to 5.1.8 also apply to the capability meeting.

- 5.4.3 The Chair should arrange for an impartial colleague to take notes. If it is intended that the meeting will be recorded (with any video recording and AI assistance switched off) to provide a transcript to assist the notetaker, the Chair will check that all the individuals attending the meeting consent to the recording before the recording is started. If any person objects to being recorded, the meeting will not be recorded. The Chair should also ensure that the employee and the notetaker are aware that any breaches of confidentiality could lead to disciplinary action.
- 5.4.4 The purpose of the capability meeting is to consider:
- if there has been a thorough and reasonable investigation into the reasons for the poor performance.
 - if the lack of performance is fully supported by reliable evidence.
 - the interventions which have been put into place (where appropriate) to help the employee improve.
 - if the timescales for improvement were reasonable.
 - the attempts that have been made to explore a transfer to an alternative role.
 - the likelihood that a further period of monitoring would lead to acceptable performance (in which case the meeting could be adjourned to enable this).
 - any submissions that the individual or their companion may wish to make.
- 5.4.5 If the Chair concludes that they reasonably believe in the light of the evidence that the employee's skillset is a poor fit to the role, or if the prospect of the employee improving within a reasonable timescale is unlikely, making them unsuitable for the job with no prospect of that changing, they will dismiss the individual.
- 5.4.6 Following the capability meeting, the notetaker will review the notes, and the transcript if necessary, and produce a finished draft usually within two working days of the meeting. The notetaker will send the notes to the Chair and HR for their approval. The Chair will send the notes to the employee usually within five working days of the meeting. The employee will be given usually three working days to provide any suggested amendments. Where the Chair and/or HR do not agree any suggested amendments made by the employee, the employee's suggested amendments will be included in square brackets to reflect that they are not agreed amendments. A final version of the notes will usually be sent to the employee within a week of receipt of the suggested amendments. The Chair (or HR) will arrange for any recording, transcript or AI assistance to be deleted once the employee has had an opportunity to suggest any amendments to the notes and the notetaker has produced a final version.
- 5.4.7 Usually the outcome of the meeting will be conveyed in writing within five working days of the capability meeting setting. If the outcome is dismissal, the reasons for the dismissal and the right of appeal will be set out in full. Where a decision to dismiss is made, the dismissal will be with the appropriate contractual notice.

5.5 Appeal

- 5.5.1 An employee who is given a warning or is dismissed under this policy has a right of appeal. The appeal should be sent in writing to the Chair and set out the grounds on which the employee believes that the decision was flawed, unfair or the sanction

inappropriate (providing supporting evidence where appropriate). The appeal must be made within five working days of receiving written confirmation of the written warning or dismissal.

- 5.5.2 The appeal will be heard by a manager (Appeal Chair) who may be more senior to the Chair, but not in all circumstances depending on the situation and availability of individuals and will have had no prior involvement. Further information is set out in the Disciplinary Policy. The Appeal Chair will be advised by an HR professional. The provisions relating to a notetaker and any recording are set out in paragraphs 5.4.3 & 6.
- 5.5.3 Appeal meetings will normally take place within 14 days of receipt of the employee's written notice of appeal. The employee may be accompanied by a workplace colleague or a trade union representative/ official. The provisions set out in 5.1.4-5.1.8 apply to appeal meetings. Guidance for the process to be followed at the appeal meeting is available on the intranet or by clicking [here](#).
- 5.5.4 The Appeal Chair will consider any representations made by the employee and the employee's companion. They must also consider representations made by the Chair.
- 5.5.5 Upon completion of the appeal, the Appeal Chair will convey their decision to the employee. Usually, the decision will be confirmed in writing within five working days.
- 5.5.6 The outcome of the appeal is final. There is no further right of appeal.

5.6 Acts of Gross Incapability/Negligence

- 5.6.1 Where an employee commits an act of gross incapability or gross negligence which is so serious as to endanger the welfare and safety of colleagues, service users or members of the public, or which results in the loss or significant damage to a Council asset, a full investigation will take place. While the investigation is being conducted, it may be necessary to suspend the employee from duty following the same process used in the Disciplinary Policy.
- 5.6.2 Where the matter relates to an accredited trade union representative, removal from the workplace and/or suspension if necessary may occur without prior discussion of the case with a full-time trade union representative of the recognised trade union who is employed by the Council, or an official employed by the recognised trade union (as is the case for all other employees). The Director of HR and Organisational Development must be informed as quickly as possible as well as the trade union official.
- 5.6.3 Should the investigation conclude that matter is likely to be an act of gross incapability (rather than gross misconduct such as gross negligence), a formal capability meeting for gross incapability should take place. This may result in the individual being summarily dismissed (i.e. dismissed without notice).

6. Referrals to external bodies

- 6.1 The Council and its employees will comply with any obligations or regulations that require it to refer formal capability action taken under this policy to other relevant bodies as appropriate.
- 6.2 Where the Council believes that a referral to an external body may be necessary if incapability is found, the Council will endeavour to notify the employee of this possibility when inviting the employee to the capability meeting. It may not always be possible to give advance notice to the employee if further information comes to light during the capability meeting. The absence of advance notice of the possibility of having to notify an external body does not preclude the Chair from taking any capability action as a result of the capability meeting or the Council from notifying the relevant external body.
- 6.3 There is a specific statutory requirement for the Council to comply with the provisions of the Safeguarding of Vulnerable Groups Act 2006 when dismissing a member of staff working with children or vulnerable adults, where the dismissal has occurred on grounds which harmed, or placed at risk of harm, a child or vulnerable adult.
- 6.4 Where an individual is dismissed in these circumstances (or would have been dismissed had they not resigned, retired, been made redundant or transferred to a post not involving regulated activity) and where the circumstances of the case meet the relevant thresholds, the details of the case must be referred to the [Disclosure and Barring Service \(DBS\)](#). In certain circumstances it may be appropriate to refer the individual to the DBS before the capability meeting has taken place.
- 6.5 Where a registered manager, social worker or occupational therapist is suspended or dismissed on grounds of professional capability, their Director must ensure that the relevant regulator is notified [Health Care Professions Council \(HCPC\)](#) for Occupational Therapists or [Social Work England](#) for Social Workers.
- 6.6 Where this policy is adopted by schools and a teacher is dismissed (or would have been dismissed had they not resigned or left their post) on the grounds of capability which could be considered 'unacceptable professional conduct', the case should be referred to the [Teaching Regulation Agency](#)

7. Data protection, references and retention of employee records

- 7.1 The Council processes personal data collected under this Managing Poor Performance Policy (whether during the informal or formal stage) in accordance with its data protection policy. Such data is held securely and accessed by, and disclosed to, individuals for the purpose of the Managing Poor Performance Policy or for HR and management reasons. Any outcome will be held on an individual's personal record file which is retained for seven years after their date of leaving the Council. Inappropriate access or disclosure of employee data may constitute a data breach and should be reported in accordance with the data protection policy immediately. It may also constitute a disciplinary matter which may be dealt with under the Disciplinary Policy.

- 7.2 Employees should be aware that capability outcomes (including dismissal) may be disclosed to future employers if such information is requested from the Council.
- 7.3 The Council may have to disclose personal data to third parties, as appropriate, including but not limited to the police, regulatory bodies and any transfer under the Transfer of Undertakings (Protection of Employment) Regulations 2006 (TUPE).

MANAGING POOR PERFORMANCE POLICY

Agreed between the Council and the recognised trade unions.

Signed:

Kathryn Cook	Director for HR and Organisational Development
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Miriam Palfrey	Staff Side and Branch Secretary for Unison
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Kieran Magee	Joint Shop Stewards Committee and Branch Secretary/Convenor for Unite
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Alison McNamara	Education & Community Unions Panel and Branch Secretary for the National Education Union (NEU)
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Robert Stirling	Convenor for GMB
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Disciplinary Policy

July 2026



www.reading.gov.uk



Document History	
Version	2.0 (see below)
Status	Final
Date	January 2026
Target audience	All employees of Reading Borough Council with the exception of Schools based staff, the Head of Paid Service, Section 151 Officer and the Monitoring Officer for whom alternative procedures apply.
Ratification	None
Author	HR Advisory Team
Version control	Reviewers
Version 1.1	Initial draft - January 2018
Version 1.2	Draft incorporating HR professionals' feedback - March 2018
Version 1.3	Second draft incorporating Head of HR and Organisational Development's comments – July 2018
Version 1.4	Final version agreed with Joint Trade Unions in December 2018
Version 1.5	Updated to replace Head of Service with Assistant Director. No other changes. Agreed with Joint Trade Unions and HR.
Version 1.6	Reviewed May 2023
Version 1.7	Reviewed June 2025
Version 2.0	Agreed with Trade Unions – June 2026

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Additional Guidance

- Guidance on the process to be followed at a disciplinary meeting.
- Guidance on the process to be followed at an appeal meeting.

(The additional guidance is not part of the policy but is available to assist those involved in the policy. It can be found on the intranet or by [clicking here](#).)

1. Objectives and scope

- 1.1 This policy applies to all employees of Reading Borough Council, including those on permanent, temporary, full-time, part-time or fixed-term contracts, job sharers, and those on non-standard terms of employment, with the exception of those below.
- 1.2 This policy does not apply to:
- the Head of Paid Service, Section 151 Officer and the Monitoring Officer for whom separate procedures apply.
 - agency workers or contractors.
 - staff employed by schools who may be covered by separate terms and conditions relating to their employment.
- 1.3 The Council's objective is to ensure that this policy will be applied fairly in all instances where disciplinary action is regarded as necessary.
- 1.4 The Code of Conduct sets out clear advice on the standards expected of everyone who works for the Council, including casual workers, agency workers and self-employed consultants i.e. everyone who carries out work for or on behalf of the Council. The standards it sets out are consistent with the Councillors' Code of Conduct and the Values and Standards in Public Life included within the Nolan Committee Report 1996. All staff are expected to ensure that they have read and understood the Code of Conduct and if they have any questions to ask their manager.
- 1.5 This policy is not intended to deal with issues of poor performance as these are dealt with under the Managing Poor Performance Policy. However, where poor performance is due to behaviour which indicates a deliberate or wilful lack of care and attention, or negligence, then this policy may be used.
- 1.6 Concerns about an employee's capability which are the result of sickness absence or related to a long-term health condition should be dealt with under the Managing Sickness Absence Policy.
- 1.7 The Council reserves the right to implement this policy at any stage as set out below, taking into account the alleged misconduct of an employee. Employees will not ordinarily be dismissed for a first disciplinary matter, except in cases of gross misconduct.
- 1.8 The Council reserves the right to amend, remove or replace this policy at any time after effective and meaningful consultation with Joint Trade Unions.

2. Responsibilities

- 2.1 Employees should:

- in addition to the Code of Conduct and other rules, make themselves aware of and understand any rules, policies, procedures and standards applicable to their role and function including any professional standards and ethics.
- maintain high standards of behaviour, attitude and conduct in keeping with the interests and standing of the Council at all times.
- act with responsibility, judgement and good faith when doing their job.
- carry out any reasonable instruction given by the Council's managers.
- respect and maintain the confidentiality of any HR processes involving themselves or others in the Council.
- not bring the Council into disrepute.

2.2 HR will decide whether it is necessary to appoint an independent investigator (whether internal or external) to investigate the disciplinary.

2.3 Managers should ensure that:

- all staff are aware of and understand any rules, policies, procedures and standards applicable to their role and function.
- induction, probation and supervision processes are applied appropriately and consistently in order to communicate the standards of conduct and behaviour expected.
- employees are aware of the consequences of not complying with these rules, policies, procedures and standards.
- where necessary, guidance and training are given to employees to enable them to meet these standards.
- if employees do not have internet access, they inform employees where hard copies of the relevant policies, processes, rules and standards are kept in their workplace for reference without having to ask anyone for a copy.
- any reasonable adjustments, that have been agreed with the employee and confirmed in writing to the employee and their line manager by HR regarding the provision of information/instructions or any adaptations to the role/work, have been implemented.
- they address any day-to-day concerns they have with staff conducted promptly in the next 1-1, or sooner if necessary, explaining what the employee should do to improve, while keeping a record of what has been discussed.
- where more serious concerns are identified by managers or others, advice is taken from HR as to whether it is more appropriate for an investigation to be initiated without first addressing these concerns informally.
- if they or HR consider it inappropriate to raise any concerns informally, or if that approach has been unsuccessful, the formal stage of this policy is followed.
- Consider if referrals may need to be made to the LADO/external bodies (see 8.8)

3. Disciplinary concerns

3.1 Concerns that the Council views as amounting to disciplinary matters include (but are not limited to) those listed below (and those considered to be gross misconduct in section 8.6). In all cases an investigation will be conducted to establish the facts before further action is considered:

- failure to comply with, or observe, the Code of Conduct, policies, procedures, standards and other rules.
- persistent lateness.
- unauthorised absence.
- damage to the Council's property or premises.
- rude and abusive behaviour.
- refusal to follow a reasonable instruction issued by a manager or supervisor.
- poor attendance (outside of sickness absence).
- abuse of or failure to follow sickness absence procedures.
- confidentiality/data protection breaches or misuse of the Council's information, where these have not been resolved through the Council's IT policies.
- inappropriate use of AI outside of the Council's policy [AI Strategy](#);
- alcohol and non-prescribed drug misuse.
- inappropriate use of social media. [Social Media Policy.docx](#)
- smoking or use of an e-cigarette in non-designated areas of the Council's premises.
- bribery offences under the Bribery Act 2010 which include offering to or giving a bribe to another, accepting or requesting a bribe, bribery of a non-UK public official, consent or connivance to a bribe, or knowingly failing to prevent a bribe.
- bringing the Council into disrepute.
- Failure to comply with the Declaration of Interest Policy

4. The authority to take disciplinary action

4.1 The immediate line manager or supervisor will usually be responsible for informal action. The immediate line manager or an independent person will usually be responsible for formal action.

4.2 The table below sets out those who are authorised to chair disciplinary meetings and issue disciplinary sanctions (Chair) and hear appeals (Appeal Chair), depending on the seniority of the employee facing possible disciplinary action.

Disciplinary action in respect of:	Executive Director	Director	All other employees

Investigator	Executive Director / Chief Executive	Director / Executive Director	An individual chosen by HR
Chair	Sub Committee of Personnel Committee	Director / Executive Director	A manager chosen by HR
Appeal Chair	Sub Committee of Personnel Committee (with members not previously involved)	Director / Executive Director (not previously involved) / Chief Executive	Director (not previously involved)
Chair appeal hearing against a decision to dismiss	Sub Committee of Personnel Committee (with members not involved in the original hearing)	Chief Executive or a Executive Director not previously involved in the case, Chair of Personnel Committee and one other member of Personnel Committee, or a substitute member(s)	Director not previously involved in the case, Chair of Personnel Committee and one other member of Personnel Committee, or a substitute member(s)

5. Allegations against Trade Union representatives

- 5.1 Where this policy is to be applied to an accredited trade union representative, no formal action should be taken until the case has been discussed, with the employee's prior consent, with a full-time trade union representative of the recognised trade union who is employed by the Council, or an official employed by the recognised trade union. If the employee does not consent to their case being discussed, the Council will proceed with the appropriate formal action.
- 5.2 Removal from the workplace and/or suspension, if necessary, may occur without this prior discussion (as is the case for all other employees in section 8.2 below). The Director of HR and Organisational Development must be informed as soon as possible as well as the relevant trade union representative.

6. Relationship with the Grievance Policy

- 6.1 A grievance raised by an individual in response to an investigation and/or management action into their alleged misconduct may be addressed in a number of ways, depending on the nature and timing of the grievance.
- 6.2 HR will decide whether:

- to appoint an independent investigator (whether internal or external) to investigate the grievance as a part of a separate process alongside the disciplinary
- to pause the disciplinary while the grievance is investigated and, if necessary, heard first.

7. Informal management of disciplinary issues

- 7.1 Many potential disciplinary issues can be resolved by the line manager intervening at an early stage as part of their normal day-to-day responsibilities and having a clear and constructive discussion with the individual about the concerns and the immediate changes required with respect to their conduct.
- 7.2 In cases of minor breaches of conduct the immediate line manager should discuss these concerns with the employee to ensure that the employee:
- is aware of the specific concerns.
 - knows what is required to meet expected standards of conduct.
 - is made aware of the timescale of the improvement required and the potential consequences.
- 7.3 These discussions are not a formal stage under this policy as they are part of the standard day-to-day relationship between line managers and the people they manage.
- 7.4 The objective of the informal approach is to address minor concerns, seeking improvement to the required standard. Where it becomes clear that the misconduct is being repeated or is more serious, managers should consider taking formal disciplinary action under this policy.

8. Formal management of disciplinary issues

8.1 Investigating the facts

- 8.1.1 Where there is a need to investigate a disciplinary issue formally, a [Disciplinary Form](#) should be submitted to HR. This form will include details of the employee concerned, the alleged misconduct, any relevant reasonable adjustments, the names of any witnesses, and whether any informal resolution has been attempted and by whom. An employee's line manager will promptly and thoroughly investigate any matter that is reasonably suspected or believed to contravene any of the Council's policies or rules or may otherwise be a disciplinary matter.
- 8.1.2 Throughout the investigation process, the employee will be informed in writing as soon as possible:
- That there will be an investigation,
 - the allegations being investigated

- that the investigation has been concluded,
- The investigation outcome (including if there is no further action to be taken).

8.1.3 The employee will be invited to attend a fact-finding investigatory meeting prior to a disciplinary meeting. The employee will be informed at the outset that the investigatory meeting is fact-finding only. The Council allows employees to be accompanied to investigatory meeting(s) by a trade union representative/official or a workplace colleague as long as the trade union representative/official or workplace colleague is available. Where the employee is unable to attend the meeting and provides a good reason for this, the meeting will be rescheduled to another day within 5 working days of the original date. If a reasonable alternative date is proposed by the employee, it will not be unreasonably refused. The employee should agree a convenient date with their Trade Union Representative, if any, in the first instance. The meeting will only be rescheduled for the unavailability of the companion once. If the companion is subsequently unable to attend the rearranged meeting, the Chair can choose to proceed with the meeting on that day. The employee can choose an alternative companion provided that the companion is available to attend the meeting.

8.1.4 The investigator should choose an impartial colleague (with no prior involvement in the matter and someone who is unlikely to be Chair or Appeal Chair, if necessary) to take notes at the investigatory meeting. The process for dealing with the notes, any AI summary and any recording is set out below in paragraphs 8.3.2 & 12. The investigator should also ensure that the employee, the notetaker and any witnesses are aware that any breaches of confidentiality regarding the investigation could lead to disciplinary action.

8.1.5 If the allegations involve criminal behaviour and/or harm to vulnerable adults or children, then HR advice must be sought before any action is taken.

8.2 Suspension

8.2.1 There may be instances, including where serious or gross misconduct is alleged, or where there is a potential risk to the organisation, its people or property, in which suspension on full pay may be necessary while investigations are carried out. Any such suspension is a neutral act, is not disciplinary action in itself, and does not imply any pre-judgement of the outcome. The Council has the right to suspend with pay where there are substantial grounds for concern. Such a suspension is not disciplinary action in itself and does not imply any prejudgement of the outcome of the investigation.

8.2.2 Suspension will be confirmed in writing to the employee by their manager or the investigator usually within five working days of being told of the suspension. The letter will confirm who the employee's point of contact will be for regular support during their period of suspension, the timescale for the review of the suspension, and any restrictions on them with respect to attending work or contacting individuals.

8.2.3 The suspended employee must remain available to assist with, or participate in, the disciplinary process unless they have booked and agreed annual leave.

8.3 Disciplinary Hearing

8.3.1 Where, upon completion of an investigation, there are reasonable grounds to believe that an employee has committed an act of misconduct, the employee will be invited to attend a disciplinary meeting.

8.3.2 The Chair will be advised at the meeting by an HR professional to ensure fair and consistent application of process and procedure. The Chair will arrange for an impartial colleague to take notes. If it is intended that the meeting will be recorded to provide a transcript to assist the notetaker, the Chair will check that all the individuals attending the meeting consent to the recording before the recording is started. The Chair should also check that any individual joining the meeting after the meeting has started also consents to the recording. If any person objects to being recorded, the meeting (or the relevant part of the meeting) will not be recorded. The Chair will ensure that the employee, the notetaker and any witnesses are aware that any breaches of confidentiality could lead to disciplinary action. A guidance note for the process to be followed at a disciplinary meeting is available on the intranet or by clicking [here](#).

8.3.3 The Council will give the employee a minimum of five working days' advance notice of the meeting in writing. The employee will be provided with the relevant information which may be relied upon during the meeting which may include statements taken from any employees and/or the names of the witnesses that will be asked to attend. If any statements are redacted, an explanation will be provided to the employee. The letter will include the following information:

- the purpose of the meeting and that it will be held under the Disciplinary Policy.
- the employee's right to be accompanied at the meeting by a workplace colleague or a trade union representative/official (companion).
- details of the nature of the employee's alleged misconduct.
- the most serious disciplinary sanction that could be given if any, some or all of the allegations are upheld.

8.3.4 The employee and their companion should make every effort to attend the meeting. Where the employee is unable to attend the meeting and provides a good reason for this such as pre-booked annual leave, the meeting will be rescheduled to another day within five working days of the original meeting. Unless there are special circumstances mitigating against it, if the employee is unable to attend the rearranged meeting, it will take place in the employee's absence. The employee may also make written submissions provided these are received at least five working days prior to the start of the meeting. The Chair may adjourn the start of the meeting if time is needed to read the written submissions.

- 8.3.5 Where the companion is not available to attend the meeting, it will be rescheduled provided the employee requests the meeting be rearranged giving an alternative time which is reasonable and within five working days of the original date. If a reasonable alternative date is proposed by the employee, it will not be unreasonably refused. The meeting will only be rescheduled for the unavailability of the companion once. If the companion is subsequently unable to attend the rearranged meeting, the Chair can choose to proceed with the meeting on that day in their absence. The employee can choose an alternative companion provided that they are available to attend the rescheduled meeting.
- 8.3.6 If the employee wishes to rely on the evidence of any colleagues at the meeting, then the employee or their companion must provide the names of the colleagues to the Chair at least three working days before the meeting. The employee or their companion will be responsible for arranging the attendance of these colleagues. Any employee who is asked to attend a disciplinary meeting to provide evidence should inform their own line manager of the need to attend the disciplinary meeting without divulging on whose behalf they are providing evidence so as to maintain the confidentiality of the disciplinary process. If necessary, the Chair or HR can confirm to the employee's line manager that their attendance is required at the disciplinary meeting. In the event that the line manager is not available, they will arrange for a suitable alternative manager to attend,
- 8.3.7 It may not be possible for former employees to attend a disciplinary meeting to provide evidence as it is difficult for the Council to ensure confidentiality is maintained as there is no longer an employment relationship between the former employee and the Council. If such a request is made, an assessment will be made by the Chair, with advice from HR, as to whether: confidentiality is likely to be maintained, the evidence can be obtained from a current employee and/or that evidence is key to deciding any of the allegations.
- 8.3.8 If the employee wishes to rely on any other documents at the meeting, then the employee or their companion must provide copies to the Chair at least three working days before the meeting. If documents are not provided at least three days before the meeting, the employee and/or their companion may have to summarise the relevant points at the meeting whilst also providing all documents on the understanding that the Chair will read any such documents before coming to a decision.
- 8.3.9 At the meeting, the employee will be given a clear explanation of the case against them and can set out their case and answer any allegations. The employee will also be given the opportunity to raise points about any information provided and to ask any questions of colleagues they have asked to attend the meeting.
- 8.3.10 The Chair may adjourn the disciplinary meeting if it appears necessary or desirable to do so (including for the purpose of gathering further information). The employee will be informed of the period of any adjournment. If further information is gathered, the employee will be allowed a reasonable period of

time, together with their companion, to consider the new information prior to the reconvening of the disciplinary meeting or given an appropriate opportunity to consider the information at the reconvened disciplinary meeting.

- 8.3.11 Following the meeting, the Chair will decide whether or not disciplinary or any other action is justified. In all cases the outcome will be confirmed in writing to the employee usually within five working days of the meeting. Where there are several allegations of misconduct, it may take longer for the Chair to confirm their decision. If any outcome letter is not provided to the employee within two weeks of the disciplinary meeting, the employee or, at the employee's request, their companion, will be provided with an update as to the likely timeframe for receipt of the outcome letter.
- 8.3.12 The notetaker will review their notes, and the transcript, if necessary, of the disciplinary meeting and produce a finished draft usually within five working days of the disciplinary meeting. The notetaker will send the notes to the Chair and HR for their approval. The Chair will send the notes to the employee usually within five working days of the meeting. The employee will usually be given three working days to provide any suggested amendments. Where the Chair and/or HR do not agree any suggested amendments made by the employee, the employee's suggested amendments will be included in square brackets to reflect that they are not agreed amendments. A final version of the notes will usually be sent to the employee within a week of receipt of the suggested amendments. The Chair (or HR) will arrange for any recording and transcript to be deleted once the employee has had an opportunity to suggest any amendments to the notes and the notetaker has produced a final version.

8.4 Right to be accompanied

- 8.4.1 All employees have a statutory right to be accompanied at a formal disciplinary meeting. The companion may be a workplace colleague or a trade union representative/official. The employee must tell the Chair who they have chosen as their companion at least three working days before the meeting.
- 8.4.2 Reasonable adjustments may be needed for an employee with a disability (and possibly for their companion if they are disabled), for example, the provision of a support worker or advocate with knowledge of the disability and its effect. This is in addition to the right to be accompanied by a companion. HR will arrange for any previously agreed reasonable adjustments, as relevant, to be put in place for the meeting. Otherwise, it is the employee's responsibility to request any additional reasonable adjustments relevant to this section 8.4 and, if agreed, to arrange for them to be implemented, in consultation with HR.
- 8.4.3 The Council considers it is good practice to allow the companion to participate as fully as possible in the meeting, including putting questions to witnesses if appropriate. However, the companion is not allowed to answer questions put to the employee on the employee's behalf or to address the meeting if the employee does not wish it. The companion should also not have any conflicts of interest.

- 8.4.4 If the employee has not requested to be accompanied to the meeting, the Chair will check at the start of the meeting that they understand that they have the right to be. If they decline to be accompanied, a note will be made to that effect in the notes of the meeting.

8.5 Disciplinary sanctions - misconduct and serious misconduct

- 8.5.1 Broadly, where misconduct is found, it is usual to give the employee a **first written warning**. The letter confirming the first written warning will set out the nature of the misconduct found and inform the employee that any further misconduct is liable to result in further disciplinary action under this policy. A first written warning will usually remain live for six months from the date it is issued. The letter will also confirm the employee's right of appeal.
- 8.5.2 Where further misconduct is found after a first written warning has been issued and remains live then a **final written warning** may be given to the employee. As an alternative, consideration may also be given to extending or reissuing the first written warning. A final written warning, without having given a first written warning, may also be appropriate for more serious cases of misconduct where dismissal might be an option for consideration if the misconduct was repeated. A final written warning will usually remain live for 12 months from the date it is issued. The letter confirming the final written warning will set out the nature of the misconduct found and inform the employee that any further misconduct is likely to result in dismissal with notice. The letter will also confirm the employee's right of appeal.
- 8.5.3 Where the employee is found to have committed further acts of misconduct (these being acts of misconduct other than gross misconduct) following a final written warning which remains live, the employee may be dismissed with notice. The letter confirming dismissal will set out the nature of the misconduct found and will also confirm the employee's right of appeal.
- 8.5.4 HR will inform the employee's line manager of any sanction that has been given to the employee, subject to any appeal.

8.6 Disciplinary sanctions - gross misconduct

- 8.6.1 Gross misconduct is misconduct which is so serious that it justifies the possible sanction of dismissal without notice (summary dismissal). In these circumstances pay in lieu of notice is not appropriate.
- 8.6.2 The Council will initiate a disciplinary investigation for any employee who is charged with a criminal offence, although being charged with, or convicted of, a criminal offence away from work would not automatically lead to dismissal. Dismissal would depend on the type of criminal offence and its seriousness, the effect on the employee's ability to continue in the job, or the Council's credibility with the public.

8.6.3 Misconduct that the Council views as amounting to gross misconduct is set out in Appendix 1.

8.7 Appeal

8.7.1 An employee may appeal against any disciplinary sanction imposed against them under the formal stage of this policy. The Appeal Chair may be more senior to the Chair, but not in all circumstances depending on the situation and availability of individuals and will have had no prior involvement.

8.7.2 The employee must provide written notice of an appeal within five working days of receiving the written confirmation of the disciplinary sanction. The appeal should be sent to the Chair. When lodging an appeal, the employee should state:

- the grounds of appeal; and
- whether the employee is appealing against the: findings of misconduct, level of disciplinary sanction, procedure not being followed correctly.

8.7.3 Appeal meetings will normally take place within 14 days of receipt of the employee's written notice of appeal. Guidance for the process to be followed at the appeal meeting is available on the intranet or by clicking [here](#). If the employee wishes to provide any documentary evidence for consideration at the appeal meeting, then the employee or their companion must provide copies of this to the Appeal Chair at least three working days before the meeting. If any documentary evidence is not provided within this timeframe, there may be an adjournment at the start of the appeal meeting to allow the Appeal Chair time to consider this information.

8.7.4 The Appeal Chair will be advised at the appeal meeting by an HR professional. The Appeal Chair should choose an impartial colleague (with no prior involvement in the matter) to take notes at the appeal meeting. The process for dealing with the notes and any recording is set out above in paragraphs 8.3.2 & 12. The Appeal Chair should also ensure that the employee, the notetaker and any witnesses are aware that any breaches of confidentiality could lead to disciplinary action.

8.7.5 The appeal meeting will not usually be a re-hearing of the whole disciplinary case. However, if the employee contends that the earlier disciplinary meeting was fundamentally flawed, the Appeal Chair has the discretion to arrange for a re-hearing of the case at appeal stage. It will be for the employee or their companion to state clearly why they believe the meeting was fundamentally flawed if this is alleged in the grounds of appeal.

8.7.6 The Appeal Chair will consider any representations made by the employee or their companion, the investigator and the Chair (if necessary) as well as any further information that may have come to light. The Appeal Chair may decide to uphold the disciplinary sanction, give a lesser sanction or remove the

sanction. In the event the Appeal Chair reduces or removes the sanction, all records of the disciplinary sanction will be updated or removed from the employee's record accordingly. In the event that the Appeal Chair does not accept the representations made by or on behalf of the employee, they will uphold the disciplinary sanction.

8.7.7 Upon completion of the appeal, the Appeal Chair will convey their decision to the employee confirming the decision in writing usually within five working days. Where there are several grounds of appeal, it may take longer for the Appeal Chair to confirm their decision. If any appeal outcome letter is not provided to the employee within two weeks of the appeal meeting, the employee or, at the employee's request, their companion, will be provided with an update as to the likely timeframe for receipt of the appeal outcome letter. HR will inform the employee's line manager of the outcome of the appeal.

8.7.8 The outcome of the appeal is final. There is no further right of appeal.

8.8 Referrals to external bodies

8.8.1 The Council and its employees will comply with any obligations or regulations that require it to refer formal disciplinary action taken under this policy to other relevant bodies as appropriate. The specific actions to be taken are addressed in the guidance that sits alongside this policy – this includes guidance about those working with vulnerable adults, children and other regulated bodies, The guidance also addresses the circumstances whereby the Disclosure and Barring Service will be informed of any disciplinary action.

9. Data protection, references and retention of employee records

9.1 The Council processes personal data collected under this Disciplinary Policy (whether during the informal or formal stages) in accordance with its data protection policy. Such data is held securely and accessed by, and disclosed to, individuals for the purpose of the Disciplinary Policy or for HR and management reasons. Any sanction will be held on an individual's personal record file which is retained for seven years after their date of leaving the Council. Inappropriate access or disclosure of employee data may constitute a data breach and should be reported in accordance with the data protection policy immediately. It may also constitute a disciplinary matter which may be dealt with under the Disciplinary Policy.

9.2 Employees should be aware that disciplinary sanctions (including dismissal) may be disclosed to future employers if such information is requested from the Council.

9.3 The Council may have to disclose personal data to third parties, as appropriate, including but not limited to the police, regulatory bodies and any transfer under

the Transfer of Undertakings (Protection of Employment) Regulations 2006 (TUPE).

Agreed between the Council and the recognised trade unions.

Signed:

Kathryn Cook	Director for HR and Organisational Development
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Miriam Palfrey	Staff Side and Branch Secretary for Unison
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Kieran Magee	Joint Shop Stewards Committee and Branch Secretary/Convenor for Unite
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Alison McNamara	Education & Community Unions Panel and Branch Secretary for the National Education Union (NEU)
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Robert Stirling	Convenor for GMB
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Misconduct that the Council views as amounting to gross misconduct includes but is not limited to:

- Persistent, deliberate or reckless refusal to carry out a reasonable management instruction.
 - Serious or deliberate failure to comply with:
 - the Code of Conduct.
 - Financial regulations and standing orders.
 - Corporate or Directorate Safety Policies and Practices.
 - Corporate or HR policies.
- Physical violence, threats, aggressive behaviour towards, or assault of, a member of the public, service users, Council Members or colleagues.
- Unacceptable use of obscene or abusive language (including language of a discriminatory nature) towards a member of the public, service users, Council Members or colleagues.
- Theft or attempted theft of cash/property belonging to a member of the public, service users, Council Members, colleagues or the Council itself.
- Breach of cash-handling procedures or other pecuniary shortage by reason of negligence or dishonesty in relation to money or Council finances within the employee's responsibility.
- Serious or persistent act(s) of discrimination, bullying or harassment against members of the public, service users, Council Members, or colleagues.
- Sexual Harassment against members of the public, service users, Council Members, or colleagues.
- Dishonesty or conduct of a fraudulent nature, including but not limited to falsification of time sheets/claim forms/CVs and other recruitment documents, misuse of the flexitime scheme/time sheets, fraudulently recording arrival on behalf of other colleagues, inappropriate application of the Council's services.
- Persistent and deliberate abuse of the sickness absence process.
- Unacceptable use of social media; [Social Media Policy.docx](#)
- Wilful or irresponsible actions or omissions which would endanger people or property.
- Wilful damage to the property of the Council, colleagues or other individuals using the Council's premises.
- Conduct liable to cause serious loss of confidence in the Council or considered contrary to the interests of the Council including but not limited to those mentioned in the Code of Conduct, criminal offences whether inside or outside of work or which may affect the continued performance of the employee's contract of employment.
- Interference with, or misuse of, or unauthorised access to, Council computer systems, hardware, software or data.

- Misuse of the Council's authorised AI or use of unauthorised AI.
- Unauthorised removal and use of Council property.
- Bribery, corruption or improper use of an official position for private gain, including seeking and accepting bribes.
- Breach of confidentiality and/or unauthorised use/disclosure of information relating to the Council's business, its members, staff, or service users or any relevant connected individual.
- Serious failure to discharge obligations in accordance with statute or contract of employment including but not limited to working for another employer without the Council's express agreement to the hours worked.
- Repeated issues of sleeping on duty unless expressly permitted.
- Possession or use of non-prescribed drugs on Council premises or during working hours.
- Serious incapability through the result of the influence of alcohol or other non-prescribed drugs.
- Deliberately accessing internet sites containing pornographic, offensive or obscene material.
- Serious insubordination.
- Bringing the Council into serious disrepute.
- Serious breach of health and safety rules or endangering the health and safety of colleagues, service users, Council Members or members of the public.
- A significant breach of trust and confidence.
- Recording colleagues covertly without their permission and knowledge.
- Breach of safeguarding requirements regarding children or vulnerable adults.
- Deliberate breach of professional standards relevant to the employee's role.
- Deliberate breach of the Council's policies relating to data protection or information security or AI.
- Gambling at work.
- Gross negligence.

Grievance Policy

July 2026



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Borough Council
Working better with you

Document History	
Version	2.2 (see below for previous versions)
Status	Final
Date	April 2026
Target audience	All employees of Reading Borough Council with the exception of School-based staff
Ratification	None
Author	HR Advisory Team

Version control	Reviewers
Version 1.1	Initial draft – January 2018
Version 1.2	Draft incorporating HR professionals' feedback – March 2018
Version 1.3	Second draft incorporating Head of HR and Organisational Development's comments – July 2018
Version 1.4	Final version agreed with Joint Trade Unions in December 2018
Version 2.0	Reviewed by HR
Version 2.1	Final version reviewed and agreed by Trade Unions in June 2022. Approved by Personnel Committee in July 2022
Version 2.2	Draft for review by Trade Unions – January 2026 Final version agreed by Trade Unions – June 2026

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Additional Guidance

- [Guidance for employees on what to include on the Grievance Form](#)

(The additional guidance is not part of the policy but is available to assist those involved in the policy. It can be found on the intranet or by clicking on the links above.)

1. Objectives and scope

- 1.1. Reading Borough Council is committed to its aim of providing a working environment where everyone is treated with fairness, consistency, dignity and respect. This policy provides a framework for assisting employees and managers in seeking to resolve disputes and/or differences arising from employment within the Council. The Council's objective is to ensure matters will be resolved fairly and without undue delay, whether informally or formally.
- 1.2. Grievances may be concerned with a wide range of issues including, but not limited to, allocation of work, working environment/ conditions, opportunities that have been given for career development or the way in which an employee has been managed.
- 1.3. Line managers should respond to issues raised in a timely way. In many cases grievances can be resolved informally by the manager and individual concerned.
- 1.4. The Council encourages all parties involved in a grievance to look proactively for a positive resolution and way forward.
- 1.5. It has been agreed with the Joint Trade Unions that this policy is the most effective means of resolving a grievance or collective dispute.
- 1.6. One of the Council's objectives is that no employee will be made to feel disadvantaged because they have raised or pursued a grievance in good faith.
- 1.7. Grievances should not be raised vexatiously or without reasonable grounds for concern. If, having investigated, the grievance is vexatious and without any proper grounds for concern, the Council may decide that it is appropriate to consider action under the Disciplinary Policy in relation to the employee who raised the grievance.
- 1.8. If two or more employees have identical grievances and wish them to be managed together in the same grievance process, they can raise a collective grievance. Collective grievances (apart from bullying and harassment) will be dealt with under section 5 of this policy.
- 1.9. Formal action under this policy will be taken where HR considers informal action is inappropriate or it is not possible to resolve issues informally or through mediation. HR will speak to the member of staff and TU if further clarification is needed to deal with the issue appropriately.
- 1.10. This policy applies to all employees of Reading Borough Council, including those on permanent, temporary, full-time, part-time or fixed-term contracts, job sharers, and those on non-standard terms of employment, with the exception of those below.
- 1.11. This policy does not apply to the following officers who are subject to other terms and conditions and reference to the constitution:
 - the Head of Paid Service, for whom the provisions of the JNC for Local Authority Chief Officers Conditions of Service Handbook would apply.

- agency workers.
 - staff employed by schools for whom separate procedures may apply.
- 1.12. The Council may choose on a case-by-case basis to investigate concerns raised by former employees but is under no obligation to do so.
 - 1.13. Where an employee raises a grievance after notice of termination of employment has been given (whether by the employee or the Council) HR will discuss and agree whether the grievance will be dealt with formally or informally and will inform the individual and the service of the decision and any next steps.
 - 1.14. Issues that are the subject of collective negotiation or consultation with the recognised trade unions will not be considered under this policy, unless it relates to a failure to engage in effective and meaningful collective negotiation or consultation.
 - 1.15. Where time limits are referred to in this policy, they may need to be extended, depending on the circumstances, due to the Council's operational requirements or the absence of any relevant individuals. The employee will be kept informed of any extensions to time limits.
 - 1.16. Where necessary, if employees do not have internet access, managers will ensure employees are informed where hard copies of this policy are kept in their workplace for reference without having to ask anyone for a copy.
 - 1.17. The Council reserves the right to amend, remove or replace this policy at any time after effective and meaningful consultation with Joint Trade Unions.

2. Relationship to other Council policies

- 2.1 This policy is not intended to add another layer to Council decision making or to challenge actions and/or decisions taken under other policies or processes. This policy will not apply where it is not appropriate, or where there is an alternative mechanism for concern(s) to be addressed, which includes but is not limited to:
 - Job Evaluation Appeals
 - Recruitment decisions
 - Expiry of fixed term contracts
 - Disciplinary, capability and poor performance processes
 - Application of pension scheme rules
 - Passing probation or concerns raised by managers during probation
 - Service restructures resulting in redundancy
 - Consultation arising from the Transfer of Undertakings (Protection of Employment) Regulations 2006 (TUPE)
 - Day-to-day reasonable routine line management including appraisals.
- 2.2 The Bullying and Harassment Policy allows for a complaint of bullying or harassment (which is not being dealt with informally) to be managed formally as a grievance under this policy. Allegations of bullying or harassment often need to be handled quite differently and further guidance is available within the Bullying and

Harassment Policy. Any concern(s) relating to bullying or harassment should be submitted to HR on the Bullying and Harassment Form.

- 2.3 The Council has a Whistleblowing Policy for raising concerns about any alleged wrongdoing in the workplace such as fraud or corruption, unlawful acts or dangers to health and safety. Matters raised under the Whistleblowing Policy may more appropriately be dealt with as a grievance (and potentially vice versa). Whether allegations are more appropriately dealt with under the Whistleblowing or Grievance Policy is a decision for HR. The key point is that the concerns will be dealt with seriously and progressed.
- 2.4 A grievance raised by an employee in response to an investigation or management action about alleged misconduct, underperformance, or capability may be handled in different ways, depending on when it is raised and what it concerns.

HR will decide whether:

- to appoint an independent investigator (whether internal or external) to investigate the grievance as a part of a separate process alongside the other disciplinary/ poor performance/ sickness absence process; or
 - to pause the disciplinary/ poor performance/ sickness absence process while the grievance is investigated and, if necessary, heard first.
- 2.5 Where a grievance relates to working conditions, the 'status quo' will be maintained until all formal stages of this policy have been exhausted. The status quo is defined as the working conditions prior to the raising of the grievance. The status quo will not apply where there would be a detrimental impact on service provision or where there are overriding statutory obligations.
- 2.6 The Council recognises that a grievance process can be stressful and upsetting for everyone involved. All employees are entitled to be treated respectfully. Both the employee raising the grievance and those facing the alleged grievance will be kept regularly up to date on progression. The investigator or HR, where appropriate, will provide details of local trade union representatives and support services available.

3. Informal resolution and mediation

- 3.1 All employees are encouraged to discuss their concerns at the earliest opportunity with their line manager or, where they are a member of a trade union, with their trade union representative.
- 3.2 The Council encourages informal resolution of grievances wherever possible and appropriate. Informal resolution is often the quickest and least disruptive way to address concerns and can help restore working relationships without the need for a formal process. This may include, for example, a facilitated conversation, clarification of expectations, an agreed way forward, mediation (where suitable), or practical steps to resolve the issue. Informal resolution will not prevent an employee from raising a formal grievance where this is needed and may not be appropriate where the concerns are serious, involve allegations of misconduct (including

bullying, harassment or discrimination), or where an informal approach has already been attempted without success.

- 3.3 Any informal outcome should be confirmed in writing where appropriate, so that expectations and next steps are clear to everyone.

3.4. Mediation

Mediation is one possible way of resolving workplace concerns and may be offered at any stage of this procedure, including as part of informal resolution, during a formal grievance process, or as an outcome following a formal process where relationships would benefit from rebuilding. Mediation is a voluntary and confidential process in which an accredited or suitably trained mediator supports two or more individuals to explore issues, improve understanding, and seek to reach an agreed way forward. Any agreement is made by the individuals involved; the mediator does not make findings, determine who is right or wrong, or impose outcomes. The mediator's role is to facilitate constructive dialogue and help the parties identify workable solutions.

3.5 Suitability and participation

Mediation will not be suitable in every situation and may not be appropriate where there are serious allegations, safeguarding concerns, significant power imbalances, or where either party does not feel able to participate. Participation is entirely voluntary. If any party declines mediation, or if mediation does not proceed or does not resolve the matter, this will not influence the consideration or outcome of the grievance, and the grievance process will continue without delay.

4. Formal action

- 4.1 The employee should submit their grievance on the Grievance Form to their line manager, copied to HR. If the grievance is about the employee's line manager, the form should be submitted to their 2nd line manager, copied to HR or to HR directly. HR will usually acknowledge receipt of the form within three working days. A copy of the form will not be provided to the person who is the subject of the grievance.
[Grievance Submission Form](#)
- 4.2 The form must be submitted within three calendar months of the date of the incident. The Council will not usually progress grievances raised after this time limit unless HR decides that it was not feasible for the employee to submit the grievance earlier. Historic cases of sexual harassment may be an example of where this time limit may be extended and the Bullying and Harassment Policy and Whistleblowing Policy provides more information.
- 4.3 The form will provide the basis of the subsequent meeting and any investigations, so it is important that it sets out clearly the nature of the grievance and the outcome being sought, focusing on the facts and avoiding language that could be interpreted as offensive or inappropriate. If the form does not provide all the relevant

information, it may be necessary to seek further clarification from the employee before any meeting takes place. Guidance for employees on what to include on the form is available on the intranet.

4.4 When an employee submits a grievance in writing, the following steps will be taken:

- Impartial Investigator appointed by HR
- Investigation carried out – gather evidence and speak to those involved.
- Grievance meeting held to discuss the issues raised.
- Decision made and outcome letter issued.
- Appeal process offered if the employee is unhappy with the outcome.

4.5 Before inviting the employee to a grievance meeting, it may be necessary to carry out an investigation of the allegations made. Wherever possible, the confidentiality of the grievance process will be respected although the person who is the subject of the complaint will be provided with appropriate information to allow them to respond to the complaint either during the investigation meeting or before any investigation meeting. If information is gathered during the investigation, the employee will usually be given the relevant information at least five working days before the meeting so that they can consider their response. In some circumstances, the information given by individuals may have to remain confidential. Where confidentiality is necessary, this will be explained to the employee and an appropriate summary of the information gathered will be provided to them.

4.6 Normally HR will designate a manager from within the employee's service area to investigate the grievance and to chair the grievance meeting (Chair). The nature of the grievance will determine the most appropriate way to establish the facts. It may be necessary for HR to appoint an investigator and/or Chair from another service area or in exceptional circumstances engage an external investigator to manage very sensitive, confidential or highly complex matters.

4.7 The right to be accompanied

4.7.1 Employees who have raised a grievance have a statutory right to be accompanied to a grievance meeting. The companion may be a workplace colleague or a trade union representative/ official. The employee must tell the Chair whom they have chosen as their companion at least five working days before the grievance meeting.

4.7.2 Reasonable adjustments may be needed for an employee with a disability (and for their companion as necessary), for example, the provision of a support worker or advocate with knowledge of the disability and its effect. This is in addition to the right to be accompanied by a companion. HR will arrange for any previously agreed reasonable adjustments, as relevant, to be put in place for the meeting. Otherwise, it is the employee's responsibility to request any additional reasonable adjustments relevant to this section and, if agreed, to arrange for them to be implemented in consultation with HR.

4.7.3 The Council considers it good practice to allow the companion to participate as fully as possible in the meeting. However, the companion is not allowed to answer

questions put to the employee on the employee's behalf or to address the meeting if the employee does not wish it. The companion should not have any conflicts of interest, and HR and the Trade Union Representative will manage this.

- 4.7.4 If the employee is not accompanied, the Chair will check at the start of the grievance meeting that the employee understands that they have the right to be. If they decline to be accompanied, a note will be made to that effect.
- 4.7.5 The employee and their companion should make every effort to attend the grievance meeting. Where the employee is unable to attend the grievance meeting and provides a good reason for this, the meeting will be rescheduled to another day (within 5 working days of the original meeting date). Unless there are special circumstances mitigating against it, if the employee is unable to attend the rearranged meeting it will take place in the employee's absence. The employee's companion may attend and in exceptional circumstances will have the opportunity to make representations on behalf of the employee in their absence. The employee may also make written representations provided these are received prior to the start of the meeting.
- 4.7.6 Where the companion is not available to attend the grievance meeting, it will be rescheduled provided the employee requests the meeting be rearranged giving an alternative time which is reasonable and within five working days of the original date. If a reasonable alternative date is proposed by the employee, it will not be unreasonably refused. The employee should agree a convenient date with their Trade Union Representative, if any, in the first instance. The meeting will only be rescheduled for the unavailability of the companion once. If the companion is subsequently unable to attend the rearranged meeting, the Chair can choose to proceed with the meeting on that day. The employee can choose an alternative companion provided that the companion is available to attend the rescheduled meeting.
- 4.7.7 Employees responding to a grievance against them will be able to bring a workplace colleague or a trade union representative/ official to an investigatory meeting providing that they confirm to the chair who they have chosen at least five working days in advance and, if invited, to a formal grievance meeting. They will be provided with an outline of the allegation(s) against them in advance of the investigatory meeting.
- 4.7.8 Reasonable adjustments may be needed for an employee with a disability (and for their companion as necessary), for example, the provision of a support worker or advocate with knowledge of the disability and its effect. This is in addition to the right to be accompanied by a companion. HR will arrange for any previously agreed reasonable adjustments, as relevant, to be put in place for the meeting. Otherwise, it is the employee's responsibility to request any additional reasonable adjustments relevant to this section and, if agreed, to arrange for them to be implemented in consultation with HR.
- 4.7.3 The Council considers it good practice to allow the companion to participate as fully as possible in the meeting. However, the companion is not allowed to answer questions put to the employee on the employee's behalf or to address the meeting if

the employee does not wish it. The companion should not have any conflicts of interest, and HR and the Trade Union Representative will manage this.

- 4.7.4 If the employee is not accompanied, the Chair will check at the start of the grievance meeting that the employee understands that they have the right to be. If they decline to be accompanied, a note will be made to that effect.

4.8 The grievance meeting

- 4.8.1 The meeting will be held as soon as is reasonably feasible by the Chair subject to any need to carry out investigations. The employee will be invited to attend a meeting to discuss the grievance, once the Chair has had a reasonable opportunity to consider how best to investigate the grievance. The Council will give the employee a minimum of five working days' advance notice of the meeting in writing, and the letter will include the date, time and location of the meeting and their right to be accompanied by a workplace colleague or a trade union representative/ official. The meeting will also be attended by an HR professional to advise on process and procedures.
- 4.8.2 The Chair will arrange for an impartial colleague to take notes at the grievance meeting. If it is intended that the meeting will be recorded (with any video recording and AI assistance switched off) to provide a transcript to assist the notetaker, the Chair will check that all the individuals attending the meeting consent to the recording before the recording is started. The Chair should also check that any individual joining the meeting after the meeting has started consents to the recording. If any person objects to being recorded at any point in the meeting, the meeting will not be recorded. The Chair should also ensure at the start of the meeting that the employee, the notetaker and any witnesses are aware that any breaches of confidentiality regarding the investigation could lead to disciplinary action. This should be captured in the notes.
- 4.8.3 The intention of the grievance meeting is that it should be an opportunity for discussion and dialogue, with the objective of seeking to understand the nature of the grievance fully and to identify the outcome and solutions sought by the employee raising their concerns.
- 4.8.4 There is no set format for this meeting. The Chair may choose to meet with the employee on more than one occasion and consider any supporting information provided. This may include the opportunity to meet together with the employee and the person the grievance is against at the same time, if the Chair considers it appropriate and reasonable after taking account of each individual's circumstances. The Chair may need to adjourn the meeting if they need to investigate further, including interviewing potential witnesses and exploring alternative possibilities for resolution of the grievance.
- 4.8.5 While the employee will be given every opportunity to explain their case fully, they should confine their explanation to matters that are directly relevant to their grievance/s. The Chair will intervene if they think that the discussion is straying too far from the key issue(s), or to ensure that the meeting can be completed within a reasonable timeframe, depending on the nature and complexity of the issues raised.

4.8.6 After the grievance meeting:

- The notetaker will review the notes (and transcript if needed) and prepare a draft, usually within two working days.
- The notetaker will send draft notes the Chair and HR for approval.
- The Chair will send the notes to the employee, usually within five working days of the meeting.
- The employee will normally have three working days to suggest amendments.
- A final version of the notes will usually be sent to the employee within one week of receiving the suggested amendments (If the Chair and/or HR do not agree with any suggested amendments, these will be included in square brackets to show they are not agreed.)
- The Chair or HR will arrange for any recording and transcript to be deleted once the notes are finalised, using the transcript only to check accuracy.

Meetings will not be videoed (see guidance)

4.8.7 After due consideration, the Chair may dismiss, partially uphold or uphold the grievance or elements of the grievance. The Chair may also, if a breach of either the Code of Conduct or other policies by any party is indicated, decide to deal with the issue(s) under the Disciplinary Policy.

4.8.8 Where possible, the Chair will meet the employee, and, where appropriate, the individual the grievance is against, either separately or together, to inform them of the decision and if applicable, set out any proposed action(s) that will be taken. The Chair will also consider if mediation may be appropriate at this stage and define this as part of their outcome.

4.8.9 The Chair will confirm their decision in writing usually within five working days after they have concluded their investigations and meetings. Where the grievance refers to several issues or alleged incident(s), it may take longer for the Chair to confirm their decision. If any outcome letter is not provided to the employee within two weeks of the last grievance meeting, the employee, or at the employee's request, their companion will be provided with an update as to the likely timeframe for receipt of the outcome letter. The outcome letter will also confirm the employee's right of appeal if the grievance is not upheld. The outcome will not be unreasonably delayed. An update will also be provided to the individual the grievance is made against to similar timescales. The wellbeing of all individuals should always be taken into consideration and appropriate actions taken. The individual against whom the grievance was made will be informed to similar timescales.

4.9 Grievance appeal

4.9.1 If the employee believes that the correct process wasn't followed, or there is new evidence to present or the decision was unfair/biased/unreasonable based on fact, they can appeal in writing to the Chair within five working days of receiving the written outcome. They should state clearly the grounds of the appeal, i.e. the basis on which they believe the outcome of the grievance was wrong, such as failure to

follow process, where new information has become available or that the actions taken failed to consider all evidence and fact presented.

- 4.9.2 The chair of the appeal meeting (Appeal Chair) will have had no prior involvement in the grievance and may be more senior to the manager who heard the grievance, but not in all circumstances depending on the situation and availability of individuals. Normally this would be a Service Head or Director from the same or different directorate. The Appeal Chair will be advised by an HR professional.
- 4.9.3 The Appeal Chair should choose an impartial colleague (with no prior involvement in the matter) to take notes at the appeal meeting. The process for dealing with the notes and any recording is set out above in paragraphs 4.7.2 & 6. The Appeal Chair should also ensure that the employee, the notetaker and any witnesses are aware that any breaches of confidentiality could lead to disciplinary action.
- 4.9.4 The Appeal Chair will make arrangements for a meeting to be convened as soon as possible. They will write to the employee confirming arrangements for the meeting, giving a minimum of five working days' notice, including details of the date, time and location of the meeting and the employee's right to be accompanied by a workplace colleague or a trade union representative/official.
- 4.9.5 The employee and their companion should make every effort to attend the appeal meeting at the specified time. If the employee is unable to attend because of circumstances beyond their control, they should inform the Appeal Chair as soon as possible. If the employee fails to attend a grievance appeal meeting a second time without explanation, or if it appears that they have not made sufficient attempts to attend, the meeting may take place in their absence. The employee's companion may attend and will have the opportunity to make representations on behalf of the employee in their absence. The employee may also make written representations provided these are received prior to the start of the meeting.
- 4.9.6 Where the companion is not available to attend the meeting, it will be rescheduled provided the employee requests the meeting be rearranged giving an alternative time which is reasonable and within five working days of the original date. If a reasonable alternative date is proposed by the employee, it will not be unreasonably refused. The meeting will only be rescheduled for the unavailability of the companion once.
- 4.9.7 The purpose of the appeal is to consider the grounds of appeal; this could, for example, be to determine if the previous decision was sound, to consider any new facts that have come to light since the meeting and/or to judge the reasonableness of the process, such as the thoroughness of the investigation.
- 4.9.8 The decision at the appeal stage will be confirmed in writing to the employee usually within five working days of the meeting. Where there are several grounds of appeal, it may take longer for the Appeal Chair to confirm their decision. If any appeal outcome letter is not provided to the employee within two weeks of the appeal meeting, the employee, or at the employee's request, their companion will be provided with an update as to the likely timeframe for receipt of the appeal outcome

letter. It may also be appropriate to consider mediation at this stage. The individual against whom the grievance is made will be informed to similar timescales.

4.9.9 The outcome of the appeal is final and there is no further right of appeal.

5. Collective grievances

5.1 All colleagues raising a collective grievance must agree (without any pressure being exerted on staff members to join the collective process) to deal with the concern as a collective grievance. All participating colleagues will be entitled to the steps in this policy only. If all the colleagues do not entirely voluntarily agree to this arrangement, or if their grievances are not identical, the Council will arrange to hear their grievances on an individual basis.

5.2 If the participating colleagues are all members of the same trade union, the trade union representative can (if all colleagues wish them to do so) raise the grievance on their behalf. Alternatively, the participating colleagues can agree to nominate one of them to act on behalf of everyone. If there is no one nominated representative, the participating colleagues will be entitled to address concerns individually at the grievance meeting, but they will have no additional right to be accompanied beyond having their participating colleagues present. If the colleagues wish to be represented by their trade union representative(s) on an individual basis, the Council will arrange to hear their grievances individually.

5.3 When submitting a collective grievance on the Collective Grievance Form, the names of all employees submitting the complaint should be provided. [Guidance for employees on what to include on a Collective Grievance Form](#) is available on the intranet. Other information to be included is:

- the identity of any nominated trade union representative or workplace colleague who represents everyone.
- confirmation that all named employees have voluntarily consented to have the grievance considered collectively.
- confirmation that everyone understands that the collective grievance will give each colleague the right to only one collective grievance meeting, one identical outcome and (if applicable), one appeal meeting and one identical appeal outcome.

5.4 The collective grievance meeting and the collective grievance appeal meeting (if there is one) will be conducted in the same way as for an individual grievance meeting, with the exception of arrangements for a nominated representative as set out in paragraph 5.2.

6. Data protection and retention of employee records

6.1 The Council processes personal data collected under this Grievance Policy (whether during the informal or formal stage) in accordance with its data protection policy. Such data is held securely and accessed by, and disclosed to, individuals for the purpose of the Grievance Policy or for HR and management reasons. Outcomes

will be held on an individual's personal record file which is retained for seven years after their date of leaving the Council. Inappropriate access or disclosure of employee data constitutes a data breach and should be reported in accordance with the data protection policy immediately. It may also constitute a disciplinary matter which will be dealt with under the Disciplinary Policy.

- 6.2 The Council may have to disclose personal data under this policy to third parties, as appropriate, including but not limited to the police, regulatory bodies and on any TUPE transfer.

GRIEVANCE POLICY

Agreed between the Council and the recognised trade unions.

Signed:

Kathryn Cook

Director for HR and
Organisational Development

Miriam Palfrey

Staff Side and Branch Secretary
for Unison

Kieran Magee

Joint Shop Stewards Committee
and Branch Secretary/ Convenor
for Unite

Alison McNamara

Education & Community Unions
Panel and Branch Secretary for
the National Education Union
(NEU)

Robert Stirling

Convenor for GMB

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Supporting the Prevention of Suicide Policy

July 2026



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Document History	
Version	1.2
Status	Final
Date	July 2026
Target audience	All employees of Reading Borough Council with the exception of School-based staff
Author	HR Advisory Team

Version control	Reviewers
Version 1.1	Initial draft – April 2026
Version 1.2	Draft incorporating Trade Union, Public Health and Education comments – June 2026

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RBC Supporting the Prevention of Suicide Policy

1. Introduction

This policy sets out the Council's approach to supporting the prevention of suicide, identifying and supporting individuals at risk, and responding effectively to suicide-related incidents affecting staff. This policy aims to create a safe and supportive workplace where staff feel able to seek help and support others. It sets out clear roles and responsibilities including those for leaders/managers and employees.

2. Scope

This policy applies to all employees, workers, casual staff, and agency workers as well as to elected members.

This policy will be used as the basis of a consultation with school leaders on the agreement of a schools – specific policy.

3. Aims of this policy

- To promote a “whole organisation” approach to suicide prevention, ensuring confidentiality, dignity and respect at all times
- To encourage open, stigma-free conversations about mental health
- To provide timely and proportionate support to staff
- To ensure managers and staff are able to develop the skills to recognise and respond to suicide risks

3. Definitions of terms used in this policy

- **Suicide prevention:** Actions to reduce risk and support wellbeing
 - **Intervention:** Responding to warning signs or disclosures of suicidal thoughts
-

4. Roles and Responsibilities

Roles and responsibilities are as follows:

Chief Executive / Corporate Management Team: provide leadership and oversight and ensure relevant resources and arrangements are in place

HR & Organisational Development: responsible for developing this policy and guidance, ensuring appropriate guidance and training is in place, monitoring workforce data and assessing learning (where appropriate)

Line Managers are responsible for identifying early warning signs through holding regular 1:1s and encouraging openness and having supportive conversations with staff, understanding the support available to staff and signposting them towards it where necessary, escalating concerns appropriate

Employees are responsible for looking after their own wellbeing, raising concerns about themselves or colleagues, engaging with training and support opportunities

5. Suicide Prevention:

The council will embed suicide prevention within its wider wellbeing and health & safety framework by:

a) Creating a supportive culture

- Promoting trust, respect, and a “no blame” culture
- Working to reduce stigma around mental health
- Encouraging flexible working and work-life balance

b) Early identification of risk

Providing training and toolkits etc to enable managers to identify concerns including relating to burnout, stress, behaviour changes or withdrawal and providing them with the necessary tools to support their team including through 1:1s and performance reviews, provision of occupational health support and the Employee Assistance Programme, stress risk assessments and return-to-work discussions

c) Training and awareness

- Suicide First Aid and/or Mental Health First Aid training
- Awareness campaigns (e.g., Mental Health Awareness Week, Suicide Prevention Week)
- Guidance tools for staff including the Suicide First Aid Toolkit

d) Access to support

- Employee Assistance Programme (EAP)
- Occupational Health
- Peer support / Mental Health First Aiders

6. Responding to Risk (Intervention)

Where a staff member may be at risk:

Managers should: act immediately and take concerns seriously. Depending on the nature of the concern, they should consider speaking to the individual in a private, supportive setting, listen without judgement and encourage the individual to seek help including via our Employee Assistance programme, their GP or by making a referral to the Council's Occupational Health provider. If there is an immediate risk, to contact the emergency services.

- Managers will need at all times to consider the confidentiality required whilst ensuring appropriate documentation is completed confirming actions taken. Support is available to managers via the HR Advisory team. If relevant concerns should be reported (e.g., incident/reporting forms)
-

7. After a Suicide or Attempt

Where appropriate, the council will provide a coordinated response to support staff and services:

Immediate actions may include activating critical incident procedures, liaison with senior leadership/ HR&OD and ensuring accurate, sensitive internal communication if applicable. Longer terms actions may include reviewing the support available, reviewing learning and identification of improvements.

Staff support may include access to counselling and EAP as well as time off or adjustments.

8. Support and Signposting

The council will promote access to external support services, including:

- **Samaritans** – 24/7 confidential support
 - **Papyrus HOPELINEUK** – support for young people
 - Bereavement support organisations
-

9. Data, Monitoring and Governance

As part of its regular monitoring mechanisms RBC will continue to monitor absence, wellbeing data, and trends using data and insights to inform any changes needed to the preventative actions identified in this policy. Data available via RBC's Employee Assistance provider and Occupational Health provider will be used to further inform provision and preventative actions.

11. Review

This policy will be reviewed initially in 6 months (then to be reviewed every 2 years) , or sooner following:

- A serious incident
- Changes to legislation or national guidance

Personnel Committee

16 July 2026



Reading
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Title	RBC Staff Survey Action Plans
Purpose of the report	To note the report for information
Report status	Public report
Executive Director/ Statutory Officer Commissioning Report	Louise Duffield, Executive Director Resources
Report author	Kathryn Cook, Director HR&OD
Lead Councillor	Councillor Ruth McEwan
Council priority	Ensure Reading Borough Council is fit for the future
Recommendations	1. That Personnel Committee notes the current corporate and service staff survey action plans

1. Executive Summary

- 1.1. The results of the 2025 staff survey and the corporate action plan were shared with Personnel Committee at its meeting on 12th March 2026. This report provides an update to Personnel Committee (as requested at that meeting) about the corporate and service staff survey action plans that were developed to address the issues that arose from the survey.

2. Policy Context

- 2.1. The Council recognises its people are its greatest asset and aims to be an employer of choice. The Council's people strategy outlines four focus areas: Attract, Engage, Develop, Recognition & Reward to ensure an engaged and motivated workforce. The Council's Inclusion and Diversity strategy's aim is to have "an inclusive culture where we can all do our best work and thrive".
- 2.2. The regular staff survey enables the Council to understand employee experiences at work and identify areas that are working well and areas for improvement.

3. The Proposal

- 3.1 The staff survey was open for 5 weeks from 10 November to 12 December 2025. The survey consisted of 58 questions, plus questions on the respondent's directorate, service area and work location plus optional diversity questions related to protected characteristics and care experience. There were 1235 responses to the survey which represents 52% of the Council's workforce (excluding schools) - this was an increase on last year's response rate of 43%. Overall the results were very positive, showing increases in positive scores for the vast majority of the questions and improvements in scores for the majority of actions taken as a result of the previous staff survey.

3.2 Corporate actions

As the Committee was advised at its meeting in March, six themes for action were identified corporately. These were:

- **Improving Leadership impact** including more regular communication and listening sessions; continuing to encourage staff to speak up; strengthening leadership and management development and continuing to develop the regular 'Team Talk' programme
- **ICT and change programmes** including acting on feedback-becoming more of a learning organisation; putting user experience at the centre from day one; better understanding the 'change-load' on staff; clearer communication about why changes are happening; involving Digital Champions and Change Makers more effectively and involving staff groups to support inclusion and better outcomes
- **Bullying & Harassment** including targeted support; working with staff groups to improve experiences; mandatory training for all managers; supporting collective learning
- **Culture** including focusing on our Team Reading value: "Working Together"; creating more opportunities for collaborative learning; refreshing our Staff Awards; driving collaboration across the organisation; improving internal processes; embedding inclusion and shaping our future strategy

3.3 Executive Director Service plans

Each DMT has been provided with the detailed analysis of responses from their teams and have identified priority areas for action within each Directorate. These action plans build on (but do not duplicate) the corporate action plans.

The themes for each are as follows:

3.3.1 DEGNS:

Leadership & Culture including actions to ensure appraisals are completed in a timely way (including grandparenting); quarterly Extended Management Meetings and Away Days to build relationships, support development and training and model expected leadership behaviours; showcase employee achievements at DEGNS All Staff Briefings; providing clarity on priorities and support workload conversations

Bullying & Harassment including actions to analyse HR casework to understand grievance cases and identify where we can act earlier; setting up a staff reference group to explore issues and reinforce channels for reporting through communications.

Health and Wellbeing including actions to create a DEGNs Wellbeing Action Plan; to develop a Staff garden at Civic; to advertise REDA walking tours and other initiatives

3.3.2 DCASC:

Workload & Capacity including actions to monitor caseloads, demand & wellbeing; challenge the norm to stop non-value work; strengthen workforce capacity (ASC & Housing); clarify priorities and customer focused activity; embed workload conversations & escalation routes

Rewards & Benefits including actions to benchmark roles and review market alignment; implementation of the Workforce Race Equality Standard (WRES); strengthen career pathways & secondment opportunities; increase recognition (STAR, peer & Customer feedback); improve visibility of pay, progression & rewards

ICT Systems including actions to identify key system 'pain points' through staff input; provide targeted ICT training and develop super users; deliver system fixes and reduce duplication; use AI and digital tools to improve efficiency

Leadership & Culture including actions to establish a clear communication rhythm and engagement; increase leadership visibility and listening opportunities; strengthen manager communication and cascade; deliver cross-directorate priorities to improve collaboration

Bullying & Harassment including actions to strengthen leadership accountability, embed early intervention and manager development and increase transparency and consistency in case handling

3.3.3 DOR:

Communication: – Whole directorate engagement – ED hosted quarterly sessions, bi-monthly in person DoR management sessions, increased cascading and feedback, team meetings in all teams, tools, newsletter/blog.

Collaboration and customer focus: - Continue and extend our cross-directorate collaboration, focus on reducing silos and duplication of work, thinking customer first.

Leadership: - Senior leaders at team meetings, visible leadership through shadowing and listening sessions, steering group to ensure the staff survey action plan is delivered, focus on quality in our 1-1s.

Workload and Opportunity: – Improved prioritisation and planning, what can we stop?, development and training opportunities (esp. IT and leadership).

Specific Director level action plans to focus further on specific needs of services/teams.

3.3.4 DOCS

Visible, Accessible Leadership including actions to connect from Day One - meet the DOCS Leadership team; open Access to Leadership – informal drop-in sessions with the ED are now open – no agenda, just a safe space; more Visible Leadership – spending time in your workspaces; ‘You said, we did’ – regular updates – hold us accountable

Communication & Engagement including actions to reintroduce the Staff Newsletter (Monthly); continue Quarterly Roadshows - Celebrate our ‘Bright Stars’ ; introduce Managers Briefing Packs; pulse Surveys & Quick polls; exit interviews

Collaboration & One Council Working including actions to raise awareness of what DOCS does; create opportunities to connect and tackling challenges together

Wellbeing, Values & Workload including actions to target support where it’s needed; recognise our Bright Stars; improve workloads

Confidence, Voice & Speaking Up including actions to create safe spaces to talk; social Graces roll out; strengthen Anti Racist Practice; strengthen support for managers

- 3.4 All action plans are in delivery and there is a formal communication plan in place to ensure that staff are kept up to date on progress in implementing these plans. The timing for the follow up staff survey will be confirmed to Personnel Committee at its meeting in November 2026.

4. Contribution to Strategic Aims

- 4.1. The report supports insights into employee experience at work and actions to address issues identified to “Ensure Reading Borough Council is fit for the future”.

5. Environmental and Climate Implications

- 5.1. Not applicable to this report

6. Community Engagement

- 6.1. Not applicable to this report

7. Equality Implications

- 7.1. The staff survey is open to employees including those without a reading.gov.uk account. The survey includes diversity questions to enable analysis of results for specific groups. The diversity questions were reviewed this year and updated to ensure all nine

protected characteristics in the Equality Act 2010 were covered and the Council's additional tenth characteristic "care experienced".

8. Other Relevant Considerations

8.1. None

9. Legal Implications

9.1. None.

10. Financial Implications

10.1 None

11. Timetable for Implementation

11.1. Actions plans have been timetabled and implementation has commenced. Progress will be regularly reviewed and communicated pending a decision about the timing of the next full survey.

12. Background Papers

12.1. There are none.

Personnel Committee

16 July 2026



Reading
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Title	Returning Officer Scale of Fees for Local Government Elections
Purpose of the report	To make a decision
Report status	Public report
Statutory Officer Commissioning Report	Jayne La Grua, Director of Legal & Democratic Services
Report author	Jayne La Grua, Director of Legal & Democratic Services
Lead Councillor	Cllr Liz Terry, Leader of the Council
Council priority	Not applicable, but still requires a decision
Recommendations	1. Approve the payment of the fee of £4,420.76 to the Returning Officer for the local elections held on 7 May 2026; 2. Approve the scale of fees shown in Appendix 1 to determine the remuneration for the role of Returning Officer for the local elections in May 2027; 3. Request that officers review and publish the Returning Officer Scale of Fees annually as part of the Pay Policy Statement and, where appropriate, apply the relevant national pay award percentage to ensure the fee is maintained in line with inflation; 4. Authorise the Returning Officer, in consultation with the Section 151 Officer and the Monitoring Officer, to apply the scale to ordinary elections, by-elections and combined polls.

1. Executive Summary

- 1.1 This report outlines the current position relating to the payment of a fee in respect of the role of Returning Officer (RO) duties for the running of local elections and recommends a revised fee structure to reflect the duties and personal responsibility relating to the RO role.

2. Policy Context

- 2.1. The Representation of the People Act 1983 requires each local authority to appoint a RO for the conduct of local government elections. In performing these functions the RO acts independently of the Council and is personally accountable to the courts for the lawful conduct of the election.
- 2.2. Section 63(1) and (3)(b) of the 1983 Act states that if the RO or appointed deputies are, without reasonable cause, guilty of an act or omission in breach of official duty they are liable on summary conviction to an unlimited fine.

- 2.3. The role of the RO is entirely separate to that of the postholder's responsibilities as a local government officer. The RO is not directly responsible to the local authority and is instead directly accountable to the courts as an independent statutory office holder.
- 2.4. As a result of the degree of personal liability and unique legal status, local authorities are required to have an appropriate fee structure in place for RO fees and associated expenses as determined by Section 36(4) of the Representation of the People Act 1983.
- 2.5. Local election RO fees are set locally, unlike parliamentary election fees which are prescribed nationally. Whilst there is no statutory requirement to publish details of the RO's scale of fees for local elections, adoption of a published scale will improve transparency, consistency and audit assurance.

3. Background

- 3.1 At a meeting of Council on 27 January 2026, the Executive Director of Resources was appointed as the Council's Returning Officer for local elections. Prior to that, the Council's Assistant Director of Legal and Democratic Services was the RO.
- 3.2 The fee paid to the RO for the 2024 local elections was £4,420.76 and the same budget provision was made for the 2026 local elections.
- 3.3 Benchmarking against comparable electoral areas suggests that the fee paid to the RO in 2024 was reasonable. However, there is currently limited information contained within the Council's Pay Policy Statement explaining how the RO's fees were calculated and approved, only that the RO's fees are "*as set out in the Council's budget estimates for local elections*" (see [Pay Policy Statement](#), paragraph 14.3).
- 3.4 There is no statutory requirement to publish details of RO fee scales and many authorities do not. Those that do vary significantly. Most calculate RO fees according to the size of the electorate, while some calculate fees based on the number of wards, and a small number have adopted the same fee scale as that used for parliamentary elections.
- 3.5 For an authority that elects by thirds, as Reading does, an adjustment needs to be made to take account of the fact that the RO is not delivering a whole-council election, which reduces the operational scale of the election but does not remove the RO's statutory responsibilities, recognising that many of the RO's tasks still occur across the whole borough including:
 - Poll cards issued to all electors;
 - Postal votes issued across the whole borough;
 - Polling stations open in all wards;
 - Count and verification processes;
 - Candidate and agent administration in every ward.
- 3.6 Remuneration of Deputy Returning Officer(s) is in the discretion of the Returning Officer. For the 2024 and 2026 local elections, this was set at a fixed fee of £500 for the count and verification and £350 for undertaking the duties of a Polling Station Inspector.
- 3.7 The rates of payment of other election staff, including polling station staff, count staff and postal voting hub staff, is determined by the RO within pay bands set by the Ministry of Housing, Communities and Local Government.

4. The Proposal

- 4.1 It is proposed that there be no change to the RO Scale of Fees for the 2026 local elections and that payment of the previously budgeted fee of £4,420.76 to the RO be approved for the local elections held on 7 May 2026.
- 4.2 In future, it is proposed that the RO Scale of Fees shown in Appendix 1 be used to determine the level of remuneration for the role and that the Returning Officer, in consultation with the Section 151 Officer and the Monitoring Officer, be authorised to apply the scale to ordinary elections, by-elections and combined polls. It is also recommended that the fee scale be reviewed annually as part of the Pay Policy Statement and, where appropriate, the relevant national pay award percentage applied to ensure that the fee is maintained in line with inflation.
- 4.3 It is not possible to comprehensively benchmark RO fees across all councils, because many councils do not publish this detail. However, benchmarking has been undertaken against 4 authorities in South East England, namely Hampshire & Isle of Wight Council, Milton Keynes City Council, Slough Borough Council and Swindon Borough Council (which uses the Wiltshire Councils pay scales). Each of those authorities' scale of fees has been calculated using Reading's whole-council electorate of 117,269 to produce a comparison table set out in Appendix 2.
- 4.4 Hampshire calculates RO fees according to the size of the electorate. Milton Keynes calculates fees using a hybrid methodology which includes an amount per ward and an amount per elector in each ward. Slough previously calculated RO fees according to the size of the electorate but has recently adopted the pay scale used for parliamentary elections. Swindon calculates fees according to a formula which takes account of both the size of the electorate and the number of postal voters.
- 4.5 Comparator RO fees for a whole-council local election average £8,151.50. RO fee scales for councils that elect in thirds are typically 60% of whole-council elections equivalent fees. If a 40% reduction is applied to the whole-council equivalent for comparator councils, this produces an average of £4,758.32.
- 4.6 Recognising that the published comparator fee scales are each at least a year old, a 3.2% uplift has also been applied to the adjusted figures to take account of inflation. This produces an average of £4,910.59.
- 4.7 Where RO fees are calculated according to the size of the electorate, the average amount paid per 500 electors is £36.50.
- 4.8 Below is a worked example of RO fees calculated according to the size of the electorate applied to Reading, using the average amount paid per 500 electors, which is £36.50:

No. of Eligible Electors	Returning Officer Pay Scale	Whole Council Equivalent	60% of Whole Council Equivalent
111,269	£36.50 for every 500 electors (or part thereof).	£8,139.50	£4,883.70

- 4.9 A fee scale based on the size of the electorate, with a reduction applied to take account of Reading's electoral cycle is recommended, as set out in Appendix 1. The proposed scale reflects Reading Borough Council's elections-by-thirds cycle and recognises the personal statutory responsibility borne by the Returning Officer. For ordinary elections conducted by thirds, the fee is calculated at 60% of the whole-council equivalent fee. This reflects reduced scale while recognising fixed statutory duties.
- 4.10 An alternative method of calculating RO pay is by the number of contested wards or seats. West Berkshire Council has adopted this method, with each contested district ward attracting a fee of £244 and each contested parish or parish ward attracting a fee of £122. This pay scale would produce a disproportionately low rate of pay for the Reading RO because Reading has 16 wards, whereas West Berkshire has 24 district wards and 75 parishes/parish wards. However, a rate of £300 per contested seat in a ward would typically result in an RO pay award of £4,800, as 1 seat in each of Reading's 16 wards is typically contested in each ordinary election.
- 4.11 The benefit of using a flat rate for each contested ward is that, for an ordinary election, it produces a reasonably consistent rate of pay each year which can be budgeted for. However, this would be subject to fluctuations in the event that there are one or more by-elections, and the whole council equivalent is disproportionately high.
- 4.12 Below is a worked example of RO fees calculated according to the number of contested seats:

Returning Officer Pay Scale	48 seats	16 seats	1 seat
£300 for every contested seat.	£14,400	£4,800	£300

- 4.13 Another alternative would be to apply the same fee scale to local elections as for parliamentary elections, which are calculated at a rate of £475 per 10,000 electors. Where this amount would be less than £2,500, a 'floor' of £2,500 has been set to recognise that some level of work is required regardless of the size of the electorate. A copy of the MHCLG Expenses Guidance for Returning Officers (March 2026) is included in Appendix 3.
- 4.14 If the fee scale for parliamentary elections were applied to Reading's electorate, the whole-council equivalent would be £5,700 and 60% of this would be £3,420. Again, based on the size of Reading's electorate, this would produce an unusually low pay scale and is not recommended.
- 4.15 As set out above, remuneration of Deputy Returning Officer(s) is in the discretion of the Returning Officer. For the 2024 and 2026 local elections, this was set at £500 for the count and verification, with an additional £350 paid to Returning Officers undertaking the duties of a Polling Station Inspector. No change is recommended at this time.
- 4.16 The rates of pay of other election staff, including polling station staff, count staff and postal voting hub staff, is determined by the RO within pay bands set by the Ministry of Housing, Communities and Local Government. A copy of these pay bands is included in Appendix 4.

5. Equality Implications

5.1 There are no equalities implications arising from this report.

6. Legal Implications

6.1. These are set out in the body of the report.

7. Financial Implications

7.1. The total Returning Officer fee payable for 2026 is £4,420.76, which can be met from existing election budgets.

7.2. The RO fee for the local elections in May 2027 is expected to be £4,883.70, which will need to be met from with the election budget for 2026/27.

Appendices

Appendix 1 – Draft RO Fee Scale 2026/27

Appendix 2 – Comparator Authorities

Appendix 3 – Expenses Guidance for Returning Officers (Parliamentary Elections)

Appendix 4 – Elections Funding Pay Band Rates 2026/27

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Reading Borough Council

Returning Officer Scale of Fees

Local Government Elections

Effective from 17 July 2026

Scale of expenditure fixed under section 36(4) and (5) of the Representation of the People Act 1983

PART 1: RETURNING OFFICER FEES

1. Interpretation

1.1 In this Appendix:

- “Returning Officer” (RO) means the officer appointed by the Council under the Representation of the People Act 1983;
- “Whole-council equivalent fee” means the fee that would be payable were all council seats contested at a single election;
- “Ordinary election” means an election conducted as part of the Council’s elections-by-thirds cycle.

2. Returning Officer Duties

2.1 Returning Officer fees for conducting a local election include the following duties:

- giving the prescribed notices;
- preparing and supplying nomination papers, distributing, filling up;
- verifying and adjudicating upon the same;
- Appointing Deputy Returning Officer(s);
- Arranging for or conducting the poll;
- Counting the votes and declaring the results.

In addition to the above duties, the Returning Officer will generally perform all the duties which a Returning Officer is required to perform under the Act or the Rules and Regulations made under it. This also includes all disbursements and expenses other than those for which special provision has been made. The scale of fees set out below

will remain in full force and be used for Local Government elections unless and until it is replaced.

3. Basis of Calculation

3.1 The Returning Officer fee shall be calculated by reference to:

- The total registered electorate, as published in the register in force on the last date for publication of the notice of election; and
- The applicable election type set out in section 4.

3.2 The fee is payable to the Returning Officer personally, in recognition of statutory responsibility, and is separate from all election expenses and staffing costs.

4. Scale of Fees

4.1 Whole-Council Equivalent

4.1.1 The whole-council equivalent fee shall be calculated as follows:

Returning Officer		Whole-council equivalent
Contested Local Elections		
(a)	For every 500 electors in each ward	£36.50
(b)	By-election fees: for every 100 electors per ward	£36.50
Uncontested Local Elections		
(c)	For every 500 electors in each ward	£25

4.2 Ordinary Elections (Election by Thirds)

4.2.1 For ordinary local government elections conducted as part of the elections-by-thirds cycle, the Returning Officer shall be paid 60% of the calculated whole-council equivalent fee.

4.2.2 This percentage reflects the reduced scale of contest while recognising the Returning Officer's continuing personal statutory responsibility:

Returning Officer		Election by Thirds
Contested Local Elections		
(a)	For every 500 electors in each ward	£21.90
(b)	By-election fees ¹ : for every 100 electors per ward	£21.90

¹ Where a by-election is held other than on an ordinary polling day.

Uncontested Local Elections		
(c)	For every 500 electors in each ward	£15

4.3 By-Elections (Local Government)

4.3.1 For a by-election affecting one or more wards:

- The fee shall be calculated using the electorate of the ward(s) concerned; and
- The same calculation in paragraph 4.1 shall apply.

4.3.2 Where multiple wards are contested on the same date, the electorates shall be aggregated for the purposes of calculating the fee.

5. Combined Elections

5.1 Where a local government election is held on the same day as a Parliamentary, Police and Crime Commissioner, Mayoral or other statutory election:

- The fee payable under this Appendix shall apply only to the local government election; and
- Any fees or charges payable for national or other polls shall be dealt with separately in accordance with the relevant statutory provisions.

6. Deputy Returning Officers

6.1 Any fees payable to Deputy Returning Officers are not included within this scale and shall be treated as election expenses, not as part of the Returning Officer's personal fee.

7. Review and Uprating

7.1 This scale of fees shall be reviewed annually or earlier where there are significant legislative, organisational or electoral changes.

7.2 The Council may approve annual uprating of the fees by reference to National Joint Council pay awards.

PART 2: ELECTION STAFF COSTS

The fees stated are the maximum amounts payable for the services of staff. The Returning Officer has the discretion to disburse funds on the different functions described below up to the maximum amount.

Role	Fee	Notes
DEPUTY RETURNING OFFICER(S)		
Verification & Count	£500	A separate fee is payable in respect of Polling Station Inspector duties.
POLLING STATION STAFF		
Polling Station Inspector	£350	
Presiding Officer	£360	Includes £20 for training
Poll Clerk	£255	Includes £20 for training
Poll Clerk Reserve	£40	£20 deducted from fee if called upon and paid for number of hours worked.
COUNT STAFF		
Top Table Supervisor	£338.80	Paid at 1.5 rate for overnight count.
Top Table Assistant	£202.08	Paid at 1.5 rate for overnight count.
Count Supervisor	£220	Includes £15 for training. Paid at 1.5 rate for overnight count.
Count Assistant	£136.08	Paid at 1.5 rate for overnight count.
Ballot Box Receipt	£75	Paid at 1.5 rate for overnight count.
Lifting & Shifting	£18.96 per hour	Paid at 1.5 rate for overnight count.
POSTAL VOTE HUB STAFF		
Postal Vote Scanning Manager + Deputy Returning Officer Duties	£1,650	
Postal Vote Opening Manager	£27.50 per hour	Paid at 1.5 rate for overnight count.

Benchmarking of Returning Officer Fees

1. Purpose of benchmarking

- 1.1 This appendix provides a benchmarking comparison of the proposed Returning Officer (RO) fee scale for Reading Borough Council against a selection of named comparator authorities and also against the fees set nationally for parliamentary elections.
- 1.2 The benchmarking exercise is intended to demonstrate that the proposed approach is reasonable, proportionate and consistent with sector practice, taking account of Reading Borough Council's elections-by-thirds cycle and a borough-wide electorate of 117,269.

2. Electoral scale and context

- 2.1 Reading Borough Council elects by thirds and has a borough-wide electorate of 117,269, placing it at the upper end of electorate size for authorities operating elections by thirds.
- 2.2 This electorate is:
 - materially larger than many district councils operating ward-based remuneration models; and
 - smaller than some neighbouring unitary authorities, such as Wokingham and Bracknell Forest, which operate whole-council election arrangements.

3. Elections by thirds

- 3.1 Benchmarking demonstrates that authorities electing by thirds do not typically reduce Returning Officer fees in simple mathematical proportion to the number of wards or seats contested.
- 3.2 Instead, sector practice shows that authorities commonly:
 - identify a whole-council equivalent fee; and
 - apply a moderated percentage reduction in ordinary election years to reflect reduced operational scale, whilst continuing to recognise fixed statutory duties and legal risk.
- 3.3 Percentage reductions for councils electing in thirds range between 50% and 70%, with 60% being the most common.

Comparator councils using a fee scale based on electorate size:

Council	Elects in thirds or whole council?	Returning Officer Pay Scale	Whole Council	60%	+ NJC uplift
Hampshire & Isle of Wight Council (2023/24)	Whole Council.	£100 for the first 1,000 electors. £38 for every additional 500 electors or part thereof.	£8,498.00	£5,098.80	£5,261.96
Milton Keynes City Council (2024/25)	Thirds at the relevant date. Has since moved to whole council elections.	£125 for each ward £10 for the first 500 electors in each ward. £40 for each additional 500 electors or part thereof.		£4,280.00	£4,416.96
Slough Borough Council (2019)	Whole Council.	£35 per 500 electors.	£7,805.00	£4,683.00	£4,832.86
Swindon Borough Council (2021)	Thirds at the relevant date. Has since moved to whole council elections.	£32 for first 500 electors. £8.50 for each subsequent 250 electors or part thereof. £12 for first 50 postal voters. £2.50 for each subsequent postal voters or part thereof. £14 poll cards per contest OR £0.23 per 100 poll cards, whichever is greater.		£4,971.49	£5,130.58
		Average	£8,151.50	£4,758.32	£4,910.59

3. Application to Reading Borough Council

3.1 The proposed Reading Borough Council approach is consistent with this established practice by:

- calculating a whole-council equivalent fee by reference to the full borough-wide electorate of 117,269; and
- applying a reduced fee for ordinary elections conducted by thirds.

3.2 In benchmarking terms, the proposed Reading RO fee scale:

- results in remuneration higher than ward-based models such as West Berkshire;
- remains lower than whole-council equivalent unitary authority levels in ordinary election years; and
- is proportionate to Reading's electorate size, urban density, electoral complexity and statutory risk profile.

4. Comparator approaches: Ward-based

4.1 [West Berkshire Borough Council](#) operates a ward-based model, under which the Returning Officer fee is derived from a per-ward calculation. This reflects a smaller electorate and produces relatively low aggregate remuneration. If this fee scale were applied to Reading's 16 wards, it would produce an RO fee of £3,904, which would be unusually low:

Returning Officer Pay Scale	24 District Wards 4 Parishes	16 Wards
• £244 per contested District Ward (24) • £122 per contested Parish Ward (4 at the last ordinary election in May 2023)	£6,344	£3,904

5. Comparator approaches: Parliamentary elections

5.1 The fee for RO's services for the conduct of a Parliamentary election is calculated at a rate of £475 per 10,000 electors. Where this amount would be less than £2,500, a 'floor' of £2,500 has been set to recognise that some level of work is required, regardless of the size of the electorate. If this fee scale were applied to local elections, it would produce the following fees:

Rate	Whole Council	60%
£475 per 10,000 electors. Subject to a minimum amount of £2,500.	£5,700	£3,420

5. Benchmarking conclusion

5.1 Benchmarking against named comparator authorities confirms that the proposed Returning Officer fee arrangements for Reading Borough Council are consistent with approaches adopted by authorities of comparable scale and appropriate for an authority electing by thirds with a borough-wide electorate of 117,269.

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Ministry of Housing,
Communities &
Local Government

Expenses Guidance for Returning Officers

March 2026

Elections Funding Team
Elections Directorate
Ministry of Housing, Communities & Local Government

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Expenses Guidance for Returning Officers

Introduction

This guidance relates to the reimbursement of expenditure incurred by statutorily independent Returning Officers (ROs) in relation to polls where the UK Government-held Consolidated Fund is the funding source.

The monies that can be reimbursed are set out in legislation and reimbursement is on the basis that expenditure was ‘necessary for the efficient and effective running of the poll’.

The law provides that where an election takes place, but a poll is not run because there are less than two candidates for each or any seat being competed, a set sum is payable to the relevant RO.

The Consolidated Fund is public money and as such needs to be accounted for properly and accurately.

As ROs are statutorily independent, the Elections Claims Unit (based in Norwich) undertakes the role of ensuring this is done on behalf of His Majesty’s Treasury (HMT). The National Audit Office (NAO) also undertakes random sampling each year to ensure that the scrutiny of claims is being undertaken correctly.

Failure to properly account for public monies is a breach of statutory duty for a RO.

HMT and NAO require the relevant Government Department dealing with statutory elections (currently MHCLG) to effectively manage the monies provided to support ROs to run polls. A failure to do so means that MHCLG would be at fault and that its overall accounts could be ‘qualified’ for failure to effectively account for the expenditure.

Guidance has been developed over the past decade to assist ROs with effective use of the monies and to make clear where expenditure cannot be reimbursed. The guidance aims to support an effective understanding of the legislation and also work towards providing certainty and consistency of approach with regard to reimbursement – as has been requested by ROs and their teams over many years.

It is strongly recommended that each RO, and anyone with delegated authority to incur expenditure on their behalf, should read and understand this guidance.

1.1 1.1 Legislative Background

The legislative framework for how UK Parliamentary and Police and Crime Commissioner elections are funded has been set out in full in Appendix A.

We recommend Returning Officers read the contents of Appendix A as it provides the basis for what is included in the guidance that follows.

1.2 Returning Officers and Deputy Returning Officers

1.2.1 UK Parliamentary Elections

Acting Returning Officer (England and Wales) and Returning Officer (Scotland) personal responsibility for accounts

As set out in section 28 of the 1983 Act, the Acting Returning Officer in England and Wales is either the registration officer designated by the Council, or the registration officer designated by the Secretary of State in the Order referred to above.¹ An Acting Returning Officer has all the powers, obligations, rights and liabilities of a Returning Officer. They perform all the duties of the Returning Officer (except those mentioned above which have been reserved or not delegated) including in relation to expenses.

Acting Returning Officers (AROs) in England and Wales and Returning Officers (ROs) in Scotland can recover their charges for services necessarily rendered and expenses necessarily incurred for or in connection with the elections. This is set out in section 29 of the 1983 Act.²

AROs in England and Wales and ROs in Scotland are also personally responsible for all the expenditure incurred for the purposes of conducting the election in their constituencies. Although Electoral Service Managers (ESMs), deputies or other staff may assist with preparing the accounts, responsibility for ensuring that the accounts are complete, legitimate, properly presented and auditable rests ultimately with the ARO in England and Wales or the RO in Scotland. This responsibility includes signing off the accounts personally.

Therefore, ROs must ensure all parts of the claim meet with their approval before submission to the Election Claims Unit (ECU). We may still contact ROs/AROs directly about particular costs to determine whether they were necessarily and reasonably incurred. These observations will be sent before we can decide on the final amount to be reimbursed. In such instances, the ARO or RO should respond in a timely fashion and provide further information to assist with the scrutiny of the claim, otherwise settlement of a claim could be delayed.

Please note, all financial evidence must be retained for six years even if not requested by the ECU, as the National Audit Office (NAO) can ask for these at any point in time. Returning Officers will be required to submit all available evidence as part of their claim once the new digital system goes live. This will ensure that all the necessary evidence is available to both the ECU for the scrutiny of the claims and NAO for their annual audits.

[Note - In this guidance, the terms Returning Officer and RO also encompasses Acting Returning Officer / ARO, unless the specified context indicates otherwise.]

¹ <https://www.legislation.gov.uk/ukpga/1983/2/section/28>

² <https://www.legislation.gov.uk/ukpga/1983/2/section/29>

1.2.2 The Returning Officer's use of existing resources

The funding regime is predicated on an expectation that local authorities support ROs to deliver polls using existing resources at local government level, as this provides a ready-made infrastructure for the delivery of electoral events.

For example, in Scotland, where registration duties are generally separated out from the local authority and therefore there are no standing election teams for the RO to call on, the legislation specifically makes it clear that local authorities in Scotland must put their resources at the disposal of the RO for the conduct of the elections³. The same applies for the conduct of PCC elections in England and Wales as set out in existing PCC legislation⁴ as some of the local authorities involved in each Police Area will be ones for which the PARO is not an officer of the authority.

1.3 Police and Crime Commissioner Elections

Police Area Returning Officer (PARO) and Local Returning Officer (LRO) personal responsibility for accounts

Section 3 of the Police and Crime Commissioner Elections (Functions of Returning Officers) Regulations 2012, provides that it is the general duty of each Police Area Returning Officer (PARO) and relevant Local Returning Officer (LRO) to do whatever things are necessary for conducting a PCC election in the police area or voting area for which the officer acts.⁵ As such, PAROs and LROs are personally responsible for the expenditure incurred for the purpose of conducting the election in the area for which they act.

Section 55 of the Police Reform and Social Responsibility Act 2011 sets out that they may claim under the Consolidated Fund for expenditure that was reasonable and necessary for the efficient and effective running of the poll.⁶ Although Electoral Services Managers (ESMs), deputies or other staff may prepare the accounts, responsibility for ensuring the accounts are complete, legitimate, properly presented and auditable rests with the PARO/LRO.

Therefore PAROs/LROs must ensure all parts of the claim meet with their approval before submission to the ECU. We may still contact PAROs/LROs directly about particular costs to determine whether they were necessarily and reasonably incurred. These 'observations' will be sent before we can decide on the final amount to be reimbursed. In such instances, PAROs/LROs should respond in a timely fashion and provide further information to assist with the scrutiny of the claim, otherwise settlement of a claim could be delayed.

³ Representation of the People Act 1983, section 25 (2)

<https://www.legislation.gov.uk/ukpga/1983/2/section/25>

⁴ Police Reform and Social Responsibility Act 2011, section 54 (4)

<https://www.legislation.gov.uk/ukpga/2011/13/section/54/enacted>

⁵ <https://www.legislation.gov.uk/uksi/2012/1918/regulation/3/made>

The duties of the PARO and the LRO are also set out in more detail in schedule 3 of the Police and Crime Commissioner Elections Regulations 2012. For further information on these duties, please refer to these Regulations, and to schedule 3 in particular. <https://www.legislation.gov.uk/uksi/2012/1917/schedule/3/made>

⁶ <https://www.legislation.gov.uk/ukpga/2011/13/section/55/enacted>

Please note all financial evidence must be retained for six years even if not requested by the ECU as the NAO can ask for these at any point in time.

1.4 UK Parliamentary and Police and Crime Commissioner Elections

1.4.1 Returning Officer Fee

It is the RO's general duty at a UK Parliamentary or Police and Crime Commissioner election to do all such acts and things as may be necessary to effectively conduct the election. In return for effectively performing this role, and for holding personal responsibility for the conduct of the election, the RO will receive a fee for their services as set out in the relevant Charges Order.

The fee for RO's services is calculated at a rate of £475 per 10,000 electors. Where this amount would be less than £2,500, a 'floor' of £2,500 has been set to recognise that some level of work is required, regardless of the size of the electorate.

1.4.2 RO Fees for Combined Elections

When there is a poll combined with a UK Parliamentary or Police and Crime Commissioner election the RO fee will be increased in recognition of the increased complexity involved in administering more than one election at the same time. Local authorities can make their own determination as to any uplift they may wish to make for their local authority polls.

[Note - Parish elections are excluded from any RO fee calculations where they are held in combination with PCC or UK parliamentary elections because of the uncertainty of polls taking place in parish elections. This is a long-standing position agreed with SOLACE and the AEA.]

1.4.3 Deputies and authorised signatories

It is recognised ROs may wish to appoint deputies (deputes in Scotland) to act on their behalf. For UK Parliamentary elections, there is provision, in section 28 of the 1983 Act, for the appointment of deputies who can also be given delegated powers to sign documents instead and on behalf of ROs, should those officers be unavailable.⁷

For Police and Crime Commissioner elections, section 5 of the Police and Crime Commissioner Elections Regulations 2012 similarly sets out that PAROs and LROs may appoint deputies to discharge any or all the officer's functions, on the condition that this appointment must be in writing.⁸

⁷ <https://www.legislation.gov.uk/ukpga/1983/2/section/28>

⁸ <https://www.legislation.gov.uk/uksi/2012/1918/regulation/5/made>

Deputies who are given responsibility for covering the entire range of the RO's duties are referred to as "deputies with full powers". Other deputies may be given limited powers to exercise responsibility over specifically identified areas or functions. The ECU will accept documents signed by deputies only when they have been notified of their appointment and identity in advance.

To notify the ECU of deputies, ROs must submit electronically:

- Duly completed Form B, or the relevant form applicable at the time.
- Specimen signatures against which subsequent signatures can be checked and;
- A copy of their letter of appointment signed by the relevant RO.

If the RO does decide to appoint a deputy, they should notify us after the appointment, but before the submission of any documents to the ECU that have been signed by deputies.

In general, it is preferable for the use of such deputies to be restricted both as to function and to number. Their specific functions and the extent of the delegation should also be made clear when they are appointed. This ensures ROs are fully engaged in the preparation and submission of their accounts and cognisant of their progress and content. It also establishes a clear and verifiable audit trail back to the responsible officer and lessens the risk of misunderstanding.

In line with this, we would generally expect the relevant RO to sign documents personally where possible.

1.4.4 Deputy Returning Officer (DRO) Fee

There is no specific fee for DROs for any polls funded from the Consolidated Fund. The funding review highlighted several instances where claims have been submitted in respect of "DRO fees". Please note there is no provision for this in the Charges Order or elsewhere in legislation.

ROs are able to allocate some or all of their own fees to deputies but will not receive any further contribution over and above this amount for a fee for deputies. Any responsibilities delegated from the RO to a DRO should be paid for from the RO fee and cannot be claimed back as an additional staff cost.

1.5 Funding Model

1.5.1 The Funding Model

In advance of national polls, MHCLG calculates the level of funding necessary for their effective conduct in Great Britain. For UK Parliamentary elections, MHCLG calculates the funding for all constituencies in England, Scotland and Wales. Northern Ireland Office (NIO) calculates the level of funding necessary for the effective conduct of UK Parliamentary

elections in Northern Ireland. For Police and Crime Commissioner elections, MHCLG calculates the funding for voting areas in England and Wales.

Currently, funding for UK Parliamentary and PCC elections is calculated by taking the settled expenditure incurred by each constituency or voting area at the previous poll of the same type. This figure is then updated to take account variables such as price inflation, changes in the size of the electorate, number of postal voters, changes to Royal Mail charges and changes in the degree of poll combination.

MHCLG then agrees the projected costs with HM Treasury so that funding can be made available from the Consolidated Fund.

This calculation is based on scheduled polls only. Unscheduled polls (e.g. by-elections) do not affect the original apportionment, however, there is more likelihood of local level by-elections than for UK Parliamentary or PCCs and so retaining it at scheduled election level is tilted to the benefit of local authorities in general.

1.5.2 The Funding Model Post Boundary Changes

UK Parliamentary constituencies were reviewed by the Boundary Commissions for England, Scotland, Wales and Northern Ireland, and these changes were implemented in November 2023 via *The Parliamentary Constituencies Order 2023*⁹.

For UK Parliamentary elections, the funding model relies on using the previous settled costs incurred by a constituency as the basis for the costs required for the next election. However, when the boundaries change, previous constituencies will no longer be comparable to the new constituencies. They will differ in factors such as geography and electorate, and these changes will need to be reflected in the sum of monies allocated for the efficient and effective conduct of the poll.

As a result, for the first UK Parliamentary election following the boundary changes, a slightly different model – the proportionate allocation model – will be used to allocate funding for constituencies in England, Scotland and Wales. NIO will be responsible for estimating the funding allocations for Northern Ireland.

The proportionate allocation model works in two stages. Firstly, it will use the current funding model to calculate the cost of the UK Parliamentary election in each constituency in Great Britain, as if no boundary changes had occurred.

Funding will then be reallocated to the new constituencies in a way that is proportionate to the movement of certain factors between them, such as the electorate and number of polling stations. The model assumes that costs involved in the conduct of the election are relative to these factors, and their movement between the new constituencies consequently offers a set of data upon which new funding allocations can be calculated.

⁹ <https://www.legislation.gov.uk/uksi/2023/1230/made>

As the current funding model will be used to calculate the total cost of conducting the election, the total amount of funding provided to RO in England, Scotland and Wales will be the same as if no boundary changes occurred. However, the way that funding is allocated between the new constituencies will be conducted in the manner described above.

We will be using data provided by the Office of National Statistics (ONS) and from the Boundary Commissions for England, Scotland and Wales. The proportionate allocation model will only be used for the first UK Parliamentary election after the boundaries have changed. Funding for subsequent UK Parliamentary elections will then be calculated using the existing funding model.

The Boundary Review relates to UK Parliamentary constituencies only. This will not affect how the funding for PCC elections is calculated.

1.5.3 Further Information about funding

Given the methodology used for the funding allocation, it is important that ROs submit a claim form to the ECU that accurately reflects the sum necessarily incurred for the efficient and effective running of the poll.

Once the ECU have scrutinised the costs incurred, the settled figure will form the basis for calculating funding allocations in a particular constituency or voting area at the next poll of the same type.

If ROs foresee any significant increases to existing costs or any significant new costs they will have to incur for an upcoming poll, they should [notify the ECU](#) as soon as is practicable in advance of the election so that any necessary additional funding can be secured. Where they have been communicated to us in advance of the Maximum Recoverable Amounts (MRA) being finalised, these additional costs can be discussed and reflected in the funding allocation where they are necessary. If additional costs are communicated at a later date and agreed, these costs will be considered as part of the overspend process. Costs exceeding the MRA that have not been raised in advance may not always be met as additional funding may not be available.

1.6 Initial and Further Advances

1.6.1 Terms of Advances

For UK Parliamentary elections, section 29 of the 1983 Act as amended by the Electoral Administration Act 2006, sets out that an advance can be made to the RO by the Treasury on such terms as it thinks fit.¹⁰

¹⁰ <https://www.legislation.gov.uk/ukpga/1983/2/section/29>

For Police and Crime Commissioner elections, it is section 55 of the 2011 Act sets out that an advance can be made to the RO on such terms as the Secretary of State sees fit.¹¹

The Elections Funding team within MHCLG coordinates with HM Treasury to arrange any advances made for polls funded from the Consolidated Fund.

As a result, prior to an election the RO will usually receive an advance of 75% of the maximum recoverable amount they have available to spend for the running of the poll. In exceptional cases, a further advance of 15% may also be made to the RO. Please see the 'Further Advances' section for more information.

1.6.2 Initial Advances

An initial advance of 75% of the maximum recoverable amount can be paid to ROs on submission of their bank details ahead of the poll. Payment of advances can only be processed if the ECU has received notification from the RO of the bank account details to which payments are to be made.

It should be noted that ROs are strongly advised to consider opening a separate bank or building society account for their initial advances and any subsequent election expenditure. This ensures that the funds are kept separate from local authority money and that the expenditure can be more easily accounted for.

Any interest which the RO receives on a bank account opened for the purposes of the election must be returned to the ECU upon submission of the claim.

If the RO does choose to use a local authority bank account, rather than setting up their own, the Consolidate Fund monies must be very clearly distinguished from any other monies and the RO must be able to account for their expenditure separately from the local authority's expenditure.

Once an election has been called, each RO will be asked to submit or confirm their current bank details to the ECU. The relevant RO will need to confirm that they have read and accepted the terms and conditions under which the advance is issued. The terms are that the RO:

- Will account properly and on time for any advances received;
- Will repay any unspent funds that have been advanced;
- Will use any advances only in accordance with the provisions in the Charges Order; and
- Has read and understood the compliance requirements, including the deadlines for submission and the sanctions that may apply if these are not met.

Once the bank details have been received/confirmed, an advance of 75% of the overall MRA will be made directly into the notified bank account.

The figure of 75% for the advance has been set at a level which means that ROs need to submit a claim to be reimbursed the balance of the account. Experience has shown that

¹¹ <https://www.legislation.gov.uk/ukpga/2011/13/section/55/enacted>

where advances exceed the amount required to run a poll, there can be issues with the completion and submission of accounts.

Deadlines and Sanctions

Claims must be submitted within the deadlines set out in the relevant account regulations. If an RO is unable to meet the deadline, they must contact ECU *before the deadline passes* to request an extension. The maximum extension will normally only be agreed in exceptional circumstances, in all other cases the length of any extension will depend on the reasoning provided. **Extensions cannot be granted retrospectively.**

Where a claim is not submitted by the deadline and no extension has been agreed in advance, the following sanctions may apply:

- The claim will no longer be eligible for consideration or reimbursement;
- The RO may be required to **repay the full advance** within 30 days of an invoice being issued;
- Future advance payments may be withheld or delayed;
- A formal notification may be made to the Electoral Commission and the Accounting Officer at MHCLG.
- We encourage early contact to avoid these scenarios.

These measures are intended to ensure effective management of public funds and support timely closure of election accounts, while allowing flexibility where valid reasons for delay exist and are communicated in good time.

1.6.3 Further Advances

Further advances of up to 15% of the overall MRA can be made to the RO (to a maximum total of 90% of the MRA) in exceptional cases. These advances are made for ROs facing unexpected and/or higher costs which cannot be covered by the initial advance and have to be paid before the poll takes place.

ROs who need a further advance must submit a special application with supporting evidence. A breakdown of costs, payments made so far and copies of invoices awaiting payments will need to be provided as evidence, along with an explanation for the extra monies needed. The RO will need to submit a separate request for this process. The request will require confirmation they have read and understood this guidance and the conditions upon which advances are made.

If agreed, up to a further 15% of the overall MRA will be granted. The ECU will deal with applications for further advances as soon as they are alerted to the submission of the request, and it is accompanied by relevant and correct supporting documentation.

The deadline for the receipt of applications for further advances will be one month after the date of poll of the relevant UK Parliamentary or Police and Crime Commissioner election.

If there is a need for further funds after the date of poll, the RO is encouraged to submit the full claim for the account to be settled and the balance paid as soon as possible.

1.6.4. General Requirements for Completing the Forms

ROs should note the following when completing and submitting request forms:

- Any information submitted must be sent to the ECU electronically using the digital system. The ECU will accept scanned copies of original signatures sent electronically, which can also be uploaded through the digital system.
- If, in exceptional circumstances, documents must be sent by post in hard copy, this must be discussed and agreed with the ECU before any documents are sent. Please also note that the submission of paper documents may delay the settlement of your claim.
- Due to changes in how banks now process payments, the account holder details submitted to the ECU must match exactly the name stated on the bank account itself. If the names listed on the relevant form and the bank account do not match; payments may be delayed.

1.6.5 Use of Advances

Advances made for any UK Parliamentary or Police and Crime Commissioner elections must not be used to offset payments in respect of any other polls, such as local elections. They must only be used for expenses in relation to the poll for which the advance has been made.

1.7 General Advice on what can be claimed

1.7.1 General Advice for Claiming Items

As set out in section 29 of the 1983 Act for UK Parliamentary elections, and section 55 of the 2011 Act for Police and Crime Commissioner elections, the RO is entitled to recover their charges in respect of services rendered or expenses incurred for the efficient and effective conduct of the poll.¹² However, this does not entitle the RO to spend without constraint.

Section 29 of the 1983 Act, and section 55 of the 2011 Act also set out that ROs are only entitled to recover their charges from the Consolidated Fund if the expenditure was necessary for the efficient and effective conduct of the poll.¹³

¹² <https://www.legislation.gov.uk/ukpga/1983/2/section/29>
<https://www.legislation.gov.uk/ukpga/2011/13/section/55/enacted>

¹³ <https://www.legislation.gov.uk/ukpga/1983/2/section/29>
<https://www.legislation.gov.uk/ukpga/2011/13/section/55/enacted>

That means we are not required to reimburse for charges which fall outside of that definition. Neither are we empowered to reimburse extra spending unless it was necessary for the expenditure to be incurred and the amount was reasonable.

Consequently, the Secretary of State can refuse to settle claims that do not confirm to the statutory requirements, and this is not limited to unnecessary or unreasonable expenditure. It includes, for example, claims submitted late, those without sufficient supporting documentation, or those which cannot be audited.

Costs that have not been reimbursed in previous claims have helped to clarify what has been deemed to be unreasonable and unnecessary expenditure. These remain relevant and should be taken into account when considering whether expenditure is necessary for the efficient and effective conduct of the poll. Such examples are provided in this guidance to assist ROs with their claim submission.

Reimbursement of a cost at a previous poll should not be taken as a guarantee that the same cost will be reimbursed at future polls. Guidance is reviewed regularly and is subject to change, so please ensure that you are referring to the most up to date version of this guidance available within the digital claims system.

As a general rule, vague or ambiguous descriptions in the claim form will prompt the ECU to query the expense and request the supporting document(s). Any comments or descriptions provided with your submission should provide a clear and detailed breakdown of the expenditure claimed and where applicable, the relevant evidence should be attached.

Where there is doubt as to what can be reimbursed as necessary and reasonable, or the evidence that should be provided in support of any costs, we recommend the RO contact the [ECU](#) prior to the poll. The ECU will be happy to advise and provide further information. This will also reduce the need to query these costs later when scrutinising the claim.

Although there is no formal appeals process, the Elections Funding Team can review claims where the RO and the ECU do not agree on whether a particular cost meets the criteria for reimbursement. The Elections Funding Team may reach out to the RO for additional supporting evidence in these cases.

What is necessary will vary by local area and by poll. Each RO will have different circumstances in which they have to efficiently and effectively conduct the poll and necessary costs incurred will differ as a result. The ECU will consider reimbursement where sufficient evidence can be provided showing costs were necessary for the conduct of the poll, and that the most cost-effective solution was chosen given the circumstances at the time. Some brief examples of costs that may not be considered necessary have also been provided below.

[Rates of pay for staff](#)

Previously, the ECU has received claims such as a senior officer (e.g. the head of legal services) at a local authority working on postal vote opening being paid their contracted rate for the work by the RO. This would not be considered a reasonable cost for reimbursement. Whilst this is a task that needs to be conducted, the rate reimbursed must be proportionate

to the role and the duties undertaken. Please refer to sections 2.9.1-2.9.5 of this guidance for rates of pay to staff that we can reimburse from the Consolidated Fund.

Decorations at the Count

This is not a cost that is necessary for the conduct of the poll. Decorations at the count, such as stage backdrops or floral arrangements, would not contribute to its efficient and effective delivery and so cannot be reimbursed from the Consolidated Fund.

Staffing levels in polling stations

In most cases we will accept staffing levels in line with the guidance provided by the Electoral Commission. If a higher number of staff is required at specific polling stations, we may be able to consider this where a justification has been provided, taking into account the number of polls taking place, previous turnout and other relevant factors.

1.7.2 Costs Exceeding the MRA

The overall MRA set out in the Charges Order represents a figure that has been calculated using previous data on settled costs. It is what the UK Government considers to be a reasonable amount to run the poll, rather than a target to aim for and ROs may not need to spend the full sum of monies that have been allocated.

We recognise there may be occasions when particular functions will cost more than expected due to an unexpected or special circumstance e.g. hire of a more expensive venue when usual premises are not available.

Where these extra costs are unavoidable and unexpected but necessary for the efficient and effective running of the poll, and their cost cannot be absorbed by savings elsewhere, there is flexibility for the consideration of additional funds being made available if we are made aware of these additional costs in good time.

Should the RO exceed the MRA without notifying us in advance, there is no guarantee that the additional costs above the MRA will be reimbursed although we will endeavour to accommodate these wherever possible. As set out in section 29 of the 1983 Act, costs exceeding the MRA can only be reimbursed at the discretion of the Secretary of State, and only if it was reasonable for the RO to incur the expenditure and if the charges themselves were reasonable.¹⁴ Where costs do not meet these conditions, the Secretary of State is not obliged to reimburse them.

Where there is insufficient evidence to demonstrate that costs incurred have met these conditions, it should not be assumed discretion will be automatically exercised for any overspend.

¹⁴ <https://www.legislation.gov.uk/ukpga/1983/2/section/29>

1.7.3 External Scrutiny of Returning Officers' Expenses

As noted in the introduction, ROs' expenses are scrutinised by the ECU, but ROs' expense accounts are also audited annually by the National Audit Office (NAO). NAO may challenge the ECU on any payments they do not believe to be reasonable or necessary and may challenge any payments which they do not believe are supported by sufficient evidence.

MHCLG is also accountable to His Majesty's Treasury (HMT), as any expenditure incurred by ROs in the running of UK Parliamentary and Police and Crime Commissioner elections is reimbursed from the Consolidated Fund. The ECU must be able to demonstrate to HMT that costs incurred were necessary and reasonable for the efficient and effective conduct of the poll.

Consequently, the ECU must ensure that they are scrutinising expenses to the standards required of them by the legislation, by NAO and by HMT, and by any other organisations asked to audit or scrutinise Returning Officers' expense accounts (e.g. The Government Internal Audit Agency).

Additionally, in 2014 the UK Government committed to publishing in detail the costs incurred in the delivery of national elections. As a result, data on the cost of national elections is also published on [gov.uk](https://www.gov.uk) for the purposes of transparency.¹⁵ This data is available publicly and may also be subject to scrutiny by others who are taking an increasing interest in this area. They may question payments which could be seen as unreasonable or unnecessary. For this reason, and the reasons mentioned above, we must ensure that we have legal authority to make payments and that no unlawful payments are authorised.

1.7.4 Seeking value for money

While ROs act in a statutorily independent capacity, we do not see any issues with the use of existing local authority frameworks or contracts where these achieve value for money. However, it should be stressed that in these circumstances it is the RO, and not the local authority, who is incurring the costs. ROs are statutorily independent and are generally not bound by contracts the local authority has with external suppliers. ROs consequently have the option of entering into contracts with alternative suppliers to ensure any necessary goods or equipment can be acquired at better value for money.

Local authorities should also be mindful of the expectation that they support the RO in the conduct of statutory polls, and this should be considered in their agreements with third party suppliers.

While we recognise ROs may prefer to use trusted service providers, achieving value for money is a factor ECU will take into account when looking at reimbursement. ROs may wish to reach out to several suppliers to obtain a range of quotes or negotiate with existing

¹⁵ These reports can be viewed at <https://www.gov.uk/government/collections/reports-on-the-cost-of-uk-national-polls-and-pcc-elections>

suppliers to ensure costs remain competitive. The ECU may request supporting evidence in the form of additional quotes received by the RO to assist in the scrutiny of the claim.

1.7.5 Authorisation from ECU

This guidance is intended to be as comprehensive as is reasonably possible and covers most of the questions likely to arise in relation to a scheduled poll.

However, if you:

- Have any queries to which you cannot find an answer;
- Are experiencing any difficulties with the preparation or presentation of your accounts;
- Have doubts or concerns as to whether a particular item or service is appropriate or necessary for the running of the poll; or
- Expect to incur additional and/or novel costs - e.g. because of a 'snap' election;

you should [contact the ECU](#) and seek further advice before committing to any expenditure.

1.8 Advice for Claiming Specific Items

1.8.1 Prior approval for novel expenditure

You need to obtain prior agreement from the ECU on reimbursement before you incur any costs in the categories listed below or for any other novel or additional costs or for items that have previously been accepted but where the charges have significantly increased.

All novel requests must be:

- submitted in writing and include a detailed breakdown of the costs involved and
- accompanied by a clear explanation of why the expenditure is necessary for the effective conduct of the election

Where the novel cost relates to a resource that is owned by the local authority or funded through public money—a justification for why the cost is being recharged to the Returning Officer (noting that such charges are generally not expected). If the resource is being procured from an external supplier, multiple quotes should be provided to demonstrate value for money and ensure procurement transparency.

Specific agreement is needed for (but not limited to):

- The use of consultants for the delivery of the poll. The use of consultants will only be accepted for reimbursement when there is a need to fill in a vacancy for an ESM post.

- Any novel items of equipment which you intend to use for the poll.
- Purchasing novel IT goods and services.
- Other novel or additional costs.
- Items that have previously been accepted but where the charges have significantly increased.

We reserve the right to refuse reimbursement of these costs unless prior agreement from the ECU has been obtained.

For information on legal advice, please refer to the relevant section of this guidance - 1.8.6 *Legal services*.

The following sections offer advice on the costs that can and cannot be claimed back from the Consolidated Fund.

1.8.2 Polling Station Costs

Accommodation - Use of Public Buildings

Legislation makes provision to support ROs to run polls and, in particular, provides for specific provision in relation to use of public buildings. ROs can be faced with polls arising at short notice (especially by-elections) and need to have access to resources to run the poll regardless.

Relevant legislation¹⁶ provides that public buildings paid for by the public purse, including principal area and parish and community council premises, should be made available to ROs without a hire charge for the purpose of taking the poll. Running costs (e.g., heating and power) for days of use can be reimbursed from the Consolidated Fund.

This includes schools which receive public funding. However, we also appreciate that over recent years some schools have been reluctant to offer rooms to ROs for the purposes of running polls and, if the polling day is known well in advance of the election, schools might agree in liaison with the local authority to set those days as inset days to avoid disruption. If an RO cannot use a school or schools for polling stations, hire of other buildings can be reimbursed.

For the avoidance of doubt, aside from costs for heating and power, the Consolidated Fund cannot reimburse ROs for the costs of hiring school rooms as polling stations or for any loss of revenue that may result from their use as polling stations.

The ECU can reimburse a nominal cost where a caretaker is required to open and close public venues used as polling stations. Note the cost for a caretaker to be on-site for the full day would not normally be reimbursed. Any claim for that would have to be justified.

¹⁶ <https://www.legislation.gov.uk/ukpga/1983/2/schedule/1/part/III/chapter/n1/crossheading/use-of-schools-and-public-rooms>

Polling Station Requirements

We recommend that ROs assess the requirements for their polling stations individually. We are unlikely to fund blanket claims unless there is clear evidence of the need for equipment or heaters without any assessment having been made as to whether all polling stations required it or whether it was only needed at some. While we do not require details to be provided for individual polling station requirements, we may request evidence which shows that you have considered these requirements for each polling station.

Obviously, staff should be prepared for the likely conditions on the day in terms of weather and availability of heat and light at their polling station and make sure they have suitable clothing and refreshments. Should there be a specific need for items such as blankets or torches at a particular polling station then we will consider reasonable costs as necessary.

Staff are expected to come prepared for the anticipated conditions on polling day, including weather and the availability of heating and lighting at their polling station. This includes bringing appropriate clothing and personal refreshments. In exceptional cases where specific items such as blankets or torches are genuinely required due to the conditions at a particular polling station, we will consider covering reasonable and minimal costs—provided there is a clear and justified need.

Use of Private Venues

We recognise that it is not always possible, especially if a poll is called at short notice, to request the use of publicly funded premises. The venues available to the RO may be limited and possibly charged at a rate considerably higher than they would normally pay. In such cases where no other cost-effective alternatives exist, the ECU can consider reimbursement of these higher costs where this has been raised with the ECU in advance. This is to ensure there is sufficient funding to meet the higher cost once the claim has been submitted.

For private venues, we would expect the cost of hire to include a key holder/caretaker to open and close the venue.

Temporary Accommodation

In circumstances where there is a shortage of polling station venues, ROs may have to hire temporary accommodation, such as portacabins. These costs can be reimbursed where necessary and reasonable, but ideally such accommodation would only be used as a temporary measure until permanent accommodation can be found.

The [ECU](#) should be informed if no permanent accommodation can be identified as temporary accommodation costs significantly more than other public or private venues. The Elections Funding Team will then need to take these additional costs into account when allocating funding for the conduct of the election.

Equipment

The cost of purchasing substantive re-usable equipment (e.g. polling booths, ballot boxes and other 'capital' items) which are used in both local and national polls has been queried in the past and we have devised a system which provides for reimbursement in relation to use

for scheduled polls. This operates on the basis of the cost being divided by the number of scheduled polls known about at the time of purchase that will occur in the lifetime of the equipment. We have referred to this as ‘apportionment’ of costs.

For the purposes of calculating the apportionment of equipment costs, ROs should anticipate one PCC and one UKPGE to take place every four and five years respectively in England and Wales, and in Scotland one UKPGE to take place every five years.

All other scheduled polls, except for parish/community council elections, should be included in the calculation for apportionment of capital item costs. Where more than one election is scheduled to take place on the same day, they should still be treated as separate entities for the purposes of apportioning equipment costs.

Where any proportion of the cost is for a poll paid for by the Consolidated Fund, that proportion is to be included in the claim made for that poll. If any additional polls are introduced during the lifetime of the equipment (for instance, principal area by-elections, neighbourhood planning and council tax referendums, UK Parliamentary by-elections, local authority governance referendums or national referendums) these will have no effect on the initial apportionment for payments that have already been agreed.

Overall, a local authority will be likely to benefit from that calculation as they will be more likely to have unscheduled local polls and any residual value will sit with the local authority.

In cases where equipment is reusable across multiple polls, the associated costs should be apportioned over its expected lifetime. This ensures fair and efficient use of public funds, particularly where the equipment supports both local and national elections.

In order to continue to monitor how this system works we will need each RO to notify us of the purchase of equipment and the calculation as to number of polls over the lifetime of the product. We can then ensure we are paying the relevant amount when any future expenditure on equipment will be due.

We expect major items of polling station equipment, such as modern polling screens and ballot boxes, to last at least 15 years in regular use. Any lower estimation of the life of such equipment will need to be justified in more detail in your claim. Estimates of a longer life expectancy will, of course, be acceptable.

We have provided an example below setting out how the cost of equipment should be apportioned, and what portion of the total cost can be claimed from the Consolidated Fund. For the purposes of the example, the total cost of the equipment is £20,000 and this has an assumed lifetime of 5 years. For the purposes of the example, at the time the equipment is purchased there are 5 polls scheduled to take place during its lifetime.

- The sum of the equipment (£20,000) will be divided equally by the number of polls scheduled to take place over the equipment’s lifetime.
- In this example, there are five polls scheduled to take place over the equipment’s lifetime. This leaves an apportionment figure of £4,000 per poll.

- For any polls funded from the Consolidated Fund, this apportionment figure can be claimed through the election expenses claim form, following the relevant poll.

Total Equipment Cost = £20,000					
Equipment Lifetime = 5 years					
Timeline	Year 1	Year 2	Year 3	Year 4	Year 5
Poll Type	UKPGE	Local election	Local election	No election	UKPGE Local election
Apportionment (%)	20%	20%	20%	-	20% UKPGE 20% Local election
Apportionment (£)	£4,000	£4,000	£4,000	-	£4,000 and £4,000
Source of Funding	Consolidated Fund	Local Authority	Local Authority	-	Consolidated Fund Local Authority
Claim relevant proportion through ECU following the poll	Yes	No	No	-	Yes

Please note that gross costs should only be included in the sum to be apportioned where VAT is being claimed from the Consolidated Fund. VAT on equipment used for local polls can be claimed directly from His Majesty's Revenue and Customs (HMRC). Where VAT has been claimed from HMRC, it is the net cost that should be apportioned. ROs can refer to Appendix B of this guidance for further information provided by HMRC¹⁷ on this matter - the HMRC guidance is also available online.

Please note: Gross costs should only be included in the apportionment **if VAT is being claimed from the Consolidated Fund**. This applies in two distinct contexts:

- Apportioning costs between constituencies for the same reserved poll (e.g. UKPGE):**
 - If an invoice relates solely to a reserved poll, such as a UK Parliamentary General Election, and needs to be split between different constituencies, the **gross cost** (including VAT) should be apportioned, as the VAT is reclaimable from the Consolidated Fund.
- Apportioning costs across different types of polls (e.g. reserved and local):**

¹⁷ HMRC guidance on VAT <https://www.gov.uk/hmrc-internal-manuals/vat-government-and-public-bodies/vatgpb8680>

- Where an invoice covers **services for two distinct polls** that can be clearly separated between the relevant funding sources (e.g. printing of: poll cards, ballot papers, postal votes, and postage), the **VAT should be apportioned** along with the cost. In these cases, each funding source should bear its share of the cost **inclusive of VAT**.

In all other cases — such as equipment or services that may be used for both reserved and local elections — the cost should be apportioned **net of VAT**, as the VAT is fully reclaimable by the local authority from **HMRC**. Returning Officers (ROs) should refer to **Appendix B** of this guidance for further clarification from HMRC. The HMRC guidance is also available online.

Ballot Papers

Where a single contract has been entered into for ballot paper (including tendered ballot papers) and postal ballot pack production, for ease of identifying costs for reimbursement, it is best if you require the contractor, as part of the contract, to identify the costs separately so that they can be accounted for appropriately.

If this not available, in most cases it should be possible to identify these costs separately simply by dividing the ballot paper costs in the same ratio of polling station voters to postal voters.

Accounting for Polling Station Costs

Polling station costs, including accommodation, heating, power, setting up etc., must be supported by evidence, such as paid invoices or signed vouchers if it is to be reimbursed. Reports generated through Elections Management Software systems can be accepted where they are signed by the RO. These reports should still provide an itemised breakdown of any costs incurred. Booking confirmation for polling stations will not be sufficient in itself – evidence of actual payment is required. Only in exceptional circumstances will a booking confirmation signed by the RO as to being accurate for the amount paid can be accepted.

Note – we cannot have the submission of endorsed booking confirmations become the norm, as the law requires evidence.

The evidence provided should make clear why costs have been incurred. Where it is not clear what an item relates to, more detailed narratives of what they include will be needed. These should also show the VAT incurred where applicable. For example, if the invoice includes several cost components these must be itemised (venue hire, heating & lighting etc.).

With regard to equipment, your claim should make clear how you have determined the apportioned value of the equipment claimed for. It should include supporting evidence, such as invoices showing the initial cost, and any advice you may have received about the useful life of the equipment. It will be necessary to retain all these for submission with future claims, and you should keep records so that you can refer the ECU or the appropriate

body to this when making a claim at a future date. Other invoices or other supporting evidence should also be submitted and listed on the form. This evidence should include any relevant invoices, the agreed apportionment for any piece of equipment and any other supporting information. For example, where the lifetime of major items of polling station equipment, such as ballot boxes, is shorter than 15 years an explanation should be provided in support of the claim.

Costs that cannot be claimed for Polling Stations

Polling Stations	
Item	Further Information
Premises paid for and maintained at a public rate must be made available to the RO at no cost other than heating and power.	As the public purse is already paying for the premises, the Consolidated Fund would not be expected to pay additional costs for their use other than for heating and power. We can accept nominal payments where a key holder/caretaker is required to open and close the venue. The cost for a caretaker to be on-site for the full day, however, cannot be reimbursed.
Loss of revenue for venues hired as polling stations, including bar or restaurant takings, membership subscriptions, payment of wages for centre staff or lost revenue from car park fees. This includes any lost revenues for nurseries or schools.	The Consolidated Fund can only reimburse necessary and reasonable costs incurred for the purpose of conducting the poll. Loss of revenue does not fall under these criteria and is not a cost that can be reclaimed from the Consolidated Fund.
Additional permanent lighting inside or outside polling places.	The owner has responsibility for the upkeep of the venue so these are not costs that can be paid for from the Consolidated Fund. We can consider reasonable claims for temporary lighting if it can be justified on the grounds of value for money and that it was necessary for the taking of the poll. This may include, for example, additional temporary lighting to accommodate a snap election called in winter.
Any costs that relate to adapting or changing the venue permanently should be paid for by the owner, unless this is agreed in advance with the ECU.	The owner has responsibility for the upkeep of the venue, so these are not costs that should be paid for from the Consolidated Fund. Where changes are required specifically for a national election, the ECU should be contacted prior to the poll for further guidance.

Supervision and repair of polling equipment including painting	If repairs are needed and these can be shown to provide value for money, they may be reimbursed with prior agreement from the ECU. However, the Consolidated Fund cannot reimburse the RO for payments to an additional member of staff solely for the purpose of supervising these repairs.
Health and Safety Assessments	These assessments should be undertaken as part of the polling district and polling place review, rather than as part of the conduct of the poll. As every local authority must regularly review their polling districts and polling places, we would only consider claims from the Consolidated Fund for these charges in exceptional circumstances and with prior agreement.
First aid kits	Venues used as polling stations should already provide first aid kits. Where first aid kits are required at temporary polling stations (portacabins) we will consider reasonable cost of up to £20 per kit. Higher costs should be raised with the ECU in advance. A blanket approach of providing a kit for every polling station will not be accepted unless there is a justification for doing so.
Electric kettles and microwaves for use in polling stations	While these items are allowed in polling stations, it is not necessary to purchase them for the conduct of the poll. As a result, the cost of their purchase cannot be reclaimed from the Consolidated Fund.
Interpreters such as in providing specialist translation services at polling stations.	The legislation does not provide for interpreters at polling stations or their funding from the Consolidated Fund.
Flags or bunting at polling stations	Provision of such items is not necessary for the efficient and effective conduct of the poll and will not be reimbursed from the Consolidated Fund.
Floral/shrub or other decoration for any stage of the polling process	Provision of such items is not necessary for the efficient and effective conduct of the poll and will not be reimbursed from the Consolidated Fund.
Hire of polling equipment from local authorities	The Consolidated Fund will reimburse the correct apportionment of the cost of purchasing equipment as set out in the guidance above. However, it cannot reimburse the RO for the cost of hiring polling equipment from the local authority.
Provision of unnecessary items e.g. torches	Provision of items that are not necessary for the efficient and effective conduct of the poll cannot be reimbursed from the Consolidated Fund. While

	torches are generally considered unnecessary for the taking of the poll, should there be a power outage at a particular polling station, we will consider reasonable costs incurred in the event of an emergency.
Polling station security	We will only consider covering security costs where there is supporting police intelligence or a history of previous concerns at the polling station. Please note that if such security is needed then this would count as novel expenditure and needs to be raised with ECU in advance of the poll and will be agreed on a case-by-case basis for each poll.
External cleaning and waste disposal	Cleaning of areas outside of polling stations, including streets, is not the responsibility of the Returning Officer. Waste disposal should be included in the venue hire agreement and not incur additional costs. Overall, cleaning and waste management remain the responsibility of the local authority or the owner or manager of the venue hired for this purpose.

*Tablets/electronic pollbooks and data management systems at polling stations:

Although ROs and ESMs have been keen to have clarity on what will and will not be reimbursed, the ECU has always been happy to consider novel suggestions to avoid any surprise in costs not being reimbursed.

There are a number of polling station pollbook and data management systems being put forward by different suppliers and these are no longer a 'novel' item, so we have updated the guidance to recognise that position.

It is a matter for ROs whether they want to use such systems, and to satisfy themselves that they meet the requirements of legislation. As with other changes, we will reimburse costs where they are equivalent or less than would be incurred in undertaking the polling station work in a traditional fashion.

[Please refer to a worked example of how tablets may be used to save costs at polling stations in Appendix D.](#)

1.8.3 Poll Card Costs

Printing

Where poll cards are combined, costs should be apportioned as necessary between the relevant polls. This includes, for example, splitting postage costs between the relevant polls for the poll cards in question. Parish or community council elections should not be included in this apportionment.

Where poll cards are produced in-house, any equipment costs should be listed and supported by appropriate invoices. Claims for equipment should be made on the same basis as other equipment, taking into account its annual depreciation value and use across a number of elections.

Similarly, printing costs should be recorded, and the invoices submitted. Where printing and stationery has been sourced in-house, confirmation of the cost from internal finance departments will be sufficient evidence.

Preparation and Issue

As a task often undertaken in-house, most of the of costs for this head will fall under staff payments and will be covered in the relevant section of this guidance. However, ROs should also note that where poll card printing is outsourced, additional costs claimed under this head should be minimal. These costs may cover, for example, the cost of proofing poll cards with printers, producing and checking data for poll cards or, where poll cards are going to be hand delivered, sorting poll cards into canvasser rounds. As with other parts of the election process that have been outsourced, the Consolidated Fund will only reimburse the preparation and issue of poll cards at a rate comparable to what the task would have cost, were it undertaken in-house.

Postage or Delivery

It is clear from previous claims that many ROs use business delivery rates or hand deliver using casual staff. We will accept claims for use of either method. If using hand delivery, the costs should be reasonable and should not exceed the rates provided in this guidance.

While we recognise using existing trusted service providers might be preferred, we also expect ROs to consider cost-effectiveness. This may involve changing suppliers to benefit from lower rates and higher discounts. A change in supplier should not, however, affect the quality of the service provided.

Combined Poll Card

As with postal vote packs, from the electors' point of view where there are combined polls, it is more convenient and less confusing to receive one poll card for all the combined polls taking place on one day, rather than separate ones for each. In areas where the election is combined with other polls, issuing joint poll cards in this way may be good practice and an approach that puts the needs of the elector first. We understand there may be circumstances in which the RO will choose to issue separate poll cards, e.g. for a 'snap' Parliamentary election. We recognise the decision as to whether to combine poll cards is entirely for the individual RO for those elections, although we will consider the necessary costs incurred, we may ask for further explanation as to why the decision was taken.

Empty Property Poll Cards

The Consolidated Fund will not reimburse the cost of empty property poll cards. This is a registration activity.

Poll Card Costs that cannot be claimed

Poll Cards

Item	Explanation
Empty property poll cards	This is a registration activity, rather than a conduct one, and so cannot be reimbursed from the Consolidated Fund.
Higher Downstream Access delivery costs than using Royal Mail	As ROs have the option of using Royal Mail, any delivery costs incurred through alternative suppliers should be at a saving when compared to rates offered by Royal Mail.
Hand delivery at a rate that exceeds what has been set out in this guidance.	Hand delivery should be carried out at a reasonable cost. As ROs have the option of using Royal Mail, the costs of hand delivery should be done at a saving when compared to Royal Mail rates, and in line with the rates provided in this guidance. This is to achieve value for money.

1.8.4 Postal Voting Costs

Printing

Where printing and stationery has been sourced in-house, confirmation of the cost from internal finance departments will be sufficient evidence. Your selected postal supplier will probably submit a single invoice for their postal voting services, but the invoice will need to breakdown the costs into separate elements (outward post, inward post, etc.).

While we recognise using existing trusted service providers might be preferred, we also expect ROs to consider cost-effectiveness. This may involve changing suppliers to benefit from lower rates and higher discounts. A change in supplier should not, however, affect the quality of the service provided.

Postage

ROs may choose to either send postal vote packs by post or have these hand delivered by staff. We will accept claims for either method. If hand delivering, the costs should be reasonable and in line with the way we have calculated rates for hand delivery of poll cards as set out in this guidance (see rates under 2.9.5). The upper rate is set at 75% of the current business rate for Royal Mail postage. The lower rate is set at what some Returning Officers are already paying at local elections.

As ROs have the option of using Royal Mail as the universal service provider, any costs incurred for hand delivery should be at a saving when compared to the rate offered by Royal Mail.

You will also need to advise us on the final number of postal voters in your area as part of your claim submission.

Royal Mail Licence costs

The costs of Royal Mail licences for postal votes and costs for access fees can be reimbursed from the Consolidated Fund for UK Parliamentary and PCC elections. Where access fees cover both local and national polls held in combination, these should be split equally between the relevant sources of funding.

The costs for postal vote sweeps are paid for centrally from the Consolidated Fund and are not items of expenditure that ROs would need to incur, unless there is a by-election. In this case, the RO can have this cost reimbursed if they deemed a sweep was necessary.

Accommodation

You can claim for the accommodation costs of preparing postal ballot packs. We will only reimburse ROs for the use of local authority accommodation where there is usually a charge for using the rooms and if the amount that you are looking to claim is consistent with or below the rate usually charged. If there is a charitable rate used by the local authority, we would expect the rate charged not to exceed this.

You cannot claim for refreshments for staff when preparing postal ballot packs, and the onus is on ROs to prepare staff for the working conditions they can expect. If there are circumstances that mean the health and safety of your staff will be compromised if you do not provide refreshments, we may agree claims in those exceptional circumstances if this is raised with the ECU in advance of the poll.

Any accommodation costs should also be set out with supporting evidence. Once again, internal confirmation of the cost from internal finance departments will be sufficient evidence where appropriate.

Equipment

As with polling station equipment, any contribution to postal voting processing equipment and the associated IT is not intended to cover their whole cost. It represents the proportion of those costs for the election(s) funded by the Consolidated Fund in that area.

Typically, Postal Vote Identifier (PVI) checking software is supported by annual licence fee payments similar to a maintenance contract. Your claim may also cover the supply of scanners, other equipment, and software upgrades to assist in using the particular system purchased. These costs may also be queried further where they do not appear necessary for the conduct of the poll. Please see the section below on signature verification licences for more information on this cost.

Where polls are combined, any extra costs arising solely from providing equipment for the use of electors/staff in respect of the local elections e.g. grass skirts, cannot be reimbursed from the Consolidated Fund. Similarly, anything needed purely for the poll paid for from Consolidated Fund should only be claimed via the ECU.

In Scotland, the use of postal vote management systems is more prevalent than in other parts of the UK. In those circumstances, ROs may hire software/hardware from the supplier, rather than purchase it outright.

Equipment to support disabled electors

Returning Officers (ROs) have discretion in the types of equipment they provide to support disabled voters at polling stations, but this flexibility must be exercised within the framework of [Electoral Commission guidance](#). The Commission sets out a list of recommended equipment designed to ensure accessibility, and while ROs are not strictly bound to this list, failure to provide appropriate support may expose them to the risk of discrimination claims.

Voters are also entitled to request specific forms of assistance beyond what is listed, and ROs are expected to make reasonable efforts to accommodate these requests. In doing so ROs will need to consider proportionality and the options for providing the requested support as there may be a number of means to address the assistance required.

NOTE - At present some suppliers are examining options for rental of kit to support voters who have sight-loss. Once costs are known there needs to be an assessment of which route may provide best value given there may be price advantages to ownership but other benefits to renting, such as avoiding broken kit and greater flexibility to move to an updated or different product. We will update this guidance when we have a clearer picture of the options and costs.

Election Management Software

Electoral management software (EMS) systems underpin a number of electoral processes, especially registration. ROs and Electoral Registration Officers (EROs) need to have this software in place continuously, whether or not there is an election funded from the Consolidated Fund.

Whilst the EMS is used for a number of registration activities, the costs of registration activities cannot be claimed from the Consolidated Fund.

Local Authorities / Electoral Registration Officers universally have an Electoral Management System (EMS) in place at all times to carry out their statutory duties. Because the system supports both registration and conduct activities, we assume that half of the total EMS cost relates to registration, which cannot be reimbursed from the Consolidated Fund. Of the remaining conduct-related cost, a maximum of half can be reimbursed in any year where there is an election funded by the Consolidated Fund. This equates to 25% of the total EMS cost.

If more than one Consolidated Fund-funded poll occurs in the same year, this 25% is split equally between those polls. For example, if a UK Parliamentary general election and a Police and Crime Commissioner election take place in the same year, each poll would contribute 12.5% of the total licence cost.

ROs should note that once the full 25% has been claimed in a given year, no further claims can be made for EMS costs for any additional Consolidated Fund-funded polls.

EMS Apportionment in a year with UK Parliamentary and/or PCC Elections

A local authority has to have an EMS system and licence in any event but when elections take place it is deemed the costs of the licence are split between registration and conduct.

For funding purposes, it is deemed that 50% of the total cost is for registration in a year when elections take place with the remaining 50% treated as conduct related.

Where a UK Parliamentary and/or PCC election take place in any given year we will pay up to a quarter of the whole licence cost.

If there is more than one UK Parliamentary and/or PCC election in any given year then the 25% should be split equally between the claims for each poll.

If a UK Parliamentary and/or PCC election has already take place and full 25% has already been claimed, an RO cannot claim for more from the Consolidated Fund.

Where any new IT process that incurs a cost is being introduced, it should be done to meet a particular need or to save costs. There have been instances where IT based processes have been introduced that were unnecessary and have increased costs overall. The ECU will not reimburse the cost of any such new system beyond what the costs of any necessary process would have been.

Signature Verification Licence

As with EMS, local authorities will need to have a signature verification licence for local elections. Consequently, in years where there is a scheduled election funded from the Consolidated Fund, the ECU will reimburse up to a maximum of 50% of the licence cost for that year. When there is more than one scheduled election funded from the Consolidated Fund in a year, that proportion will be split equally by the number of Consolidated Fund polls taking place.

Accounting for Electoral Management Software and Signature Verification Licences

All costs incurred for EMS and signature verification licences must be supported by appropriate evidence. You must provide an itemised invoice that shows separately the costs incurred for the EMS licence and the costs incurred for signature verification licence. A separate cost line should be provided for each. Costs for other services, for example mapping software, should not be included. Where other goods or services have been included in these costs line or where the licence costs have not been separated out, the ECU can challenge the expenditure and may request further evidence to consider whether it is a cost that can be reimbursed.

Managed services

Where a “managed ballot service” is used, the Consolidated Fund will reimburse only those costs that would have been incurred if the service had been provided in-house. The Consolidated Fund can reimburse those rates that were necessary for the service to take place but additional rates for other services not required should the function have been undertaken in house, cannot be reimbursed from the Consolidated Fund.

This also means we will not reimburse costs around the provision of project management, project manager packs, reporting, training and user guides for project managers.

When claiming for any costs in respect of a managed ballot service you should ensure that detailed breakdowns are provided for all elements of the service and ensure your claim reflects only essential costs. Contractors should not object to this, but if there are any questions, you should point out that we require transparency in the process of funding elections. You as the customer, the Government as the funding source, and the public who ultimately pay for it, have a right to know what each element of the process has cost.

Combined Postal Vote Packs

Where combined postal vote packs can be issued, this is the preferred option, both for elector convenience and to achieve savings. This benefits both the Consolidated Fund and local authorities.

Where combination takes place, costs should be apportioned as necessary between the relevant elections including, for example, postage costs for despatch and return and the cost of checking postal vote identifiers. We understand there may be circumstances in which the RO will choose to issue separate postal vote packs, e.g. for a ‘snap’ Parliamentary election. We recognise the decision as to whether to combine the postal vote issue is entirely for the individual RO for those elections, although we will consider the necessary costs incurred, we may ask for further explanation as to why the decision was taken.

Replacement and Additional Postal Vote Packs

The Consolidated Fund will reimburse the production of additional postal vote packs up to 20% of the number of postal voters in the constituency or voting area. For example, in a constituency of 20,000 postal voters, the Consolidated Fund can reimburse the production of up to 4,000 contingency/replacement postal vote packs. The proportion of 10% had previously been agreed, but recent conversations with the AEA and SOLACE, and the introduction of online absent voting, have led us to think this should now be increased to 20%.

If there is a requirement to produce a higher proportion of contingency/replacement postal vote packs than this, it should be discussed and agreed with the ECU before any additional packs above that 20% limit are produced. Where more postal vote packs need to be printed because of delivery issues or a higher-than-expected demand for postal votes, we will consider these costs.

In cases where a full re-issue of postal vote packs would be required as a result of a printer error, the ECU would expect the printer to cover the resulting costs. It would not be for the

Consolidated Fund to reimburse costs where the supplier is at fault. ROs may want to consider including this as part of their contract with the supplier.

Postal Vote Costs that cannot be claimed

Postal Votes	
Item	Information
Hand delivery at a rate that exceeds what has been set out in this guidance.	Hand delivery should be carried out at a reasonable cost. As ROs have the option of using Royal Mail, the costs of hand delivery should be done at a saving when compared to Royal Mail rates, and in line with the rates provided in this guidance.
The full cost of a managed ballot service (with the exception of the costs stated above)	Expenditure incurred for the conduct of the poll must provide value for money. The local authority should support the RO for the conduct of the elections. We recognise that this is not always possible. As a result, the Consolidated Fund can reimburse part of the costs of a managed ballot service where necessary. However, as the costs of managed ballot services are significantly higher than the cost of undertaking this function in-house, the Consolidated Fund will only reimburse a cost equivalent to what this service would cost to provide in-house.
The full cost of the annual EMS licence (with the exception of the proportion mentioned above).	The full cost of the annual EMS licence will not all be attributable to the conduct of elections paid for from the Consolidated Fund. It will be used for registration purposes and for local polls. As a result, the Consolidated Fund cannot reimburse the full cost of the annual EMS licence. It can reimburse the appropriate amount as set out in the guidance above, in years when a national poll occurs.
The full cost of the annual Signature Verification licence (with the exception of the proportion mentioned above)	The full cost of the annual Signature Verification licence will not all be attributable to elections paid for from the Consolidated Fund. It will also be used for local polls. As a result, the Consolidated Fund will not reimburse the full cost of the annual Signature Verification licence.

	It can reimburse the appropriate amount as set out in the guidance above, in years when a national poll occurs.
Downstream Access postage rates if higher than Royal Mail	As ROs have the option of using Royal Mail, any delivery costs incurred through alternative suppliers should be at a saving when compared to rates offered by Royal Mail.
Loss of revenue in relation to postal vote opening venues	The Consolidated Fund will only reimburse necessary and reasonable costs incurred in relation to the hire of postal vote opening venues. Loss of revenue is not a cost that can be reclaimed from the Consolidated Fund.
Postal Vote Opening Session refreshments	We would expect members of staff to bring their own refreshments, as would be the case in other work settings.
Postal Vote sweeps	Postal vote sweeps are paid centrally by MHCLG for polls funded from the Consolidated Fund. As a result, they are not costs that ROs are required to pay and should not be claimed through the claim form. The exception is for by-elections, as outlined in this guidance.

1.8.5 Count costs

Accommodation

Accommodation costs are primarily intended to cover hire of premises. They also cover such things as heating, power, caretaking, set up and breakdown costs. We are aware of the wide variation in charges for suitable count accommodation throughout Great Britain, as well as the difficulty in obtaining it for some areas. We expect ROs to make every effort to keep costs to a minimum and consider that enough flexibility has been built into the system to compensate for any unexpected extra accommodation costs. However, if ROs anticipate significant extra accommodation costs they should contact the ECU as soon as possible, setting out the difficulties in finding a suitable venue. This should be done so that any additional costs likely to be incurred in advance can be agreed. We can then ensure that there is sufficient funding to meet the cost once the claim has been submitted.

Under the accommodation costs, there is also an allowance for expenditure on light refreshments (for example tea, coffee, water and biscuits) for count staff. Expenditure on providing meals for staff will not be accepted and only light refreshments can be

considered. Refreshments for candidates and/or their agents are not considered a necessary expense for the conduct of the election and cannot be reimbursed.

Contingency venues

As a matter of course we do not consider there is a need to provide funding for contingency count venues. However, if you have significant concerns and justification as to why a contingency count venue is required in addition to the main venue you should [contact the ECU](#) as soon as possible before making any such arrangements.

ROs may wish to identify suitable alternatives for use as a count venue which can be done without incurring any upfront costs. Should these alternative venues then be required for the count, necessary and reasonable expenditure for their hire will be considered by the ECU.

Equipment

Claims can be made for the equipment costs of both hardware and stationery items (such as trays, tables, paper clips, elastic bands and similar special items for the count, if not already held) if necessary for the efficient and effective running of the poll.

The cost of necessary materials specifically for a single poll paid for by the Consolidated Fund, such as paper clips, can be claimed through the claim form in full.

The cost of equipment which may be used for other polls or other purposes, such as tables, should not be claimed in full. In these cases, claims for a proportion of their cost, related to their expected life and usage at scheduled polls, will be considered. Claims for a contribution to the costs of any necessary IT equipment to be used at the count will also be considered on the same basis.

Any apportionment of costs should reflect all the scheduled polls expected to take place in the lifetime of the equipment. Unscheduled polls, such as by-elections will not alter the original apportionment and should not be retrospectively factored into the calculation.

The Consolidated Fund will not reimburse the costs of purchasing new laptops or computers. These are likely to be used by the local authority for purposes other than national polls, so it would not be appropriate for the Consolidated Fund to reimburse this cost. Similarly, if they were going to be used solely for polls paid from the Consolidated Fund, then the purchase of such equipment for one-off usage would not provide value for money.

Stage and Audio Equipment

Necessary costs for audio and staging equipment at the count will be considered by the ECU. This is on the basis these items should be obtained at a rate that is reasonable and supported by evidence. For example, by providing at least three quotes demonstrating value for money, and/or including the costs clearly itemised where they are provided by the venue.

Transport

Transport costs can be reclaimed in order to cover the costs of transporting ballot boxes and documentation from polling stations to the count, and from the count to the final destination. It is also intended to cover any costs of transport of postal votes and other equipment to and from the count centre. ROs should aim to keep such costs reasonable and limited to what is necessary for the conduct of the elections.

Verification and Combination

Where there is a combination of polls, the cost of verification should be split between the relevant sources of funding.

Recounts

ROs should aim to meet the costs of any recounts from within their overall budget, taking advantage of any savings already made elsewhere where possible. However, where the recount is of a significant nature, we will consider claims for extra funding, provided all the accounting requirements are met. Namely that all other costs incurred and claimed were necessary and reasonable for the conduct of the elections.

Clearly it will not be practicable to inform us of a need for further funds for recounts at the time they occur, but you should make contact as soon as possible after the event to explain the circumstances.

Accounting for Count Costs

Count costs, including accommodation, equipment etc., must be supported by evidence, such as paid invoices or signed vouchers in accordance with the scrutiny level required. Booking confirmations for count venues will not be sufficient.

The evidence provided should make clear why costs have been incurred. Where it is not clear what an item relates to, costs will require more detailed narratives of what they include and show the VAT incurred where applicable. For example, if the invoice includes several cost components these must be itemised (venue hire, equipment use, etc.).

Count costs that cannot be claimed from the Consolidated Fund

The Count	
Item	Further Information
Loss of revenue for venues hired as count or verification centres, including bar or restaurant takings, car parking fees, membership subscriptions, payment of wages for centre staff.	The Consolidated Fund will only reimburse necessary and reasonable costs incurred for the purpose of conducting the poll. Loss of revenue is not a cost that falls under these criteria and is not a cost that can be reclaimed from the Consolidated Fund.
Purchase of flat screen televisions, radios, walkie talkies, bluetooth wristbands, mobile phone signal boosters (unless necessary), Wi-Fi routers or other related items (without prior permission).	Most venues are likely to already have Wi-Fi capabilities installed, and it is therefore not generally something the Consolidated Fund will reimburse without prior approval.

	Any costs required to repurpose the venue must be raised with the ECU in advance of the poll, especially where the changes are likely to be permanent in nature. We may consider boosters for mobile phones in areas of poor signal reception. Where this is the case, it will need to be properly explained in the accounts.
Refreshments for the media, candidates, party agents, security personnel or police at the count or verification centres.	This is not a cost that is necessary for the conduct of the poll. We would expect the personnel mentioned to bring their own refreshments.
Refreshments for count staff that exceed £6 per head.	Given that the count will usually take place overnight for parliamentary elections, and the large numbers of staff required at the count, there is a small cost per person for refreshments that can be claimed from the Consolidated Fund. This only covers light refreshments such as tea, coffee, water and biscuits. Anything more than this, such as lunches or meals, would have to be provided by staff themselves as in any other work setting.
Photography, outdoor signage and large banners (This does not include signs necessary for the running of the count process e.g. table signs)	These costs are not necessary for the efficient and effective conduct of the poll, and so cannot be claimed back from the Consolidated Fund.
Additional permanent lighting inside or outside count centres.	We may consider reasonable claims for temporary lighting if it is necessary. The RO must obtain multiple quotes to demonstrate value for money.
Any costs that relate to adapting or changing the venue permanently should be paid for by the owner, unless agreed in advance with the ECU.	The owner has responsibility for the upkeep of the venue, and these are not costs that should be paid for by the Consolidated Fund. In exceptional circumstances where changes are required specifically for a national election, the ECU should be contacted prior to the poll for further guidance.
Floor covering at count or verification centres, unless this has been agreed for particular reasons with the ECU.	This is not a cost that is usually necessary for the conduct of the election. In certain circumstances where floor coverings are required specifically in order to use a venue (as a condition of hire) for a national election, and provide a saving over

	alternative venues, the ECU should be contacted for approval and further guidance.
Police at the Count	Costs for the police to attend will require prior approval from the ECU as this should be necessary only in exceptional circumstances.
Interpreters providing specialist translation services at the count	The legislation does not provide for the funding of interpreters at the count from the Consolidated Fund. Hence, this is not a cost that can be claimed for. An exception for this is made for Welsh translations. See section 1.8.5 under “Translations” for more information on this.
T-shirts/sweatshirts/high-visibility vests for the count staff	These items are not considered necessary for the conduct of the election. There is no requirement to provide staff with items of clothing or a uniform, and these items cannot be reimbursed from the Consolidated Fund. High visibility vests are generally not considered an essential election expense, but minimal costs may be considered if justified—such as for staff working outside of the count venue at nighttime.
Stage backdrops, printed banners, lecterns, tablecloths or coverings, flowers and other decorations not deemed necessary for the count venue	These items are not necessary for the conduct of the election and cannot be reimbursed from the Consolidated Fund.
Visual Equipment	This equipment is not thought to be necessary for the efficient and effective running of the election; however, reasonable costs may be considered where there is justification for their use.
St John’s Ambulances or other first aid cover at the count	Venues used for the purposes of the count should already provide the necessary first aid cover required. As a result, additional first aid cover, including the provision of St John’s Ambulances, cannot be reimbursed from the Consolidated Fund.
Waste disposal	Cleaning of areas outside of the count venue, including streets, is not the responsibility of the Returning Officer. Waste disposal should be included in the venue hire agreement and not incur additional costs. Overall, cleaning and waste

	management remain the responsibility of the local authority or the venue hired for this purpose.
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1.8.6 Other Costs

Textbooks

In the past, the cost of one textbook per council (for instance “Parker’s Law and Conduct of Parliamentary Elections”) has been judged to be an acceptable election expense, since it can be argued to be necessary to ensure the proper conduct of the election. However, since any textbook can be used to assist with other elections and for general electoral purposes, the UK Government has only been prepared to fund the initial purchase, and not any annual subscriptions. We will only consider the purchase of a new textbook if this has not been kept up to date for more than five years.

Any claim which is made for this expense should be accompanied by the appropriate invoice.

Translations

ROs in Wales can claim for the costs of Welsh translations of documents, where these are necessary. Instances should be limited as the EC and MHCLG have already provided full Welsh translations of all forms and notices. MHCLG does not fund translations of electoral documents into other languages, as these are often available free of charge from the Electoral Commission.

Legal Services

If you are seeking legal advice and it relates to a possible or threatened challenge to the poll, you should talk to your insurers in the first instance who should provide you with legal support.

If you are seeking legal advice for other matters related to the conduct of the poll, [please contact the ECU](#) before doing so. If the matter is then such that ROs need legal advice, as has been the case with PCC election addresses (to name one example), we can discuss options. If the matter is urgent and you require immediate legal advice, please ensure that you inform ECU as soon as practicable so that we can ensure that sufficient funding is available to cover the relevant costs.

Mobile phones

The purchase of mobile phones cannot be reimbursed from the Consolidated Fund. There are very few people who do not own a mobile phone. It is also unreasonable for the taxpayer to subsidise the provision of mobile phones to local authorities for purposes other than elections funded from the Consolidated Fund. Furthermore, most phones now have inclusive contracts for calls and texts which can also be used for the purpose of the election.

Claims may be paid for call charges provided these have been incurred wholly and exclusively for the purpose of the election. Phone hire may be considered in areas of poor connectivity where a specific phone or operator is required. This should first be discussed and agreed with the ECU. No costs will be considered for calls and texts that are included by network providers in an unlimited package. Evidence will also be required for any costs claimed in relation to mobile phone hire.

Other costs that cannot be claimed

Other Costs	
Items	Further Information
Costs for legal advice obtained in any other way than what has been set out in this guidance	See legal services section above.
Purchase of mobile telephones, with the exception of phone hire where a specific phone or operator is required due to coverage issues.	In cases where poor connectivity requires specific phones to be hired for use, this may be reimbursed, but should be discussed and agreed with the ECU before any costs are incurred.
Reimbursement for calls and texts that fall under an unlimited package.	As all calls and texts within such packages are provided at no extra cost, there are no additional costs incurred by staff that can be reimbursed.

1.8.7 Advice for other items

Outsourced services

Care should be taken when outsourcing any element of the election process to ensure the costs incurred are not increased from those that would be incurred were the service provided internally.

While ROs may incur costs across the various heads as necessary, and these are not constrained by any set amounts for those heads, we will query any element of a claim which greatly exceeds the average cost we would expect. We will similarly challenge costs we consider to be above what is necessary for the efficient and effective running of the polls.

It is not uncommon for ROs to outsource parts or all of the postal voting process. Any claim must only reflect what is necessary for the efficient and effective running of the service and should not exceed any cost of providing the same service internally. Therefore, we will not fund any costs for any special technology or computer aided services over and above that which we consider necessary. This includes services which provide additional or special levels of managed services (see managed ballot service section above).

Across all expenditure you should be able to demonstrate that you are achieving value for money. Where elements of a claim exceed that which is necessary for the efficient and

effective running of the poll, we may refuse to pay for all or part of those additional elements. In order to avoid paying for a service which may not be reimbursed, you should [contact the ECU](#) ahead of the relevant poll for further advice.

Contingency Planning

The Electoral Commission's guidance sets out the need to plan for contingencies and gives examples of areas to consider. While it gives examples, it does not require ROs to take any specific action in terms of expenditure unlike some other recommendations it makes. However, the guidance always provides for ROs to take a course based on consideration of their local area and previous experiences.

Risk and contingency planning to ensure you can deliver a successful election should be undertaken with the level of risk, likelihood and proportionality in mind. Consequently, seeking to cover for every possible eventuality will not be supported in reimbursement on claims. In those circumstances where you do need to incur a cost to make provisions for contingency planning, these should be discussed and agreed with the ECU before those costs are incurred.

Indemnity

ROs should make their own arrangements to insure themselves against any risks they face in taking forward their statutory duties at all elections and referendums. The cover obtained usually forms part of the local authorities' own insurance arrangements and ROs should check what cover they have in place.

While the local authority insurance will cover certain risks, ROs may also be liable for claims of a type not covered by its existing insurance policies. In light of this, the UK Government provides ROs with a specific indemnity for Police and Crime Commissioner and UK Parliamentary elections to supplement the insurance policies that are arranged locally. However, this only comes into force where existing insurance cover has been exhausted and should not be seen by the RO as a replacement. A similar indemnity is also provided for recall petitions.

Where any claim is in respect of a devolved government election, an indemnity is to be provided by that government. If a claim is in relation to a devolved government and a Police and Crime Commissioner and/or UK Parliamentary election, all indemnities may need to be called upon depending on the circumstances of any given case.

Insurance policy 'excess' payments are not covered by the UK Government indemnity.

VAT

Guidance on VAT for the expenditure that ROs incur for the conduct of the poll is issued directly by HMRC and is available via [gov.uk](#).¹⁸ It has also been included in Appendix B in this guidance. ROs should ensure they have read this guidance before submitting their claims as the ECU will not reimburse any VAT that has been incorrectly claimed.

¹⁸ <https://www.gov.uk/hmrc-internal-manuals/vat-government-and-public-bodies/vatgpb8680>

Encouraging Participation costs (Police and Crime Commissioner elections only)

This is a unique provision for PAROs in England and Wales. Whilst it is generally a duty on Returning Officers to promote awareness / encourage participation in polls, under the Police and Crime Commissioner Elections (Functions of Returning Officers) Regulations 2012, there is a requirement for PAROs and LROs to undertake activities as they feel appropriate to encourage participation in the PCC election.¹⁹

When the PCC elections were introduced, the government agreed to make some specific funding available to PAROs for this purpose as the elections were a new process. Therefore, there is a set amount made available from the Consolidated Fund to PAROs for this purpose which will be communicated to PAROs in advance of the election. Whilst PAROs and LROs may use a number of mechanisms to promote awareness and participation, (previously, the funds have been used for newspaper adverts, poster campaigns and radio adverts) the amount available to the PARO is fixed and any additional expenditure on this area is not recoverable from the Consolidated Fund.

Equipment costs under £100

Where ROs incur costs for minor items of equipment, for example mirrors or pencil grips, and the overall cost of purchasing these items does not exceed £100, the cost can be reclaimed via a single payment, rather than be apportioned out and claimed over time.

Please note that items of equipment costing over £100 should be apportioned in the usual way and should continue to be claimed for in line with the approach set out in this guidance.

Costs under £100 claimed via a single payment would still need to be appropriately apportioned between the local authority and the Consolidated Fund. This apportionment should be based only on the number of **scheduled** polls—whether local or national—known at the time the equipment is purchased. For example, if there were three scheduled local elections and two national elections in the lifetime of the equipment, 60% of the equipment cost would be attributable to the local authority, and 40% of the cost would be attributable to the Consolidated Fund. The 40% can then be claimed as a single payment rather than across the relevant elections at different points in time. Any **unscheduled** polls that are announced after the purchase cannot be factored into the calculation.

Standby Costs

We have not previously paid for standby costs, but given recent issues with staffing for polling stations, we have agreed to consider reasonable costs as detailed in this guidance.

General Items that cannot be claimed from the Consolidated Fund

General advice for all heads	
Item	Further Information
Payment for employment of health and safety officers to undertake checks of premises and equipment	These checks should be undertaken as part of polling district and place review, rather than under the conduct of the election. We would only consider such charges in exceptional circumstances.

¹⁹ <https://www.legislation.gov.uk/ukxi/2012/1918/regulation/7/made>

Consultancy fees (without prior agreement)	Consultancy costs of any kind cannot be reimbursed unless they have been agreed with the ECU prior to the poll. This includes for legal advice and for consultancy e.g. from the AEA or another supplier. As these can be significant costs, prior approval is required.
Equipment Repairs	If repairs are needed, and these can be shown to provide value for money, they may be reimbursed with prior agreement from ECU. However, the Consolidated Fund will not reimburse an additional member of staff solely for the purpose of supervising these repairs. The staff undertaking the repairs should be able to do so without additional supervision.
Warranty for Equipment	This is a cost that is not seen as providing value for money and is not something that can be reimbursed from the Consolidated Fund.
Standby Costs (other than those specified in this guidance in relation to polling station staff).	We have made specific provisions for where the Consolidated Fund can reimburse costs for items or services that will not be used for the conduct of the election. Outside of those specific provisions, we will not reimburse unless there has been a specific prior agreement made.
Supervision of recovery of equipment from storage	The Consolidated Fund can reimburse for reasonable staff costs for recovering equipment from storage where necessary in relation to parliamentary and PCC elections. Reimbursement will not usually cover extra staff hired only to supervise this task.
Resurfacing or gritting of roads	This is the responsibility of the local authority and cannot be claimed from the Consolidated Fund for any polls.
Hotel accommodation (such expenditure has previously been accepted only in relation to ROs or deputy ROs on the night of the election)	Expenditure for hotel accommodation would have to be agreed with the ECU prior to the election where necessary and justified.
Taxi costs	The use of taxis on polling day or at any other stage during the election is normally not a necessary cost and not one that can usually be reimbursed. However, in cases where public transport cannot be used, the option of a car is not available, and the use of a taxi is necessary and can be justified the cost can be considered.

	Although, please note that costs for taxis cannot be claimed where they are used to transport staff to and from their place of work.
Parking fees	We do not expect local authority and RO staff to be charged for parking at local authority premises - we would expect parking for election staff and support services to be provided as part of an LA's support for the running of polls. If commercial parking has to be used, then costs can be recovered.
Laundry Costs	The Consolidated Fund will not reimburse laundry costs for items such as hi-visibility vests or other items of clothing.
Photographs or photographers for recording any part of the election process	This is not necessary for the conduct of the election, and these costs cannot be reclaimed from the Consolidated Fund.

1.9 Claim Scrutiny

As we move to a new digital claims system, for future election expenses claims all evidence will need to be submitted with your claim. This will help to eliminate delays that arise from missing evidence at the point of submission. It will also assist NAO to complete their annual audits in a quicker fashion as they will have direct access to all the evidence provided.

Claims will go through an initial triage to ensure that all the information has been provided prior to the claim being scrutinised. You will be notified by ECU of any outstanding documentation and the time available to submit this in support of the claim. This will help reduce the number of observations that ECU need to raise which should result in a quicker settlement process overall.

Section 2: Guidance on Staff payments

We recognise that people work hard on the preparation and delivery of elections and staff should be properly recompensed for the work they do to ensure elections are delivered successfully.

There is also a need to be clear and consistent with regards to payments which can be difficult to achieve with people working in different areas to independent Returning Officers. This section aims to ensure there is a basis for transparency and consistency, and equity in so far as that is achievable.

2.1 Background

In 2014, changes were made to the methodology used to allocate funding for polls paid for from the Consolidated Fund. The changes were intended to provide Returning Officers with more flexibility in how they could utilise the monies provided for the efficient and effective conduct of the polls. However, since 2014 this has led to a significant variation in the rates paid to staff across Great Britain, for what in many cases is very similar work. NAO and HMT identified this as an area that warranted further review.

The 2022/23 Funding Review also identified that payments made to staff were not as transparent as they could be when scrutinised by ECU and NAO. Staff who were paid a flat fee rather than at an hourly rate caused additional correspondence as often limited information was provided on how these fees were calculated and what tasks and responsibilities they covered. The Funding Review identified the need for greater transparency and clarity to ensure that payments made to staff were necessary, reasonable, and at a rate proportionate to the roles and responsibilities undertaken.

MHCLG has worked closely with the Association of Electoral Administrators (AEA) and the Society of Local Authority Chief Executives (SOLACE) and the Elections Funding Working Group (EFWG) to develop a pay structure for all staff working on polls funded from the Consolidated Fund. We appreciate the input from these groups and their comments on the payment scheme being introduced.

MHCLG have devised a set of pay bands that apply to all polls across Great Britain paid for by the consolidated fund. These pay bands have been calculated based on data provided by the EFWG and in turn uplifted and updated to reflect additional responsibilities introduced by the Elections Act 2022 as well as changes to average public sector pay and national minimum wage since then. The pay bands are intended to increase the consistency and transparency of staff payments. They should also reduce the number of 'observations' the ECU are required to send on staff payments, allowing claims to be settled more quickly, whilst ensuring that payments continue to reflect the work undertaken. However, the ECU may still query staff payments that do not appear necessary or reasonable or are not

supported by sufficient evidence. On the latter, it is important that relevant evidence is held for up to six years as this could be requested by ECU or NAO at any time. Once we move to a digital system, ROs will be required to submit all evidence online in support of their claim. ECU will then perform checks based on the level of scrutiny applied to each constituency or voting area as necessary. The main aim of the guidance is to assist ROs in the completion and submission of their expenses by ensuring that the correct information is provided first time. This will help to minimise the number of queries from ECU and speed up the reimbursement process overall.

2.2 Pay Bands

There are four pay bands in total covering a range of roles involved in the delivery of elections. There is also a set of rates covering other costs, such as training and travel.

A list of the election roles necessary for the conduct of the poll has been developed in consultation with the AEA, SOLACE and the EFWG and is included in appendix C of this guidance. These roles have then been assigned to a pay band based on their level of responsibility. The rates for each pay band have been calculated using data provided by Returning Officers and Electoral Administrators representing Scotland, Wales, and each of the regions across England.

The pay bands set out a range of daytime **hourly rates** for each role that can be reimbursed from the Consolidated Fund. MHCLG has worked closely with the sector to set these rates at a level that is reasonable and proportionate to the roles and the responsibilities undertaken. The pay bands also reflect any additional responsibilities staff will be required to undertake because of the changes introduced by the Elections Act 2022. The range in each pay band provides flexibility for the reimbursement of daytime hourly rates that reflect circumstances particular to each constituency or voting area.

- To ensure transparency, ROs can only be reimbursed for payments to staff working at an hourly rate set within the relevant pay band. These rates do not reflect overtime enhanced pay or night rates for overnight count staff (see relevant sections below).
- Flat fees for staff will not be reimbursed unless they are specifically provided for in this guidance or agreed in advance of the relevant poll with the ECU.

Please refer to the section titled 'Core Elections Teams' with regards to rates that can be reimbursed for members of the elections or core services teams substantively employed by the local authority.

2.2.1 Annual uplift of pay bands

Pay bands will be updated on an annual basis to reflect changes to national minimum wage and average public sector pay. The guidance will be updated each year to include the new

rates for the following financial year. This will typically be done following the autumn statement around November time. The latest version of the guidance will be made available immediately via the digital claims system.

2.2.2 Guidance on the pay bands

Staff payments will be reimbursed with minimal queries from the ECU providing:

- The rates claimed for each role are within the relevant pay band and follow a sliding scale (in the order in which the roles are listed under each pay band – these are in descending order e.g. top of the list also means top of the pay band);
- Claims for staff payments are supported by sufficient and appropriate evidence supporting the costs incurred; and
- Claims for payments to staff follow the requirements set out in this guidance.

MHCLG has implemented pay bands to achieve greater consistency in the rates paid, providing a level playing field whilst still allowing ROs the flexibility to determine the appropriate rate within the relevant pay band. At the same time, there is a need to act responsibly when setting rates in line with the pay bands to avoid moving to a stricter process with less flexibility. This approach will help minimise the number of queries raised by ECU on staff payments going forward.

Rates claimed for different roles in the same pay band should aim to follow a sliding scale, proportionate to the tasks undertaken. The order we have placed on roles in each pay band provides an indication as to the hierarchy and where they fit within the pay band. For the avoidance of doubt, roles are listed in descending order with those with higher responsibilities being at the top of each pay band. We do not expect rates for all roles to be claimed at the top end of the pay bands, and costs claimed in this manner will be queried by the ECU.

London weighting will apply for voting areas in London as is common across the public sector. This is detailed further below. There will be a period of adjustment for London, while the rates for the rest of the country converge.

The ECU may still query rates set within the relevant pay bands if:

- They do not appear reasonable or proportionate to the work undertaken e.g. a role is paid at the top end of the pay band despite being listed at the bottom end
- All roles in a pay band appear to have been paid at the top end of that pay band without following a sliding scale.
- Insufficient evidence has been provided in support of the payment.

Please note that, as with other payments, reimbursement of a staff cost at a previous poll should not be taken as a guarantee that the same cost will be reimbursed at future polls. The new pay bands supersede any previous rates paid.

ROs should, therefore, ensure they have read this guidance before setting rates of pay for their staff and should contact the ECU in the case of further queries.

2.2.3 Reimbursing Rates Outside of the Pay Bands

In exceptional circumstances, it may be necessary to pay certain roles at a rate exceeding the prescribed pay band. This may be, for example, because of recruitment difficulties for certain roles in a particular area. If there are exceptional circumstances which impact your ability to set rates within the pay bands, please contact the ECU prior to any payments being agreed or made. This enables rates to be discussed and agreed prior to the poll, thus avoiding subsequent queries, and ensures the necessary funding is available. Where higher rates have not been discussed and agreed in advance, the ECU may refuse to reimburse at the rate paid. They may instead recalculate the cost based on a rate within the pay band for the role.

Where a higher rate has been agreed by ECU, please retain confirmation of this as it will need to be submitted with your claim. This will help expedite the processing of your expenses claim.

Please also note that there is no provision for 'bonus payments' i.e., those payments which are given to staff for working on the election on top of any other payments. Any bonus payment cannot be reimbursed from the Consolidated Fund.

2.2.4 Overtime Rates

For core election staff (those employed by the local authority to work on elections and registration are deemed to be part of the core elections team) that work overtime, the RO will be reimbursed in accordance with the accepted overtime rates as stipulated in the staff's contract of employment with the local authority.

For other local authority staff who are coming from elsewhere to work on elections, the pay bands set out an **hourly rate** for reimbursement to the RO for payments to such staff. Where local authority staff work on election roles that are not specifically provided for with rates for reimbursement – so excluding roles such as in polling stations, on postal vote opening or counting – and work overtime during evenings, weekends and/or bank holidays, an uplifted rate of pay can be claimed from the Consolidated Fund in line with their terms of employment.

For other staff, e.g. non-local authority casual staff hired by the RO directly, where they work beyond their contracted hours the RO can be reimbursed for that overtime.

- Rates for work undertaken outside of the contracted hours during the week and Saturdays can be uplifted up to a maximum of **1.5x** the hourly daytime rate for the role.
- Rates for work undertaken on Sundays and bank holidays can be uplifted up to a maximum of **2x** the hourly daytime rate for the role.

[**Note** that overtime in relation to registration work cannot be considered as this is not a Returning Officer function and there is no provision to reimburse Electoral Registration Officers for that work.]

2.3 Polling station staff

Payments for polling station staff can be reimbursed in line with the hourly rates set out in the pay bands. The rates provided apply to the role from start to finish. There is no enhanced overtime rate or night rate payable as the role requires staff to work for a certain number of hours during which the same rate applies.

2.4 Night Rates (for an overnight verification and count)

In line with existing [government guidance](#), an enhanced night rate can be paid to staff working at an overnight verification and count. Whilst guidance refers to night hours as the period between 11pm-6am, we will consider payments at the enhanced night rate for verification and count staff as long as the start time is reasonable (more than an hour prior to the close of poll for instance would not be considered reasonable unless there is a specific reason for this). The same rate can be applied up to the completion of the verification and count or 8am (whichever comes sooner). The night rate can be up to 1.5x the hourly daytime rate shown in the pay bands.

Verification and count assistants and supervisors can receive a guaranteed minimum payment of 4 hours from the moment they are required to be present at the verification and count until its completion, where this takes place back-to-back (e.g. verification is immediately followed by the count) and is less than 4 hours overall. The expectation will be for these staff to start at a reasonable time, allowing for any briefing to be had before the verification and count commences as explained above. Where verification takes place separately after the poll and is followed by a day count, then the guaranteed minimum payment covers the overall time spent at both – only one guaranteed minimum payment can be made (e.g. verification takes one hour overnight, and the count takes two hours the following day). Where that is the case, the minimum guaranteed payment should consider the relevant hourly rate for the verification (night rate) and the count (daytime rate).

We will consider reimbursing verification and count staff for reasonable hours worked in line with a reasonable start time. An early start would need to be explained as to why it was necessary but normally, we would not consider staff being at the verification and/or count earlier than they are required.

The enhanced pay period for an overnight verification and count should not, on average, exceed eight hours in a twenty-four-hour period. We can, however, extend this so that it covers staff working at an overnight verification and count from their start time until 8am the following morning. This is intended to help make the calculations for the overall pay of these staff simple. However, where the verification and count exceed the hours mentioned

then the calculation will have to reflect both the enhanced rate and the day rate for the relevant hours.

This provision will apply to all staff working at an overnight verification and count. Staff working at daytime verifications and counts can be reimbursed at the appropriate daytime rates listed in the pay bands – the uplifts mentioned above do not apply to a daytime verification or count.

2.4.1 Hourly Rates and Transparency

To improve transparency, the pay bands are set in the form of an hourly rate. Any claims made for payments to staff must be accounted for as an hourly rate. There is a floor as a guaranteed minimum payment provided for certain staff working at the count as detailed in the section above.

For any work done as a fraction of the hour, for example a 15-minute period, this should be paid as a fraction of the hourly rate paid.

2.4.2 Exceptions to Hourly Rates

The RO can be reimbursed a set sum for payments to staff who undertake the following activities:

- Attending training
- Delivery of training
- Bookkeeping²⁰

This guidance provides the maximum rate at which payments for these activities can be reimbursed and should be consulted for further information. Any claims for the reimbursement of these activities must still be accounted for under the appropriate head of expenditure, with the relevant evidence attached.

2.4.3 Rates for Count Staff

There is provision for count assistants and count supervisors working at the verification and count to receive a guaranteed minimum payment, equivalent to four hours of pay at the relevant rate for the role. Regardless of the count length, ROs can be reimbursed this minimum payment for the above roles working at the count.

This provision aims to ensure that rates can remain competitive, even in cases of shorter counts.

²⁰ For further information on how costs for bookkeepers can be reimbursed, please refer to section 2.12.3 in this guidance.

If the count lasts longer than four hours, any additional hours will then be payable at the relevant hourly rate for the role.

For further information on how payments to staff at the count can be calculated, please refer to the examples set out in this guidance.

2.5 Staff Structures at the Count

The pay bands provide for four tiers of staff at the count, ranging from the count manager to count assistants. ROs may employ different staff structures at the count, depending on circumstances in their constituency or voting area.

Where ROs have greater or fewer levels of supervision, they should assess how their count roles can still be paid in line with the pay bands, so staff are paid at a rate that is reasonable and proportionate to the responsibilities they undertake.

The ECU will consider the levels of supervision at the count when scrutinising rates of pay. To facilitate this, ROs may wish to provide their count structure as evidence in support of their claim. Similarly, the ECU may request further information about count structures when assessing claims.

We will generally reimburse costs for one count manager per venue. However, circumstances that warrant more than one count manager at the count venue should be discussed and agreed in advance.

2.6 Core Elections Teams

Whilst election core team staff are working on registration and elections as part of their ordinary role, where they have to work outside of their ordinary salaried hours on the conduct of elections they can be reimbursed for that extra time from the Consolidated Fund – this includes at overtime rates for evening and weekends. Consequently, payments for work that takes place during normal office hours in support of the conduct of the poll cannot be reimbursed from the Consolidated Fund.

Any overtime worked on a task that would normally form part of the core team member's responsibilities can be reimbursed at their contracted overtime rate. This will normally be up to 1.5x their hourly daytime rate unless the overtime takes place on a Sunday or bank holiday in which case the uplift could be up to 2x their hourly daytime rate. It is for the RO to determine an enhanced rate, if any, with reimbursement from the Consolidate Fund up to the maximum limit provided if this is not already included in the contract of employment.

For core election staff who work part-time, the RO can claim the standard hourly rate for any additional hours worked on the conduct of elections up to the full time contracted hours of the local authority. For example, if a member of the core team works 20 hours a

week on a part-time basis they would continue to be paid their standard contracted rate up to the full time equivalent of 37 hours a week. An enhanced rate only applies for additional hours that exceed the full time equivalent (e.g 37 hours a week). This is applicable where the work is part of the responsibilities for the role and in relation to the conduct of the elections.

Any tasks the core elections team take in addition to their usual duties, for example managing postal vote opening sessions in the evenings or working at the count, can only be reimbursed at a rate proportionate to the role undertaken, and not at that member of staff's contracted rate. All work on national elections should be paid at a rate proportionate to the role and responsibilities undertaken, and not in line with the grade or level of seniority of the officer in post. Payments for these roles can be reimbursed in line with the rates set out in the pay bands.

Where postal vote opening sessions or the count take place during the daytime i.e. during normal office hours, we would not expect to see any claim for overtime as this period should already be covered by the standard contracted hours.

As part of the core team's responsibilities are to support the conduct of the poll, we would not expect core team members to be taking annual leave or special leave to work on or around polling day. Any claims made to reimburse core staff who have taken leave to work on the conduct of the poll may be challenged.

Similarly, core staff could not be reimbursed from the Consolidated Fund for any work they undertake on postal vote opening sessions that occur during normal working hours. As this is a task required to facilitate the conduct of the poll, and in this example, undertaken during normal office hours, it would be accounted for by the salary received by the core team from the local authority.

Please also note that if core staff are paid for overtime hours at their contracted rate, the RO may have to confirm their contracted hourly rate as part of the scrutiny of the claim.

There may be cases where the local authority provides a higher uplift for overtime work than paid by the Consolidated Fund. If members of staff working on the conduct of the poll are eligible to receive their contracted overtime rate, this higher uplift can be considered. ROs should then make clear on their claim wherever contracted overtime rates are subject to an uplift of higher than rates set out in this guidance and provide supporting evidence.

The number of hours of overtime claimed need to be reasonable overall and clearly explained in the accounts. Where this appears to be significant and above what we would normally expect to see we are likely to query this further. There needs to be a distinction between the number of hours worked overtime when the elections are unscheduled compared to a scheduled poll – for the latter we would normally expect fewer hours claimed.

If there is any doubt on how certain roles or responsibilities can be reimbursed, please contact the ECU before any payments are agreed or made so that they can provide further guidance.

Please also refer to the relevant section of this guidance for examples of how ROs can be reimbursed for payments to members of the core elections team working on the conduct of a poll.

2.7 London

In line with the approach taken by the wider public sector, ROs in and on the fringe of London can be reimbursed at an uplifted rate for payments they make to staff.

- For inner London boroughs, each pay band can be uplifted by a maximum of 20%.
- For outer London boroughs, each pay band can be uplifted by a maximum of 15%.
- For fringe areas, each pay band can be uplifted by a maximum of 5%

The areas to which these uplifts can be applied to are included below:

2.7.1 Inner London Boroughs – 20% uplift

- Camden
- Greenwich
- Hackney
- Hammersmith and Fulham
- Islington
- Kensington and Chelsea
- Lambeth
- Lewisham
- Southwark
- Tower Hamlets
- Wandsworth
- Westminster

2.7.2 Outer London Boroughs – 15% uplift

- Barking and Dagenham
- Barnet
- Bexley
- Brent
- Bromley
- Croydon
- Ealing
- Enfield
- Haringey
- Harrow
- Havering

- Hillingdon
- Hounslow
- Kingston upon Thames
- Merton
- Newham
- Redbridge
- Richmond upon Thames
- Sutton
- Waltham Forest

2.7.3 Fringe areas – 5% uplift

- Brentwood
- Broxbourne
- Dartford
- Elmbridge
- Epping Forest
- Epsom and Ewell
- Hertsmere
- Mole Valley
- Reigate and Banstead
- Sevenoaks
- Slough
- Spelthorne
- Tandridge
- Three Rivers
- Thurrock
- Watford
- Welwyn and Hatfield

The following parliamentary constituencies can also receive a 5% uplift on their rates of pay to staff:

- Beaconsfield
- Windsor

All other rates, including for training and travel, are not subject to the same uplifts that apply to pay bands A-D.

2.7.4 Evidence

The ECU will require evidence in support of all claims made for staff payments. Evidence should be provided showing:

- The hourly rate at which staff were paid – fixed fees cannot be considered unless specifically provided for in the guidance or agreed in advance with ECU (e.g. better value for money).
- The number of hours staff members were required to work.
- Rates paid to staff for training and travel where relevant.
- A breakdown of the tasks that were completed where relevant.

Evidence for staff payments should be grouped by role where possible.

For any overtime conducted by core staff, detailed timesheets must be provided showing:

- How many overtime hours were worked and when (detailing dates and times).
- A detailed split between conduct related overtime and any hours relating to non-conduct related work e.g. electoral registration.
- A breakdown of the tasks that were completed during these hours.
- The rate at which these hours were paid.

Where the number of overtime hours claimed is significant, we may also require further information or context to understand the specific circumstances leading to this. For example, we may need to be aware of any vacancies or other exceptional circumstances that may have contributed to the significant overtime. We also recommend reviewing timesheets carefully to ensure that no standard hours have been included in error.

This facilitates scrutiny of the overtime worked and assists the ECU in their checks to ensure the overtime was relevant to the conduct of the polls.

ROs should provide supporting evidence in the form of payroll records or evidence of payments to staff. For other expenditure, ECU will require invoices to be provided where appropriate. This will provide the ECU with the necessary evidence required for the scrutiny of the claim.

Should this facility be unavailable to the RO, evidence from a similar system can be accepted. However, any evidence should provide a sufficient level of information, as set out above, to allow the claim to be scrutinised. Please note that quotes, estimates and requests for payment cannot be considered as evidence of payment.

The ECU must be able to reconcile all payments submitted on the claim form with the supporting evidence provided. In particular, staff-related payments must be clearly linked to payroll records. It is the responsibility of the RO to ensure that the relevant sections of the payroll are clearly identified and aligned with the corresponding entries in the claim.

Where supporting evidence (e.g. payroll data) is unfiltered, unclear, or not appropriately referenced - especially when provided in formats that are difficult to navigate or search, such as PDF files - this can lead to significant delays in processing. Where the ECU is unable to reconcile staff payments due to insufficient or unclear evidence, the claim may be rejected or returned for further clarification. Please review all evidence carefully before

submission to ensure it supports the amounts claimed and is presented in a clear, reconcilable format.

Please ensure that all supporting evidence is submitted as part of the claim. Timesheets should be kept for all staff working on the election for a period of up to 6 years for audit purposes.

Auditing bodies are increasingly paying attention to election accounts and closely scrutinising payments made to staff. One issue that could raise concern is that of employment by the RO or their deputies of family and close friends. While there is no bar on such employment, it is important that the nature of duties of any such staff are clearly itemised, and all payments accounted for so that they are completely transparent.

Not only will claims be queried by the ECU where there is no clear explanation of duties performed in respect of receipt of a payment, but auditors may well identify such occurrences and seek to make further enquiries.

2.8 Accounting for Transparency

Where an individual earns an aggregate of £3,000 or more for their work on the conduct of polls, the Returning Officer will need to provide:

- A sufficiently detailed description of the tasks performed.
- The hourly rate at which they were paid (if they were paid at more than one rate, all different rates should be included); and
- The number of hours worked at each rate.

This information will also need to be recorded separately for transparency reasons using the separate form available on the online system.

For clarity, this applies to all members of staff (excluding the Returning Officer which has a set fee as prescribed in the Charges Order) who have earned more than £3,000 for their work on the conduct of polls, regardless of the number of constituencies or voting areas they have worked across. If staff have worked on the conduct of polls in more than one constituency or voting area and have earned more than £3,000 across multiple claims, they must complete the transparency form and attach this to each claim.

These payments may not be reimbursed unless a breakdown of the tasks undertaken, and the hourly rate paid for those tasks, is included.

2.9 New Roles Outside of the Pay Bands

MHCLG, working with the AEA, SOLACE and EFWG, have developed a list of roles necessary for the conduct of an election. Rates have been set for these roles specifically.

ROs may sometimes employ people into roles that perform a similar function to those set out in the pay bands but are named differently. In these instances, ROs should be able to identify a corresponding role from the pay bands that most closely aligns with the responsibilities undertaken. For consistency, the job title from the pay bands should then be provided when completing the accounts.

We recognise that there may also be additional roles not included in the pay bands, but for which an hourly rate of pay is required. These additional roles should be discussed with the ECU to establish whether their cost can be reimbursed from the Consolidated Fund. If so, the ECU can then provide an indication as to where that fits in the pay bands provided. It will not be possible to submit a claim for any additional roles that are not included in the guidance unless this has been raised and agreed in advance. Any additional roles will need to be added to the digital system to allow a claim to be made.

2.9.1 Contacting the ECU

ROs should contact the ECU if they require further advice or clarification on staff payments or any other section of this guidance. We very much encourage discussion in advance of expenditure so that it can be understood as to necessity or reservations about reimbursement made clear.

If, due to exceptional circumstances, ROs will need to claim costs in addition to what has been set out in this guidance they should contact the ECU to discuss and agree any additional or novel costs before they are incurred. This includes paying for additional roles or paying a fee that is not in keeping with the pay bands provided.

We appreciate that Returning Officers and Electoral Administrators will be busy when preparing for polls, particularly where these are called at short notice. We will aim to make the process as easy as possible and will aim to provide a timely response to any queries raised with us. We will aim to answer most queries within 24 hours from the time the query is received, however, more complex queries may take longer to address and where that is the case we will advise accordingly.

We would also expect any additional costs to be discussed and agreed with us so that we can ensure funding is available. A short conversation with us before any costs are incurred can help to facilitate the claims process and reduce the number of subsequent queries or observations on the costs in question. We will not normally reimburse novel or additional costs that have not been agreed in advance – this includes the cost of consultants.

IMPORTANT

The funding required to support ROs in the successful delivery of the UK Parliamentary and PCC elections is agreed with HM Treasury in advance of the relevant poll, and MHCLG are provided with a finite pot for this purpose. Should ROs necessarily face additional costs in the conduct of the poll which are not provided for in guidance, the Elections Funding Team needs to ensure that there is sufficient funding to meet them. If we are not made aware of these additional costs, we may not be able to secure additional funding from the Consolidated Fund, and as such will be limited on the costs that we can reimburse above the MRA.

2.10 The Pay Bands

The Pay Band tables below set out the main election roles and their respective pay bands. Please note that the order of roles is provided in descending order starting from the highest paid to the lowest. For example, in pay band A, the casual admin support role would be reimbursed at a higher rate than reception staff. Roles must be paid following a sliding scale that reflects the order of the roles as listed in the pay bands. There will be some flexibility around this if roles need to be moved up or down a few places to suit local circumstances.

Please note that the rates provided in the tables below are day rates only and for a night count, for example, an enhanced night rate of up to x1.5 applies.

2.10.1 Pay Band A

Pay Band A	
Roles	Pay Band
Casual admin support	£12.71-£15.99
Polling station - ballot box/equipment issuing assistants	
Postal vote - prep and issue assistant	
Postal vote - opening and checking assistant	
Poll clerks	
Poll card - prep and issue assistant	
Ballot box receipt assistant	
Count setup/take down assistant	
Count and verification assistants	
Count security*	
Postal vote security*	
Reception staff	
Poll card – printing	
Printing coordinator (e.g. printing of letters)	

*Does not apply to security company staff if this service is outsourced. This only applies to staff employed by the RO directly. For security staff who are outsourced, the ECU will consider reimbursing rates that are reasonable. These should be supported by evidence of value for money, for example, by obtaining multiple quotes from two or more security firms.

For poll clerks, we can accept claims of up to 17 hours for work on and around polling day, including any necessary preparation. This does not include the costs of any necessary travel or training.

2.10.2 Pay Band B

Pay Band B	
Roles	Pay Band
Polling station - ballot box/equipment issuing supervisors	£14.22-£18.96
Postal vote - prep and issue supervisor	
Postal vote - opening and checking supervisor	
Ballot box receipt supervisor	
Poll card - prep and issue supervisor	
Count staff - IT support	
Postal vote - IT support (signature verification)	
Count setup/take down supervisor	
Count and verification team leader	
Unused ballot papers checking and verification	
Collection and prep of equipment *	

*The role of collection and prep of equipment refers to the person(s) that will be responsible for the collection of equipment and preparations for both the polling stations and count venues.

2.10.3 Pay Band C

Pay Band C	
Roles	Pay Band
Presiding officer*	£16.59-£20.73
Count and verification supervisor	
Staff payments/payroll	
Poll card, postal votes and ballot papers - running data, checking and proofing	
Postal vote - signature adjudicators	

Top table assistant/data officer	
Media handling/comms	

*The legislation only provides for one presiding officer to attend at each polling station. The ECU would not be able to reimburse the costs for presiding officers where these exceed the number of polling stations in use. The ECU would not be able to reimburse costs where the number of presiding officers exceeds the number of polling stations in a particular polling place.

Please also note that the legislation only provides for presiding officers and poll clerks to be working in polling stations. Costs for any other roles working in polling stations cannot be reimbursed from the Consolidated Fund.

Presiding officers taking on additional responsibilities can be paid an additional £25 on top of the overall presiding officer fee for the day. These responsibilities can include managing common areas in polling places with more than one polling station. Such staff are often incorrectly referred to as senior presiding officers and would not be in a position legally to decide on behalf of the actual presiding officer for the polling station e.g., on whether to accept or refuse an ID document.

Where a presiding officer is looking after more than one polling station e.g. due to the other presiding officer falling ill, we can consider an enhanced rate of pay to reflect the additional responsibilities. This should not be more than 1.5 times the hourly rate and should only apply to those hours where they have covered both polling stations.

For presiding officers, we can accept claims of up to 20 hours for work on and around polling day, including any necessary preparation prior to the day of the poll. This does not include the costs of any necessary travel or training. Should additional hours be claimed, the ECU may request further information as part of the scrutiny of the claim to ensure that those additional costs were necessary and reasonable.

Staff working in polling stations may also undertake additional work relevant to the conduct of the election that is outside the normal duties of polling station staff. For example, work at the count. If these tasks more appropriately fall under other roles, they should be claimed for separately, under the relevant job role and corresponding pay band.

Any payments for separate election roles should be accounted for separately and are not to be combined on a claim.

2.10.4 Pay Band D

Pay Band D	
Roles	Pay Band
Count manager*	£17.77-£30.80
Polling station inspector	
Postal vote – opening session manager	

* The ECU will generally reimburse costs for one count manager per venue. Should there be circumstances that warrant more than one count manager at the count venue, this should be discussed and agreed in advance.

2.10.5 Other Rates

Other Rates*	
Type	Rate
Poll card hand delivery (per poll card)	£0.21-£0.40
Postal vote hand delivery (per pack)	£0.36-£0.70
Travel up to 10 miles	£4.50
Travel between 10-20 miles	£9
Travel more than 20 miles	£9-£18
Private Mileage rate **	£0.45
Public Mileage rate**	£0.25
Private Mileage rate (Electric vehicles) **	£0.08
Public Mileage rate (Electric vehicles) **	£0.14
Training per member of staff (up to a maximum) ***	£44.96
Training prep & delivery per session****	£106-£159
Bookkeeping capped at a maximum (prior approval required)	£423

*The London uplift does not apply to these rates.

**Mileage rate can be claimed at the rate provided for presiding officers and polling station inspectors. An alternative fixed rate is provided for up to 10 miles, between 10 and 20 miles and over 20 miles of travel if this would be less burdensome to administer.

There is also provision to reimburse for poll clerk travel at the fixed rates provided unless significant travel is required in which case a mileage claim can be considered.

Electric vehicle mileage rates were introduced by HMRC with effect from 1 September 2025.

These rates only apply to company vehicles, so we do not expect these to apply for most election staff. If in doubt, please contact ECU.

***A fee of up to the maximum rate provided in the pay bands can be reimbursed for training polling station and count staff. This is the maximum fee that can be reimbursed to the trainee and the rate should be proportionate to the level of training required and the number of sessions they may need to attend. We would expect polling station staff to require more training than count staff and the fees claimed to reflect this.

****The fee provided is the maximum per session, where a training session is run by two or more trainers then the fee should be split accordingly.

2.11 Further information on Other Rates

2.11.1 Travel

ROs can be reimbursed for necessary travel costs paid to polling station inspectors, presiding officers and poll clerks. These costs may include, for example, costs for a presiding officer to travel to and from the polling station, including travel in advance of polling day, or for any necessary travel required to collect or transport ballot boxes and equipment. Similarly, this may include costs for polling station inspectors to travel between polling stations as part of their duties on polling day. There is also provision to consider travel costs for poll clerks in line with the fixed rates provided in the table above.

For other members of staff working on the conduct of the poll, for example count staff or staff working on postal vote opening sessions, there is no provision in law to reimburse costs for their travel to and from their place of work. These costs e.g., count staff travelling to and from the count venue, cannot be claimed from the Consolidated Fund. Staff should be advised of this in advance so that they are aware of what to expect on the day.

Should there be circumstances particular to your area that would require these staff to be paid for necessary travel, ROs should contact the ECU. Travel costs will only be reimbursed for staff other than polling station inspectors, presiding officers and poll clerks if this has been specifically agreed in advance.

Any eligible costs for travel should be claimed in line with the rates for mileage or public transport that have been set out in this guidance. Where helpful, costs for travel can also be claimed as a fixed rate, proportionate to the mileage travelled.

2.11.2 Training

Training should be claimed at a rate that is proportionate to the level of training to be completed. For example, we would not normally expect presiding officers and count staff to receive the same fee for training. This is because we anticipate that the training will be tailored to the specific roles.

Rates for training can be claimed up to the maximum rate provided in the pay bands per member of staff. If staff are required to attend both face to face and online training, the fees for each part of the training should add up to no more than the maximum rate provided in the pay bands. ROs can be reimbursed for fees which reflect the time needed to complete each part of the training.

In line with requirements for the pay bands, the Consolidated Fund will not reimburse training costs if all members of staff have been paid at the maximum amount.

Whilst training sessions can be delivered either in person or online, we will not reimburse for both in combination unless that can be justified and is agreed in advance with ECU. If more than one session is needed, we ask for a clear justification to support any additional costs incurred. Claims without sufficient explanation may be rejected.

When conducting face to face training for presiding officers, ROs may wish to combine these sessions with tasks such as ballot box collection where possible. This will help to avoid multiple journeys for presiding officers.

2.11.3 Online Training

If training is delivered online by a third party and you are charged a licence fee per user, we will consider reasonable costs instead of the training preparation and delivery figure provided in the pay bands. Similarly, if the training is delivered online, we would expect to reimburse staff a lower fee to reflect this. The point here is that no travel will be required to attend online training, and this can be completed at a time that is more suitable to each member of staff.

2.11.4 Preparation and Delivery of Training

We recognise that those providing the training may spend more time preparing for the first session and then less for each subsequent session. Where there is a cost for the preparation and delivery of training, we will reimburse in line with the rates provided in the pay bands.

2.11.5 Staging and Audio Equipment

Necessary costs for audio and staging equipment will be considered by the ECU. Previously, there was a limit of £800 on the amount that could be reimbursed for stage and audio equipment at the count. However, we recognise that the cost of this equipment, where it is necessary for the conduct of the poll, can vary depending on the size of the count venue in

question. We also recognise that this cost may be in part determined by the count venue itself where it provides stage and audio equipment directly to the RO.

The removal of the set rate for staging and audio equipment should provide ROs with additional flexibility when incurring this cost.

This is still on the condition that any items purchased or hired must be necessary for the conduct of the poll and the costs of those items must be reasonable. Where costs are incurred for equipment that is not necessary for the conduct of the poll, for example lecterns, backdrops, curtains or carpets, these will not, as a general position, be reimbursed.

Any necessary costs that are incurred must also be supported by evidence. When claiming for stage and audio equipment, ROs should provide multiple quotes from suppliers to demonstrate that they have sought value for money and have only obtained equipment suitable for the purpose of the announcement of results of the poll. Where stage and audio equipment are provided by the venue, only necessary equipment will be reimbursed for. We expect ROs to have heed to the public purse and seek to negotiate for what they need, including seeking multiple quotes to obtain better value for money where possible.

Any costs claimed should be clearly itemised in the invoice so that they can be properly scrutinised by the ECU. Costs may be challenged or removed where detailed breakdowns have not been provided and it is not clear what the costs are in relation to.

Where it provides value for money to purchase stage and audio equipment and then to reuse it at subsequent elections, we will consider the apportionment of the cost of purchase. We would normally expect the life expectancy of audio equipment to be around 10 years. The apportionment of the equipment should be calculated in line with the approach set out in earlier sections of this guidance. Looking at previous claims, in most cases it would have been cheaper to purchase the equipment rather than hiring it for individual use, and we will always support the most cost-effective approach. However, storage cost is not a cost that is vested in the Returning Officer's responsibilities and, thus, it cannot be reimbursed by the Consolidated Fund.

2.11.5 Worked Examples

The following section sets out some *examples* of how costs for different roles could be reimbursed for work undertaken on the conduct of the poll.

Poll Clerk

Hourly daytime rate - £11.50

- The poll clerk role is in Band A which has an hourly daytime rate of between £11.44-£15.12. In this example, the rate is set at £11.50.

Training - £30

- The poll clerk attends a training session in advance of polling day. In line with the rates set out in this guidance they receive a payment of £30 for attending.

Polling Day - £184

- On polling day, the poll clerk arrives at the polling station at 6:30am and leaves at 10:30pm. They are paid an hourly rate of £11.50 for these 16 hours. This results in a total payment of £184 (£11.50x16) for their work on polling day.

Travel

- They are paid a set fee for travel of £4.50 for up to 10 miles of travel.

Total payment - £218.50

- The total payment received by the poll clerk including their fee for training and travel would be £218.50.

Presiding Officer²¹

Hourly daytime rate - £18

- The presiding officer role is in Band C which has an hourly daytime rate of between £15.98-£19.60. The hourly rate is set at £18.

Training - £35

- The presiding officer attends a training session in advance of polling day. In line with the rates set out in the guidance they receive a payment of £35 for attending.

Work ahead of polling day and travel - £33.30

- The presiding officer checks the polling station ahead of polling day to ensure the necessary arrangements are in place. This takes 30 minutes, for which they are paid £9.
- The presiding officer is then also required to collect the ballot boxes and other equipment in advance of the election which takes approximately 1 hour (an additional £18).
- They also need to travel for 14 miles to collect ballot boxes and equipment and travel to and from the polling station (mileage £0.45/mile). Thus, £6.30 will be paid to them for travel.

Polling Day - £306

- On polling day, the presiding officer arrives at 6:15am to set up the polling station and leaves at 10:45pm after the close of poll.
- They then travel to the count which takes 30 minutes.

²¹ Please refer to section 2.10.3 for more information on the number of hours that can be claimed for a presiding officer.

- They consequently work 17 hours on polling day, for which they are paid $17 \times £18 = £306$

Total payment £374.30

- In total, the presiding officer in this example would receive a payment of $£35 + £33.3 + £306 = £374.30$.

Count Manager

Hourly daytime rate - £25

- The count manager role is in Band D which has an hourly daytime rate of between £16.80 and £29.12.
- This role is undertaken by a member of the election services team. However, as the role does not fall under their contracted responsibilities, the rate can only be reimbursed within Band D, rather than in line with the staff member's contracted rate of pay.
- In this example, the rate is set at £25 per hour. For a night count, this would be uplifted by up to 1.5x for an hourly rate of £37.50.

Count - £162.50

- The count manager arrives at 9pm for the count. The count lasts 6 hours and 30 minutes. The count manager then leaves at 3.30am.
- Therefore, the count manager will be paid $6.5 \text{ hours} \times £37.50 = £243.75$.

Total Payment - £243.75

- The count manager receives a total payment of £243.75
- This does not include any payment they may receive for work on preparation for the count.
- Any claims for preparation would also need to be supported by a detailed breakdown of the tasks undertaken, and the rate at which they were paid. The latter means that different tasks not related to the count manager role will need to be paid at the appropriate rate for the task.

Count and Verification Supervisor

Hourly daytime rate - £16.50

- The count and verification supervisor role are in Band C which have an hourly daytime rate of between £15.68-£19.60.
- The rate is set at £16.50 per hour in this example.

Count - £99

- They arrive at 9:30pm and the count finishes in 3 hours. They leave by 12:30am.
- For an overnight count they can be paid at an enhanced night rate of up to 1.5x, in this case, this would be up to £24.75/hour.

- They would receive a minimum guaranteed payment of 4 hours, at the relevant hourly rate depending on the timing of the count (e.g. enhanced rate or daytime rate).
- The total payment in this example would consequently work out as £99 (£24.75x4).

Count Assistant

Hourly daytime rate - £12.00

- The count assistant role is in Band A which has an hourly daytime rate of between £11.44-£15.12.
- In this example, the hourly daytime rate is set at £12.00.

Count -£108

- They arrive at 9:30pm and work for 6 hours, leaving at 3:30am.
- Their enhanced night rate for an overnight count can be up to a maximum of 1.5x, in this case, this would be £18/hour.
- Their first 4 hours is paid as a guaranteed minimum payment.
- The total guaranteed payment would be £72, and covers time worked at the count until 1:30am.
- The additional 2 hours they work, between 1:30am and 3:30am is also paid at their hourly enhanced rate of £18.
- Therefore, the total amount paid would be £18x6 = £108 (this includes the guaranteed minimum payment and the two additional hours).

Core Staff

Hourly daytime rate (contracted responsibilities)

- A member of the core elections team is working overtime on a weekday evening in the run up to the election.
- In this example, their contracted rate is £14 per hour (i.e. the salary at which they are contracted by the LA).
- Their overtime rate for evening work on weekdays is uplifted by up to 1.5x their contracted salary, giving a rate of £21 per hour.
- They work between the hours of 6pm-8pm on a task that falls under their contracted responsibilities.
- For the hours between 6pm-8pm, they can be paid at their contracted rate, uplifted for overtime.
- For two hours this would equate to a maximum of £42.

Hourly daytime rate (postal vote opening manager) - £17

- At 8pm until 10pm, they then work as a postal vote opening manager.

- Given that the postal vote opening manager role is a distinct task, the RO can usually only be reimbursed at a rate proportionate to the task. However, if out of normal hours, this rate can be increased as below.
- The role of postal vote opening manager falls under pay band D. In this example, the hourly daytime rate is set at £17 per hour.
- The hourly rate could be uplifted by up to 1.5x to recognise that it is out of normal hours, leaving a maximum hourly rate payable of £25.50 per hour.
- For 2 hours in that role, up to £51 could be paid.

Total Payment - £93

- The total payment for work undertaken between 6pm-10pm would be £93 (£42+£51).
- Any additional or overtime work would need to be supported by a timesheet detailing the tasks and responsibilities as well as the hours worked.
- The timesheets should also differentiate between work that falls under contracted responsibilities and those that do not fit within the day job.

2.12 Other information

2.12.1 Registration Duties

The Consolidated Fund can only reimburse necessary costs for the conduct of the election. Any costs associated with staff working on registration activities cannot be claimed from the Consolidated Fund as this is a role legislatively placed on the local authority to undertake.

Similarly, where core or elections services teams work on registration activity, the RO should note that these costs cannot be claimed for through the election expenses claim form. This also applies to any overtime worked by staff on registration work.

Funding for additional registration activity arising from the Elections Act 2022 has been provided separately via new burdens grant payments to local authorities.

2.12.2 Combination

It is for ROs to use their discretion in uplifting payments to **polling station staff** to account for combination where necessary. We can consider reimbursing the relevant proportion of up to a maximum of 20% uplift of the hourly rate for the role. The amount of this uplift should be split equally between the relevant sources of funding for the polls which are to be held in combination. For example, if a parliamentary election is combined with a local election, the Consolidated Fund and the local authority should each fund half of the uplift.

This uplift for combination for polling station staff is to account for the extra responsibilities placed on them by the combination of polls. Please note that this uplift is **only** applicable to polling station staff.

2.12.3 Bookkeepers

The Consolidated Fund can reimburse ROs for the costs for a bookkeeper to check the election expenses claim form prior to submission. This service can be reimbursed at a maximum of £423.

There is no provision for ROs to be reimbursed the costs of using a bookkeeper for the full completion of the accounts. This function is the personal responsibility of the RO, as set out in the relevant Returning Officers' Account Regulations.

Payments exceeding the rate set out in this guidance will not be reimbursed from the Consolidated Fund.

The bookkeeping fee cannot be reimbursed where it is paid to general members of staff, including members of the core team, for completing the form on behalf of the RO. The cost can only be reimbursed when the services of a bookkeeper are used, and only covers the checking of the claim form before submission.

If a member of staff is completing the claim form on behalf of the RO, any payment they receive for this task should be apportioned from the RO fee. This function is the personal responsibility of the Returning Officer and is one of the duties provided for by the RO fee.

2.12.4 Holiday pay

This guidance on holiday pay has been written following consultation with HR professionals, employment lawyers and colleagues in the Department for Business and Trade.

We have aimed to provide general guidance clarifying where holiday pay can be paid to the range of staff working on elections. Where it has not been possible to provide a definitive answer, we have signposted more detailed Government advice on holiday pay.

Holiday pay rules are complex and whether holiday pay is payable will depend on the particular circumstances of the arrangements that local authorities and/or returning officers have in place. It also depends on whether the work, including the nature of the employment contract and number of hours worked, is guaranteed, compulsory, or otherwise sufficiently regular. As circumstances are not uniform, it is not possible to provide a definitive explanation about when holiday pay may or may not be payable, and at what rate. Furthermore, where a fixed fee payment is made this may not necessarily attract holiday pay e.g. training. Therefore, Returning Officers (ROs) should ensure they are satisfied with the approach they take and seek their own advice as they feel necessary.

When holiday pay should be paid

In general, election roles delivering key functions such as working in polling stations, opening postal votes and working at the count, are entitled to holiday pay under the Working Time Regulations 1998 for their contracted hours of work.

The amount of pay a worker receives for the holiday they take depends on a 'normal' week's pay. The principle is that pay received by a worker while they are on holiday should reflect what they would have earned if they had been working. For staff working on elections this should be in line with the relevant rates paid for the election work.

Overtime worked by staff can accrue holiday pay providing it is obligatory, guaranteed or sufficiently regular.

Overtime spent on election work should be considered in calculating holiday pay if it is either:

- a) contractually guaranteed or compulsory
- b) not guaranteed but compulsory if requested
- c) voluntary but performed with sufficient regularity or consistency to make it 'normal' within a 52-week reference period.

For 'c', we recognise this time limit would exclude almost all overtime work on elections from being seen as regular across the year. Consequently, given the unique nature of elections:

- the shortest reference period that can be considered for staff working on the conduct of elections is **three months**. We would regard a reference period of fewer than three months difficult to consider in line with the legislation.
- Consequently, if overtime has been worked regularly over a period of **three months**, someone can accrue holiday pay in respect of that overtime.

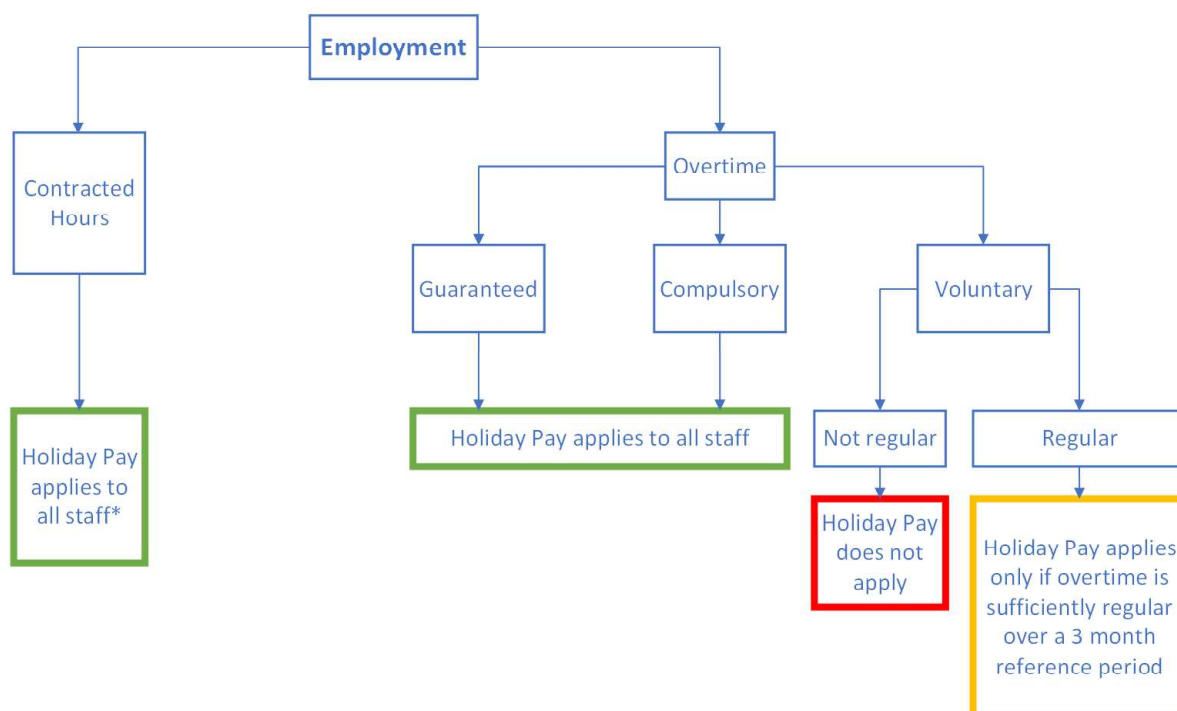
It is for the employer to determine whether overtime is worked regularly over the reference period in question. The ECU may still seek further information about holiday pay payments for overtime that does not appear regular.

However, whether overtime worked on the election can accrue holiday pay will ultimately depend on the circumstances of each case.

To ensure a timely and accurate processing of holiday pay claims, it is essential that the evidence provided clearly details the amount payable for each individual based on the actual work performed. We are unable to accept evidence which shows holiday pay as a lump sum for all staff employed. This makes it difficult to reconcile payments made with the information provided on the claim and verify whether holiday pay applies.

Where overtime does not meet the conditions set out in this guidance, it cannot be reclaimed from the Consolidated Fund. In most cases, overtime worked by casual staff is unlikely to meet the conditions necessary to accrue holiday pay, but we will consider reimbursement where it does.

ROs cannot seek reimbursement for the holiday pay that applies to normal working hours for LA staff, as this is already paid for by the local authority. The following flowchart provides a quick way to check whether holiday pay is likely to apply or not.



*Local authority staff whose normal contracted hours are paid for by the LA will also have holiday pay paid by the LA. ROs cannot seek reimbursement for the holiday pay that applies to normal working hours for LA staff.

Figure 1: Flowchart outlining the circumstances where holiday pay does or does not apply.

Calculating Holiday Pay

The government is introducing new legislation with effect from 1 January 2024 which will make it possible to accrue holiday pay on a 12.07% basis and allow for rolled-up holiday pay beginning on or after 1 April 2024.

Where a worker has irregular hours or works part of the year, employers can calculate their holiday pay using an average from the last 52 weeks in which they have worked and have earned pay. If a worker has not been in employment for long enough to build up 52 weeks' worth of pay data, their employer should use however many complete weeks of data they have. For example, if a worker has been with their employer for 26 complete weeks, that is what the employer should use. If a worker takes leave before they have been in their job a complete week, then the employer has no data to use for the reference period. In this case the reference period is not used. Instead, the employer should pay the worker an amount which fairly represents their pay for the length of time the worker is on leave.

In working out what is fair, the employer should take into account:

- the worker's pay for the job
- the pay already received by the worker (if any)

- what other workers doing a comparable role for the employer (or for other employers) are paid

For leave years beginning on or after 1 April 2024, part-year and irregular hours workers are legally entitled up to a maximum amount of 5.6 weeks of paid statutory holiday entitlement per year, calculated according to actual hours worked using the 12.07% accrual method. If their employer chooses to use rolled-up holiday pay, then the entire amount of their leave for irregular hours and part-year workers will be paid at the ‘normal’ rate of pay.

Normal pay must include:

- Payments, including commission payments, intrinsically linked to the performance of tasks which a worker is contractually obliged to carry out;
- payments relating to professional or personal status relating to length of service, seniority, or professional qualifications;
- other payments, such as overtime payments, which have been regularly paid to a worker in the 52 weeks preceding the calculation date.

For further information on how holiday pay can be calculated, ROs should refer to guidance published by the Department for Business and Trade on holiday pay and calculations for staff working irregular hours – this guidance can be found [here](#).

The ECU can only consider reimbursement of holiday pay where the necessary conditions have been met as set out in guidance.

National Insurance Contributions (NIC) and Holiday Pay

Payments to election staff are excluded from national insurance contributions (NIC) under the Social Security (Categorisation of Earners) Regulations 1978 (“SSCE Regs 1978”).

Schedule 1, Part III, para 10 of this legislation sets out that payments to any staff employed directly by the Returning Officer for the election are to be excluded from NIC. The same provision applies to any holiday pay they are entitled to.

For staff working on elections, it is the employment rather than the pay that is disregarded from NIC. As casual staff work directly to the RO, any pay they receive for necessary work on the conduct of the election (whether it is ordinary pay or holiday pay) is exempt from NIC in line with Schedule 1, Part III, para 10 of the SSCE Regs 1978.

Accounting for Holiday Pay on the Claim Form

ROs should provide a clear breakdown of holiday pay they have paid to an employee, or reimbursed to the local authority, under the relevant section of the claim form. This evidence should make it clear how much holiday pay is being claimed for each member of staff, and at what rate (%).

To support any claims made for holiday pay on overtime hours, evidence needs to be provided demonstrating that:

- These hours can be classed as overtime
and
- These hours were either guaranteed **or** compulsory **or** these hours were worked regularly over the reference period in question
and
- The overtime hours claimed were solely related to work on the election, and not registration functions
and
- The work was necessary and paid at a proportionate and reasonable rate for the task.

Seeking Further Advice

If ROs think it necessary to seek further legal advice on specific circumstances - in respect of pay, taxation and pensions - not covered by this guidance, ECU will consider reimbursing the costs of that advice. In this case, ROs should **obtain ECU approval** before they seek advice, given the costs that may be involved.

ROs may be required to obtain any such advice on the basis it is shareable with the sector more widely where it would be of benefit to other ROs and electoral administrators.

2.13 Tax and National Insurance Contributions for Staff

All figures in your accounts relating to staff payments should be shown as gross, not net, of income tax. Any questions on income tax matters should be made to the local Inspector of Taxes who oversees the PAYE for the relevant local authority.

ROs are urged to make contact with their local tax authorities before the election to ensure that they are clear about what is acceptable practice in that area.

For all staff working on national elections, where applicable, all due income tax should ideally be paid to HMRC as soon as possible after the poll.

For the RO or any staff working on national polls, penalties or payments that are incurred because of overdue payment of due tax cannot be reclaimed from the Consolidated Fund.

If staff are paid through a payroll system, you must ensure that arrangements are made to exclude National Insurance contributions.

Although the fees received by ROs and their staff for duties performed at elections are chargeable to tax as employment income, these fees are specifically excluded from National Insurance contributions liability by the provisions of schedule 1 of the Social Security (Categorisation of Earners) Regulations 1978, as amended.

2.14 Superannuation on Staff Payments

For parliamentary elections, in accordance with section 29(6) of the Representation of the People Act 1983, a Returning Officer's charges may include claims in respect of any increase in superannuation contributions that are required to be paid by a local authority as a result of any fee paid to a person employed on electoral duties. Claims may be made for both ROs and for others performing electoral duties at the election who fall within section 29(6).

Before making a claim for the reimbursement of superannuation payments, ROs or any other person making a claim must satisfy themselves that any superannuation payments to which they are entitled:

- Would have been required to be increased by the local authority as a result of a fee paid, and
- That such a payment either has been made by the authority or would have been made for a claim under section 29(6).

We cannot advise on a particular individual's entitlement to such payments, as this will depend on their conditions of employment and the terms of their superannuation arrangements. If the RO is in doubt as to a person's entitlement to increased superannuation payments, they should seek further advice and confirmation from the relevant local authority. The reimbursement of these payments from the Consolidated Fund can then be considered, so long as the claim can be supported by confirmation from the local authority.

The fees payable to PAROs or LROs for delivering Police and Crime Commissioner elections are not pensionable under the terms of the Local Government Pension Scheme. Consequently, superannuation costs for PAROs or LROs at PCC elections cannot be reimbursed from the Consolidated Fund.

2.15 Standby Staff

The Consolidated Fund has not previously reimbursed ROs for employing standby staff on UK Parliamentary or Police and Crime Commissioner elections. As a result of the Covid-19 Pandemic, an exception was made for the Police and Crime Commissioner elections held in May 2021 where there was provision for ROs to keep additional staff on standby.

Considering the recent feedback and the issues reported from the sector, we will consider reimbursing reasonable standby costs where these are necessary. This should not exceed a payment of more than £50 per reserve staff and should be limited to no more than 5% of the total staff needed at polling stations. For polling stations, we will consider levels of staff in line with Electoral Commission guidance. Note that this payment is not applicable in instances where staff on standby are then called to work. Where that is the case, they

should be paid for the actual hours worked. If this would result in a payment lower than the standby fee we may consider reimbursing up to that amount to ensure that staff are not made worse off.

Example

- The RO employs 120 polling station staff across 50 polling stations.
- Therefore, they could have 6 additional staff (5% of the total number of polling station staff) on reserve.
- All reserve staff are paid a fee of £40 each plus an additional fee for attending training if this was required in advance.

2.16 Call Centre Staff

ROs cannot be reimbursed for dedicated call centre staff to answer queries in relation to registration activity from the Consolidated Fund. If on the day of the poll, calls are received in relation to the conduct of the elections (e.g., queries around the polling station etc) then those costs may be considered but will need to be explained on the claim. Unless there is further justification provided, call centre costs prior to polling day are unlikely to be taken into account.

2.17 Payments to Returning Officers and Deputy Returning Officers

ROs should be aware that no fee is payable for their duties other than within the overall maximum amount available for their services. That said, ROs may also claim reasonable costs for the delivery of training and necessary travel, if applicable. They should not therefore be in receipt of separate payment for other duties, such as supervision of postal vote issue or opening, as any such duty is deemed to be included in the overall payment for their services. Any claims in respect of other such duties will not be met except for the provision of training.

There is no provision in the legislation for a fee to be paid to Deputy Returning Officers (DROs). Should the RO choose to delegate any of their responsibilities to a DRO, these should be paid for from their RO fee.

The ECU cannot reimburse any payments made to DROs for taking on RO responsibilities covered by the RO fee.

Furthermore, it is the responsibility of the RO to ensure that they recompense staff who undertake delegated RO responsibilities from the RO fee.

If the DRO is performing duties to support the conduct of the election that are not RO responsibilities, they should be paid at a rate proportionate to the task. For example, if a

DRO was managing the count, they should be paid within the appropriate pay band for a count manager.

All staff working on the conduct of the election should be paid at a rate that is proportionate to the role. The ECU will not reimburse at rates that have been set in line with the level of seniority or grade of the staff member undertaking the role. Similarly, the ECU will not consider rates that have been set in line with contracted salaries when these are not proportionate to the responsibilities undertaken.

Appendix A

The Legislative Background for the Funding of National Elections

1. UK Parliamentary Elections

The Representation of the People Act 1983

The principal legislation governing UK Parliamentary elections is the Representation of the People Act 1983 (the 1983 Act).²² This Act consolidated all previous primary legislation relating to UK Parliamentary elections, though it has itself subsequently been considerably amended.

Section 29 of the 1983 Act provides for payments by and to Returning Officers and gives the Secretary of State the power to make Orders specifying the charges recoverable by Returning Officers for election expenses.²³

Electoral Administration Act 2006

The Electoral Administration Act 2006 (the 2006 Act) introduced a number of changes to the arrangements for the recovery of the costs of Returning Officers' services and expenses at UK Parliamentary elections.²⁴ The 2006 Act amended section 29 of the 1983 Act, allowing the Secretary of State to specify in an Order the total overall amount a Returning Officer can recover for the services rendered and the expenses incurred for or in connection with an election. These costs can only be recovered providing the services were necessarily rendered or the expenses were necessarily incurred for the efficient and effective conduct of the poll.

The amended section 29 also enables the Secretary of State to specify a maximum recoverable amount for services or expenses of a specified description.²⁵ In addition, in particular cases the Secretary of State may authorise the payment of more than the maximum recoverable amount. This is only if the Secretary of State is satisfied that it was reasonable to render the services or incur the expenses and that the charges in question were also reasonable.

The Parliamentary Elections (Returning Officers' Charges) Order

For the purposes of UK Parliamentary elections, each constituency is allocated a maximum recoverable amount (MRA) through a central funding model. The funding model is currently based on the settled expenditure incurred in each constituency at the previous UK Parliamentary election. This figure for each constituency is then updated to take into account a number of variables such as inflation, changes in the size of the electorate, number of postal voters, poll combination, postage costs etc.

²² <https://www.legislation.gov.uk/ukpga/1983/2/contents>

²³ <https://www.legislation.gov.uk/ukpga/1983/2/section/29>

²⁴ <https://www.legislation.gov.uk/ukpga/2006/22/contents>

²⁵ <https://www.legislation.gov.uk/ukpga/1983/2/section/29>

The final updated amount each constituency has available to claim is set out in secondary legislation under the relevant Parliamentary Elections (Returning Officers' Charges) Order.

The Charges Order is made under section 29 of the 1983 Representation of the People's Act.²⁶ The schedule to the Order lists the Parliamentary constituencies in Great Britain and sets out the maximum amounts recoverable by each RO in respect of the specified services rendered and the specified expenses incurred in connection with the running of the election. The figures totalled together provide the overall MRA for each constituency.

The schedules to the Order

There are two schedules to the Order. The schedules list all the constituencies in Great Britain in alphabetical order setting out the maximum recoverable amount available (MRA) for the next scheduled poll. One schedule sets out the MRA reflecting the level of combination in place for the relevant poll.²⁷ There is also a schedule providing the MRA for each constituency were the poll to be fully standalone.

Any subsequent by-elections will also use the figures listed in the schedule, unless that by-election is to be combined with other polls and the level of combination is not covered in the Order. In this case, a separate MRA will be provided to the constituency. In such instances, Returning Officers should contact MHCLG for further information and for the revision that will need to be made to their funding allocation.

Specified services

The Charges Order sets out the RO's specified services and sets out the maximum amounts recoverable for these services. These include making arrangements for the election and discharging the RO's duties at the election. This is referred to as the 'RO's fee' and reflects the RO's statutory independence from the local authority.

Specified expenses

The Charges Order lists what an RO may claim in respect of specified expenses and sets out the maximum amounts recoverable for these expenses by constituency. These include providing and paying staff, conducting the poll and count and the ancillary activities necessary to discharge the RO's functions.

Uncontested elections

In the event of an uncontested Parliamentary election, the Charges Order sets out an overall maximum recoverable amount of £1,750 for each UK Parliamentary constituency.

²⁶ <https://www.legislation.gov.uk/ukpga/1983/2/section/29>

²⁷ <https://www.legislation.gov.uk/uksi/2019/1454/schedule/made>

2. Police and Crime Commissioner Elections

The Police Reform and Social Responsibility Act 2011

The principal legislation governing Police and Crime Commissioner elections is the Police Reform and Social Responsibility Act 2011.²⁸ This Act contains the provisions for the first and subsequent elections of Police and Crime Commissioners.

Section 55 of the 2011 Act provides for Police Area and Local Returning Officer expenditure in relation to Police and Crime Commissioner election.²⁹ It allows the Secretary of State to specify in an Order the maximum recoverable amount (MRA) a Returning Officer can recover for the services rendered and the expenses incurred for or in connection with an election of a Police and Crime Commissioner. These costs can only be recovered, providing the services were necessarily rendered or the expenses were necessarily incurred for the efficient and effective conduct of the poll.

In addition, the Secretary of State may, in particular cases, authorise the payment of more than the maximum recoverable amount. This is only if they are satisfied that it was reasonable to render the services or incur the expenses and that the charges in question were reasonable.

The Police and Crime Commissioner (Local Returning Officers' and Police Area Returning Officers' Charges) Order

For the purposes of Police and Crime Commissioner elections, as with UK Parliamentary elections, each voting area is allocated a maximum recoverable amount (MRA) through a central funding model. The funding model is currently based on the settled expenditure incurred in each voting area at the previous Police and Crime Commissioner election. This figure for each voting area is then updated to take into account a number of variables such as inflation, changes in the size of the electorate, number of postal voters, poll combination, postage costs etc.

The final updated amount each voting area is eligible to receive is set out in secondary legislation under the relevant Police and Crime Commissioner (Local Returning Officers' and Police Area Returning Officers' Charges) Order.³⁰

The Charges Order is made under section 55(2) of the 2011 Act. The schedules to the Order list the local authorities in England (except London and any other areas where the PCC functions have been transferred to a combined authority Mayor) and Wales.³¹

²⁸ <https://www.legislation.gov.uk/ukpga/2011/13/contents/enacted>

²⁹ <https://www.legislation.gov.uk/ukpga/2011/13/section/55/enacted>

³⁰ <https://www.legislation.gov.uk/uksi/2021/390/contents/made>

³¹ When combined with Senedd elections, Welsh parliamentary constituencies will be listed instead.

The schedules set out the maximum recoverable amounts that Local Returning Officers and Police Area Returning Officers will have available in respect of specified services rendered and the specified expenses incurred in connection with the running of the elections. These figures totalled together provide the overall MRA for each voting area.

The Charges Order will normally include one schedule setting out the MRAs taking into account the level of combination at the time of poll.³² A second schedule provides the MRAs for each voting area where the poll is to be fully standalone.³³

Any subsequent by-elections will also normally use the figures listed in the second schedule, unless that by-election is to be combined with other polls and the level of combination is not covered in the Order. In this case, a separate MRA will be provided to the voting area. In such instances, Returning Officers should contact MHCLG for further information and for the revision that will need to be made to their funding allocation.

Uncontested Elections

In the event of an uncontested Police and Crime Commissioner election, the Charges Order sets out:

- In respect of a local returning officer, the overall maximum recoverable amount for each voting area is £1,750.
- In respect of a Police Area Returning Officer, the overall maximum recoverable amount for each police area is £350.³⁴

3. UK Parliamentary Elections and Police and Crime Commissioner Elections

The Returning Officers' Accounts Regulation

These Regulations set out the time and manner in which ROs accounts must be submitted. These Regulations require accounts to be submitted within six months, commencing on the date the RO declares the result of the election.

This deadline can be changed at the discretion of the Secretary of State. In 2019 for example, the deadline for the submission of accounts for the 2019 UKPGE was temporarily extended to twelve months. This was to account for the additional time required by ROs to complete their claims following the European Parliamentary Elections that took place earlier that year.

Should there be any changes to the existing deadline of six months for the submission of accounts, we will inform ROs as soon as practicable.

³² <https://www.legislation.gov.uk/uksi/2021/390/schedule/1/made>

³³ <https://www.legislation.gov.uk/uksi/2021/390/schedule/2/made>

³⁴ <https://www.legislation.gov.uk/uksi/2021/390/part/4/made>

The Account Regulations pertaining to UK Parliamentary elections extend to England, Scotland and Wales. The Account Regulations pertaining to Police and Crime Commissioner elections extend to England and Wales only.

Account regulations can be updated to reflect any changes to the time and way accounts must be submitted. Any changes to the existing Regulations will be made available ahead of the relevant elections.

4. Legislative Background for Returning Officers

UK Parliamentary Elections

Returning Officer's role and responsibilities

Section 23 of the 1983 Act sets out that it is the Returning Officer's general duty at a Parliamentary election to do all such acts and things as may be necessary for effectually conducting the election in the manner provided by those parliamentary election rules.³⁵ The 1983 Act also specifies who the Returning Officer is (sections 24 and 25), his or her general duties (section 27) and who may discharge his or her functions at a Parliamentary election (section 28).³⁶

For a County Constituency in England and Wales which is coterminous with or wholly within a county boundary (or preserved county boundary in Wales), it is the Sheriff of the county. For a Borough Constituency in England and Wales which is coterminous with or wholly within a district council boundary (or county borough in Wales), it is the Chairman of the District Council. For a London constituency coterminous with or wholly within a London Borough, it is the Mayor of the Borough or the Chairman of the Council. For any other constituency, the Returning Officer is designated by the Secretary of State.

In Scotland, where the constituency is wholly situated within a local government area, the Returning Officer is the person appointed (under section 41 of the 1983 Act) as the Returning Officer for local elections in that area.³⁷ For any other constituency, the Returning Officer is designated by the Secretary of State.

In England and Wales, for UK Parliamentary elections, all the functions of Returning Officers are generally discharged by Acting Returning Officers. Returning Officers may reserve some specific functions to themselves (receipt of the writ, the declaration of the result of the election, the issue of the public notice of the result and the return of the writ) by giving written notice to the Acting Returning Officer. They may also delegate to the Acting

³⁵ <https://www.legislation.gov.uk/ukpga/1983/2/section/23>

The RO's duties are set out in more detail in schedule 1 of the 1983 Act. For further information on these duties, please refer to this schedule, and to parts II and III in particular.

<https://www.legislation.gov.uk/ukpga/1983/2/schedule/1>

³⁶ <https://www.legislation.gov.uk/ukpga/1983/2/part/I/crossheading/conduct-of-parliamentary-elections>

³⁷ <https://www.legislation.gov.uk/ukpga/1983/2/section/41>

Returning Officer the duty to receive the writ, but only if they do so in writing in the prescribed form to the Clerk of the Crown.

Police and Crime Commissioner Elections

Police Area Returning Officer role and responsibilities

Section 54 of the Police Reform and Social Responsibility Act 2011 specifies that the Police Area Returning Officer (PARO) is an acting Returning Officer by virtue of section 28(1) of the 1983 Act.³⁸

Article 6 of the Police and Crime Commissioner Charges Order sets out that it is the duty of the PARO to make the necessary arrangements for the Police and Crime Commissioner election, and to discharge the PARO's duties at that election.

As part of these duties, the role of the PARO includes planning and coordinating at a Police Area level, managing the collation of the count totals (and where applicable, organising a central count) and declaring the result.

PAROs are also responsible for preparing and submitting the accounts, but only for their own activities. They are not responsible for preparing and submitting accounts for all LROs in their police area - although they will all also be LROs in their own right and be required to prepare and submit separate accounts for their activities as an LRO.

Local Returning Officer role and responsibilities

Section 54 of the Police Reform and Social Responsibility Act 2011 specifies that a Local Returning Officer (LRO) is a person who, by virtue of section 35 of the 1983 Act, is a local returning officer for any local elections.**Error! Bookmark not defined.**

It is the duty of the Local Returning Officer to make the necessary arrangements for the Police and Crime Commissioner election and to discharge the local officer's duties at that election, as set out in section 4 of the Police and Crime Commissioner Charges Order.

As part of these duties, the role of a LRO includes managing the conduct of the poll in their local area, counting the votes and passing the local area totals (where a local count is taking place) to the PARO.

LROs are also responsible for preparing and submitting the accounts for their own activities.

Section 54 of the Police Reform and Social Responsibility Act 2011 also sets out that each relevant local authority must place the services of its officers at the disposal of PAROs or LROs for the purpose of assisting in the discharge of their functions.**Error! Bookmark not defined.**

The Elections Act 2022

This Act makes new provision about the administration and conduct of elections. It includes measures designed to strengthen the integrity of the electoral process by introducing voter

³⁸ <https://www.legislation.gov.uk/ukpga/2011/13/section/54/enacted>

identification and measures about regulation of expenditure for political purposes. It also extends the franchise for overseas electors and voting and candidacy rights of EU citizens. The Elections Act 2022 is available to read at <https://www.legislation.gov.uk/ukpga/2022/37>.

Information for Returning Officers

For UK Parliamentary and Police and Crime Commissioner elections, the Elections Act 2022 introduces new responsibilities Returning Officers will need to take account of when incurring expenditure for the running of the poll.

These additional responsibilities include, but are not limited to:

- Managing Voter Identification checks and queries where necessary.
- Providing increased support to disabled voters.
- Undertaking additional checking and processes for handed-in postal votes.
- Training relating to these and other measures.

In relation to UK Parliamentary and Police and Crime Commissioner elections, costs incurred by Returning Officers for additional responsibilities arising from the Elections Act will still be reimbursed from the Consolidated Fund. This is still subject to being where necessary and reasonable for the efficient and effective running of the poll. This additional expenditure can be claimed back from the Consolidated Fund in the usual way; through the completion of the election expenses claim form submitted to ECU.

Appendix B

HMRC guidance on VAT

[VATGPB8680 - Other local authority activities: miscellaneous \(A to E\): election and returning officer's expenses](#)³⁹

Local Elections

Under section 35(1) of the Representation of the People Act 1983, “every district council shall appoint an officer of the council to be the returning officer for the elections of councillors of the district and an officer of the council to be the returning officer for elections of councillors of parishes within the district.” Other types of elections are covered by similar provisions within the RPA 1983.

Returning Officers (RO) are statutorily independent of the local authority and are ultimately responsible for the efficient and effective running of elections. They are also responsible for accounting for the expenses incurred for the conduct of elections in their area. If the RO directly incurs costs for an election, they can make a claim for reimbursement from the local authority.

Local authorities have a statutory obligation to appoint a RO for their area. As such, where local authorities incur costs on behalf of the RO, who uses the goods and services for no cost, they can recover that VAT under section 33 (see VATGPB4000). This will include the purchase of any equipment needed for the running of the elections.

If the district or county council organises an election for another tier of local government, it may recover any VAT incurred in arranging the ballot under section 33. If it then charges the other authority for the election expenses, this is not a business activity, and therefore no VAT is charged.

UK Parliamentary Elections

At UK Parliamentary elections, ROs are statutorily independent of the local authority, act on behalf of the Crown, and are accountable to the courts.

UK Parliamentary elections are funded out of the Consolidated Fund. Until recently the responsibility for managing those funds was with the Cabinet Office, but this function has now transferred over to the Department for Levelling Up, Housing and Communities (MHCLG). ROs are by law entitled to reimbursement for their services in relation to the delivery of UK Parliamentary elections, to reflect their statutory independence from the local authority, and reimbursement is made through the Consolidated Fund.

Where local authorities are required by law to provide their resources, for example polling places in a school hall, any reimbursement from the Consolidated Fund is not subject to VAT. In such instances, any VAT incurred on the provision of a local authorities' resources is recoverable by the local authority under section 33.

³⁹ [VATGPB8680 - Other local authority activities: miscellaneous \(A to E\): election and returning officer's expenses - HMRC internal manual - GOV.UK](#)

Similar treatment applies to any other services provided under a statutory requirement. However, the hire of non-council premises or portable buildings, for example, or the provision of refreshments or security, are business activities to which the standard VAT rate will apply. If the RO has received goods or services from sources other than the local authority, any VAT incurred is not recoverable by the local authority and should be included in any reimbursement from the Consolidated Fund.

The RO can seek reimbursement from the Consolidated Fund, in part or in full, for any expenses relating to the purchase of election equipment such as polling booth screens and ballot boxes, the services of ballot paper printing or the hire of portable buildings. However, only the share relevant to UK Parliamentary and Police and Crime Commissioner (PCC) elections can be reimbursed from the Consolidated Fund. In many cases, equipment and other services will be bought for the RO by the local authority, such as polling booths. If the items will be used in different types of elections, then the local authority can recover the VAT in full, with no onward charge to the RO. If the items are to be used solely for a UK parliamentary election, the local authority cannot reclaim the VAT under section 33, but the RO can make a claim for the gross costs from the Consolidated Fund.

If items are bought exclusively for general elections, then a local authority can only recover VAT to the extent that it recharges it to the RO as the buying agent. The VAT recharged to the RO should form part of their election expenses accounts that will need to be submitted to the Elections Claims Unit (ECU) at MHCLG (previously part of the Cabinet Office) within six months from the announcement of the election results. This has been a legal requirement since 2014.

Police & Crime Commissioners Elections

Where Council Officers function as ROs for PCC elections, whether held as a standalone election or combined with local elections, the role and responsibilities of the RO are not to the council but are directly accountable to the courts as an independent statutory office holder.

PCC elections are also funded from the Consolidated fund and as such any claims for reimbursement of items or services used exclusively for the PCC elections should include the incurred VAT. Where the expenditure relates to items or services that can be used at other elections then the above provisions apply. Expenses claims should be submitted to ECU at MHCLG. Once ECU has received all the necessary evidence and scrutinised the expenses claim they will make a payment to the RO to reimburse them for any expenses reasonably and necessarily incurred for the effective and efficient running of the elections.

Joint elections

Local elections

Full VAT recovery is available on all expenditure attributed to local elections. Any recharges to another tier of authority (such as a District Council) would be a non-business activity.

Local Elections with CA Mayoral Elections and PCC Elections

Full VAT recovery is available on all expenditure attributed to local elections and Combined Authority Mayoral Elections. However, VAT exclusively attributable to PCC Elections is non-recoverable, and gross reimbursement should be sought from the Consolidated Fund.

Local & Parliamentary Elections

VAT recovery is available on all expenditure attributed to local and parliamentary elections as per the above relevant sections of this guidance.

Where the local authority purchases goods or services for the RO solely in respect of the parliamentary election, they should seek reimbursement of the gross costs from the RO, via the Consolidated Fund. For reimbursement of local election costs, see the relevant section above.

APPENDIX C

Role Descriptions

Please note that these descriptions have been provided by the sector and not written by MHCLG

1. Roles under Pay Band A

Casual admin support:

Key responsibilities include, but are not limited to:

- Printing and enveloping correspondence to candidates/agents, and election staff.
- Preparing entry tickets and attendance lists for the count.
- Checking payment files before submission to Returning Officer payroll.
- Proof checking election notices.

Polling station - ballot box/equipment issuing assistants:

Key responsibilities include, but are not limited to:

- Preparing ballot boxes, including cleaning, and ensuring they have no defects.
- Labelling ballot boxes.
- Inserting stationery and polling equipment into ballot boxes.
- Inserting election documents into ballot boxes, ensuring they are correct for the polling station.

Postal vote - prep and issue assistant (including Re-issue):

Note that this role applies where postal votes are being issued in-house. Key responsibilities include, but are not limited to:

- To work in teams as allocated by the postal vote supervisors. However, flexibility will be required to work amongst teams and assist other teams as directed.
- Ensure their team tables are kept clear & tidy during the issuing process and that all registers, documentation & equipment are delivered to the issue supervisors.
- Perform other postal vote issue duties as required.

Postal vote – opening and checking assistant:

Key responsibilities include, but are not limited to:

- Opening, counting, and sorting postal votes quickly and accurately.
- Working as part of a team.
- Following instructions from the postal vote – prep and issue supervisor.

Ballot box receipt assistants:

Key responsibilities include, but are not limited to:

- Receive ballot box/es, ballot Paper Account and Postal Vote pouch.
- Check the accuracy of the BPA and identify if there have been any issues that could affect the number of BPs in the box.
- Using a checklist, check off the return of various packets and equipment as instructed.

Poll card – prep and issue assistant:

Key responsibilities include, but are not limited to:

- Undertaking quality assurance checks to ensure printing is of a high quality.
- Sorting poll cards into rounds for hand delivery, and following any specific instructions, for example removing poll cards for deceased electors.
- Collating paperwork for delivery staff and allocating stationery.
- Issuing correct poll cards to delivery staff and recording their issue.

Poll clerks:

Key responsibilities include, but are not limited to:

- Ensure that voters are able to cast their vote in secret, free from influence and in a calm atmosphere.
- Comply with any instructions from the Presiding Officer and/or Returning Officer.
- Ensure that all electors are treated impartially and with respect.
- Ensure the secrecy and security of the ballot at all times.
- Checking ID, issuing ballot papers and marking the register.

Count set-up and take down assistants:

Various duties related to the count set-up and the taking down of the post count. Thus, responsibilities are varied depending on which responsibility the staff will have. For example:

Count setup:

- Set out tables, chairs, table dividers and crowd barriers in the correct position based on the supplied layout.
- Arrange the stationery and equipment for each count table including the top tables.
- Make sure the stage has been correctly set up with corporate banner, microphones, lectern, and PA system.
- Set up the meet and greet area including signing in sheets with secrecy requirements, ID badges to be issued and any count information booklets.

Take down post count:

- Remove any signs that have been put up at the venue.
- Take down the tables, chairs, table dividers and crowd barriers from the count hall including any used in the ballot box receipting or postal vote areas.
- Make sure any stationery or equipment has been packed away properly so it can be re-used.
- Any paperwork you find is handed to the count setup/take down supervisor.

Count and verification assistants:

Key responsibilities include, but are not limited to:

- Ballot paper verification.
- Sorting verified ballot papers.
- Flag up any doubtful ballot papers to the Supervisor.
- You may be asked to conduct a recount.
- Counting ballot papers.

Count security (staff not external):

Key responsibilities include, but are not limited to:

- Control of entry to count staff, candidates, agents, returning officer's staff.
- Ensure no photos are taken on the Count floor and mobile phones are only used in the designated area.
- Regularly patrol outside of the Count Venue reporting any suspicious behaviour or incidents to the Count Manager immediately.

Postal Vote Security:

Key responsibilities include, but are not limited to:

- Ensure only those authorised to attend the postal vote sessions are allowed entry.
- Ensure candidates and agents sign in/out and read the secrecy requirements.
- Ensure candidates, agents, and observers remain on the outside of the postal vote tables.
- Ensure anyone attending the sessions behaves in a manner so as not to breach the security of the vote.

Reception Staff:

Key responsibilities include, but are not limited to:

- Meet and greet attendees.
- Check attendees count admittance letter, ensure every attendee signs in, issue them with a count booklet and ID badge.
- To consult with the Count and Verification Manager if someone turns up to attend who are not on the list.
- To pack away the meet and greet area once the count has finished.

Poll card printing:

Key responsibilities include, but are not limited to:

- Receiving data from Elections Office and processing data, including formatting and personalisation, to agreed timescales and specifications.
- Cutting poll cards to size.
- Following specific requirements for the printing of anonymous registration, maintaining confidentiality at all times.
- Ensuring poll cards are sorted in polling district/canvass round order.

Printing coordinator (e.g. printing of letters):

Key responsibilities include, but are not limited to:

- Receiving data files from the Elections Office and processing data, including formatting and personalisation, to agreed timescales.
- Enclosing/enveloping.
- Conducting regular quality assurance checks.

2. Roles under Pay Band B

Polling station – ballot box issuing supervisors

Key responsibilities include, but are not limited to:

- Preparing and collating documents, packets, and labels for ballot boxes.
- Preparing and ordering equipment and stationery.
- Supervising a small team in the preparation and filling of ballot boxes.
- Checking ballot boxes contain all the correct documents and equipment prior to issue.

Postal vote – prep and issue supervisor

Note that this role applies where postal votes are being issued in-house.

Key responsibilities include, but are not limited to:

- To consult with the security team on the facilities/layout needed for the postal vote opening.
- To supervise the layout of the issuing room & the provision of postal vote materials, registers & documentation for the postal vote opening.
- To supervise the arrival of all postal vote ballot boxes & associated printing materials.
- To supervise the opening of postal votes with other supervisors.

Postal vote – opening and checking supervisor

Key responsibilities include, but are not limited to:

- Manage the Postal Vote Opening process ensuring that the correct steps are taken at each stage.
- Ensuring staff arrive on time, sign in and work the required hours.
- Overseeing the opening, counting, and sorting postal votes and the completion of the Tally Sheets.
- Moving batches of Postal Votes from Opening Staff to the Verification tables and ensuring that there is a good workflow.
- Recording any 'Provisionally Rejected' PVS or BPs and working with the PV Expert at the end of the Opening session to match any received.

Ballot box receipt supervisor

Key responsibilities include, but are not limited to:

- Ensure that every ballot box (s), returned paperwork and other materials returned by Presiding Officers is receipted correctly.
- To provide support to the ballot box receipting assistant to check the accuracy of the ballot paper account and identify any issues that could affect the number of ballot papers in the box.
- To support the Count and Verification Manager to find a solution in the event of a delayed ballot box.

Poll card – prep and issue supervisor

Key responsibilities include, but are not limited to:

- Supervise receipt and storage of poll cards from printers.
- Supervise a small team in sorting poll cards into rounds for hand delivery.
- Ensure that the poll cards have been printed to a high quality and data is accurate.
- If required, ensure that poll cards for deceased electors are removed.

Count staff – IT support

Key responsibilities include, but are not limited to:

- Provide general IT support to ensure that the count runs smoothly.
- Ensure the postal voting equipment is set up and is working correctly ahead of the final opening session.
- Make sure that any laptops that are being used for the count all have access to power and connectivity.

Postal vote - IT support (signature verification)

Key responsibilities include, but are not limited to:

- Set up IT equipment including laptops, screens, printers, and scanners for postal vote opening sessions.
- Test connectivity and ensure all hardware and software are updated to latest versions.
- Be first point of call for any technical issues during opening sessions.
- Consult with Election Management System supplier.

Count setup/take down supervisor

Key responsibilities include, but are not limited to:

Count setup

- Instruct the count setup/take down assistants to set out tables, chairs, table dividers and crowd barriers in the correct position as set out on the supplied layout.
- Check that the stationery and equipment for each count table including the top table is correct.

- Check that the stage has been correctly set up with corporate banner, check that the microphone and PA is working.
- Ensure that the meet and greet area is set up correctly. Make sure that the signing in sheets with secrecy requirements match the ID badges to be issued and the count information booklets are available.

Take down post count

- Ensure all the official count paperwork has been securely packed away.
- Instruct the count setup/take down assistants to take down any signs that have been put up.
- Make sure everything has been packed away from the ballot box receipting areas and meet and greet area.
- Ensure everything is packed away properly so it can be re-used.

Count and verification Supervisors

Key responsibilities include, but are not limited to:

- Responsible for multiple count teams.
- Providing clear instructions to Count Assistants and team leaders as to their roles and reminding them of their responsibilities.
- Ensuring the correct Electoral Area sign is displayed for the ballot papers being verified or counted.
- Responsible for the accurate verification of ballot boxes for each polling station.
- Responsible for the accurate sorting of verified ballot papers and totalling of votes for each candidate.
- Reviewing all doubtful ballot papers – approving those authorised to approve and placing those going to adjudication in relevant tray.
- Recording the number of votes for each candidate and results of adjudication of doubtful ballot papers on the Count Summary Sheet.

Count and verification Team Leader

Key responsibilities include, but are not limited to:

- Leading a team of Verification and Count assistants to verify, sort and count ballot papers accurately.
- Work with the Verification and Count Supervisors to trouble shoot and oversee re-counts.
- Fill in the verification and count paperwork and supply accurate figures.
- Ensure proceedings are running smoothly and verification/count figures are produced in a timely manner.

Unused ballot papers checking and verification

Key responsibilities include, but are not limited to:

- Calculate the number of ballot papers that have not been used in each polling station.
- Open the sacks (packet 2) containing the unused ballot papers, calculate the remaining ballot papers using the number issued to the Presiding Officer and record this figure on the paperwork provided.
- Place ballot papers back in their sack and arrange sacks in order.

Collection and prep of equipment

Key responsibilities include, but are not limited to:

- To oversee the collection of the equipment from storage and ensure that it is all in good working order.
- To collate the right amount of equipment/stationery for the count and ensure it is appropriately labelled with the right electoral areas.
- Ensure any ordered equipment/stationery arrives and is ready for the count.

3. Roles under Pay Band C

Presiding Officer

Key responsibilities include, but are not limited to:

- Responsible for the conduct of the ballot in your polling station.
- Responsible for the management of your polling staff.
- Ensuring the accurate delivery of the poll and the account of all ballot papers.
- Comply with any instructions from the Returning Officer.
- Ensure that all electors are treated impartially and with respect.
- You must ensure the secrecy and security of the ballot at all times.
- Consult with the key holder and make arrangements for the opening and closing of your polling building.
- You should also visit your polling station in advance to ensure polling day arrangements are in place.
- Make contact with your poll clerk(s), and if you are in a dual polling station, with the other Presiding Officer at least a week before Polling Day.
- Collect your ballot box and equipment in advance of Polling Day at the time slot booked and keep secure.

Count and verification supervisor

Key responsibilities include, but are not limited to:

- Responsible for multiple count teams.
- Providing clear instructions to Count Assistants and team leaders as to their roles and reminding them of their responsibilities.

- Ensuring the correct Electoral Area sign is displayed for the ballot papers being verified or counted.
- Responsible for the accurate verification of ballot boxes for each polling station.
- Responsible for the accurate sorting of verified ballot papers and totalling of votes for each candidate.
- Reviewing all doubtful ballot papers – approving those authorised to approve and placing those going to adjudication in relevant tray.
- Recording the number of votes for each candidate and results of adjudication of doubtful ballot papers on the Count Summary Sheet.

Staff payment – payroll

Key responsibilities include, but are not limited to:

- Ensure that election staff are paid at their agreed rate of payment in a timely manner that is compliant with tax and pension rules.
- Ensure all the overtime timesheets worked by the core Elections Team are calculated for the Returning Officer's approval and processed for payment.
- Provide regular updates to the RO to ensure payments are within budget and provide information to support the ECU claim.

Poll card, postal votes and ballot papers - running data, checking and proofing

Key responsibilities include, but are not limited to:

- Extract data for initial poll card printing, following documented procedure, and ensuring all printing parameters are set correctly for the election type.
- Check contents of data files before issue to printers.
- Checking proofs of poll cards, both the static and the personalized data, using supplied checklists and maintaining an audit trail of what has been checked.
- Consulting with printers for any amendments.

Postal vote - signature adjudicators

Key responsibilities include, but are not limited to:

- Scanning of Postal Vote Statements and comparing signatures and dates of birth with existing records.
- Using Xpress Register to check original applications to ensure a processing error has not occurred.
- Using principles of Signature Verification, deciding whether a signature is matched or not. If it does not match this has to be rejected.

Top table assistant/data officer

Key responsibilities include, but are not limited to:

- To collate all the verification and count figures into the supplied spreadsheet from the count tables (electronic and hard copy version) to calculate totals and produce accurate figures for the Returning Officer to use.
- To flag any discrepancies to the Returning Officer.
- To prepare the declaration of result of poll for the Returning Officer.

Media handling/comms

Key responsibilities include, but are not limited to:

Social Media

- Publish the Electoral Commission's communication templates prior to and throughout polling day.
- Monitor social media channels and post regular content to keep followers updated on the progress of the count.
- Upload a copy of the results as soon as they are declared.

Press/media

- Provide your contact details to the press/media as the main point of contact.
- Co-ordinate attendance at the count and provide guidance booklet on what is allowed.
- Count liaison with the press/media.

Council website

- Work with IT to upload a copy of the declaration of result of poll and ensure they are accessible.

4. Roles under Pay Band D

Count manager

Key responsibilities include, but are not limited to:

- To ensure a clear area for the arrival of ballot boxes.
- To monitor the arrival and processing of ballot box/ballot paper account & associated documentation & materials.
- Manage the verification & counting of the number of ballot papers.
- Agree figures with the Count Accountants
- Approve the recounting of ballot papers following consultation with the Returning Officer at verification & count.
- Manage the re-counting if required.

Polling station inspector

Key responsibilities include, but are not limited to:

- Ensure that polling stations are open and being operated in accordance with election rules.
- Ensure that voters are able to cast their vote in secret, free from influence and in a calm atmosphere.
- Visit polling stations as instructed by the Returning Officer and to ensure they are correctly staffed, with all equipment in place and that all functions of the polling station are correct.
- Maintain the secrecy of the vote and the integrity of the voting process at all times.
- Assist the Returning Officer with the rectification of any operational problems and to distribute polling equipment and stationery if required.
- Comply with any instructions from the Returning Officer.

Postal Vote – Opening Session Manager

Key responsibilities include, but are not limited to:

- Responsible for the management of postal vote opening sessions.
- Arranging the preparation of equipment and layout of the sessions.
- Ensure postal vote sessions follow all relevant procedures and comply with legislation.
- Management of the postal vote opening supervisors and postal vote opening assistants.
- Management of security staff.
- Dealing with candidates, agents, and observers.

APPENDIX D

Example of how the cost of using tablets at polling stations may be offset by a reduction in polling station staff.

Total cost of using tablets	£13,125
Total savings as detailed below	£11,988.72
Total number of polling stations	75
Number of Poll Clerks for previous election of the same type	150
Number of Poll Clerks recommended by Electoral Commission guidelines	165
Number of Poll Clerks used for this election	110
Reduction in number of Poll Clerks (from number previously used)	40

COST SAVINGS AGAINST MANUAL PROCESS			
Item	Quantity	Hrly Rate	Total Savings
Poll Clerks (at 16 hours each)	40	£15	9600
Poll Clerk Holiday Pay	40	£-	1158.72
Poll Clerk Training	40	£20	£800
Poll Clerk Training Delivery (per session)	1	£150.00	£150.00
Poll Clerk Mileage	40	£4.50	£180
Associated costs - Paper, postage etc.			£100

In the above example, we would consider reimbursing up to the value of the savings as a result of a reduction in staff i.e. £11,988.72.

Pay Bands 2026/27 (with effect from April 2026)

Pay Band A			
Roles			
Casual admin support	£12.71	-	£15.99
Polling station - ballot box/equipment issuing assistants			
Postal vote - prep and issue assistant			
Postal vote - opening and checking assistant			
Ballot box receipt assistant			
Poll card - prep and issue assistant			
Poll clerks			
Count setup/take down assistant			
Count and verification assistants			
Count security			
Postal vote security			
Reception staff			
Poll card – printing			
Printing coordinator (e.g. printing of letters)			

Pay Band B			
Roles			
Polling station - ballot box/equipment issuing supervisors	£14.22	-	£18.96
Postal vote - prep and issue supervisor			
Postal vote - opening and checking supervisor			
Ballot box receipt supervisor			
Poll card - prep and issue supervisor			
Count staff - IT support			
Postal vote - IT support (signature verification)			
Count setup/take down supervisor			
Count and verification team leader			
Unused ballot papers checking and verification			
Collection and prep of equipment			

Pay Band C			
Roles			
Presiding officer	£16.59	-	£20.73
Count and verification supervisor			
Staff payments/payroll			
Poll card, postal votes and ballot papers - running data, checking and proofing			
Postal vote - signature adjudicators			
Top table assistant/data officer			
Media handling/comms			

Pay Band D			
Roles			
Count manager	£17.77	-	£30.80
Polling station inspector			
Postal vote – opening session manager			

Other Rates			
Type			
Poll card (hand) delivery (per poll card)	£0.21	-	£0.40
Postal Vote (hand delivery)	£0.36	-	£0.70
Travel up to 10 miles			£4.50
Travel between 10-20miles			£9.00
Travel of 20 miles or more	£9	-	£18
Private mileage rate			£0.45
Public mileage rate			£0.25
Electric vehicle mileage rate (home charging)*			£0.08
Electric vehicle mileage rate (public charging)*			£0.14
Training per member of staff (up to a maximum) **			£44.96
Training Prep & Delivery (per session)	£105.78	-	£158.67
Bookkeeping capped at a maximum (prior approval required)			£423

*Electric vehicle mileage rates were introduced by HMRC with effect from 1 September 2025.

** Note that ROs can choose to pay at any fixed rate up to the maximum amount. The rate, however, will need to reflect the duration and complexity of the training.

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By virtue of paragraph(s) 5 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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