SUDBURY TOWN COUNCIL
MINUTES OF THE MONTHLY MEETING OF SUDBURY TOWN COUNCIL
HELD IN THE TOWN HALL ON TUESDAY 10TH NOVEMBER 2026 AT 7.00PM

Present: Mr A Stohr– Mayor of Sudbury, in the CHAIR

Mrs M Barrett	Mr A Osborne
Mr N Bennett	Mrs J Osborne
Mr S Hall	Miss A Owen
Mr J Jeagar	Mr T Regester
Ms E Murphy (until 9:02pm)	Mr A Welsh
	Mr N Younger (from 7:23pm)

In attendance: Mr C Griffin – Town Clerk
Ms L Smith – Babergh District Councillor and Suffolk County Councillor
Mrs K Turner – Suffolk County Councillor

1. APOLOGIES AND APPROVAL OF ABSENCES

Apologies were received from Town Councillors Ms J Carter and Mr K Graham.
Councillor Mr N Younger had sent notification that he was delayed.

2. DECLARATIONS OF INTERESTS

Councillors Mr A Osborne, Miss A Owen and Mr T Regester declared that they were also Babergh District Councillors.

Councillors Ms E Murphy declared that she had been asked to bring forward the public interest concerns of residents under item 8.

3. DECLARATIONS OF GIFTS AND HOSPITALITY

No declarations of gifts or hospitality were made.

4. REQUESTS FOR DISPENSATION

There were no requests for dispensation.

5. TO CONFIRM THE PREVIOUS MINUTES

RESOLVED
That the minutes of the council meeting held on 13th October 2026 are an accurate record and are to be signed by the Chairman.

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6. QUESTIONS AND REPORTS

a. Public Forum – About 20 members of the public attended the meeting. The flowing questions were asked.
   - A representative of the Sudbury Society asked why Babergh District Council were actively marketing the Borehamgate and Hamilton Road land for immediate sale when there was a team of consultants working on a Sudbury Masterplan which was due to report in March 2027?
   - The Sudbury Society asked Babergh members to pass back to those responsible that there was already an active plan to move the bus station.
   - The Sudbury Society also asked why there were 5 empty flats in Borehamgate which should be returning about £28,000 per annum to the council?
   - Babergh District Councillors at the meeting confirmed that no decision had been made to sell this land and that they were just conducting a marketing exercise to estimate the value of the property. Any decision to sell the land would have to come back to the Babergh Cabinet for approval.
   - A member of the public expressed concern at the low number of police who were visible on foot patrol in Sudbury and asked why Sudbury could not have a police station that was open for the public to come in to report concerns. The Town Clerk explained that decisions on police numbers and opening of stations were made at county level by the Police and Crime Commissioner in consultation with the Chief Constable. Whilst the Clerk and members held regular meetings with the local policing team, they could not increase the resources that they had been allocated. Members of the public were encouraged to write directly to the Police and Crime Commissioner to lobby for more local police.
   - Many members of the public wished to ask questions about houses in multiple occupation (HMOs), but the Mayor asked them to wait until item 8.

b. Policing report – The police were not able to attend due to other commitments, but the Mayor thanked the police for the progress that they had made tackling crime. All members of the public were encouraged to report any criminal behaviour directly to the police.

c. Mayor's Announcements – The Mayor reviewed his civic commitments.
   - The Mayor had signed the iWill Charter and the council were working on projects to engage younger people.
   - The Mayor had attended the AGM of the Town Twinning group and was hoping to be able to visit Clermont in France in spring 2027.
   - The Mayor had held a Wine and Cheese evening, which had raised nearly £500 for charity.
   - The Mayor had presented the allotment awards.
   - The Mayor had launched the Poppy Appeal and had attended many related events.
   - The Mayor had attended the second 'National Emergency Briefing' in the Sudbury Arts Centre in St Peter's, which had filled the building to capacity.
   - The Mayor had attended a winter well-being event in the Sudbury Arts Centre.
   - Looking forward, the Mayor was planning to attend;
     - The 2-minutes' silence outside the Town Hall at 11:00am on Wed 11th November.
     - Ipswich Mayor's Cheese and Wine evening.
     - Haverhill Civic Carol Service and Quiz Night
     - Diss Christmas Carol Concert
     - Scuba dive with Sudbury Scuba Club (subject to a pool being available)
     - Sudbury Christmas lights switch-on – Fri 27th November.
     - Christmas Day gifts to the elderly.

- He hoped that the Deputy Mayor would be able to cover the Civic Carol Service in Bury on 7th December when he was already committed to a Sudbury event.

d. County Councillors' reports – Councillors Mrs K Turner, Mr Philip Faircloth-Mutton and Ms L Smith had sent in their reports, which had been circulated before the meeting, and are shown at minute pages 1076 to 1079. The following points were raised for discussion.
   - Why was the Active Travel funding for the footpath improvements across Friars Meadow towards Great Cornard in doubt?
   - What penalties had Suffolk Highways imposed on contractors who put up temporary traffic lights, but were not present to conduct the work?
   - As it had been announced that nine family hubs would be going, could Suffolk County Council confirm which ones had been selected and did this include the Phoenix Hub? County Councillors expressed a 99% confidence that the Phoenix Hub was not one of the nine due for closure.
   - Was the desire to have a 20mph speed limit on Ballingdon Road compatible with its status as the main A road and designated lorry route through Sudbury?

RESOLVED
That the County Councillors Ms L Smith, Mrs K Turner and Mr Philip Faircloth-Mutton be thanked for their reports.

e. District Councillor's report – Councillor Mr T Regester had sent in his report, which had been circulated before the meeting, and is shown at minute pages 1080 to 1083. The following points were raised for discussion.
   - When would the scaffolding on the flats in Minden Road be taken down, as it had been up for months?
   - What was being done for the people who would normally be referred for swimming therapy in Kingfisher pool? Often they were too frail to undertake a long journey to an alternative pool.
   - Could the next Babergh Cabinet meeting that would discuss the options for a new swimming pool in Sudbury hold the meeting in Sudbury so that more local people could attend? It was understood that this would be in January 2027.

RESOLVED
That District Councillor Mr T Regester be thanked for his report.

7. TO NOTE THE MINUTES OF THE FOLLOWING COMMITTEES

Planning, Development & Highways Committee on 19th October and 2nd November 2026. – The Chair summarised the minutes.

Finance Committee on 3rd November 2026– The Chair summarised the minutes.

Leisure and Environment Committee on 27h October 2026 – The Chair summarised the minutes.

Policy and Resources Committee on 22nd October 2026 – The Chair summarised the minutes.

8. TO DISCUSS THE USE OF HOUSES IN MULTIPLE OCCUPANCY (HMO) IN THE SUDBURY AREA TO ACCOMMODATE ASYLUM-SEEKERS

The Council had received a request from a resident who was concerned about the lack of clarity on the accommodation of asylum seekers in houses of multiple occupancy (HMO).

A member of the public requested that the town council undertake a risk assessment or impact assessment of whoever the occupants of the HMO were, on the local population, especially on their proximity to schools. If this could not be done by the town council, could they request it from the Home Office? Could this risk assessment be made available to local people? It would not need to include any personal details of the occupants of the HMOs, or their exact addresses. If a risk were to be identified, there should be some method for local people to lodge their concerns with the Home Office.

Many of these questions had been answered by the officers at Babergh District Council and were covered in the district councillor's report on pages 1081 to 1083, which Cllr T Regester then read aloud in full.

The Mayor reminded the members of the public that this was a council meeting held in public, not a public meeting, and so he would control the discussion as the Chair. He emphasised that, in law, there was a clear difference between registered asylum seekers waiting for their claims to be processed and illegal immigrants. There were also other categories of people who were accommodated in HMOs, such as families fleeing from domestic abuse. As the town council were not consulted or informed of the occupants of HMOs, it was not possible to say who they were.

The Mayor emphasised how he loved Sudbury and was doing all he could for local people. He summarised that the town council were not responsible for accommodating asylum seekers or for HMOs. As they were not consulted, they could not assess any potential risks. He recommended that concerned residents contact the Home Office or their contractor, SERCO, and ask for information. If there were actual problems with the behaviour of any person, whatever their background, this should be reported to the police.

One member raised her concern that another member had suggested that being worried about asylum seekers was racist, which she felt was an unfair way of trying to shutdown the debate. Another member asked for compassion for local families who were worried for the safety of their children. Many local families were worried because insufficient information had been released to the public.

RESOLVED
To note the arrangements for accommodating asylum seekers in houses of multiple occupancy (HMO).

9. TO AUTHORISE THE EXPENDITURE OF UP TO £15,000 EXCLUDING VAT ON RESILIENCE PLANNING

The Town Clerk explained that Government Ministers were stressing the need for national resilience in the face of multiple risks from both natural and man-made sources. Whatever the cause of the problem, the short-term requirement would be resilience at every level. The Town Council could help in a number of areas.

- Advice and Communication to Residents – The Leisure and Environment Committee had already agreed that the Town Council would have a 'resilience' tab on the website to help residents understand how best to prepare for the possible disruptions from serious climate events or hostile attacks on national infrastructure.
- Resilience of the Town Hall Building – The Town Hall had been identified as a focal point for responding to any crisis in the Sudbury area and so it would be important that the Town Hall could continue to maintain its basic functions. Officers were working with the county and district councils to assess how the Town Hall could be made more resilient against disruptions to essential services. Planned work on solar panels and battery power storage would help when installed, but there was little resilience for the current winter. If member wanted the council to be in a position to help local people during any crisis during this winter, some key areas had been identified which would need financial authorisation, as this was the last full council meeting until January.
    - Flood protection (low risk, but some door flood socks acquired)
    - Drinking water (6 x 25 litre storage containers acquired)
    - Food that could be stored for long periods. (SCC)
    - Cooking equipment. (LPG hobs with propane cylinders recommended)
    - Emergency lighting (Battery torches and rechargeable head-torches acquired)
    - Blankets and other warm clothing. (SCC)
    - FM radio receiver (hand crank and solar charged radio acquired)
    - Independent power supply (options for CIL purchase)

The Business Manager, who was the focus for emergency planning, had identified a number of suitable generators that could provide an emergency back-up power supply for the Town Hall. The best option was the Jackery Explorer 3000 Portable Power Station, which were available for under £3,000 each. A single one of these could only allow limited operations in a particular room, so up to five would be required to provide basic lighting and power for computer systems around the Town Hall.

Many members were against spending local precept money on resilience measures, which they felt should be the responsibility of central government. The Chair of the Finance Committee proposed that neighbourhood CIL funds, of which over £15,000 remained uncommitted, should be used for this purpose. He proposed that the full council authorise this expenditure, subject to the Leisure and Environment Committee on 24th November, or the Finance Committee on 1st December, approving the list of prosed items. This would give officers another two weeks to check alternative options and answer members' questions.

Members asked for consideration of a range of alternative options, including diesel generators, sodium batteries and a better understanding of how much electrical power could be stored on site. The Town Hall systems would need to be tested to ensure that essential data was stored on site and would be accessible when using an emergency power supply.

RESOLVED
That, under the power of the Local Government Act 1972, s.111, members authorised the expenditure of up to £15,000 on the purchase of resilience equipment required for the current winter, using uncommitted neighbourhood CIL funds, subject to the list of items being scrutinised and approved by a committee.

That the full council consider additional longer-term resilience options at another meeting in 2027.

10. TO AUTHORISE THE EXPENDITURE OF £12,000 EXCLUDING VAT ON TREE SURGERY AS RECOMMENDED BY THE LEISURE AND ENVIRONMENT COMMITTEE

Members considered the recommendation from the Leisure and Environment Committee to carry out all the tree works that had been identified in the recent tree survey over the winter period when the trees would be dormant.

RESOLVED
That, under the power of the Public Health Act 1875, s.164, members authorised the expenditure of up to £12,000 on tree surgery.

11. TO AUTHORISE THE EXPENDITURE OF £15,500 EXCLUDING VAT ON A NEW 5-YEAR PRINTER AND COPIER CONTRACT AS RECOMMENDED BY THE LEISURE AND ENVIRONMENT COMMITTEE

Members considered the recommendation from the Leisure and Environment Committee to replace the current Town Hall printer when it came to the end of its 5-year lease in 2027.

RESOLVED
That, under the power of the Local Government Act 1972, s.111, members authorised the expenditure of up to £15,500 on a new 5-year printer contract.

RESOLVED
To extend the meeting by 30 minutes to allow it to continue until 9:30 p.m.

12. TO APPROVE THE TRAINING AND DEVELOPMENT POLICY AS RECOMMENDED BY THE POLICY AND RESOURCES COMMITTEE

Members considered the Training and Development Policy as recommended by the Policy and Resources Committee.

RESOLVED
To approve the Training and Development Policy as shown at minute pages 1084 to 1087.

13. TO APPROVE THE TRAINING AGREEMENT POLICY AS RECOMMENDED BY THE POLICY AND RESOURCES COMMITTEE

Members considered the Training Agreement Policy as recommended by the Policy and Resources Committee.

RESOLVED
To approve the Training Agreement Policy as shown at minute page 1088.

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14. TO APPROVE THE FLEXIBLE WORKING POLICY AS RECOMMENDED BY THE POLICY AND RESOURCES COMMITTEE

Members considered the Flexible Working Policy as recommended by the Policy and Resources Committee.

RESOLVED
To approve the Flexible Working Policy as shown at minute pages 1089 to 1094.

15. TO APPROVE THE HOLIDAY POLICY AS RECOMMENDED BY THE POLICY AND RESOURCES COMMITTEE

Members considered the Holiday Policy as recommended by the Policy and Resources Committee.

RESOLVED
To approve the Holiday Policy as shown at minute pages 1095 to 1099.

16. TO APPROVE THE BUSINESS ETHICS POLICY AS RECOMMENDED BY THE POLICY AND RESOURCES COMMITTEE

Members considered the Business Ethics Policy as recommended by the Policy and Resources Committee.

RESOLVED
To approve the Business Ethics Policy as shown at minute pages 1100 to 1106.

17. TO APPROVE THE WHISTLEBLOWING POLICY AS RECOMMENDED BY THE POLICY AND RESOURCES COMMITTEE

Members considered the Whistleblowing Policy as recommended by the Policy and Resources Committee.

RESOLVED
To approve the Whistleblowing Policy as shown at minute pages 1107 to 1110.

18. TO APPROVE THE HARASSMENT AND BULLYING POLICY AS RECOMMENDED BY THE POLICY AND RESOURCES COMMITTEE

Members considered the Harassment and Bullying Policy as recommended by the Policy and Resources Committee.

RESOLVED
To approve the Harassment and Bullying Policy as shown at minute pages 1111 to 1116.

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19. TO APPROVE THE EQUALITY, DIVERSITY AND INCLUSION POLICY AS RECOMMENDED BY THE POLICY AND RESOURCES COMMITTEE

Members considered the Equality, Diversity and Inclusion Policy as recommended by the Policy and Resources Committee.

RESOLVED
To approve the Equality, Diversity and Inclusion Policy as shown at minute pages 1117 to 1122.

RESOLVED
EXCLUSION OF PUBLIC (WHICH TERM INCLUDES THE PRESS)
That pursuant to the Public Bodies (Admission to Meetings) Act 1960 s.1(2), the public be excluded from the meeting for the business specified in item 20 as the publicity would be prejudicial to the public interest by reason of the confidential nature of the business to be transacted, which covered contractual information and personal data.

20. TO RECEIVE AN UPDATE ON OTHER PRIVATE AND CONFIDENTIAL LEGAL, CONTRACTUAL AND HR MATTERS

See CONFIDENTIAL Annex A, minute pages 1123 to 1125.

RESOLVED
To extend the meeting by another 15 minutes to allow it to continue until 9:45 p.m.

The business of the meeting was concluded at 9:44pm.

Chairman ……

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Report for November 2026 to Sudbury Town Council

From SCC Councillors Kerrie Turner and Philip Faircloth-Mutton

1. New Career/ Work opportunities with new Project launched: 3,000 Learners to Gain Engineering & Construction Skills

- The Lound Civil Campus project at East Coast College, will focus on addressing current and future skills needs in the civil and construction trades in collaboration with regional employers.
- Funded by £2.1m from the Asset Skills Enhancement and Capability (ASEC) Fund, a £7.8 million pot secured through the planning process for Sizewell C and managed and allocated by Suffolk County Council, East Suffolk Council and Sizewell C in partnership to enhance the supply of skills related to Sizewell C, alongside regional needs and aspirations.
- The campus will provide training opportunities for new entrants, career changers, and existing workers seeking to up-skill.
- The project has been designed to be delivered in multiple phases. The £2.1m ASEC funding has supported Phase 2 of the project, the implementation of a Technical Operators area.
- Phase 3, which includes the partial refurbishment of the previous site infrastructure to provide a new training area for construction-specific learning, is expected to commence within six months of the start of the previous phase.

https://www.suffolk.gov.uk/council-and-democracy/council-news/up-to-3000-learners-to-gain-engineering-and-construction-skills

2. Achieved Bronze status in Ministry of Defence employer scheme

Suffolk County Council has achieved the Bronze Award through the Ministry of Defence's Armed Forces Employer Recognition Scheme (ERS). Work has started to achieving Silver status.

The award recognises the council's commitment to supporting the Armed Forces community and upholding the Armed Forces Covenant.

The aim is to ensure members of the Armed Forces community are not disadvantaged in accessing employment opportunities.

As part of this commitment, Suffolk County Council:

- Provides up to two weeks paid leave each year for employees who are reservists to attend their annual training commitments.
- Supports employees who volunteer with cadet organisations and contribute to the wider Armed Forces community.
- Takes steps to ensure members of the Armed Forces community are not disadvantaged through our recruitment and selection processes

https://www.suffolk.gov.uk/council-and-democracy/council-news/council-achieves-bronze-status-in-ministry-of-defence-employer-scheme

3. The *Be Kind to a Kid at Christmas* toy appeal launched on Monday 2 November and closes on Friday 4 December, giving our Christmas helpers time to deliver the toys before the big day.

This year, our local libraries are teaming up with BBC Radio Suffolk to relaunch this much-loved appeal. Thousands of new toys have been donated to children in previous years, and we'd love your help to sprinkle a little more Christmas cheer across Suffolk.

For many families facing financial pressures, Christmas can be a difficult time. A donated toy can help make the day a little brighter and give a child a happy memory to treasure.

Our Christmas helpers include local businesses and charities, with Vertas lending a hand to make sure the donated toys reach their destination. With your support, we can make this year's appeal even bigger and better!

No sleigh or reindeer required, just a little generosity and Christmas spirit!

Visit the Suffolk Community Libraries' website for all the important details, including the donation criteria and participating library donation points, - Sudbury Library is on the list of donation points.

4. UPDATE MEADOWS/CORNARD PATHWAY from Active Travel/PROW

We are actively progressing this. We are in the process of confirming the access arrangements to the meadow, working closely with Sudbury Common Lands Charity and Babergh Public Realm team. Once we have confirmed this, we will then be able to get a cost estimate, review and confirm funding arrangements and, all being well, hope to be ready to construct during the springtime.

As a further note, given the nature of the land as a water meadow, even if we were ready to construct now, springtime would be the most sensible to avoid the risk of flooding or other construction challenges during the winter period.

5. SUFFOLK COMMUNITY NURSES being saved as additional funding to be voted on at the next Cabinet meeting, Tuesday 10th November.

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Report for November 2026 to Sudbury Town Council

From SCC Councillor Laura Smith

Consultation on changes to Family Hubs

The SCC Cabinet has voted to review the number of Family Hubs in the county (formerly known as children's centres), with a view to closing nine of them.
Closure of the planned family hubs will save the council £425,000 per annum in property-related costs, with family hubs services being hosted in libraries or community buildings in some areas, though the Cabinet report states that that outreach work and staff numbers will actually increase.
Sudbury's Phoenix Family Hub is one of the centres that is not set to close under proposed changes, fortunately.

There are concerns that there may be negative impacts for families on a low income, without access to transport, or for whom English is not a first language. Families with multiple young children, or children who are disabled or have special education needs may also be disadvantaged by the closures.
An eight-week public consultation on the Family Hubs proposals is open and closes on 20th December:
https://www.suffolk.gov.uk/council-and-democracy/consultations-petitions-and-elections/consultations

Aldi crossing

Since writing to Highways about a crossing at Aldi I have been informed that there are plans in progress for two pedestrian crossings at the Springlands Way roundabout, one of which is located on Waldingfield Road/B1115 near Aldi.

Further to this there are also plans to introduce toucan crossings on Northern Road, which will improve pedestrian and cycle connections between the McDonald's side of the road and the industrial estate opposite.

Nature projects map

The Norfolk and Suffolk Nature Recovery Partnership has launched the 'Local Nature Recovery Hub', which provides an interactive online map so projects that benefit wildlife and the natural environment can be recorded and explored.
Communities and organisations in Suffolk are being encouraged to record and share their nature recovery projects through the new online hub.
The hub supports the ambitions set out in Suffolk and Norfolk's Local Nature Recovery Strategies, which were published a year ago.

The hub is open to everyone, including residents, landowners, schools, parish councils, businesses, charities and community groups.
Projects of all sizes are welcome and can be added at any stage, from concept through to completion.

You can explore the hub at the website for Norfolk and Suffolk Nature Recovery Partnership and add your projects here.

Flood Prevention

As storm season approaches, it is worth being prepared for heavy rain and flooding events. Suffolk County Council is the Lead Local Flood Authority and is seeking funding for and planning projects to reduce the impact of flooding on residents, businesses and critical infrastructure in the county.

There are also practical steps that residents can take themselves, from understanding their flood risk to maintaining watercourses on their land; many residents do not realise they are responsible for a ditch, stream or other watercourse on their property, and that keeping these clear reduces the risk of flooding both for themselves and their neighbours. However, increasingly heavy rainfall can lead to flooding even where drainage systems and gullies are clear and working. There are some online sources which can help:

- Check the flood risk for a property https://www.gov.uk/check-long-term-flood-risk
- Information on maintenance of ditches and watercourses, where responsibility often lies with the landowner https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/maintenance-of-ditches-and-other-watercourses
- Highways drainage works scheduled https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/highway-drainage
- Flood Smart Living Handbook provides advice and guidance on reducing flood risk https://www.suffolk.gov.uk/asset-library/FINAL-TO-BE-USED-Flood-Smart-Living-November-2024.pdf
- Reporting a flood problem in Suffolk and what happens next https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/report-a-flood-in-suffolk

Traffic in Ballingdon

I recently conducted an informal door-to-door survey in Ballingdon St and Cross St to gather evidence of the effect traffic has on the lives of the residents there. Over 80% of residents who responded indicated that they would support a 20mph zone; a similar number stated that they wished to see fewer lorries travelling through Ballingdon.

At the SCC meeting on 8th October I asked Cabinet Member for Highways Cllr Christopher Hudson for a review of Strategic Lorry Routes in Suffolk; I followed this up in writing, highlighting the impact of HGV movements on Sudbury's town centre.

In the email to Cllr Hudson I also mentioned the results of the traffic survey I commissioned from Highways last month which showed that the speeds of the traffic on the road are within the thresholds set out in the Suffolk Speed Limit Policy. The Safety and Speed Team, however, have stated that the road's strategic status makes it ineligible for a lower speed limit.

Following the departure of Cllr Hudson from SCC Cabinet I will write again on this topic to the new portfolio holder, Cllr Mulcahy.

Babergh Report

November 2026

By Cllr Tim Regester

Kingfisher Leisure Pool update.

The pool is closed and the existing pool will remain closed as it is considered structurally unsafe. A full report from the engineers and structural surveyors on this is being presented to Babergh District Council today (10th November 2026).

The main user groups of the pool have been relocated to other local pools, i.e. schools, clubs etc. Extra public swim sessions have been set up at Hadleigh Swimming pool.

The use of TGS's pool is problematic, it would require some significant investment for it to be used as a replacement. This is an option that is being investigated but really rests upon the decision of TGS School and the Community Interest Company.

Work already started to investigate options for the replacement of the Kingfisher pool had already started prior to the closure as it was recognised that pools had a limited lifetime and this pool was likely end of life soon. All potential options are being investigated and considered including a temporary pool in Kingfisher Leisure Centre and a complete replacement, different suppliers are being spoken to.

More details of the options should be available in the New Year.

Funding for these options remains a challenge for Babergh District Council and various funding sources are being considered.

Sudbury Masterplan.

After a tender process that attracted a wider range of bids than expected, a contract for the production of the masterplan has been signed with the winning bid.

The winning bid was from a consortium of We Made That (https:/wemadethat.co.uk), who are a London based Agency specialising in masterplans and Urban design with an excellent track record. PRD (https://prdweb.co.uk/) who are a consultancy specialising in local economic development projects with lots of experience in East Anglia and WSP who are no strangers to Sudbury having worked previously on the Sudbury Relief Road and other projects. All the previous plans have been provided (along with the results so that the same mistakes are not repeated) including a 1947 study of Sudbury.

They will be concentrating on assessing the whole of Sudbury (they were shown around on Monday this week by Babergh and STC officers and members) and will be speaking to many stakeholders between now and Christmas, producing a plan then holding wider consultations.

Local Government Reorganisation

We received an update from the Government on Thursday 29th October on Local Government Reorganisation in Suffolk.

As you may remember, the original decision to create three new unitary councils in Suffolk was unexpectedly withdrawn by the Government last month.

This means local elections in May 2027 will go ahead on existing council boundaries.

Minister Jim McMahon, has now made a statement to the House of Commons confirming that the Government has completed the first phase of their review and that they are satisfied that the criteria and process for LGR are robust and aligned to the new Government's priorities.

We now expect a fresh decision in relation to Suffolk by March 2027 at the latest.

This will be based on the proposals submitted in September 2025, however, we will need to respond to queries from MHCLG as the Minister tests and seeks assurance that their final decision is the best one for the residents of Suffolk.

Shadow elections for all new unitary councils will then take place in May 2028, ahead of those councils going live on 1 April 2029.

The Government also confirmed that Suffolk will receive £1.35m in coming weeks as a contribution towards the costs of LGR, including the costs of their delay.

Regulator of Social Housing inspection outcome

As you should also already be aware, the Regulator of Social Housing recently published its findings after an inspection of our councils' housing services.

It awarded both councils the C2 rating - the second tier on a scale of C1-C4, with C1 being the target grade for all social landlords.

This is the highest grading of any district or borough council in Suffolk.

The judgement reflects the good progress we have made - although we recognise there is still work to do.

We have written to our tenants, and there are also FAQs, plus copies of the full judgements on both the Babergh and Mid Suffolk websites.

Asylum Seekers housing arrangements

Given the speculation and to avoid misinformation this is the actual processes and rules about both issues.

From the Officers of Babergh District Council.
Following a number of questions and enquiries made recently I wanted to share a short briefing to clarify the arrangements for asylum accommodation, the role of the Council, and how the planning and licensing rules for houses in multiple occupation (HMOs) apply.

Key points

- The accommodation of asylum seekers is a national, Home Office-led programme.
- Serco is contracted by the Home Office in the eastern region to procure and manage accommodation.
- Properties used by Serco are privately owned. Council housing is not used for this purpose, so these arrangements do not affect the availability of council homes for people on our housing register.
- The Council can provide local information and advice, but it does not decide which properties Serco uses and is not routinely told when a property becomes operational or when people move in.
- The Council retains its normal statutory responsibilities, including HMO licensing, planning, housing standards, environmental health, community safety and enforcement where these apply.

How the accommodation process works

Serco is responsible for:

- initial accommodation for new arrivals;
- dispersed accommodation while an asylum claim is considered; and
- procuring, maintaining and managing the properties it uses.

Before deciding whether to use a property, Serco may ask for local information. The Council draws together relevant information from services including Environmental Health, Housing and Community Safety. This is passed to Serco through Suffolk County Council, alongside information from Suffolk Constabulary and health partners.

The final decision rests with Serco. It operates independently of district, borough and county councils and is not obliged to follow local advice. Councils are not routinely notified when a property becomes operational or when new residents move in.

For important safeguarding and privacy reasons, the Council will not reveal or confirm the addresses of properties used to accommodate asylum seekers.

Who owns the properties?

Serco procures accommodation from private landlords. Council-owned homes are not used.

What support does Serco provide?

Serco provides a housing officer for each property and signposts residents to services including healthcare, education, legal advice and welfare support. This can include Migrant Help and Suffolk Refugee Support.

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What is the current position locally?

The number of properties used for asylum accommodation in our districts is very low. There are currently no hotels in Babergh or Mid Suffolk being used for this purpose.
More information is available in the Council's Accommodation for asylum seekers FAQs.

HMO (Houses of Multiple Occupation) licensing and planning

HMOs form part of the wider housing mix and can provide accommodation for students, younger people, key workers, people leaving a family home and those fleeing abuse.

The main rules are:

- An HMO occupied by five or more people who form two or more separate households requires an HMO licence. Operating a licensable HMO without a licence is an offence.
- A large HMO occupied by seven or more people requires planning permission as well as an HMO licence.
- A small HMO occupied by three to six people will not usually require planning permission because national planning rules treat the change from a family home to a small HMO as permitted development. This position is different where an Article 4 Direction is in force.
- A small HMO with fewer than five occupants will not normally require an HMO licence, although other legal standards and requirements may still apply.

Building control requirements are separate from planning and HMO licensing. Building control considers matters such as structural safety, fire safety and accessibility, while planning considers whether a proposed use or development is acceptable against local and national planning policies.

What is an Article 4 Direction?

An Article 4 Direction can remove permitted development rights in a defined area. This means that a future change from a family home to a small HMO would require a planning application. It does not ban HMOs and does not mean that an application would automatically be refused.

National planning policy requires an Article 4 Direction to:

- be necessary to protect local amenity or the wellbeing of an area;
- be supported by robust evidence; and
- cover the smallest geographical area needed to address the evidenced harm.

For context, Babergh currently has 19 licensed HMOs and Mid Suffolk has seven, the lowest numbers among Suffolk's district and borough council areas. There is no automatic numerical threshold that justifies an Article 4 Direction. The key issue is whether there is evidence of a concentration of HMOs causing specific local harm.

The councils will continue to monitor the position and use their existing planning, licensing, housing standards, environmental health and enforcement powers where appropriate. If evidence emerges of significant concentration and associated harm in a defined area, the case for further planning controls can be reconsidered.

DRAFT

SUDBURY
TOWN COUNCIL

TRAINING AND DEVELOPMENT POLICY

1. INTRODUCTION

1.1. Sudbury Town Council (STC) understands the importance of having a clear training and development structure in place within the Council. STC wants you to have the skills necessary to carry out your roles to the best of your ability. STC wants to provide opportunities for training which help you develop and grow.

1.2. This Policy:

- Explains the principles that underpin our approach to training and development
- Sets out the different types of training we can offer.
- Explains the interplay between training and development, and our appraisal structure
- Sets out the process for you to request training
- Explains how we approach time off for, and paying for, external training

1.3. This Policy applies to all employees of STC. It does not generally apply to workers, agency staff, self-employed contractors or volunteers (although we may offer training to any of these categories of person).

1.4. This Policy does not form part of your contract with us. We reserve the right to amend or remove it.

2. OUR TRAINING AND DEVELOPMENT PRINCIPLES

2.1. STC is guided by the following principles:

- We will conduct a cost/benefit analysis on each occasion when responding to requests for training. All training must deliver a net benefit to the business of STC.

- We will communicate the aim of your training to enhance your learning experience.

- We will not discriminate in the provision of training. We will ensure that all employees have access to training and support in their development.

- We will make reasonable adjustments where necessary to the content, timing and location of training courses to support those with disabilities.

- We will have a joined-up approach between our appraisal process (which is the basis of our assessment of development) and the organisation and provision of training.

- We may refuse training requests if you are under investigation in relation to a disciplinary matter, if you are absent from the Council for a long period of time or if you have given or received notice of termination of employment.

- We will seek feedback from you on the effectiveness of both internal and external training.

3. STC'S APPROACH TO TRAINING

3.1. STC will follow a four-step approach when considering a training need:

- **Assess:** We will always start with an assessment of the training need. This will be done in different ways, depending on the type of training involved. For example, it may be done by way of a one-to-one discussion between you and your line manager; it may come out of the appraisal process; it may form part of a performance management process; or it may be a more general form of training for a group within the workforce.

- **Design/source:** Having decided that a training need exists, we will design or source the relevant training. We will have regard to our own internal expertise and capabilities. We will, if appropriate, engage with external organisation for training delivery.

- **Deliver:** We will deliver the agreed training – either internally or externally – in a timely manner and in a way which is accessible to all to whom it applies.

- **Evaluate:** We will seek feedback from course attendees regarding the effectiveness of the training provided and any areas where it could be improved.

4. DIFFERENT TYPES OF TRAINING

4.1. There are several different types of training which may be applicable to employees, including:

- **Induction training –** New employees and those moving to new roles with us will normally have induction training. This will train you on our systems and equipment, provide relevant contact details and introduce you to the business. Certain training courses, professional certifications or qualifications may be a requirement of your role or a condition of your employment. Where this applies, you will be informed of the specific requirements either in your contract of employment, job description, or by your manager.

- **Employee relations training –** From time to time, we may implement training courses in key areas of employee relations. We want all our employees to be aware of their legal obligations and the standards of behaviour which we require them to uphold.

- **Health and safety training –** We will provide training in all relevant areas of health and safety to ensure a safe place and safe systems of work for all.

- **Management training –** We will provide training for your managers to make sure that their management skills are developed and kept up to date. We will use training to make sure that they have a clear understanding of key employee issues.

- **Technical training –** It is of key importance that you have the skills necessary to do your job well. Through the appraisal process and the performance management process, we will highlight any technical training needs and aim to provide training in the identified area.

- **Team training –** We will assess training and development needs at a team and department level and, where appropriate, deliver team/department training on key issues. This may include team building training events to develop group ethos.

5. HOW WE WILL IDENTIFY TRAINING NEEDS

5.1. We will use our appraisal process to identify training needs. Where a performance issue is identified, we will consider whether training is required/suitable.

5.2. We encourage you to communicate any training or development needs you believe you may have. Any request for training should be made to your Line Manager.

6. PRACTICAL CONSIDERATIONS IN RELATION TO TRAINING AND DEVELOPMENT

6.1. The following practical considerations should be borne in mind in relation to training and development:

- All training courses attended should be logged with the Town Clerk / Deputy Town Clerk and listed in appraisal documentation.
- You should, as soon as possible, tell your Line Manager/ the course organiser about any adjustments needed to help you attend any training session.
- You are responsible for organising your attendance at any external training. Reasonable expenses may be recoverable – please check with your Line Manager before committing to any cost.
- If you fail to attend a training session without good reason, we may deduct the cost of such training from your wages (or, if you are no longer employed by us, require you to repay us).
- If we ask, you must agree to enter into a separate Training Fees Agreement in relation to external training courses.

Policy Name	Training and Development Policy
Current Status	Live
Approved	10th November 2026
Next Review Date	September 2031
Policy Owner	Deputy Town Clerk

SUDBURY TOWN COUNCIL

TRAINING COSTS AGREEMENT

In consideration of the training which I will be receiving from [insert training provider name], I agree to remain employed by Sudbury Town Council for a minimum period of [insert duration] after completion of the training.

The full cost of the training is £[insert amount].

This training will end on [insert date] and if I leave my employment (subject to the provisions below), I undertake to refund to my employer all, or a proportion of, the costs incurred based on the following scale:

- before commencement of the course but after fees, etc have been paid – 100% of the liability which remains subsequent to attempts to recover any costs from the training provider
- at any point during the course, or within three months after course completion – 100%
- more than three months since completion but less than six months since completion – 50%
- more than six months but less than 12 months since completion – 25%.

No repayment will be necessary in the event that employment terminates due to redundancy.

In the event of my failure to pay, I agree that my employer has the right as an express term of my contract of employment to deduct any outstanding amount due under this agreement from my salary or any other payments due to me on the termination of my employment in accordance with the legislation currently in force.

Should my final pay be insufficient to cover the total amount outstanding, I agree to make a separate payment within [insert number] days after my employment has ended or to repay in accordance with a repayment schedule which may be agreed with Sudbury Town Council. Should I fail to make payment within [insert number] days, or in accordance with the agreed repayment schedule, I understand that Sudbury Town Council may take legal action to recover the amounts outstanding.

I agree that I must repay 100% of the amount received, if I do not, in the reasonable determination of my manager, make all reasonable efforts to:

- attend for relevant examinations
- make reasonable efforts in my studies
- complete the course.

Employee signature:	
Date:	
Employer signature:	
Date:	

SUDBURY
TOWN COUNCIL

FLEXIBLE WORKING POLICY

1. INTRODUCTION

1.1. Flexible working is the idea that your working life can, with agreement, be adapted to suit your needs and preferences. This may mean a change to the hours that you work, your start and finish times, your days of work or the place where you work. Sudbury Town Council (STC) recognises the benefits of flexible working and will consider all flexible working requests with an open mind. However, we will need to balance the request against its effect on the business and its impact on other staff.

1.2. This Policy:

- Sets out your legal entitlement to make a flexible working request
- Explains how such a request should be made and the procedures we follow
- Sets out the circumstances where we may decline your request
- Explains what happens if a request is approved

1.3. This Policy applies to all employees.

1.4. This Policy does not form part of your contract of employment. We reserve the right to amend or remove this Policy.

1.5. This Policy sets out the formal process by which you can request flexibility at work. Before you make a formal flexible working application, we suggest that you discuss any request for flexibility informally with your Line Manager.

2. WHAT IS FLEXIBLE WORKING?

2.1. Flexible working might involve reducing or varying your hours or the days that you work or changing the location from which you work. There are lots of options, including:

- Part-time working
- Term-time working
- Annualised hours
- Compressed hours
- Flexitime
- Hybrid, home or remote working
- Job sharing

3. WHO CAN MAKE A FLEXIBLE WORKING REQUEST?

3.1. All employees have the right to make a flexible working request. Normally only two requests can be made in each 12-month period. But if you qualify as disabled, you can make requests to work flexibly as a 'reasonable adjustment', and you can do that more than twice a year.

4. HOW SHOULD A REQUEST BE MADE?

4.1. Under the formal flexible working regime, a request for flexible working must be sent to your Line Manager in writing and must:

- State that it is a flexible working request
- Be dated
- Set out the change that you want and when you want it to take effect
- State whether you have previously made any flexible working requests, and if so, when

4.2. You can only have one live request at any one time. Once a request has been made, it remains live until any of the following occur:

- A decision about the request is made by us (and any appeal concluded)
- The request is withdrawn
- An outcome is mutually agreed
- The statutory two-month period for deciding requests ends without an agreed extension

5. STC'S APPROACH TO FLEXIBLE WORKING REQUESTS

5.1. STC will deal with flexible working requests reasonably.

5.2. STC will consider the proposed flexible working arrangements, weighing up the benefits to you (and to STC) against any adverse impact that granting your request would have on STC or other staff.

5.3. STC may grant your request in full or in part, or we may refuse it. We may also propose changes to your request for you to consider. You may be asked to complete a trial period before we confirm whether we agree to the changes.

6. MEETING

6.1. STC will usually invite you to a meeting to discuss your request. The meeting will give you the chance to discuss why you are requesting the change, how we can accommodate it, and will allow us to understand how you think such a change will work in practice. We aim to hold a meeting within 28 days of receiving a request.

6.2. STC will write to you with the outcome of your flexible working request, usually within two weeks of having held a meeting with you.

6.3. If STC is happy to agree to the flexible working request, then we will confirm our agreement in writing without the need for a meeting.

7. THE RIGHT TO BE ACCOMPANIED

7.1. You may be accompanied by a colleague or trade union representative at any meeting called under this Policy.

7.2. If you want to exercise this right, you should tell the Town Clerk / Deputy Town Clerk as soon as possible who you want to accompany you. It is your responsibility to arrange for them to attend. If you choose a work colleague, we will not prevent them from attending, but we may rearrange the meeting if their absence from work would cause operational problems.

7.3. Your colleague or union representative can, if you'd like them to, explain the key points of your case at the meeting and can respond on your behalf. You can also confer with them during the meetings. However, they must not answer questions put directly to you or try to prevent us asking questions or outlining our points.

8. EXTENDING THE TIME THAT WE HAVE TO DEAL WITH A REQUEST

8.1. If, for some reason, we are not able to make a final decision within two months of the date that you made your request, then we will ask you to agree to extend the time that we have to deal with the request. This might be necessary if, for example, you have appealed against a decision taken to refuse your request or if we have accepted the request on a trial basis but have not made a final decision.

8.2. We will record any agreement to extend time in writing.

9. WHAT WE WILL DO IF WE RECEIVE REQUESTS FROM MORE THAN ONE EMPLOYEE

9.1. We will look at each request individually, on its own merits. Agreeing to one request does not mean we will reach the same conclusion again, nor does it create a right for any other employee. There may be situations when agreeing flexible working with one employee means that others' requests for similar flexible working cannot be granted.

9.2. If we receive several requests from the same business area or team at the same time, and we believe that we will have difficulty in accommodating all requests, then we will speak to each employee with a view to seeing whether a compromise can be reached. If a compromise cannot be reached, then we will look at the requests in order that they were received by STC (unless a competing request is made as a request for reasonable adjustments because of a disability under the *Equality Act 2010*, which will normally take priority).

10. WHAT IF A FLEXIBLE WORKING REQUEST RELATES TO A DISABILITY?

10.1. If you believe that a flexible working request may remove a disadvantage you are placed at in the workplace owing to a disability, then you should contact the Town Clerk / Deputy Town Clerk for further guidance before submitting a formal request under this Policy. We may, with your agreement, seek advice from your doctor or occupational health on the issue.

11. AGREEING A REQUEST

11.1. If we accept your flexible working request, then your new work pattern will form a variation to your contract of employment and will be permanent unless otherwise agreed. We will confirm your new terms in writing.

11.2. We will review your new working pattern with you at regular intervals following the approval of your request to make sure that it is working as expected and meeting the needs and expectations of both you and STC.

12. REJECTING A REQUEST

12.1. STC will try to accommodate flexible working requests where possible. If we cannot accept your request, we will explain why in writing and will rely on one or more of the following reasons:

- It will cost STC too much
- STC cannot reorganise the work among other staff.
- STC cannot recruit more staff.
- There will be a negative effect on quality.
- There will be a negative effect on the ability of the business to meet customer demand.
- There will be a negative effect on performance.
- There's not enough work for you to do when you've requested to work.
- There are planned changes to STC (for example, STC intends to reorganise) and we don't think the request will fit with these plans.

12.2. We will explain why our decision to reject your request for the stated reason or reasons, is reasonable.

12.3. If we reject your request, you have the option to appeal our decision.

13. TRIAL PERIODS

13.1. The legal framework surrounding flexible working does not include any right to agree to the request on a 'trial period' basis. However, it may sometimes be useful for both you and us to 'try out' the new working arrangements before a permanent change is made to your contract of employment. In these circumstances, we may seek to agree a trial period with you. We will not impose a trial period on you. If you reject the offer of a trial period, we will have to agree or reject your flexible working request straight away. If you agree to a trial period, then we will set out this agreement in writing. The letter may also include reference to an extension of the two-month time limit for dealing with flexible working requests (as this period would otherwise continue to run during the trial).

13.2. At the end of any agreed trial period, we will make a final decision on your flexible working request and will communicate this in writing. If we decide to reject your request, then you will have the option to appeal this decision.

14. APPEALS

14.1. You may appeal within one week of our decision. Your appeal should be dated and sent in writing to the person identified in the decision letter. You must explain exactly why you are appealing.

14.2. We will invite you to an appeal meeting. Wherever possible, the appeal meeting will not be led by the manager who held the meeting at which we decided what action to take. You may be accompanied by a trade union representative or work colleague, in line with the process outlined below. Appeals will normally be determined before the end of the 'decision period' (two months from when you sent your initial request) wherever possible. An extension to the 'decision period' may need to be agreed with you.

14.3. Our final decision will be sent to you in writing. We will try to do this within two weeks of the appeal hearing. You will not have any further right of appeal.

15. WITHDRAWAL OF A REQUEST

15.1. You can withdraw a request for flexible working at any time after it has been made, until it has been agreed. A withdrawn request will count as one of the two requests that you are able to make under the statutory scheme in any 12-month period.

15.2. We may notify you that we have decided to treat your conduct as a withdrawal of your flexible working request where either of the following applies:

- You have failed, without good reason, to attend both the first meeting arranged to discuss your request and the next meeting arranged for that purpose.

- We have allowed you to appeal against the rejection of your request and, without good reason, you have failed to attend both the first meeting arranged by us to discuss your appeal and the next meeting arranged for that purpose.

We will notify you in writing if we decide to treat your conduct as a withdrawal of your request.

Policy Name	Flexible Working Policy
Current Status	Live
Approved	10th November 2026
Next Review Date	September 2031
Policy Owner	Deputy Town Clerk

SUDBURY
TOWN COUNCIL

HOLIDAY POLICY

1. INTRODUCTION

1.1. Sudbury Town Council (STC) understands the importance of spending time away from work. Taking time off on holiday provides a period of leisure time, a break from work and the chance to return relaxed and refreshed.

1.2. This Policy:

- Explains how we will handle requests for holiday
- Sets out the normal rules for taking holiday
- Explains how we calculate holiday pay
- Outlines what will happen if you are sick whilst on holiday
- Explains the impact of other absences from work on your holiday entitlement
- Sets out what happens to holiday entitlement if your employment ends

1.3. This Policy applies to all employees and workers in the business. It does not apply to self-employed contractors. Although we will refer to your 'employment' contract, if you are a worker, technically, you don't have an 'employment' contract, and you should just read this as referring to your contract.

1.4. In this Policy, maternity leave, paternity leave, parental leave, adoption leave, shared parental leave, parental bereavement leave, bereaved partner's paternity leave, neonatal care leave and carer's leave are referred to as **family leave**.

1.5. This Policy does not form part of your contract with us. We reserve the right to amend or remove it.

2. HOLIDAY YEAR

2.1. Our holiday year runs from 1st April to 31st March each year (**Holiday Year**). Your annual holiday entitlement renews at the beginning of each Holiday Year.

2.2. If you start work for us part-way through a Holiday Year, then your entitlement to holiday will be pro-rated during your first year with us.

2.3. Unless this Policy (or your employment contract) says otherwise, holiday entitlement must be taken in the Holiday Year in which it accrues. There is no general right to carry over holiday from one Holiday Year to the next, and it is your responsibility to remember to book and take the holiday. Any holiday not taken in the Holiday Year in which it accrued will generally be lost. You can carry over up to five days of unused holiday from one Holiday Year into the next with the permission of the Town Clerk.

3. HOLIDAY ENTITLEMENT

3.1. Unless otherwise specified in their contract, all employees are entitled to 31 days paid holiday in each Holiday Year with a proportionate (pro rata) amount for part-time staff. If you have continuous service over 5 or 10 years there is an additional holiday entitlement shown below with a proportionate (pro rata) amount for part-time staff. This is your total holiday entitlement and includes all bank holidays, any other public holidays or additional statutory days.

Period of Continuous Service		
0 – 5 years	5 years	10 years plus
31 days holiday	36 days holiday	39 days holiday

3.2. If you work part-time, then your holiday entitlement will be calculated on a pro-rata basis. Our calculation will take account of bank holidays and other public holidays.

3.3. In your first year of employment with us, your holiday entitlement will accrue on a pro-rata basis each month at the beginning of each month.

4. BANK AND PUBLIC HOLIDAYS

4.1. The Council will not usually be open on bank or public holidays.

4.2. In England and Wales, there are usually eight bank or public holidays observed each year. There are Christmas Day, Boxing Day, New Year's Day, Good Friday, Easter Monday, the first Monday in May, the last Monday in May and the last Monday in August. If a bank or public holiday falls on a weekend, then it will be observed on the next available working day following that weekend.

4.3. Sometimes an additional public holiday is declared, such as King Charles's Coronation in 2023. When an additional public holiday is declared, we will add this date to your annual holiday entitlement as an additional day. If your holiday entitlement is stated to be 'inclusive of bank holidays', then we will take account of any additional public holidays declared when calculating your overall entitlement by giving you an extra day.

4.4. If you are required to work on a bank or public holiday, then we will allow you to take an alternative day in lieu of the bank or public holiday worked at a time to be agreed between you and your Line Manager, taking account of the needs of the business.

5. HOW IS MY HOLIDAY PAY CALCULATED?

5.1. We will calculate holiday pay at your basic rate of pay.

5.2. We will always pay holiday pay in accordance with legal requirements in place at any particular time. As a result, a decision to reflect certain elements of your remuneration in holiday pay on one or more occasions shall not give rise to an expectation on your part that it will be included on future occasions.

6. REQUESTING HOLIDAY

6.1. We encourage you to take a minimum of two working weeks consecutively during the holiday year, to ensure a proper work break as part of our commitment to staff wellbeing. In exceptional circumstances you may be permitted to take annual holiday in excess of two weeks at the sole discretion of the Town Clerk / Deputy Town Clerk.

6.2. Employees should submit holiday requests as soon as they have chosen their preferred dates and before making any non-refundable bookings. Employees are asked to give as much notice as reasonably practicable, as the earlier holiday requests are submitted, the easier it is for the Council to plan staffing and ensure appropriate cover.

Holiday requests will normally be approved wherever practicable. However, approval may be declined where, for genuine business reasons, it is necessary to ensure that key

operations and services are adequately covered. Employees will be informed of the reason where a holiday request cannot be accommodated.

There is no fixed minimum notice period for holiday requests; however, employees are expected to provide reasonable notice appropriate to the length and timing of the holiday. As a general guide, at least one week's notice should be given for individual days of leave, with as much notice as possible given for holidays of a week or more.

6.3. You must make all requests for holiday leave through Bright HR and in discussion with your Line Manager. Your Line Manager must approve all holiday requests. These are usually considered on a first-come, first-served basis. At popular times of the year – particularly Christmas, Easter and during school holidays – we may need to rotate holiday allocations regardless of who puts in the first request.

6.4. You may sometimes have to take your holiday on dates that STC specify. This is most likely to be when the Council is closed – for example, over Christmas and New Year – or to avoid busy periods, or because you still have not taken all the leave due to you in the current Holiday Year. If you are leaving STC, we may ask you to take your remaining holiday entitlement during your notice period.

6.5. Provided you have sufficient holiday entitlement, we will – wherever possible- try to fulfil requests for time off for a religious occasion. This will, however, be subject to STC work requirements.

6.6. Your Line Manager will always discuss alternative dates with you if we have to turn down a holiday request. If your request is refused and you take time off anyway, we will view it as unauthorised absence and deal with the matter in accordance with our Disciplinary Policy.

6.7. Do not make any travel arrangements or financial commitments until you have received our written confirmation that you can take the time off work. We will not be responsible if you suffer losses because your holiday request is refused, regardless of the reason.

7. ILLNESS WHILST ON HOLIDAY

7.1. If you are ill during a period of pre-booked holiday, then we will allow you to change your time off to sick leave if you provide medical evidence- translated into English if necessary – of your illness or injury. If you do not do this, we will leave your absence categorised as holiday and not sick leave. If your holiday is changed to sick leave, then you must follow the procedure outlined above to book dates for another holiday.

7.2. To receive contractual or statutory sick pay during any period of annual leave that is reallocated due to sickness, you must comply with the Council's Absence Management Policy, including the reporting and certification requirements.

7.3. In this situation, your salary entitlement will convert to sick pay rather than holiday pay, and we may make appropriate adjustments to your salary. That may include claiming back the holiday pay you received and substituting statutory sick pay (or no pay), depending on your entitlements under your contract.

7.4. If you are found to have dishonestly claimed to be sick during a period of holiday, then disciplinary action may be taken against you.

8. HOLIDAYS AND LONG-TERM SICKNESS ABSENCE

8.1. You will continue to accrue holiday during periods of sickness absence.

8.2. You can request holiday in the same way as if you were at work. You will receive holiday pay rather than sick pay for any days approved.

8.3. We are able to designate specific days or weeks during your sickness absence as holiday provided that you give us notice of at least twice the length of the holiday itself. You will receive holiday pay for these days.

8.4. If you are unable to take your statutory annual leave due to sickness absence that spans two Holiday Years, you may carry forward up to four weeks' statutory annual leave into the following Holiday Year. Any leave carried forward will be reduced by the amount of statutory annual leave already taken during the Holiday Year. Where you have already taken four weeks' statutory annual leave, no leave may be carried forward under this provision.

8.5. Any holiday that is carried over during long-term sickness absence must be taken within 18 months of the end of the Holiday Year in which it accrued, or it will be lost.

9. HOLIDAY AND FAMILY LEAVE

9.1. Holiday continues to accrue during periods of family leave.

9.2. If a period of family leave is likely to span two Holiday Years, then you are expected to take all holiday that will accrue in the first of those years before commencing family leave. Any holiday that cannot reasonably be taken before the start of the leave can be carried over to the next Holiday Year. This covers your full annual leave entitlement.

9.3. Any carried-over holiday entitlement must be taken immediately upon return to work following family leave unless other arrangements are agreed with your Line Manager.

10. HOLIDAY AND THE END OF EMPLOYMENT

10.1. If you give or receive notice of the termination of your employment, then we may require you to take any accrued but untaken holiday during your notice period.

10.2. If, on the termination of your employment, you have accrued more holiday than you have taken in the Holiday Year, then we will make a payment in lieu for each day that has accrued but has not been taken. Payment will be processed through payroll.

10.3. If, on the termination of your employment, you have taken more holiday than you have accrued in the Holiday Year, then we will deduct any excess taken from any other sums due to you from us.

10.4. Payments and deductions on termination of employment will each be calculated on the basis of 1/260th of annual salary (or average annual remuneration) for each day.

Policy Name	Holiday Policy
Current Status	Live
Approved	10th November 2026
Next Review Date	September 2031
Policy Owner	Deputy Town Clerk

SUDBURY
TOWN COUNCIL

BUSINESS ETHICS (ANTI-BRIBERY AND CORRUPTION) POLICY

1. INTRODUCTION

1.1. Sudbury Town Council (STC) has a zero-tolerance policy towards bribery or corruption within the Council. We promote the idea of free and fair competition; we do not want our successes to be tainted by bribery. You have a role to play in helping us conduct our Council activities in a way which is free from bribery and corruption.

1.2. This Policy:

- Explains what is meant by the terms 'bribery' and 'corruption'
- Sets out the legal framework which underpins behaviour in this area
- Explains our commitment as a Council to the prevention of bribery
- Sets out guidance on giving and receiving hospitality and gifts
- Explains the mechanisms by which you are able to report concerns in relation to bribery and corruption
- Sets out the consequences of a breach of this Policy.

1.3. This Policy has been prepared with the full support and involvement of STC Councillors and senior management. STC is committed, from the top down, to promoting a zero-tolerance stance on bribery.

1.4. This Policy applies to any person who provides services for, or on behalf of, STC, regardless of capacity. This may include (but is not limited to) employees, contractors, agency workers, casual workers, interns and volunteers. Town Councillors are covered by the Code of Conduct.

1.5. This Policy does not form part of your contract with us. We reserve the right to amend or remove it.

2. WHAT IS 'CORRUPTION'?

2.1. Corruption is dishonest, illegal or fraudulent conduct by persons in a position of power.

3. WHAT IS 'BRIBERY'?

3.1. Bribery is a form of corruption. It happens when one person gives another person a reward or inducement for acting improperly, illegally or unethically to gain an advantage, whether personal, commercial or regulatory. You do not need to actually give or receive the reward of inducement for this to amount to bribery.

3.2. A bribe does not need to involve money. Offering hospitality, entertainment or gifts can also be classed as bribery if the purpose is to exert influence.

3.3. Examples of behaviour which may amount to bribery include:

- Promising, offering or giving money, hospitality or gifts in the expectation of receiving a business advantage, or because you have already received that advantage

- Accepting or giving hospitality or gifts in the course of commercial negotiations of any kind, including tender processes, if there is any uncertainty about whether doing so could have an impact on the outcome

- Accepting money, gifts or hospitality from anyone you suspect is seeking a business advantage in return

- Accepting hospitality that is excessively extravagant for the context in which it is offered

- Offering gifts to government or other officials, political parties and individual politicians

- Receiving gifts from government or other officials, political parties and individual politicians.

- Offering or receiving gifts in return for the faster or smoother conclusion of a routine transaction or process

4. THE *BRIBERY ACT 2010*

4.1. The *Bribery Act 2010* sets out legal obligations placed on individuals and businesses to prevent bribery and corruption. It contains the following offences:

- Giving or offering a bribe

- Receiving or requesting a bribe

- Bribing a foreign public official

- Liability for businesses who fail to prevent persons associated with them from bribing another person on their behalf

4.2. The first three of these offences relate to personal conduct and liability. The last offence is an example of organisational liability. We will be liable as a Council if we fail to prevent you from bribing on our behalf unless we can show that we had adequate procedures in place to prevent you from doing so. Your understanding of and compliance with this Policy is key to the steps we take to make sure that STC is free from bribery.

4.3. Offences under the *Bribery Act 2010* can be committed in the UK or overseas.

4.4. Breaches of the *Bribery Act 2010* can lead to unlimited fines and/or up to 10 years in prison.

5. YOUR OBLIGATIONS IN RELATION TO BRIBERY AND CORRUPTION

5.1. You have a clear responsibility to act honestly and with integrity in your work for us. It is not acceptable for you (or someone acting on your behalf) to:

- Give, promise to give or offer a payment, a gift or hospitality with the expectation or hope that you or STC will be given a business advantage, or as a reward for a business advantage you have already been given.

- Give, promise to give or offer a payment, a gift or hospitality to a government official, agent or representative to facilitate or speed up a routine procedure

- Accept payment from a person or organisation where it is known or suspected that it is offered or given with the expectation that that person or organisation will improperly obtain a business advantage

- Accept a gift or hospitality from a person or organisation where it is known or suspected that it is offered or provided with an expectation that a business advantage will be improperly provided by the business in return

- Threaten or retaliate against another person to whom this Policy applies who has refused to commit a bribery offence or who has raised concerns under this Policy.

- Engage in any activity that might lead to a breach of this Policy

5.2. In order to help us create an environment which is free from bribery you must:

- Keep full records and receipts of any and all gifts or hospitality given or received, or payments made to any third parties in connection with your work and provide copies to us on request.

- Take the time to read and understand this Policy and to complete any training associated with it.

- Tell your Line Manager or the Town Clerk / Deputy Town Clerk about any activity of colleagues which comes to your attention which you think may be in breach of this Policy as soon as possible using the process set out below.

- Report any approach to offer you a bribe, facilitation payment, kickback or other incentive for the provision of services on our behalf, using the mechanisms set out below.

6. FACILITATION PAYMENTS/KICKBACKS

6.1. Facilitation payments are regarded as bribes. They are payments made to encourage officials to perform a function they are already obliged to do. They are sometimes referred to as 'back-handers'.

6.2. Kickbacks are generally payments made in return for a business advantage or favour. They are also regarded as bribes.

6.3. You must not make any facilitation or kickback payments to any person in return for a service or function. You must not accept any inducement, or anything which could amount to a facilitation or kickback payment, from any third party to perform a function.

6.4. If you are approached and offered a facilitation or kickback payment, then you must report it immediately to your line manager. You must not under any circumstances accept any offer made.

6.5. Be on the lookout for anything which could amount to a facilitation or kickback payment. If anyone asks you to make a payment on our behalf for a routine function, you must consider whether what they are asking for is in proportion to the goods or services involved. Always get a receipt, and if you have any concerns, discuss them with your Line Manager or the Town Clerk / Deputy Town Clerk immediately.

7. STC'S COMMITMENTS IN RELATION TO BRIBERY AND CORRUPTION

7.1. STC does not tolerate bribery and corruption. We make the following commitments:

- We will undertake risk assessments to review the risks of bribery in each key area of the Council and will review such assessments regularly.
- We will make sure that all levels of management are engaged with our approach to bribery and corruption issues.
- We will undertake due diligence when considering potential business partners and new business areas in order to assess the level of bribery and corruption risk involved.
- We will provide regular training on bribery and corruption.
- We will act swiftly and decisively in the event that any breach or potential breach of this Policy is brought to our attention.
- We will not treat you unfavourably for raising any concern in good faith regarding any breach of this Policy.
- We will put in place clear approval procedures for Council expenses, hospitality and gifts.
- We will encourage openness and communication in relation to bribery and corruption issues.

8. NORMAL HOSPITALITY, GIFTS AND ENTERTAINING

8.1. Hospitality, gifts and entertainment form an important part of any business development strategy. Giving and receiving hospitality or gifts will not, in and of itself, amount to bribery. However, expenditure needs to be reasonable and proportionate. You need to be mindful of the level of hospitality being provided or offered and the timing of any hospitality in the context of any key Council decisions or investments.

8.2. Offering hospitality and entertainment to or receiving them from third parties is allowed under this Policy, provided they are appropriate and reasonable in the circumstances and the purpose is to:

- Build or maintain Council relationships
- Enhance or maintain our reputation
- Help market our products and services more effectively

8.3. You may also give and accept gifts, but only if:

- You have the Town Clerk / Deputy Town Clerk's approval each time and all gifts are recorded in the Town Council's gifts book.
- It is not done in order to influence a business/Council decision
- You do not give or receive the gift as a reward for new business or retain existing business
- You do not give or receive the gift in return for any other benefits or favours
- You give the gift on behalf of the Council (it must not be in your own name)
- You do not give cash or any kind of cash equivalent, such as vouchers
- It is not done in secret
- You comply with local laws

8.4. You can reimburse a third party for business-related expenses – for example, the costs of attending a meeting – and you can accept a third party's offer to pay your expenses. This will not normally be bribery. However, a payment made or received that is more than a reasonable or genuine business expense is not acceptable. An example would be payment for an extended stay in a hotel, before or after business has been concluded.

8.5. You must keep written records of any gifts or hospitality you give or receive and declare these. All associated expense claims must give full details of the reason for the expenditure and must be submitted in line with any rules we have on expenses.

9. HOW TO RAISE CONCERNS

9.1. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for under our control.

9.2. If you believe or suspect that a breach of this Policy has occurred or may occur or if you are offered a bribe or asked to make one, then you should report these concerns in accordance with our Whistleblowing Policy as soon as possible.

9.3. If you are unsure about whether something you have become aware of is a breach of this Policy, then we encourage you to discuss this issue with your Line Manager, or the Town Clerk / Deputy Town Clerk.

9.4. We will not treat you unfavourably for raising a concern in good faith regarding a breach of this Policy. If you feel that you have been unfavourably treated as a result of raising concerns regarding bribery, then you should discuss this issue with your Line Manager or the Town Clerk / Deputy Town Clerk or refer to the Grievance Policy.

10. BREACHES OF THIS POLICY

10.1. Any employee who breaches this Policy may face disciplinary action, which could result in dismissal for gross misconduct. We may terminate our contractual relationship with others who provide services to us and are covered by this Policy if they breach it.

Policy Name	Business Ethics (Anti-Bribery & Corruption) Policy
Current Status	Live
Approved	10th November 2026
Next Review Date	September 2031
Policy Owner	Deputy Town Clerk

SUDBURY
TOWN COUNCIL

WHISTLEBLOWING POLICY

01787 372 331 | info@sudbury-tc.gov.uk | www.sudbury-tc.gov.uk

1. INTRODUCTION

1.1. This Policy outlines what you should do if you suspect something at work is putting you or others in danger or is illegal or unethical.

1.2. This Policy applies to our employees, workers, officers, consultants, self-employed contractors, casual workers, agency workers, volunteers and interns.

1.3. This Policy does not form part of your contract with us. We reserve the right to amend or remove it.

2. WHAT IS 'WHISTLEBLOWING'?

2.1. Whistleblowing is the name given to the reporting of certain types of wrongdoing by people who work for us. This will usually, although not always, be something you have seen or noticed at work. We aim to maintain high standards of integrity in everything we do. However, all organisations can occasionally be affected by conduct that is dangerous, against the law or that breaches ethical or professional codes. We will take your concerns seriously; they will be thoroughly investigated, and you can be confident there will be no reprisals or retaliations.

2.2. The types of concerns you may want to 'blow the whistle' about include any activity which you suspect:

- Is criminal
- Shows a failure to comply with any legal, professional or regulatory obligation
- Poses a danger to health and safety
- May damage the environment
- May breach our Bribery Policy
- May facilitate tax evasion
- Shows that sexual harassment has occurred, is occurring or is likely to occur
- Shows financial fraud or mismanagement or the deliberate concealment of any of the above matters

2.3. Genuine concerns raised in relation to any of the above are likely to amount to whistleblowing. If you are not sure whether something you wish to raise is covered by this Policy, then speak to your Line Manager or the Town Clerk / Deputy Town Clerk who will be able to provide guidance. If none of these are suitable, you should contact the independent charity Protect that also offers an advice line (020 3117 2520).

3. WHAT SHOULD YOU DO IF YOU HAVE A COMPLAINT BUT ARE NOT 'BLOWING THE WHISTLE'

3.1. If you have a complaint or issue which does not fall into the categories listed above or relates to a purely personal matter, then these should generally be raised using our Grievance Policy. If your complaint relates to the conduct of others towards you, then you should also refer to our Bullying and Harassment Policy and/or Sexual Harassment Policy.

4. HOW TO RAISE A WHISTLEBLOWING CONCERN

4.1. You should usually raise a whistleblowing concern with your Line Manager. This can be done informally and does not need to be done in writing. Your Line Manager can provide advice regarding appropriate next steps. If the matter involves your Line Manager or if the

concern you wish to raise is very serious, then you should proceed immediately to the more formal process set out below.

4.2. If the matter is not or cannot be resolved informally, you should put your concern in writing and send it to the Town Clerk. This can be done either by letter or email. You should state that you are raising a concern under the Whistleblowing Policy. Include as much information as in your correspondence as possible, including facts, events, dates, times and the people involved.

4.3. We will hold a meeting with you to discuss the issues you have raised. You are entitled to be accompanied at this meeting, and any other meetings held under this Policy, by a work colleague or trade union representative. You (and your companion, if appropriate) may be asked to keep the matter confidential whilst an investigation takes place.

4.4. We will investigate your concerns in full. We will keep you informed of our progress insofar as we can, but there may be elements which we decide should remain confidential.

4.5. We will confirm the outcome of our investigation to you insofar as we can. If you are dissatisfied with the process in any way, then you can raise this with the Town Clerk / Deputy Town Clerk and an appropriate person will be appointed to review and investigate as appropriate.

5. CONFIDENTIALITY

5.1. We discourage you from making anonymous disclosures as they are very difficult for us to investigate. We can't properly establish whether allegations are credible without being able to ask you for more details or clarification, and this makes it hard to reach an informed decision.

5.2. We will protect anyone who blows the whistle in good faith, even if we do not agree that the allegations they raise are correct. You should feel able to openly raise issues with us under this Policy. However, we understand that the subject matter covered by whistleblowing can be sensitive. If you are concerned about possible reprisals or retaliations, whether from colleagues or others, you should tell your Line Manager or the Town Clerk / Deputy Town Clerk who will be able to provide you with appropriate support and reassurance.

5.3. The sensitive nature of whistleblowing investigations means that, aside from those involved in the whistleblowing process set out above, we will try to keep your personal involvement confidential. There may be circumstances where we cannot do this, and in those circumstances, we will discuss the matter with you to explain our position.

6. EXTERNAL DISCLOSURES

6.1. This Policy outlines the process for raising, investigating and resolving wrongdoing in the workplace. It is rarely necessary – or, from our point of view, desirable – for anyone outside STC to become involved when a whistleblowing allegation is made.

6.2. In some exceptional circumstances, you may decide to go to an external body – an industry regulator, for example. That might be the case if you believe, for example, that someone senior is involved in a cover-up – but again, it is better to raise the matter internally first. The independent charity Protect (see contact details below) can direct you towards the appropriate regulator for the type of issue you want to raise.

6.3. This Policy covers the actions of third parties such as suppliers, service providers and clients, as well as those of our staff. Should you have concerns about a third party, you are

encouraged to raise them with us before approaching anyone else. Your Line Manager will be able to explain how you should proceed.

6.4. Telling the media about a concern - particularly before or during an internal investigation – is almost never justified or appropriate in any situation. We strongly discourage you from doing so, and we will treat any contact with the press as a serious disciplinary issue justifying dismissal unless exceptional circumstances exist. We would normally expect you to have taken all reasonable steps to deal with the matter internally or with an external regulator and to have taken full advice from a lawyer or from Protect (see contact details below) before being justified in approaching the press.

7. PROTECTION FOR WHISTLEBLOWERS

7.1. If you raise genuine concerns under this Policy, even if you turn out to be mistaken, we will support you and you will not face any action as a result.

7.2. We will not dismiss you, or treat you less well, because you've blown the whistle in accordance with this Policy.

7.3. You must not treat others badly if they have raised concerns under this Policy, nor must you threaten them in any way. You must not seek to discover who a whistleblower is or encourage others to do so. If you do, you may face disciplinary action which could include dismissal for gross misconduct. The whistleblower may also be able to bring legal action against you.

7.4. If you believe that you have been treated badly in any way after having raised a whistleblowing concern with us, then you should raise this matter with your Line Manager and/or raise a grievance under our Grievance Policy.

8. ABUSE OF THIS POLICY

8.1. All whistleblowers must act in good faith. If we believe that you have raised issues under this Policy – which you knew were untrue – in bad faith or maliciously, then we will deal with this as a disciplinary matter under our Disciplinary Policy. You may be subject to sanctions up to and including dismissal for gross misconduct.

9. USEFUL LINKS

9.1. You can get further advice on whistleblowing, confidentiality, and protection from reprisals or retaliations at https://protect-advice.org.uk/. Protect is an independent charity that also offers an advice line (020 3117 2520)

Policy Name	Whistleblowing Policy
Current Status	Live
Approved	10th November 2026
Next Review Date	September 2031
Policy Owner	Deputy Town Clerk

SUDBURY
TOWN COUNCIL

HARRASSMENT & BULLYING POLICY

1. INTRODUCTION

1.1. Sudbury Town Council (STC) are committed to providing a work environment where everyone is treated with dignity and respect. We do not tolerate bullying and harassment.

1.2. This Policy:

- Explains the concepts of 'bullying' and 'harassment'
- Sets out our expected standards of behaviour
- Sets out the process you should follow if you have a bullying or harassment complaint
- Explains how we will deal with any complaints

1.3. This Policy applies to everyone who works for STC, including employees, workers, agency workers, consultants, casual workers, volunteers and interns.

1.4. This Policy does not form part of your contract of employment. We reserve the right to amend or remove this Policy.

2. WHAT IS 'BULLYING'?

2.1. Bullying is unwanted behaviour from a person or group that is one of the following:

- Offensive, intimidating, malicious or insulting
- An abuse or misuse of power that undermines, humiliates or causes physical or emotional harm

2.2. Bullying can take many different forms. Examples of bullying behaviour include:

- Spreading malicious rumours about someone
- Consistently putting someone down and undermining them
- Deliberately giving someone a heavier workload than everyone else
- Excluding someone from team social events

2.3. Bullying could involve a pattern of behaviour or a one-off incident. It could happen face-to-face, online, by phone or in writing. It can be verbal and non-verbal. It is not always obvious to others.

2.4. Although bullying is often connected to a power imbalance, that does not mean that it always involves a more senior person bullying a more junior person. It can also be directed at someone more senior than the bully. It may take the form of spreading rumours, refusing to follow instructions, undermining authority, making fun of or mocking the more senior person or spreading rumours about them.

2.5. Constructive and fair feedback about your behaviour or performance from your manager or colleagues is not bullying. It is part of normal employment and management functions.

3. WHAT IS 'HARASSMENT'?

3.1. When bullying or unwanted behaviour is related to certain protected characteristics under discrimination law, then we refer to it as 'harassment'. The protected characteristics which apply are:

- Sex (which, under equality law, means biological sex)
- Sexual orientation
- Race (incorporating colour, ethnic origin, national origin and nationality)
- Religion or belief
- Gender reassignment (which covers any person who is proposing to undergo, is undergoing or has undergone a process for the purpose of reassigning their sex by changing physiological or other attributes of sex)
- Age
- Disability (which means someone with a physical or mental impairment which has a long-term and substantial adverse effect on their ability to carry-out normal day-to-day activities)

3.2. Discrimination law also recognises sexual harassment as when:

- someone is subjected to unwanted conduct of a sexual nature; or
- a person is treated less favourably because they have accepted or rejected unwanted conduct, which is either of a sexual nature, related to sex, or related to gender reassignment.

In each case where the unwanted conduct had the purpose or effect of violating the person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Sexual harassment is considered separately in our Sexual Harassment Policy.

3.3. Harassment in each of the above forms is unlawful.

3.4. It is also unlawful to treat someone badly because they have a complaint of harassment in any form or have helped someone else make a harassment complaint. This is called 'victimisation' and is not tolerated by STC.

3.5. Behaviour can still be harassment even if the person being harassed does not complain or ask for it to stop.

3.6. STC defines harassment as behaviour that creates a hostile, humiliating, degrading or similarly offensive environment related to a protected characteristic. Name-calling, lewd comments, excluding colleagues, making insensitive jokes and displaying offensive material are all examples of harassment.

3.7. Even if you did not intend to harass someone, if your behaviour has this effect on someone else, then you may be found to have harassed them. They may only be a bystander to the behaviour you directed at someone else, but they may still have been harassed.

3.8. The law protects people who are harassed because they are thought to have a certain protected characteristic when they do not or they are linked to someone who has a certain protected characteristic even if they don't have it themselves.

3.9. The equality laws in the UK currently state that sex, for the purposes of protection from discrimination, means biological sex. This means that a trans woman, for examples, falls under the definition of a man for the purposes of equality laws. We are committed to ensuring that this does not in any way diminish the right of our trans colleagues to a working life free from discrimination and harassment. Trans women and trans men working within the business are protected from harassment related to the protected characteristic of gender reassignment, whether or not they are undergoing or have undergone any surgical transition. They are also protected from sex-related harassment based on their perceived sex or their association with that sex.

4. THIRD-PARTY HARASSMENT

4.1. STC want to create a workplace which is free of harassment. This objective extends beyond acts of harassment by those working for us to harassment by third parties such as customers, visitors, clients, suppliers and members of the public.

4.2. You are encouraged to report any third-party harassment you are a victim of, or witness, in accordance with this Policy.

4.3. STC will take active steps to prevent third-party harassment of staff. Action may include, for example, warning notices to customers or recorded messages at the beginning of telephone calls.

4.4. STC will assess the risk of third-party harassment in the workplace and undertake to keep our risk assessment under regular review. STC encourages you to come forward with any areas in which you believe our third-party harassment protection could be improved. You should let your Line Manager know.

4.5. If any third-party harassment of staff occurs, we will take steps to remedy any complaints and to prevent it happening again. Action may include warning the harasser about their behaviour, banning them from our premises, reporting any criminal acts to the police, and sharing information with other areas of STC.

5. OUR POSITION

5.1. STC will not tolerate bullying, harassment or victimisation by anyone working for them.

5.2. STC expects you to treat people with respect and dignity in all communications you have with them, whether face-to-face, over the phone or in writing.

5.3. You are encouraged to report any harassment you are a victim of, or witness, in accordance with this Policy.

5.4. STC are guided by our core values. These values impact the way we view workplace behaviours and our expectations of you. Our managers are trained to recognise behaviours which may amount to bullying and harassment. We will provide regular training to everyone on what our values mean and explain how you must 'live' these values in your interactions with others.

5.5. STC has clear and universal standards of workplace conduct:

- Bad and/or offensive language or gestures of any nature should not be used in the workplace, whether directed at a particular person or not.
- You should not treat a colleague differently because they have raised a complaint of harassment, or you think they might do so, or if they have supported someone else's complaint.
- Inappropriate images or other content should not be viewed or shared at work.
- You should always think before making a joke in the workplace – could anyone be upset or offended by what you say?
- You should never invade colleague's personal space.

- You should not exclude colleagues unfairly from discussions or events.
- You should not use crude humour.
- You should not use an aggressive tone or aggressive language when speaking with colleagues.
- You should not be physically aggressive towards colleagues.
- You should not mock, mimic or belittle colleagues in relation to any protected characteristics or otherwise
- You should not gossip about your colleagues.

5.6. Our standards of workplace conduct and zero tolerance of harassment in the workplace apply equally:

- At work; or
- During any situation related to work such as at a social event with colleagues; or
- Against a colleague or other person connected to the employer outside of a work situation, including on social media; or
- Against anyone outside of a work situation where the incident is relevant to your suitability to carry out your role.

6. RAISING A COMPLAINT

6.1. If you believe that you are being bullied or harassed, then you should first consider whether it would be appropriate to discuss the matter informally with the person who is bullying or harassing you. Sometimes, people do not realise how their actions are impacting others and it might be that an informal discussion can resolve the issue and reset behaviours.

6.2. If you do not feel comfortable approaching the person yourself, or a direct approach has not worked, then you should refer to our Grievance Policy, which sets out a clear process for raising complaints (both informally with an appropriate manager, and formally, if you prefer). You can also choose to follow our whistleblowing procedure outlined in our Whistleblowing Policy, particularly if your allegation is that sexual harassment has occurred, is occurring or is likely to occur.

6.3. We realise that bullying and harassment are sensitive topics. We want to make sure that you have options available so that you feel able to come forward and report any issues you are having.

6.4. We may, if we think it necessary, separate you from the person you are complaining about whilst we investigate. This is not a prejudgement of your complaint. It is simply a way to stop things from getting worse during the investigation.

6.5. If you notice behaviour of others which may be in breach of this Policy, then you should first consider whether it is appropriate to challenge the behaviour yourself. Only do so if you feel comfortable. If you don't feel comfortable, or a direct approach has not worked, then please report the matter to your line manager, who will investigate.

6.6. If we decide that your complaint is not upheld, we will always tell you why in accordance with our Grievance Policy and/or Whistleblowing Policy. Regardless of the formal outcome, if your complaint related to a colleague, we will consider ways of improving your relationship with your colleague[s] and may, for example, suggest mediation or offer training.

6.7. Anyone who raises an allegation of bullying or harassment with us in good faith will not be subjected to any detriment as a result. In particular, if you allege that sexual harassment has occurred, is occurring or is likely to occur then this will be a qualifying disclosure for whistleblowing purposes. Details on whistleblower protection can be found in our Whistleblowing Policy.

6.8. STC will monitor the treatment and outcomes of any complaints of harassment or victimisation we receive to make sure that they are properly investigated and resolved, those who report or act as witnesses are not victimised, repeat offenders are dealt with appropriately, cultural clashes are identified and workforce training is targeted where needed.

7. CONFIDENTIALITY

7.1. To protect the interests of the person complained about, the person who has raised the complaint and any others who may be involved as witnesses or otherwise, confidentiality will be maintained during any investigation process as far as is possible. Whilst any investigation is ongoing, we will ensure that details are only shared with those who need to be aware of them for the purposes of the investigation. Breaches of confidentiality in this context will be considered a serious disciplinary matter.

7.2. If you fail to maintain confidentiality when you are involved in some way in a bullying and harassment complaint, then you may face action under our Disciplinary Policy.

7.3. We may place information and documents about a complaint raised by or about you on your personnel file. These will be processed in accordance with our Data Protection Policy.

8. BREACHES OF THIS POLICY

8.1. Any breaches of this Policy will be handled under our Disciplinary Policy and may result in action including dismissal for gross misconduct or the termination of your contract with us.

8.2. Aggravating factors such as abuse of power over a more junior colleague will be taken into account in deciding what disciplinary action to take.

Policy Name	Harassment and Bullying Policy
Current Status	Live
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Next Review Date	September 2031
Policy Owner	Deputy Town Clerk

SUDBURY
TOWN COUNCIL

EQUALITY, DIVERSITY & INCLUSION POLICY

Our Commitment

1. Sudbury Town Council (STC) is committed to providing equal opportunities in employment and to avoiding unlawful discrimination.

2. This policy is intended to assist STC to put this commitment into practice. Compliance with this policy should also ensure that employees do not commit unlawful acts of discrimination. This Policy sets out the standards of conduct that STC needs from its employees. It covers:
   - Recruitment
   - Pay and conditions of employment
   - Training and continuing professional development
   - Promotion
   - Appraisals
   - Grievances and disciplinary matters
   - Ending employment
   - Giving references
   - How visitors are treated
   - How clients and suppliers are treated
   - How any other business contacts and associates are treated

3. Striving to ensure that the work environment is free of harassment and bullying and that everyone is treated with dignity and respect is an important aspect of ensuring equal opportunities in employment.

4. This Policy applies to all employees, apprentices, consultants, officers, contractors, interns, volunteers, job applicants, and agency and casual workers.

5. This Policy does not form part of your contract with STC. STC reserves the right to amend or remove this Policy.

The Law

6. It is unlawful to discriminate directly or indirectly in recruitment or employment because of "protected characteristics".

   The current protected characteristics are:
   - Age
   - Disability (which means someone with a physical or mental impairment which has a long term and substantial adverse effect on their ability to carry-out normal day-to-day activities)
   - Gender reassignment (which covers any person who is proposing to undergo, is undergoing or has undergone a process for the purpose of reassigning their sex by changing physiological or other attributes of sex)
   - Marriage and civil partnership
   - Pregnancy and maternity
   - Race (incorporating colour, ethnic origin, national origin, and nationality)
   - Religion or belief
   - Sex – following a legal ruling, this term refers to biological sex (sex at birth)
   - Sexual orientation

7. Discrimination after employment may also be unlawful, e.g. refusing to give a reference

for a reason related to one of the protected characteristics.

8. STC will not discriminate against or harass a member of the public in the provision of services or goods. It is unlawful to fail to make reasonable adjustments to overcome barriers to using services caused by disability. The duty to make reasonable adjustments includes the removal, adaptation, or alteration of physical features, if the physical features make it impossible or unreasonably difficult for disabled people to make use of services. In addition, service providers have an obligation to think ahead and address any barriers that may impede disabled people from accessing a service.

What is equality, what is diversity and what is inclusion?

9. 'Equality' requires us, and you, to treat everyone equally and fairly, with equal opportunities and rights.

10. 'Diversity' recognises that this world is full of differences. We should note, value, and positively embrace these differences. It is important for differences to be recognised. But it is equally important that, whilst recognising them, each and every person does so positively, with the importance of equality at the forefront of their minds.

11. 'Inclusion' is the idea that, through raising awareness of the importance of equality and diversity, all members of the workplace environment feel that they are valued, respected, and included regardless of their background or identity. Everyone, without exception, should feel 'included' at work.

Types of Unlawful Discrimination

12. Direct discrimination is where a person is treated less favourably than another because of a protected characteristic.

    Examples: rejecting a job applicant because of their race or failing to promote someone because they are pregnant.

13. Where the protected characteristic is religion or belief, employees are also protected from less favourable treatment because they have *manifested* that belief, provided that they do not do so in an objectionable manner.

14. In limited circumstances, employers can directly discriminate against an individual for a reason related to any of the protected characteristics where there is an occupational requirement. The occupational requirement must be crucial to the post and a proportionate means of achieving a legitimate aim.

15. Indirect discrimination is where a provision, criterion or practice is applied that is discriminatory in relation to individuals who have a relevant protected characteristic such that it would be to the detriment of people who share that protected characteristic compared with people who do not, and it cannot be shown to be a proportionate means of achieving a legitimate aim.

    Examples: refusing a request to work part-time without a good business reason (which indirectly discriminates against women, who are more likely to have childcare responsibilities); insisting all staff work on Saturdays without a good business reason (which indirectly discriminates against Jewish employees, who may not be able to work on the Jewish Sabbath).

16. Harassment is where there is unwanted conduct, related to one of the protected characteristics that has the purpose or effect of violating a person's dignity; or creating an intimidating, hostile, degrading, humiliating or offensive environment. It does not matter whether or not this effect was intended by the person responsible for the conduct.

    Examples: name calling, lewd comments, excluding colleagues, making insensitive jokes and displaying pornographic material. Harassment is dealt with in the Bullying & Harassment Policy.

17. Sexual Harassment is where there is unwanted conduct of a sexual nature that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. This includes verbal, non-verbal or digital conduct regardless of intent.

18. Associative discrimination is where an individual is directly discriminated against or harassed for association with another individual who has a protected characteristic.

19. Perceptive discrimination is where an individual is directly discriminated against or harassed based on a perception that he/she has a particular protected characteristic when he/she does not, in fact, have that protected characteristic.

    For example, if an employee who is straight is subjected to verbal homophobic abuse in the mistaken belief that they are gay, that employee could still claim discrimination on grounds of sexual orientation. If an employee who is straight is treated unfairly because they have been seen socialising with someone who is gay, then that employee could potentially claim discrimination on grounds of sexual orientation as they are being discriminated against by association. With the protected characteristic of sex, if a trans man (biological woman) is treated unfavourably because of the perception that they are a woman then they could claim direct sex discrimination.

20. Third-party harassment occurs where an employee is harassed and the harassment is related to a protected characteristic, by third parties.

21. Victimisation occurs where an employee is subjected to a detriment, such as being denied a training opportunity or a promotion because he/she made or supported a complaint or raised a grievance under the Worker Protection (Amendment of the Equality Act 2010) 2023, or because he/she is suspected of doing so. However, an employee is not protected from victimisation if he/she acted maliciously or made or supported an untrue complaint.

    Example: an employee who is ostracised or dismissed at work because they spoke up on behalf of one of their colleagues in a harassment investigation.

22. Failure to make reasonable adjustments is where a physical feature or a provision, criterion or practice puts a disabled person at a substantial disadvantage compared with someone who does not have that protected characteristic and the employer has failed to make reasonable adjustments to enable the disabled person to overcome the disadvantage.

Part-time and fixed-term work

23. STC will treat part-time and fixed-term staff in the same way as comparable full-time or permanent staff unless different treatment is justified.

Equal Opportunities in Employment

24. STC will avoid unlawful discrimination in all aspects of employment including recruitment,

promotion, opportunities for training, pay and benefits, discipline and selection for redundancy.

Recruitment

25. Person and job specifications will be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment or promotion will be assessed objectively against the requirements for the job, taking account of any reasonable adjustments that may be required for candidates with a disability. Disability and personal or home commitments will not form the basis of employment decisions except where necessary.

Working Practices

26. STC will consider any possible indirectly discriminatory effect of its standard working practices, including the number of hours to be worked, the times at which these are to be worked and the place at which work is to be done, when considering requests for variations to these standard working practices and will refuse such requests only if the council considers it has good reasons, unrelated to any protected characteristic, for doing so. STC will comply with its obligations in relation to statutory requests for contract variations. The council will also make reasonable adjustments to its standard working practices to overcome barriers caused by disability.

27. Everyone in STC is essential to the success of this Policy. We all have a legal responsibility to comply with it, and any of us – however senior or junior we are – may be personally liable in an employment tribunal claim for unlawful discrimination if we breach the terms of this Policy.

28. Everyone working at managerial level is expected to act in full accordance with this Policy, lead by example, and attain and maintain appropriate standards of behaviour within the teams they manage.

29. The ethos and standards covered by this Policy can only be achieved and maintained if you cooperate fully and embrace the approach in this Policy. It is also important that you understand you have a legal responsibility to comply. If you breach this Policy, we may be liable for your actions, and we may both have to pay compensation to anyone who claims against us. We expect you to take personal responsibility for following this Policy's aims and commitments and for drawing any actual or potential breaches to our attention.

30. STC treats personal data collected for reviewing equality and diversity in accordance with the Data Protection Policy. Information about how data is used and the basis for processing is provided in the Data Protection Policy.

People not Employed by STC

31. STC will not discriminate unlawfully against those using or seeking to use the services provided STC.

32. Any bullying or harassment by suppliers, visitors or others should be reported to STC who will take appropriate action.

Training

33. STC will provide training in equal opportunities to those likely to be involved in recruitment or other decision making where equal opportunities issues are likely to arise.

34. STC will provide training to all staff engaged to work at the council to help them understand

their rights and responsibilities and what they can do to help create a working environment free of bullying and harassment. Additional training will be provided to managers to enable them to deal with complaints of bullying and harassment.

Employee Responsibilities

35. Every employee is required to assist STC to meet its commitment to provide equal opportunities in employment and avoid unlawful discrimination or harassment. Employees can be held personally liable as well as, or instead of, STC for any act of unlawful discrimination. Employees who commit serious acts of harassment may be guilty of a criminal offence.

36. Acts of discrimination, harassment, bullying or victimisation against employees or customers are disciplinary offences and will be dealt with under the STC disciplinary procedure. Discrimination, harassment, bullying or victimisation may constitute gross misconduct and could lead to dismissal without notice.

Grievances and Complaints

37. If a staff member considers that they may have been unlawfully discriminated against, they should use the STC grievance procedure. If a member of the public considers that they may have been unlawfully discriminated against, they should use the STC complaints procedure.

38. STC will take any complaint seriously and will seek to resolve any grievance that it upholds. You will not be penalised for raising a grievance, even if your grievance is not upheld, unless your complaint is both untrue and made in bad faith.

Monitoring and Review

39. This policy will be monitored periodically by STC to judge its effectiveness and will be updated in accordance with changes in the law.

40. This is a non-contractual procedure which will be reviewed from time to time.

Policy Name	Equality, Diversity & Inclusion Policy
Current Status	Live
Approved	10th November 2026
Next Review Date	September 2031
Policy Owner	Deputy Town Clerk