HORAM PARISH COUNCIL

Publication Scheme – Adopted April 2025

The purpose of the Freedom of Information Act 2000[1] is to legislate public access to information:

- **Public authorities have to make a significant amount of information available routinely without waiting for someone to specifically request it.**
- **A Transparency Code (the Code) was issued by the government from 1 April 2015. The Code was developed to meet the government aim to give more power to citizens and to increase democratic accountability. Transparency aims to give local electors the information they may need to hold local councils to account. It requires the online publication of certain information. The information required differs depending on the annual turnover. Smaller councils are councils with a turnover of less than £25,000 and larger councils with a turnover of over £200,000. For councils who fall in between these two categories there is an expectation that they should be as transparent and open as possible. Horam Parish Council normally falls in**

[1] Local councils are subject to the Freedom of Information Act 2000

between the two categories but some years there have been large CIL payments due to development in the area which pushes them into the larger council category.

- **Members of the public have the right to make a request for information held by a public authority[2]. This is not limited to official documents, nor to written records, CCTV is also covered for example. Information that may be known by public employees but not recorded, is not required to be communicated[3]**

Information available from Horam Parish Council[4] under the Freedom of Information Act - Model Publication Scheme[5] Updated May 2023[6]

[2] Section 1 (1) of the 2000 Act gives applicants two related rights: To be told whether the information exists and to receive the information

[3] Horam parish council should provide information requested in the form of documents provided or by directing the member of public to the council website

[4] Horam parish council is a public authority

[5] A parish council is required to adopt a publication scheme – Freedom of Information Act 2000, section 19 1 (a) which must be approved by the ICO. The scheme must set out: the types of information the authority publishes and the manner in which the information is published, and details any charges. The ICO Model Publication Scheme has been prepared and approved by the information commissioner – Freedom of Information Act 2000, section 20 (1). Where a public authority falling within the class to which an approved model scheme relates adopts such a scheme without modification, no further approval of the Commissioner is required so long as the model scheme remains approved; and where such an authority adopts such a scheme with modifications, the approval of the Commissioner is required only in relation to the modifications – Freedom of Information Act 2000, section 20 (2)

[6] Freedom of Information Act 2000 section 19 requires public authorities to review publication schemes periodically. Horam Parish Council reviews and will re-adopts it's Model Publication Scheme on an annual basis -.

Information to be published[7]	**How the information can be obtained**	**Cost**[8] **See page 6**
Class1[9] - Who we are and what we do **Horam Parish Council** Who's on the council and it's committees[10] Cllr A Billings (Chairman) Cllr V Roberts (Vice-Chairman) Cllr G Knight Cllr S Lane Cllr A Sadler Cllr G Brockhurst Cllr J Webb Cllr A Lee Cllr J Howells Cllr J Trott	(hard copy and/or website) https://horamparishcouncil.gov.uk/parish-council/councillors	

[7] The Model Publication scheme shows the information that is available and how to obtain it. Horam Parish Council is aware of disability and discrimination legislation obligations when providing information – other formats may be required

[8] Freedom of Information Act 2000 – Section 9 (1) allows an authority to issue a charge. NALC legal topic note L19-08 states charges can be made for disbursements e.g. photocopying, postage and officer time. However, the expectation is that charging for officer time should be the exemption rather than the norm as the information ought to routinely available and easily assessable. The level of charges must be stated on a schedule of charges within the publication scheme document

[9] The table consists of 7 classes of information which are identified to demonstrate transparency. NALC legal topic note L19-08 states councils are encouraged to routinely provide as much information as possible under the 7 classes.

[10] Horam Paish Council had an election in May and have a full quota of councillors. If a councillor was to resign during the four year term of office, a co-option would be required and the publication scheme would need to be amended. The Transparency Code for smaller councils under £25,000 states councils must publish the names of all councillors, committee membership and representation on external local public bodies. Although HPC doesn't fall into the smaller council category it is good practice to provide as much information as possible.

Planning Committee[11]: Cllr G Knight (Chairman), Billings, Lane, Roberts and Sadler David Marlow (non-voting member) Finance Committee: Cllr Billings, Lane, Roberts and Knight (no Chairman at present) Staffing Sturcture: Clerk/RFO Administration Assistant Please contact the Jackie Cottrell – Horam Parish Council Clerk/RFO for any further information[12]:	 clerk@horamparishcouncil.gov.uk The Horam Centre High Street Horam East Sussex TN21 0EH Office opening hours: Tues-Thurs: 9.30-12.30 Friday: 10.00-13.00	

[11] Indicates which councillors are on which committee. The Transparency Code for smaller councils under £25,000 requires councillor names, committee memberships and memberships of any outside bodies be published. Horam parish council does not fall into this category but councils should be as open and transparent as possible so the council has provided this information.

[12] Freedom of Information requests should be directed to the Clerk. Contact details are clearly stated here with the office address, opening times and contact numbers. The Clerk can contact the council's Data Protection Officer Satswana Ltd whose contact details are listed on their ICO registration certificate in the first instance and also the ICO directly for help and advice on the process. Horam parish council has yet to receive an FOI so there is not yet a need to keep a record log. If this does happen in the future I would seek advice from my Data Protection Office on the correct process for keeping a record of the request and what would need to be published in that instance.

Councillor email address[13]	01435 812151 https://horamparishcouncil.gov.uk/parish-council/councillors	
Class 2 – What we spend and how we spend it Current and previous financial year as a minimum[14]		
Annual return form and report by auditor[15]	https://horamparishcouncil.gov.uk/parish-council/annual-accounts	

[13] Councillor email addresses are listed on the website under each councillor's biography. For data protection purposes it is strongly advised councillors have a separate council email address. Horam parish council has ensured this is the case.

[14] The council must ensure the statement of accounts and annual governance statement remain available for public access for a period of not less than five years beginning with the date the documents were first published – Accounts and Audit Regulations 2015 section 13 (b)

[15] The parish council must undertake an effective internal audit and make available such documents - Accounts and Audit Regulations 2015, section 2 (5) (1) & (2) (a). The council must also publish not later than the 1st July in the year immediately following the accounting year to which it relates the Annual Governance Statement – Accounts and Audit Regulations 2015, section 13 (1)(b). They should publish the signed statement of accounts according to the format included in the Annual Return form.

	choose a relevant year	
Finalised budget[16]	Hard copy	
Precept[17]	Hard copy	
Borrowing Approval letter[18]	n/a	
Financial Standing Orders and Regulations[19]	Hard copy. Website – https://horamparishcouncil.gov.uk/parish-council/other-information-policies	

[16] The preparation of an annual budget is one of the key statutory tasks undertaken by the council, irrespective of its size. The financial year runs from the 1st April to the 31st March. Local Government Finance Act 1992, section 49A. The council must consider its estimated expenditure, revenue and reserves (the council should hold between 3-12 months expenditure as a general reserve) for the year ahead. It must consider how it will fund its budget. The difference between total expenditure minus any estimated revenue and reserves to be used will equal the council requirement for the year (precept). The budget and precept requirement must be agreed by Full Council. The budget must be approved by Full Council before the precept is set.

[17] The precept issued to the billing authority must state the amount payable by that authority for the year – Local Government Finance Act 1992, section 41 (2). The precept is the council tax requirement for the year. The precept request must be submitted to the billing authority by a specified deadline. It is not a legal duty to raise a precept.

[18] For larger projects the council may need to borrow funds. Councils can borrow from any lender although most local councils usually borrow from the Public Works Loan Board (PWLB) which is a government department. The council then needs to obtain a borrowing approval from MHCLG – which includes a requirement to consult with the elector followed by submission of an application form. If the application is agreed, MHCLG will send the council a borrowing approval letter which will set out a number of conditions that need to be fulfilled and specify how much the council can borrow, and the maximum term of the loan period – The Good Councillors Guide to Finance and Transparency. Horam Parish Council are considering this as an option to buy a large piece of land in the parish which might be being sold.

[19] Financial Regulations are approved by the full council and can only be amended by full council, and should be reviewed annually. The Financial Regulations govern, set-out and detail how the council conducts, controls and manages its financial affairs. The Accounts & Audit Regulations 2015 Regulation 3 (b)

Grants given and received[20]	Hard copy and website embedded in the December 2024 Full Council minutes	
List of current contracts awarded and value of contract[21]	n/a	
Members’ allowances and expenses[22]	n/a	
Class 3 – What our priorities are and how we are doing	(hard copy or website)	
Parish Plan (current and previous year as a minimum)[23]	Business Plan – Hard copy	
Annual Report to Parish or Community Meeting (current and previous year as a minimum)[24]	Hard copy	

[20] The clerk should check that the council has the statutory power to make the grant. Grant applications will often be made to the council by local bodies, societies and clubs such as sports clubs, residents associations, conservation groups, charities, allotment holders etc. Local councils are empowered to make grants to voluntary bodies, charities, disaster appeal funds, where in the council’s opinion the grant will benefit any part of its area or any of the inhabitants – The Good Councillors Guide to Finance and Transparency. Horam parish council has a grant awarding policy and requires a grant monitoring form to be completed before funds are released. Local councils may apply for a range of grants from various sources such as lottery funding for a number of specific purposes – The Good Councillors Guide to Finance and Transparency. Horam parish council have successfully applied for two grants from Locality for their Neighbourhood Plan. Grant receipts are shown as a separate receipt item on the accounts. The Local Government Transparency Code 2015 for larger councils requires Local councils must publish details of all grants to voluntary, community and social enterprise organisations.

[21] The Local Government Transparency Code 2015 for larger councils applies to any local council which has either gross annual income or expenditure exceeding £200,000. If this is the case the council must publish details of every invitation to tender for contracts to provide goods and/or services with a value that exceeds £5,000. Councils must publish details of any contract, commissioned activity, purchase order, framework agreement and any other legally enforceable agreement with a value that exceeds £5,000 – The Good Councillors Guide to Finance and Transparency list the which exact details need to be published regarding the above. Horam parish council does not fall into this category so does not need to supply this information.

[22] Smaller councils under £25,000 should publish all expenditure over £100. Larger councils over £200,000 must publish expense claims over £500. Councils should consider whether the Data Protection Act 1998 imposes any restrictions or constraints on publication that should be withheld from publication.

[23] It is good practice for a council to be clear about what they aim to achieve including its aims and objectives to reach their goals.

Quality status[25]	n/a	
Local charters drawn up in accordance with DCLG guidelines[26]	n/a	
Class 4 – How we make decisions (Decision making processes and records of decisions) Current and previous council year as a minimum	hard copy and website https://horamparishcouncil.gov.uk/parish-council/parish-council-minutes-agendas	
Timetable of meetings (Council, any committee/sub-committee meetings and parish meetings)[27]	Hard copy and website https://horamparishcouncil.gov.uk/events	
Agendas of meetings (as above)[28]	Hard copy and website https://horamparishcouncil.gov.uk/parish-	

[24] The Local Government Act 1972, schedule 12, part III, 7 (1) states a parish council shall in every year hold an annual meeting. The transparency code for smaller councils under £25,000 states councils must publish associated meeting papers (annual report would be classed as a meeting paper) not less than 3 days before the meeting is taking place. This is not a requirement in the Transparency Code for larger councils over £200,000

[25] The Quality Parish and Town council scheme was launched in 2003. It is open to all town and parish councils in England. There is an accreditation process. Achieving quality status demonstrates a council's ability to deliver efficient services to local residents and speak with greater authority to principle councils when seeking delegated functions which can be better carried out locally.

[26] DCLG stands for Department for Communities and Local Government. It was created on the 5th May 2006 with a remit to promote community cohesion and equality as well as responsibility for housing, urban regeneration, planning and local government. A charter is a legal document granting specific rights and responsibilities to a group of people.

[27] The timetable of meetings does not feature in The Transparency Code 2015 but there is an expectation that councils should be as transparent and as open as possible.

[28] Smaller councils under £25,000 should publish meeting agendas, which are as full and informative as possible – The transparency code 2015. The agenda must be published at least 3 clear days before the day of the meeting - Local Government Act 1972, schedule 12, paragraph 10(2)

	council/parish-council-minutes-agendas	
Minutes of meetings (as above) – nb this will exclude information that is properly regarded as private to the meeting.[29]	Hard copy and website https://horamparishcouncil.gov.uk/parish-council/parish-council-minutes-agendas	
Reports presented to council meetings[30]- nb this will exclude information that is properly regarded as private to the meeting.	Hard copy https://horamparishcouncil.gov.uk/parish-council/parish-council-minutes-agendas	
Responses to consultation papers[31]	Hard copy	
Responses to planning applications[32]	Hard copy and website https://horamparishcouncil.gov.uk/parish-council/parish-council-minutes-agendas	
Bye-laws[33]	n/a	

[29] Smaller councils under £25,000 must publish the draft minutes from all formal meetings (i.e. full council, committee and sub-committee meetings) not later than one month after the meeting has taken place. Even if the minutes have not been finalised the draft minutes should be published – The transparency code 2015. Horam parish council only publishes it's adopted minutes

[30] Smaller councils under £25,000 should publish meeting papers not later than three clear days before the meeting takes place – The Transparency Code 2015. Horam parish council publishes meeting papers.

[31] If the responses to consultation papers are to be considered at a formal council meeting these would be classed as meeting papers and should also be published not later than three clear days before the meeting takes place – The Transparency Code 2015 for smaller councils under £25,000.

[32] The responses to planning applications are embedded in the minutes of the planning meetings.

[33] Under the Local Government Act 1972, it is the responsibility of local councils to keep a copy of their byelaws

Class 5 – Our policies and procedures (Current written protocols, policies and procedures for delivering our services and responsibilities) Current information only	(hard copy or website) https://horamparishcouncil.gov.uk/parish-council/other-information-policies	
Policies and procedures for the conduct of council business: Procedural standing orders[34] Committee and sub-committee terms of reference[35] Delegated authority in respect of officers[36] Code of Conduct[37] Policy statements[38]	Hard copy and website https://horamparishcouncil.gov.uk/parish-council/other-information-policies	

[34] Standing Orders are approved by the full council and can only be amended by full council, and should be reviewed annually. The Standing Orders (model templates available on NALC website) set out the general rules applicable at council and committee meetings and for carrying out council business. The Local Authorities (Standing Orders) (England) Regulations 2001.

[35] The councils Standing Orders state that the council may appoint standing committees or other committees as may be necessary and shall determine their terms of reference. Horam Parish Council have a Finance Committee, Staffing Committee and a Planning Committee.

[36] Delegated authority in respect of officers would be included in the terms of reference of the individual committees and also in the council's Financial Regulations under authority to spend

[37] The council has a duty to promote and maintain high standards of conduct – Localism Act 2011, section 27, (1) & (2). It is good practice to re-adopt the Code of Conduct every four years with a new council. Any councillors co-opted during this period should sign a copy of the Code of Conduct.

Policies and procedures for the provision of services and about the employment of staff:	Hard copy	
Internal policies relating to the delivery of services Equality and diversity policy[39]	Hard copy https://horamparishcouncil.gov.uk/parish-council/other-information-policies	
Health and safety policy[40] Recruitment policies (including current vacancies) [41]	To be produced Vacancies website / hard copy.	
Policies and procedures for handling requests for information[42]	Contact the Clerk directly Hard copy / website: https://horamparishcouncil.gov.uk/parish-council/other-information-policies	
Complaints procedures (including those covering requests for information and	Hard copy / website	

[38] Policy statements are the policies of the council which are listed on the lines below on the Model Publication Scheme
[39] It is unlawful to discriminate directly or indirectly in recruitment or employment because of age, disability, sex, gender reassignment, pregnancy, maternity, race, sexual orientation, religion or belief, or because someone is married or in a civil partnership.
[40] A local council which employs more than 5 people must have a Health & Safety Policy – Health & Safety at Work Act 1974 s 2. I am the sole employee but the council does have 11 councillors who regularly use the council office so it would be good practice to adopt a Health & Safety policy as soon as practically possible
[41] Any vacancies for the parish council are advertised on their website. A recruitment policy is not on the list of policy documentation suggested for a small council
[42] The council's standing orders under responsibilities to provide information, state the council will respond to requests for information. A certificate of the council's membership to the ICO which is a legal requirement is available on the website. The certificate states the council pay for the services of an independent organisation as their data protection officer.

operating the publication scheme)[43]	https://horamparishcouncil.gov.uk/parish-council/other-information-policies	
Information security policy[44]	n/a	
Records management policies (records retention, destruction and archive)[45]	Hard copy / website https://horamparishcouncil.gov.uk/parish-council/other-information-policies	
Data protection policies [46]	Hard copy / website https://horamparishcouncil.gov.uk/parish-council/other-information-policies	
Schedule of charges (for the publication of information)[47]	Hard copy / website: https://horamparishcouncil.gov.uk/parish-	

[43] Code of Conduct complaints is covered within the council's standing orders and grievances under Handling Staff Matters within the council's standing orders. Disorderly conduct at council meetings is also covered within the council's standing orders. There is also a separate Complaints Policy.
[44] Information regarding security of information is contained within the council's Standing Orders under "Management of Information" but the council does not have a separate policy on this. It does not feature on the SLCC suggested policies for smaller councils
[45] Horam parish council's standing orders refer to policies for the retention and safe destruction of all information which the council holds in paper and electronic form. HPC now has a separate Document Retention Policy
[46] Any individual or organisation who processes personal data must comply with the following regulations: Data Protection Act 2018 (this act was amended in 2021 to reflect the UK's new status outside the EU).
[47] The ICO Model Publication Scheme allows for fees to be charged where it can be justified and it requires those charges to be published. The basis of the charge must be made clear

	council/other-information-policies	
Class 6 – Lists and Registers[48] Currently maintained lists and registers only	(hard copy or website; some information may only be available by inspection)	
Any publicly available register or list (if any are held this should be publicised; in most circumstances existing access provisions will suffice)	None at present	
Assets Register [49]	Hard copy Resolved at March 2025 Full Council To be uploaded to new website	
Disclosure log (indicating the information that has been provided in response to requests; recommended as good practice, but may not be held by parish councils)[50]	Not applicable for Horam Parish Council	
Register of members' interests[51]	Hard copy/ Website https://horamparishcouncil.gov.uk/parish-	

[48] The ICO Model Publication Scheme version 1.2. states that this section is for information held in registers required by law and other lists and registers relating to the functions of the authority

[49] The Local Government Transparency Code 2015 states smaller councils under £25,000 **should** publish details of all public land and building assets. Each land and building asset must include: a description, location, ownership, date of acquisition (if known), cost and present use. It should be stated if the council does not own any land or buildings. Larger councils over £200,000 **must** publish details of all land and business assets. The details required are listed in the code. Accounts and Audit Regulations 2015, regulation 4, 3 (b) state a council must keep a register of assets and liabilities

[50] This would be where information on Freedom of Information or Environmental Information requests would be held. Horam parish council do not publish this information as it is not a requirement for a parish council. I will contact the parish councils data protection officer for details of how I will need to log any FOI's going forward

[51] This is a legal requirement for the District Council to publish the parish councillor's Register of Interests. A new councillor must complete their ROI within 28 days of being in office. It is good practice for a parish council to also publish this information. Horam parish council councillors ROI's are available on the pc website.

	council/councillors	
Register of gifts and hospitality[52]	Hard copy/ Website listed within the Register of Interest Form: https://horamparishcouncil.gov.uk/parish-council/councillors	
Class 7 – The services we offer[53] (Information about the services we offer, including leaflets, guidance and newsletters produced for the public and businesses) Current information only	(hard copy or website; some information may only be available by inspection)	
Allotments	n/a	
Burial grounds and closed churchyards	n/a	
Community centres and village halls	n/a	
Parks, playing fields and recreational facilities	website	
Seating, litter bins, clocks, memorials and lighting	Asset Register to be added to the new website	
Bus shelters	Asset Register to be added to the new website	

[52] When councillors fill out their Register of Interests form there is a section on gifts and hospitality where they are required to declare if they have received any to a minimum value of £50

[53] The Transparency Code 2015 for smaller councils under £25,000 should publish details of all public land and building assets. The Transparency Code 2015 for larger councils over £200,000 must publish details of all land and building assets. The Accounts and Audit Regulations 2015, regulation 4, 3 (b) require the council in their accounting statements to keep a record of the assets and liabilities. This takes the form of the Asset Register. The majority of these are listed again in Class 7 making it clear for members of the public to see the services the council offers.

Markets	n/a	
Public conveniences	n/a	
Agency agreements	n/a	
A summary of services for which the council is entitled to recover a fee, together with those fees (e.g. burial fees)	n/a	
Additional Information[54] This will provide Councils with the opportunity to publish information that is not itemised in the lists above	n/a	
News items[55]	Website/Village Diary	

Contact details: Jackie Cottrell, Clerk Horam Parish Council
The Horam Centre, Bank Buildings, High Street, Horam, Heathfield
East Sussex TN21 0EH

[54] The ICO states that a council may wish to include information in the guide which is not specified in the definition documents. For example, environmental information which you make available in accordance with your obligations under the Environmental Regulations 2004, information which you are required to publish or make available for inspection under another enactment and where appropriate, redacted or summarised versions of documents which would otherwise be exempt.
[55] This highlights to the public where they may find council articles published for information.

clerk@horamparishcouncil.gov.uk 01435 812151

SCHEDULE OF CHARGES[56]

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

TYPE OF CHARGE	DESCRIPTION	BASIS OF CHARGE
Disbursement cost	Photocopying @15p[57] per sheet (black & white)	paper + ink
	Photocopying @20p per sheet (colour)	paper + ink
	Postage	Actual cost of Royal Mail standard 2nd class
	Email copies	No charge
Statutory Fee[58]		In accordance with the relevant legislation (Freedom of Information Act)
Other		

* the actual cost incurred by the public authority

[56] The ICO Model Publication Scheme allows for fees to be charged where it can be justified and it requires those charges to be published. The basis of the charge must be made clear

[57] NALC Legal topic note L19-08 recommend charges should not exceed 10p a sheet. However, this topic note was produced in 2008. Horam Parish Council RESOLVED a cost of 15p a sheet

[58] Statutory charges can apply to specific types of information e.g. Land registry information