

ONCHAN DISTRICT COMMISSIONERS

*Hawthorn Villa,
79 Main Road, Onchan.*

ORDINARY MEETING

3rd September 2026

Sir/Madam

You are hereby summoned to attend an **ORDINARY Meeting of the Authority** to be held in the Boardroom at **HAWTHORN VILLA, 79 MAIN ROAD, ONCHAN** to transact the undernoted business on:

Monday 21st September 2026

7:00 pm - Board Meeting

which will be followed by a meeting of the Board sitting **IN COMMITTEE**. Items on this agenda marked **(P)** will be considered in private, and correspondence is circulated separately.

Please note that the minutes referred to in the agenda have yet to be confirmed by the Authority as a true and correct record of proceedings at the various meetings, and will be published after ratification.

Yours faithfully



**R PHILLIPS
CHIEF EXECUTIVE/CLERK**

AGENDA

The order of business at every meeting of the Authority shall be in accordance with that laid down in Standing Order No. 17 or by a resolution duly moved and seconded and passed on a motion which shall be moved and put without discussion.

Chief Executive/Clerk to provide emergency evacuation procedure for Hawthorn Villa at the commencement of the Meeting.

1. To choose a person to preside if the Chairman and Vice-Chairman be absent:

None.

2. Declarations of Interest of Members and Officers (in accordance with Standing Order 18):

3. To deal with any business required by statute to be done before any other business:

None.

4. To approve as a correct record and sign the Minutes of the:

4.1 Minutes of the Ordinary Meeting held on Monday 7th September 2026 (Appendix 1.1)

5. To dispose of any relevant business arising from such minutes if not referred to in the Minutes of any Special Committee:

None.

6. To dispose of any relevant business adjourned from a previous meeting:

None.

7. To deal with any business expressly required by statute to be done:

None.

8. To consider any planning decisions/communications from the Department of Infrastructure Planning Committee:

8.1 Plans for Consideration (Appendix 8.1)

	Planning Reference	Applicant/Address	Return Date
(a)	PA 26/00564/C	Mr S Cringle - Sailmaker House, Unit 7 Carrs Lane	25 th September 2026
(b)	PA 26/00665/B	Mrs K Duncan - 38 Howe Road	2 nd October 2026

9. Finance and General Purposes:

None.

10. Consideration of any Reports from the Clerk or other Officer:

- 10.1** Secondary Employment and Business Interest Policy – Proposed New Policy (Appendix 10.1)
- 10.2** Code of Practice for the Proactive Publication of Information (Appendix 10.2)
- 10.3** Social Media Policy and Member Blogs – Review (Appendix 10.3)
- 10.4** Eastern Civic Amenity Site Joint Committee Request for Additional Funding (Appendix 10.4)

11. Consideration of any relevant correspondence (already circulated unless indicated):

- 11.1** Access to Government Valuer for Local Authorities (Appendix 11.1)

12. To answer any questions asked under Standing Order 25:

None.

13. To answer any Motions in the order in which notice has been received:

- 13.1** Motion 83: (Appendix 13.1)

That the Authority resolves to undertake and fund from the Authority's Housing Reserves a feasibility study into the potential redevelopment of the Hawthorn Villa site and the land within its curtilage, to assess the feasibility, viability and deliverability of a mixed use scheme incorporating new social housing, appropriate accommodation for the Authority's operational requirements, and the impact on, and future provision of, existing income-generating commercial properties.

Proposed by Mr Wilson and seconded by Miss Corkish at the Ordinary Meeting held on Monday 7th September 2026

14. Environmental and Technical Services:

- 14.1** Replacement Street Lighting Costs (Appendix 14.1)

15. Housing Matters:

None.

16. Chairman's Announcements:**Dates for Diary:**

Date	Organisation	Event	Time
18 th September 2026	Onchan Methodist Church	Coffee Morning	10:00 am to 12 noon
18 th September 2026	St Peter's Church	Flim, Fizz and Chips Night	7:00 pm
18 th September 2026	Captain of the Parish	Garff Requisition Meeting – Elim Family Centre	7:00 pm
21 st September 2026	Onchan District Commissioners	Board Meeting	7:00 pm
5 th October 2026	Onchan District Commissioners	Board Meeting	7:00 pm

17. Any other URGENT business as authorised by the Chair for consideration

PLANS LIST

Board Meeting to be held on Monday 21st September 2026
The Lead Member of Environmental and Technical Services and the District
Surveyor have viewed the applications and recommend the following:

	Applicant/Address	Description
PA 26/00564/C Return Date 25/09/2026	Sailmaker House Unit 7 Carrs Lane Tromode Onchan	Additional use, to include the crushing and baling of cans, baling of waste cardboard, and the temporary storage of refrigerant cylinders, all in association with the approved use of the site
	Recommendation – Approve	
PA 26/00665/B Return Date 02/10/2026	Mrs Karen Duncan 38 Howe Road Onchan IM3 2BA	Erection of single storey extension to south elevation with flue, alterations to doors and fenestration to west, east and south elevations, erection of decking to south elevation, alteration to existing roof, installation of two dormers to south elevation, installation of pitched roof to north outrigger, removal of existing chimney, installation of roof lights, alteration to external wall render and cladding, and the erection of a garage /store with a pitched roof to extend over the existing garage on the front elevation.
	Recommendation – Approve	



REPORT

Report to:	Board of Onchan District Commissioners
Reporting Officer:	Chief Executive/Clerk
Date of the Meeting:	21 st September 2026
Subject:	Secondary Employment and Business Interest Policy – Proposed New Policy
Public or Private Document:	Public

Introduction:

The Authority recognises that employees may wish to undertake paid or unpaid employment, self-employment, business activities, public appointments, voluntary work, or other external interests outside their employment with the Authority.

In the interests of good governance, transparency, and the effective management of conflicts of interest, it is appropriate for the Authority to establish a clear framework governing the declaration and approval of secondary employment and other external interests.

The Board previously requested that the draft policy be circulated to employees prior to consideration of its approval and adoption. The policy has now been circulated to the Authority's employees, and no feedback or comments have been received.

The Board is therefore requested to consider the attached draft policy and determine whether it should be approved and adopted for implementation across the Authority.

Previously Considered by the Board:

Ordinary Board Meeting held on Monday 7th September 2026.

Minute reference C26/07/01/10.

Recommendation/s or Action/s Taken:

Option 1

That the Board resolves to approve and adopt the Secondary Employment and Business Interests Policy, as appended to the Chief Executive/Clerk's report dated 21st September 2026, with immediate effect.

Option 2

That the Board resolves to approve and adopt the Secondary Employment and Business Interests Policy, as appended to the Chief Executive/Clerk's report dated 21st September 2026, subject to such amendments as the Board may determine, with immediate effect.

Option 3

That the Board resolves to defer consideration of the Secondary Employment and Business Interests Policy pending further review and amendment.

Supporting Rationale:

The introduction of a Secondary Employment and Business Interests Policy will provide the Authority with a clear and consistent framework for the declaration, consideration, approval, and monitoring of secondary employment and other external interests undertaken by employees.

The policy is intended to support good governance, transparency, and accountability by ensuring that any actual, potential, or perceived conflicts of interest are identified and appropriately managed. It will also assist in protecting the Authority's reputation, safeguarding confidential information, and ensuring that external activities do not adversely affect an employee's ability to perform their duties or comply with working time and health and safety requirements.

Whilst the Authority recognises that employees may wish to undertake legitimate employment, business, voluntary, or public service activities outside their employment, it is important that such activities are considered within an appropriate governance framework to ensure that the interests of both the employee and the Authority are protected.

The adoption of the policy will establish clear expectations for employees and managers, promote consistency in decision-making, and provide a formal mechanism for the declaration and management of external interests across the Authority.

Alternatives Considered but not Recommended:**Option 3**

That the Board resolves not to adopt the Secondary Employment and Business Interests Policy appended to the Chief Executive/Clerk's report dated 21st September 2026 and acknowledges that, in the absence of a formal policy, matters relating to secondary employment, business interests and external activities will continue to be considered on a case-by-case basis without a defined governance framework or approval process.

Standing Orders:

Not applicable.

Resource Impact:

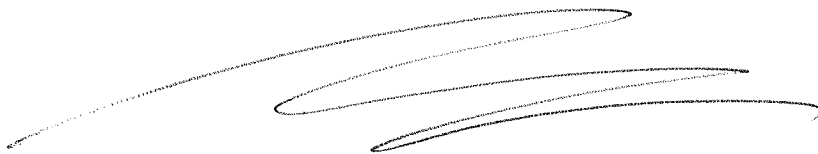
Not applicable.

Financial Impact:

Not applicable.

Legal and/or Insurance Impact:
There are no immediate legal implications arising from the Board's decision. However, if the policy is not adopted, the Authority will continue to manage secondary employment matters without a formal governance framework. This may increase the risk of inconsistent decision-making and could make it more difficult for the Authority to defend allegations of unfair treatment, inconsistency or discrimination should any future employment-related dispute arise.
Equality Impact:
Not applicable.
Climate Change Impact:
Not applicable.
Consultation with Others:
Not applicable.
General Data Protection Regulations and/or Confidentiality Impact:
Not applicable.
Appendices:
See enclosed draft Secondary Employment and Business Interest Policy.

For Members Consideration.



**ROSS PHILLIPS
CHIEF EXECUTIVE/CLERK**



**ONCHAN DISTRICT
COMMISSIONERS**

SECONDARY EMPLOYMENT AND BUSINESS INTERESTS POLICY

Date: August 2026
Review: August 2029



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Policy Review - History:

Please be aware that a hard copy of this document may not be the latest available version, which is available in the Authority's document management system, and which supersedes all previous versions.

Those to whom this Policy applies are responsible for familiarising themselves periodically with the latest version and for complying with policy requirements at all times.

Effective from:	Replaces:	Originator:	Page X of Y
August 2026	None – new Policy	Chief Executive/Clerk	1 to 12
Board Ratification:			
History or Most Recent Policy Changes			
Version:	Date:	Change:	
1	August 2026	New Policy	

1. PURPOSE

Onchan District Commissioners (“the Authority”) recognises that employees may wish to undertake paid or unpaid work, voluntary activities, self-employment or other business activities outside their employment with the Authority.

The Authority does not seek to restrict employees from undertaking legitimate activities outside their employment. However, secondary employment or other external activities must not conflict with the interests of the Authority, adversely affect an employee’s ability to perform their duties, create unacceptable health and safety or working-time risks, or involve the inappropriate use of Authority information or resources.

This Policy sets out the requirements for obtaining approval for secondary employment, declaring relevant business interests, and the procedures by which such matters will be considered and managed.

2. SCOPE

This Policy applies to all employees of the Authority.

For the purposes of this Policy, secondary employment includes:

- employment with another employer;
- self-employment or running a business;
- consultancy, freelance or contract work;
- paid directorships or other paid appointments;
- regular voluntary or unpaid work where it may affect the employee’s duties or create a conflict of interest; and
- any other external work or business activity which could reasonably affect the employee’s employment with the Authority.

Occasional personal activities which have no connection with, and no reasonable potential to affect, the employee’s work for the Authority would not normally require approval.

Business interests include any external appointment, office, financial or business interest, trusteeship, committee membership or other activity which is not secondary employment but which could reasonably give rise to an actual, potential or perceived conflict with the employee’s duties or the interests of the Authority. This may include, for example, a significant shareholding or other financial interest in an organisation, an unpaid advisory or consultancy role, a directorship or partnership, or a position held as an elected member, governor or trustee.

Employees must disclose any such business interest where they reasonably consider that a conflict may arise. Routine personal, social, recreational or community activities which have no connection with the employee’s duties and do not give rise to a conflict do not need to be declared.

The requirement to obtain prior approval for secondary employment does not normally apply to the Authority’s casual or zero-hours workers, unless otherwise required by their terms of engagement. However, all workers must disclose any business interest or external activity which creates, or could reasonably be perceived as creating, a conflict of interest with their work for the Authority.

3. PRINCIPLES

Employees are expected to ensure that any secondary employment:

- does not interfere with the proper and effective performance of their duties for the Authority;
- does not create an actual, potential or perceived conflict of interest, including a contractual conflict where the employee could be required to work for two employers at the same time;
- does not involve the unauthorised use or disclosure of confidential or personal information obtained through their employment;
- does not involve the unauthorised use of Authority premises, equipment, systems, materials, contacts, working time or other resources;
- does not adversely affect the employee's availability for work or their ability to meet the requirements of their role;
- does not create an unacceptable working-time, rest-period, wellbeing or health and safety risk;
- does not adversely affect the reputation or legitimate interests of the Authority; and
- does not otherwise breach the employee's contractual or statutory obligations.

Employees remain responsible for ensuring that they are fit and able to perform their duties for the Authority.

4. REQUIREMENT TO OBTAIN APPROVAL OR DECLARE A BUSINESS INTEREST

Employees must obtain written approval before commencing secondary employment or an external activity falling within the scope of this Policy.

A business interest which does not constitute secondary employment does not necessarily require prior approval, but must be declared promptly where it creates, or could reasonably be perceived as creating, a conflict with the employee's duties or the interests of the Authority. The Authority may put appropriate arrangements in place to manage any identified conflict.

A business interest should be declared in writing to the Chief Executive/Clerk, setting out the nature of the interest and any potential conflict. Where a formal register of interests is introduced, declarations will be recorded in accordance with that arrangement.

Existing secondary employment which has not previously been formally approved should be declared and submitted for approval as soon as reasonably practicable. This applies both to secondary employment already being undertaken when this Policy takes effect, and to any secondary employment an employee subsequently identifies as not having been declared in accordance with this Policy.

Approval relates to the circumstances described in the employee's application. Where there is a material change, including a change in employer, duties, hours, location or nature of the activity, the employee must notify the Chief Executive/Clerk and may be required to submit a new request.

5. APPLICATION PROCEDURE

An employee wishing to undertake new secondary employment must complete the Secondary Employment Permission Request Form at Appendix 1 and submit it to the Chief Executive/Clerk before the proposed activity commences. The same procedure applies where an employee is declaring existing secondary employment which has not previously been approved, in accordance with Section 4.

Where a candidate for a post with the Authority indicates, at interview or on appointment, that they intend to retain existing secondary employment or have a relevant business interest, this should be discussed with them before their start date. Existing secondary employment should be recorded using the Secondary Employment Permission Request Form, while a relevant business interest should be declared in writing in accordance with Section 4.

The employee must provide sufficient information to allow the request to be properly assessed, including:

- the name of the secondary employer or organisation;
- the nature of the work or business activity;
- the proposed role and duties;
- whether the activity is paid, unpaid, voluntary or self-employed;
- the proposed start date and, where applicable, end date;
- the expected hours and days of work; and
- the location at which the work will be undertaken.

The employee must also declare whether the proposed activity could:

- affect their ability to perform their Authority role effectively;
- create an actual, potential or perceived conflict of interest;
- involve the use of confidential information, equipment, systems, contacts or other Authority resources;
- affect their availability, working hours, rest periods, wellbeing or health and safety; or
- affect the reputation or interests of the Authority.

Employees are expected to provide complete and accurate information and to raise any matter about which they are uncertain.

6. ASSESSMENT OF REQUESTS

The Chief Executive/Clerk will consider each request on its individual circumstances.

In considering an application, regard should be given to:

6.1 Performance and availability

Whether the proposed secondary employment is compatible with the employee's existing duties, responsibilities, working arrangements and required availability.

6.2 Conflicts of interest

Whether the activity creates, or could reasonably be perceived as creating, a conflict between the employee's private interests and their responsibilities to the Authority.

Particular consideration should be given where the external employer, client or organisation supplies, tenders to supply, or is seeking to provide goods, works or services to the Authority, or where the employee could influence any decision affecting that person or organisation.

6.3 Confidentiality and information

Whether there is a risk of confidential, commercially sensitive or personal information acquired through the employee's Authority role being disclosed or used improperly, including information relating to ratepayers, employees, contractors, procurement exercises or other non-public Authority business.

6.4 Authority resources

Whether the activity could involve use of Authority premises, equipment, IT systems, email accounts, telephones, vehicles, materials, contacts or working time.

Authority resources must not be used for secondary employment unless expressly authorised. This includes an employee's public-facing local authority status, uniform, vehicles, tools, or municipal keys, which must not be used to advance a private business or second job.

6.5 Working time, wellbeing and health and safety

The combined effect of the employee's working arrangements should be considered where relevant, including whether secondary employment could result in excessive working hours, inadequate rest or fatigue which could affect the employee's wellbeing, safety or ability to undertake their Authority role effectively.

Particular care should be taken where an employee's Authority role involves safety-critical field tasks, such as driving refuse vehicles, operating machinery, lifting, or clearing public areas. Employees must not undertake secondary employment in circumstances where the resulting working hours or lack of adequate rest could reasonably be expected to cause fatigue which compromises their ability to work safely or effectively for the Authority, and employees must declare their total external working hours upon request. Any injury or exhaustion sustained during secondary employment that affects an employee's ability to fulfil their Authority duties must be reported immediately.

6.6 Reputation and public confidence

Consideration should be given to whether the proposed activity could reasonably undermine public confidence in the Authority, compromise the employee's impartiality in their Authority role, or otherwise materially damage the Authority's legitimate interests or reputation.

Employees should be mindful that involvement in party political activity as part of a business interest or secondary employment may raise particular concerns for a local authority employer, including the risk of compromising, or being perceived to compromise, an employee's political neutrality in their Authority role.

7. IMMIGRATION AND WORK PERMIT COMPLIANCE

Employees are responsible for ensuring that they have any immigration permission, work permit or other authorisation required to undertake secondary employment.

Where an employee's right to undertake secondary employment is subject to immigration or work permit restrictions, the employee must satisfy the Authority that any necessary permission has been obtained before commencing the secondary employment.

Approval under this Policy does not constitute confirmation by the Authority that an employee is legally entitled to undertake the proposed secondary employment. Employees who are uncertain about their position should obtain appropriate advice or guidance from the Isle of Man Government.

Where the Authority becomes aware that approved secondary employment may be contrary to an employee's immigration or work permit conditions, the approval may be suspended or withdrawn while the position is clarified.

8. PERSONAL TAX IMPLICATIONS

Employees are responsible for their own tax and National Insurance affairs arising from secondary employment or other external activities.

Approval of secondary employment by the Authority does not constitute tax advice. Employees should ensure that any secondary income is properly declared and should contact the Isle of Man Income Tax Division or obtain independent advice if they are uncertain about their tax obligations.

The Authority will operate payroll deductions in accordance with the tax code and other instructions issued to it by the relevant authorities.

9. DECISION

Following consideration of the request, the Chief Executive/Clerk may:

- approve the request;
- approve the request subject to conditions; or
- refuse the request.

The decision must be recorded in writing on the Secondary Employment Permission Request Form.

Where approval is subject to conditions, these must be clearly stated.

Conditions might include, for example:

- restrictions on particular working hours;
- requirements to maintain separation between the employee's Authority duties and external activities;
- restrictions intended to manage an identified conflict of interest;
- prohibition on the use of Authority information or resources;
- a requirement to notify the Authority of specified changes; or
- approval being subject to review after a specified period.

Where permission is refused, the employee should be provided with the reasons for the decision.

A request should not be refused merely because an employee wishes to undertake secondary employment. Any refusal or conditions imposed should relate to a reasonable concern connected with the employee's duties or the legitimate interests of the Authority.

Where a request raises significant or unusual concerns, the Chief Executive/Clerk should seek advice from the Authority's HR Adviser, or such other specialist advice as is appropriate, before making a final decision.

10. REVIEW AND WITHDRAWAL OF APPROVAL

Approval may be reviewed where circumstances change or where concerns subsequently arise.

The Authority may amend the conditions attached to an approval or withdraw approval where there are reasonable grounds to do so, including where:

- the secondary employment begins to affect the employee's performance, attendance or availability;
- an actual or potential conflict of interest arises;
- working arrangements create a health, safety, wellbeing or working-time concern;
- confidential information or Authority resources are used inappropriately;
- the nature or circumstances of the secondary employment materially change;
- or
- the activity otherwise adversely affects the legitimate interests of the Authority.

The employee will normally be given an opportunity to discuss the concerns before approval is withdrawn or conditions are materially changed.

Any decision to withdraw approval should be confirmed in writing, together with the reasons.

In addition to any review prompted by a change in circumstances, the Chief Executive/Clerk should review approved secondary employment and declared business interests at least annually to confirm that the information previously provided remains accurate, that any identified conflicts continue to be appropriately managed and, in the case of secondary employment, that any conditions attached to approval continue to be met.

11. EMPLOYEE RESPONSIBILITIES

Employees are responsible for:

- seeking approval before undertaking secondary employment covered by this Policy;
- declaring any business interest which creates, or could reasonably be perceived as creating, a conflict of interest in accordance with this Policy;
- providing complete and accurate information;
- complying with any conditions attached to approval;
- maintaining appropriate confidentiality;
- ensuring Authority resources are not used without permission;
- ensuring that external commitments do not adversely affect their Authority duties; and

- notifying the Chief Executive/Clerk promptly of any material change in circumstances.

Employees must also notify the Chief Executive/Clerk if a conflict of interest or other relevant concern arises after approval has been granted.

12. FAILURE TO DECLARE SECONDARY EMPLOYMENT OR BUSINESS INTERESTS

Failure to disclose secondary employment or a business interest where disclosure is required under this Policy, providing materially inaccurate or misleading information, breaching conditions attached to an approval, undertaking secondary employment during a period of sickness absence where this is inconsistent with the reason for the absence, medical advice or the employee's obligations to the Authority, breaching immigration restrictions, or continuing secondary employment after permission has been withdrawn, may be addressed under the Authority's Disciplinary Policy and Procedure.

Any action taken will depend upon the circumstances and seriousness of the matter.

13. DATA PROTECTION AND CONFIDENTIALITY

Information provided in connection with a secondary employment request will be handled appropriately and in accordance with the Authority's Data Protection Policy and applicable data protection requirements.

Information will only be shared with those who reasonably require it for the purposes of assessing, administering or reviewing the request or dealing with related employment matters.

Completed forms and decisions will be retained securely in accordance with the Authority's Retention Schedule and Disposal Policy.

14. REVIEW OF DECISIONS

An employee who is dissatisfied with a decision to refuse permission, impose conditions or withdraw an existing approval should first discuss the matter with the Chief Executive/Clerk.

Where the matter cannot be resolved, the employee may request that the decision be reviewed by the Chair of the Authority, or another Board Member nominated by the Chair who has not previously been involved in the matter.

The request for review should explain why the employee considers the decision should be reconsidered. The outcome of the review will be confirmed in writing.

15. RELATED DOCUMENTS

This Policy should be read in conjunction with, where applicable, the Authority's:

- Secondary Employment Permission Request Form (Appendix 1);
- Disciplinary Policy and Procedure;
- Data Protection Policy;
- Health and Safety Policy;
- Anti-Fraud and Corruption Policy;

- Retention Schedule and Disposal Policy; and
- Code of Conduct.

16. MONITORING AND REVIEW

This Policy will be reviewed periodically, or sooner if significant changes to relevant Isle of Man legislation make an earlier review necessary, and updated where required to reflect changes in legislation, guidance, or the operational requirements of the Authority. Any questions regarding this Policy should be directed to the Chief Executive/Clerk.

APPENDIX 1

SECONDARY EMPLOYMENT PERMISSION REQUEST FORM

To be completed before undertaking any paid or unpaid work outside your primary employment.

Instructions: Please complete all relevant sections and submit this form to the Chief Executive/Clerk for consideration. Permission must be granted in writing before any new secondary employment begins. Existing secondary employment which has not previously been approved must be declared as soon as reasonably practicable. If circumstances change, a new request should be submitted.

1. Employee Details

Employee name	
Job title	
Department/team	
Line manager	
Date of request	
Contact details	

2. Proposed Secondary Employment

Name of secondary employer / organisation	
Nature of work or business activity	
Role title / duties	
Employment type	Paid / Unpaid / Voluntary / Self-employed
Proposed start date	
Expected end date, if applicable	
Hours and days of work	
Location of work	

3. Employee Declaration

Declaration	Yes / No	Details, if yes
Will the secondary employment affect your ability to carry out your current role effectively?		
Could the secondary employment create an actual, potential, or perceived conflict of interest?		
Will you use any confidential information, equipment, systems, contacts, or resources from your primary employment?		

Could the work affect your availability, working hours, rest periods, wellbeing, or health and safety?		
Could the work affect the reputation or interests of your primary employer?		
Where applicable, do you require any immigration or work permit permission to undertake the proposed secondary employment?	Yes / No / N/A	If yes, please provide details of the permission held or required.

I confirm that the information provided is accurate and that I will notify the Chief Executive/Clerk immediately if any details change. I understand that permission may be refused, withdrawn, or made subject to conditions where appropriate.

Employee signature	
Date	

4. Chief Executive/Clerk Assessment

Is the secondary employment compatible with the employee's current role and responsibilities?	
Are there any conflict-of-interest, confidentiality, reputational, wellbeing, or working-time concerns?	
Are any conditions required if permission is granted?	

5. Decision

Decision	Approved / Approved with conditions / Refused
Conditions or reasons for refusal	
Review date, if applicable	
Chief Executive/Clerk name	
Chief Executive/Clerk signature	
Date	



REPORT

Report to:	Board of Onchan District Commissioners
Reporting Officer:	Chief Executive/Clerk
Date of the Meeting:	21 st September 2026
Subject:	Code of Practice for the Proactive Publication of Information
Public or Private Document:	Public

Introduction:

At the Ordinary Board Meeting held on 1st June 2026, the Board, following consideration of Motion 81, resolved that the Authority should develop and formally adopt a Code of Practice for the Proactive Publication of Information.

The enclosed draft Code establishes a framework for the routine publication of information held by the Authority in the exercise of its statutory functions, with the aim of promoting transparency, accountability, and public engagement.

The Authority already publishes a significant amount of information, and this Code formalises existing good practice, while identifying any areas where further publication may be appropriate. The Code also provides guidance on the types of information that should be published, the circumstances in which information may be redacted or withheld, and the methods by which information should be made available to the public.

The Code has been developed in the context of the Freedom of Information Act 2015 and reflects recognised good practice principles relating to openness and accountability. In particular, it seeks to reduce reliance on Freedom of Information requests by ensuring that key information is routinely available to the public wherever practicable.

The Board is requested to consider the attached draft Code and determine whether it should be approved and adopted by the Authority.

Previously Considered by the Board:

Ordinary Board Meeting held on 1st June 2026.

Minute reference C26/06/01/13.

Recommendation/s or Action/s Taken:**Option 1**

That the Board resolves to approve and adopt the Code of Practice for the Proactive Publication of Information, as appended to the Chief Executive/Clerk's report dated 21st September 2026, with immediate effect.

Option 2

That the Board resolves to approve and adopt the Code of Practice for the Proactive Publication of Information, as appended to the Chief Executive/Clerk's report dated 21st September 2026, subject to such amendments as the Board may determine, with immediate effect.

Option 3

That the Board resolves to defer consideration of the Code of Practice for the Proactive Publication of Information pending further review and amendment.

Supporting Rationale:

- The proposed Code of Practice will formalise the Authority's existing commitment to openness and transparency by establishing clear and consistent arrangements for the proactive publication of information. While the Authority already publishes a considerable amount of information, the adoption of a formal Code will provide a structured framework for determining what information should be routinely made available, how it should be published, and when information may need to be withheld or redacted.
- The Code supports the principles of good governance and accountability by enabling residents, stakeholders and other interested parties to better understand the Authority's decision-making processes, policies and activities. Increased access to information can encourage greater public engagement, foster trust and confidence in the Authority, and demonstrate adherence to the Nolan Principles of Public Life.
- The Code is also expected to reduce the administrative burden associated with responding to Freedom of Information requests, as information that is routinely sought can be made available proactively. This will support the more efficient use of officer time and resources, whilst ensuring that information is accessible to the public wherever practicable.
- The Code has been developed with reference to recognised good practice guidance, including the Isle of Man Government's Code of Practice for Public Sector Bodies and other established publication frameworks.

Alternatives Considered but not Recommended:

That the Board resolves not to adopt a Code of Practice for the Proactive Publication of Information.

Standing Orders:
Not applicable.
Resource Impact:
No significant resource implications are anticipated.
Financial Impact:
No additional expenditure is anticipated.
Legal and/or Insurance Impact:
The Code does not create any new statutory obligations but provides a framework to assist the Authority in meeting its existing responsibilities.
Equality Impact:
Following completion of Equality Impact Assessment screening, no adverse equality impacts have been identified.
Climate Change Impact:
No significant climate change impacts have been identified.
Consultation with Others:
Executive Assistant/Officer and Housing Manager – Onchan District Commissioners.
General Data Protection Regulations and/or Confidentiality Impact:
No adverse GDPR implications have been identified.
Appendices:
See enclosed the draft Code of Practice for the Proactive Publication of Information.

For Members' Consideration.



**ROSS PHILLIPS
CHIEF EXECUTIVE/CLERK**



**ONCHAN DISTRICT
COMMISSIONERS**

CODE OF PRACTICE FOR THE PROACTIVE PUBLICATION OF INFORMATION

Date: August 2026
Review: August 2027



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Appendix B Publication Data Incident Reporting Template	Error! Bookmark not defined.

Policy Review - History:

Please be aware that a hard copy of this document may not be the latest available version, which is available in the Authority's document management system, and which supersedes all previous versions.

Those to whom this Code applies are responsible for familiarising themselves periodically with the latest version and for complying with code requirements at all times.

Effective from:	Replaces:	Originator:	Page X of Y
August 2026	None (new Code)	Chief Executive/Clerk	1 to 12
Board Ratification:			

History or Most Recent Policy Changes		
Version:	Date:	Change:
1	August 2026	New Code of Practice

1. SCOPE

This Code of Practice applies to all information held by Onchan District Commissioners ("the Authority") in the exercise of its statutory functions. It applies to the Board, its Committees (such as the Health and Safety Committee), and to all employees of the Authority, and covers information published via the Authority's website, social media channels and notice boards, or made available for inspection where online publication is not practicable.

This Code does not apply to joint committees on which the Authority is represented, as the publication of information relating to those bodies is governed by the arrangements and responsibilities of the relevant joint committee.

2. POLICY

The Authority resolved to create and formally adopt a Code of Practice for the Proactive Publication of Information at the meeting of the Board of Commissioners held on 1st June 2026.

The Authority already publishes a significant amount of information consistent with good practice; this Code recognises that practice as a benchmark, assesses it against the models referenced in Section 6 below, and identifies and addresses any gaps.

3. PURPOSE

The purpose of this Code is to guide the Authority as to what information it should routinely publish, what should be redacted or withheld, and how and where information should be made available, so as to:

- reduce reliance on Freedom of Information requests as a source of information, and the officer time taken to process them;
- improve the transparency and accountability of the Authority's processes;
- highlight the rationale and reasoning for policy decisions; and
- encourage greater and more meaningful participation by members of the public and stakeholders, by showing current issues and the options considered to address them.

In doing so, this Code gives practical effect to the Nolan Principles of Public Life, in particular the principles of Openness and Accountability.

4. BACKGROUND AND LEGAL CONTEXT

Following the passing of the Freedom of Information Act 2015, members of the public may submit requests for information to Local Authorities, provided that information is not exempt. This Code should be read alongside the Isle of Man Government Freedom of Information Act Code of Practice, which provides further guidance on the proactive release of information by public authorities.

This Code has been developed with reference to two established good-practice frameworks, neither of which imposes additional statutory obligations on the Authority:

- the draft Isle of Man Government Proactive Publication of Releases: Code of Practice for Public Sector Authorities (July 2022) which, although not formally

- adopted by Isle of Man Government at the date of this Code, is recommended by Motion 81 as the basis for the Authority's own Code; and
- the UK Information Commissioner's Office (ICO) Model Publication Scheme for Parish and Community Councils which, although developed for public authorities subject to the UK Freedom of Information Act 2000 and not directly applicable to the Isle of Man, has been used by the Authority since 2021 as a good-practice framework for its website disclosure programme.

5. PRINCIPLES OF INFORMATION RELEASE

Before publishing information, the Authority will consider whether release is in the public interest, and whether any of the following considerations apply. In determining whether information is suitable for proactive publication, the Authority will have regard to whether disclosure would:

- harm the economic, commercial, external or security interests of the Authority or the Island;
- jeopardise the candour of debate on policy decisions, or relate to ongoing policy deliberations;
- prejudice legal proceedings, relate to ongoing legal proceedings, or breach legal professional privilege;
- endanger the life or safety of any person, or disrupt public order;
- increase the likelihood of damage to the environment, protected species or their habitats; or
- be premature, where an announcement on the matter is already planned.

The fact that information is not considered suitable for proactive publication does not of itself determine whether that information would be disclosed in response to a request under the Freedom of Information Act 2015. Any such request will be considered separately in accordance with the Act and the Authority's Freedom of Information guidance and procedures.

6. WHAT WE PUBLISH

Published information is organised into the seven classes below. Within each class, the Authority will publish information relating to its current and previous financial or municipal year as a minimum, unless a longer period is indicated. Publication remains subject in all cases to Sections 5, 7 and 12 of this Code and to any applicable legal restrictions.

Class 1 - Authority Description

The objective of Class 1 documentation is to provide members of the public with a clear understanding of the Authority's structure, aims and duties.

Information Published	Detail / Examples	Format	Review
Structure of the Authority, Board and Committees	Structure of the Board, Lead Board Member portfolios and any Committees, including Terms of Reference.	Website	Annually / on change
Names and contact details	Board Members and key officers, with named contacts, telephone numbers and email addresses where possible	Website	On change
Location of offices and accessibility	Location of the main Commissioners' Office and accessibility arrangements	Website / Notice boards	On change
Staffing structure	Organisational chart (organogram)	Website	Annually / on change

Contact details for complaints and information requests	How to make a complaint, report a concern, or request information	Website	On change
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Class 2 - Financial Accountability

The Authority's annual accounts are presented to Tynwald, but this information is often difficult to locate. The Authority will therefore also publish financial information directly.

Information Published	Detail / Examples	Format	Review
Statement of Accounts	Audited financial statements, including fixed asset information	Website (PDF)	Annually
Auditor's report	Independent auditor's report, included within the audited financial statements	Website (PDF)	Annually
Budget	Finalised annual budget and budget allocation across the organisation	Website (PDF)	Annually
Quarterly financial monitoring	Quarterly accounts considered by the Board (July / October / January / April)	Board agenda and minutes	Quarterly
Borrowing, capital funding and significant approvals	Approved borrowing, capital funding plans and significant capital commitments, where applicable	Board minutes	As they arise
Financial Regulations and Standing Orders	Approved financial regulations and relevant financial provisions within Standing Orders	Website (PDF)	Annually / on change
Grants and funding	Grants given or received, applications for significant external funding and other material funding decisions	Board agenda and minutes	As they arise
Contracts and procurement	Significant contract and procurement decisions, including tender awards and approved exemptions from normal procurement requirements, where appropriate	Board agendas and minutes/Website	As they arise
Board Members' allowances and expenses	Reported to the relevant Local Government Unit and published on the website	Website	Annually

Class 3 - Priorities and Progress

Class 3 documents provide members of the public with an understanding of the Authority's strategic priorities, its corporate plans, and how it is performing against them.

Information Published	Detail / Examples	Format	Review
Mission, corporate plans and strategies	Mission statement, strategic objectives and plans (e.g. Road Map)	Website	Annually
Annual reports and performance information	Annual or periodic performance information, where produced	Website	As produced
Significant external reports and reviews	Material reports or findings arising from external reviews, inspections or assessments of the Authority's services or assets (e.g. structural or condition reports), where appropriate for publication	Website / Board agendas and minutes	As they arise
Maintenance and improvement programmes	Planned maintenance and improvement programmes for the Authority's assets and services (e.g. housing stock, parks and open spaces, or highway-related works)	Website	As they arise

Class 4 - The Decision-Making Process

Class 4 documents provide context around policy decisions and highlight issues currently under consideration.

Information Published	Detail / Examples	Format	Review
Meeting Timetables	Authority, Committee, Sub-Committee and Parish meetings	Website / Notice Boards	Annually / on change
Agendas	Published ahead of meetings, with attachments in PDF format	Website/Facebook	Before each meeting
Minutes	Published after meetings, excluding information properly regarded as private or exempt	Website/Facebook	After each meeting
Reports considered by the Board	Reports presented to Board/Committee meetings, excluding exempt items	Included in agendas, decisions recorded in minutes	Ongoing
Public consultations and engagement	Consultation papers issued and the Authority's responses to external consultations	Website / included in agenda and minutes	As they arise
Planning application responses	The Authority's responses to planning applications on which it is consulted	Included in agenda and minutes	As they arise
Byelaws	Onchan District Byelaws currently in force (e.g. dog control, parking)	Website (PDF)	On approval / on change
Externally commissioned reports	Reports commissioned from external consultants or auditors, once considered appropriately by the Board	Website (PDF) or on request	As commissioned
Monitoring of policy decisions	Progress updates against significant Board decisions and KPIs	Board reports	Periodically

Class 5 - Policies and Procedures

Current policies and procedures are made available on the Authority's website.

Information Published	Detail / Examples	Format	Review
Governance policies	Procedural Standing Orders; Corporate Governance Principles and Code of Conduct; and any approved scheme or record of delegated authority	Website (PDF)	On approval / on change
Human Resources and staff policies	Equality, Diversity and Inclusion; Health and Safety; Shared Parental Leave; Hybrid/Remote Working, Bullying and Harassment and Victimisation; and other approved employment policies suitable for publication	Website (PDF), subject to redaction of personal data	On approval / on change
Information governance policies	Data Protection Policy; Data Subject Access Requests; Data Subject Rights; Document Retention Schedule and Disposal Policy and associated Retention Schedule; Internet and Email Policy and Procedures; and Freedom of Information guidance and procedures	Website (PDF)	Annually / on change
Complaints Policy and Procedure	Covering requests for information and operation of this Code, with statutory timescales	Website (PDF)	On approval / on change
Service delivery policies	Customer Service Standards and other policies relating to service delivery	Website (PDF)	On approval / on change
Other policies and procedures	Other approved Authority policies and procedures suitable for publication	Website (PDF)	On approval / on change

Class 6 - Lists and Registers

Class 6 provides members of the public with access to key lists, registers and recorded information maintained or published by the Authority.

Information Published	Detail / Examples	Format	Review
Fixed Asset information	Fixed asset information contained within the Statement of Accounts	Website (PDF)	Annually
Disclosure Log	Anonymised record of information provided in response to Freedom of Information requests, where appropriate	Website or on request	Periodically
Register of Board Members' Interests	Declarations of Board Members' interests	Website / office, subject to statutory limits on personal data	Annually / on change

Class 7 - Services We Offer

Class 7 documents provide members of the public with information about the services and facilities the Authority offers, including how to access them.

Information Published	Detail / Examples	Format	Review
Parks, playing fields and recreational facilities	Including open spaces and glens	Website	As updated
Community centres and village halls	Hall hire information	Website	As updated
Public conveniences	Locations and opening arrangements	Website	As updated
Markets and regular events	Details of weekly and seasonal events	Website	As updated
Chargeable services	Information on services for which the Authority makes a charge, including applicable fees or charges where appropriate	Website/on request	On change
Housing services	Social housing and related housing services	Website	As updated
Waste and environmental services	Refuse collection, Eastern Civic Amenity Site, and related services	Website	As updated
Street lighting and cleaning	Street lighting and street cleaning services and information	Website	As updated
Building Control	Building Control services and guidance	Website	As updated
Library services	Onchan Library services and facilities	Website	As updated
Additional information	Any other information the Authority chooses to publish that is not itemised in the classes above	Website	As available

7. DATA PROTECTION AND REDACTION

All information must be reviewed for compliance with applicable data protection legislation before publication. Personal data will only be proactively published where there is a lawful basis for doing so and publication is necessary and proportionate, having regard to the purpose of publication.

Unless publication is required or permitted by law, or is otherwise justified in the public interest and compliant with data protection legislation, information published under this Code should not include:

- personal information, including a person's name, age, address, contact details, ethnicity, marital status or family members (other than named Board Members and officers acting in their official capacity);

- a person's opinions or beliefs, including political opinions, religion or sexual orientation;
- personal identification numbers, including medical or tax numbers and records;
- information about a named individual's income, salary or financial interests; or
- a person's membership of any political group, trade union or similar body.

Documents will be reviewed and redacted as necessary before publication. For full guidance on redaction, officers should consult the Code of Practice on Access to Government Information, the Authority's Data Protection Policy, or the Office of the Information Commissioner (ask@inforights.im).

8. ACCESSIBILITY OF INFORMATION

Proactive publication is only effective if members of the public can actually find and use the information made available; this section sets out how the Authority will keep published information accessible to as wide an audience as possible.

- The Authority will maintain a digital presence sufficient to provide ease of public access to documents and information, primarily via www.onchan.org.im.
- Documents will be published in commonly accessible formats (typically PDF), with alternative formats provided on reasonable request, for example for members of the public with visual impairments.
- Opportunities will be made available for those who are not digitally literate, with physical copies accessible at the Authority's offices where practicable.
- Where information covered by this Code is not published online, the Authority will provide clear details of how it may be accessed or inspected.

9. PUBLISHING, INDEXING AND CHARGING

The Authority will maintain a clear and accessible index of published information relevant to the organisation, so that members of the public can quickly identify what they are looking for. The index may link to information already available from a number of sources, as well as to material the Authority publishes directly.

- The majority of information covered by this Code will be available free of charge via the Authority's website.
- Where a charge applies, details of the charge will be made clear in the relevant service information or otherwise made available on request.
- Where relevant, the Authority will make clear any copyright position or licensing terms applying to published material, and the period for which information will remain available.

10. CONTINUAL MONITORING AND REVIEW

Continual monitoring of information already published, and of information that may become suitable for publication in future, is an integral part of this Code. The Authority will adopt the following good practice:

- setting review dates as part of the approval process for new information;
- maintaining a schedule of information due for publication;
- training and encouraging officers to consider publication as they prepare information ("thinking FOI" as they write, and marking material for redaction at the point of drafting);

- treating the decision to publish new information as a deliberate step whenever that information is approved; and
- incorporating checks on this Code into the Authority's records management procedures and document review cycles.

11. ROLES AND RESPONSIBILITIES

11.1 Board

The Board is responsible for:

- approving this Code and any material amendments to it;
- supporting the Authority's commitment to proactive publication and transparency; and
- receiving an annual report on compliance with this Code.

11.2 Chief Executive/Clerk

The Chief Executive/Clerk is responsible for:

- overall ownership and implementation of this Code;
- co-ordinating compliance across the Authority;
- ensuring that appropriate arrangements are in place for the review and publication of information;
- approving information for publication, or ensuring that it has been approved by another authorised officer, before it is placed in the public domain;
- resolving or escalating any significant gaps in compliance; and
- reporting to the Board on compliance at least annually.

11.3 Heads of Department

Heads of Department are responsible for:

- identifying information within their areas that should be considered for proactive publication;
- ensuring that information provided for publication is accurate, current and complete;
- reviewing published information relating to their areas in accordance with the review periods set out in this Code; and
- identifying information that may require redaction or further consideration before publication.

11.4 Officer(s) Responsible for the Website

The officer(s) responsible for maintaining the Authority's website are responsible for:

- publishing information approved for publication;
- ensuring that published information is presented in an accessible and appropriate format;
- maintaining and updating published information as required; and
- bringing any technical, accessibility or website-related issues affecting publication to the attention of the relevant Head of Department or the Chief Executive/Clerk.

12. CONFIDENTIALITY AND EXEMPT INFORMATION

Nothing in this Code requires the Authority to publish information that is confidential or exempt from disclosure, including but not limited to:

- personal data protected under applicable data protection legislation;
- information properly regarded as private to a meeting, for example matters considered in a closed or confidential session;
- information that is legally privileged, commercially sensitive, or otherwise exempt under the Authority's Freedom of Information guidance and procedures.

All information will be reviewed prior to publication in line with Section 7. Where information is withheld, the Authority will, so far as practicable, indicate that a category of information exists and explain the basis on which it is withheld.

13. BREACHES OF THIS CODE

As this Code represents a voluntary commitment by the Authority rather than a statutory publication scheme, an isolated failure to publish information in accordance with the Code will normally be addressed through corrective action. Nothing in this section prevents action being taken under another Authority policy where the circumstances independently warrant it. However:

- persistent or significant failure to publish information in line with this Code should be raised with the Chief Executive/Clerk for corrective action;
- any disclosure made in breach of Section 7 (Data Protection and Redaction) will be managed as a data protection incident under the Authority's Data Protection Policy and reported as required to the Isle of Man Information Commissioner; and
- any request for information that this Code does not already cover will continue to be handled under the Authority's guidance and procedures.

14. REVIEW

This Code will be reviewed by the Chief Executive/Clerk at least annually, and reported to the Board, or sooner if there is a material change in legislation, in Isle of Man Government's own (currently unadopted) Code, or in the ICO Model Publication Scheme on which it is based.

15. RELATED DOCUMENTS

- Complaints Policy and Procedure
- Data Protection Policy

APPENDIX A

FREEDOM OF INFORMATION PRE-PUBLISHING CHECKLIST

For completion before approving any document for website upload.

Document title: _____

Check	Requirement	✓
1. Publication Class and Retention	The document has been allocated to the appropriate publication class (Classes 1–7).	☐
	The information falls within the publication period required by the Code (current and previous financial or municipal year as a minimum, unless a longer period is specified).	☐
2. Data Protection and Redaction	The document has been checked for personal data and any necessary redactions have been made in accordance with Section 7.	☐
	Names, ages, home addresses and personal contact details have been removed where required (excluding named Board Members/officers acting in an official capacity).	☐
	Personal opinions or beliefs, including political opinions, religion or sexual orientation, have been removed where required.	☐
	Personal identification numbers and records, including medical or tax information, have been removed where required.	☐
	Individual income, salary and personal financial interests have been removed where required.	☐
	Trade union, political group or similar membership information has been removed where required.	☐
3. Public Interest and Context	Publication has been considered against Section 5 and will not harm the economic, commercial, external or security interests of the Authority or the Island.	☐
	Publication will not jeopardise the candour of debate on policy decisions or disclose ongoing policy deliberations.	☐
	Publication will not prejudice legal proceedings or breach legal professional privilege.	☐
	Publication will not endanger the life or safety of any person or disrupt public order.	☐
	Publication will not increase the likelihood of damage to the environment, protected species or their habitats.	☐
	Publication is not premature where an announcement on the matter is already planned.	☐
4. Accessibility	The document is in a commonly accessible, readable format (normally PDF).	☐
	Images or scanned material have appropriate accessibility features where required, and an alternative format can be provided on reasonable request.	☐
5. Confidential or Withheld Information	The document has been checked for confidential or exempt information under Section 12.	☐
	Where information is withheld, the Authority has, so far as practicable, indicated that the category of information exists and explained the basis on which it is withheld.	☐

Checked by: _____ Date: _____

APPENDIX B PUBLICATION DATA INCIDENT REPORTING TEMPLATE

To be initiated immediately by the Website Officer or Head of Department if a publication breach occurs.

1. Incident Overview

Date & Time of Discovery:	
Discovered By (Name & Job Title):	
Live URL where breach occurred:	
Document Title / File Name:	

2. Breach Characterisation (tick all that apply)

☐	Unauthorised publication of personal identifying or contact information (e.g. name, age, home address or personal contact details)
☐	Unauthorised publication of personal characteristics or family information (e.g. ethnicity, marital status or family members)
☐	Unauthorised publication of personal opinions or beliefs (e.g. political opinions, religion or sexual orientation)
☐	Unauthorised publication of personal identification numbers, medical information or records, or tax information
☐	Unauthorised publication of individual income, salary or personal financial interests
☐	Unauthorised publication of trade union, political group or similar membership information
☐	Exposure of private or closed Board/Committee meeting information
☐	Exposure of legally privileged or commercially sensitive information
☐	Other confidential or exempt information:

3. Containment and Remediation Actions

☐	Unpublish file - document taken down from the live website/server
☐	Remove or replace any affected links or copies under the Authority's control
☐	Notify the officer responsible for the website / technical support where required
☐	Preserve a copy of the affected material and relevant records for incident review
☐	Server Cache Cleared - technical team has purged the server cache to prevent recovery

Time taken down / access restricted:	
Immediate action taken / details:	

4. Notification and Escalation

Date Chief Executive/Clerk notified:	
Date Data Processing Officer notified:	



REPORT

Report to:	Board of Onchan District Commissioners
Reporting Officer:	Chief Executive/Clerk
Date of the Meeting:	21 st September 2026
Subject:	Social Media Policy and Member Blogs – Review
Public or Private Document:	Public

Introduction:

The Authority has maintained a Social Media Policy and Member Blogs since 2013, which was substantially revised in 2020. Since that time, no further comprehensive review has been undertaken, and the policy now requires updating to reflect changes in technology, social media platforms, digital communications, and emerging online risks.

The Board is requested to consider the attached updated Social Media Policy and Member Blogs, and determine whether it should be approved and adopted for implementation across the Authority.

Previously Considered by the Board:

Ordinary Board Meeting held on 17th February 2020.

Minute reference C20/02/02/10.

Recommendation/s or Action/s Taken:

Option 1

That the Board resolves to approve and adopt the updated Social Media Policy and Member Blogs, as appended to the Chief Executive/Clerk's report dated 21st September 2026, with immediate effect.

Option 2

That the Board resolves to approve and adopt the updated Social Media Policy and Member Blogs, as appended to the Chief Executive/Clerk's report dated 21st September 2026, subject to such amendments as the Board may determine, with immediate effect.

Option 3

That the Board resolves to defer consideration of the updated Social Media Policy and Member Blogs pending further review and amendment.

Supporting Rationale:

- The Authority's existing Social Media Policy was originally adopted in 2013 and last substantially reviewed in 2020. Given the significant changes in social media platforms, digital communications, messaging applications, and emerging technologies since that time, it is appropriate to update the policy to ensure it remains current, relevant, and effective.
- The revised Policy provides clear guidance for Board Members, employees, contractors, and others acting on behalf of the Authority regarding the appropriate use of social media and digital communication platforms. This will help ensure a consistent approach to online communications across the Authority.
- The Policy supports the Authority's commitment to good governance by setting out expectations relating to professional conduct, confidentiality, data protection, and the responsible use of digital technologies. It also helps to ensure that official Authority communications are clearly distinguished from personal opinions and activities.
- The Policy seeks to protect both individuals and the Authority from legal, operational, and reputational risks that may arise from the inappropriate use of social media or digital communication platforms. Clear guidance will assist in reducing the likelihood of incidents that could damage public confidence in the Authority.
- The Policy recognises the positive role that social media can play in community engagement and communication whilst providing safeguards to ensure its use remains lawful, respectful, and consistent with the Authority's values and governance framework.
- Adoption of the Policy will provide a modern and practical framework for managing social media and digital communications across the Authority.

Key Updates

- 1) Restructured into a standardised format.
- 2) Scope extended to messaging applications and artificial intelligence-generated content.
- 3) New subsections included – messaging applications, artificial intelligence-generated content, screenshots and private communications, reviews and ratings sites, elections and purdah and pre-election period, breaches of this policy, and related documents.
- 4) Outdated "personal blog site" guidance replaced with consolidated personal-use rules.

Alternatives Considered but not Recommended:
That the Board resolves not to adopt the updated Social Media Policy and Member Blogs.
Standing Orders:
Not applicable.
Resource Impact:
No significant resource implications are anticipated.
Financial Impact:
No additional expenditure is anticipated.
Legal and/or Insurance Impact:
• The revised Policy supports the Authority's compliance with its legal obligations relating to data protection, confidentiality, employment practices, equality, harassment, defamation, and the appropriate use of information and communication technologies. • There are no direct insurance implications arising from the adoption of the revised Social Media Policy.
Equality Impact:
Following completion of Equality Impact Assessment screening, no adverse equality impacts have been identified.
Climate Change Impact:
No significant climate change impacts have been identified.
Consultation with Others:
None.
General Data Protection Regulations and/or Confidentiality Impact:
No adverse GDPR implications have been identified.
Appendices:
See enclosed the draft Social Media Policy and Member Blogs.

For Members' Consideration.

A handwritten signature in black ink, consisting of several fluid, overlapping loops and strokes, positioned above the printed name.

**ROSS PHILLIPS
CHIEF EXECUTIVE/CLERK**



ONCHAN DISTRICT COMMISSIONERS

SOCIAL MEDIA POLICY AND MEMBER BLOGS

Date: September 2026
Review: September 2029



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DRAFT 1.1

Policy Review - History:

Please be aware that a hard copy of this document may not be the latest available version, which is available in the Authority's document management system, and which supersedes all previous versions.

Those to whom this Policy applies are responsible for familiarising themselves periodically with the latest version and for complying with policy requirements at all times.

Effective from:	Replaces:	Originator:	Page X of Y
September 2026	Social Media Policy & Member Blogs 2020	Chief Executive/Clerk	1 to 10
Board Ratification:			

History or Most Recent Policy Changes		
Version:	Date:	Change:
1	18/11/2013	Original Document
2	10/02/2020	Modernised and Updated
3	September 2026	Reviewed and updated

1. SCOPE

This Policy applies to all employees of Onchan District Commissioners ("the Authority"), including full-time, part-time, temporary, and agency staff. It also applies to elected Members of the Board ("Board Members") and third-party suppliers working on behalf of the Authority. For the avoidance of doubt, this Policy applies to the following persons:

- elected Board Members;
- employees;
- an agency, temporary, or contract member of staff working for or on behalf of the Authority;
- staff of third-party suppliers contracted to and/or providing services to the Authority;
- volunteers working on the Authority's projects; and
- students on work placements with the Authority.

This Policy covers all social media platforms, messaging applications and digital communications tools, including but not limited to Facebook, X (formerly Twitter), Instagram, LinkedIn, TikTok, YouTube, Threads, Bluesky, WhatsApp, Teams, blogs, forums, and online review sites, whether accessed on Authority equipment or personal devices.

For the purpose of this Policy "social media" includes social networking sites, blogs, forums, review sites, messaging applications and emerging AI-enabled communication platforms.

In support of this Policy, employees and Board Members should also consult the Code of Conduct, Communications Policy and AI Acceptable Use Policy (when adopted).

Nothing in this Policy is intended to interfere with an individual's right to freedom of expression. However, employees and Board Members are expected to exercise that right responsibly and in a manner consistent with their legal obligations and responsibilities to the Authority and the wider community.

2. POLICY

The Authority recognises that social media is a powerful communications tool that can be used positively to engage with residents and promote Authority services. The Authority also recognises that misuse of social media can cause significant harm to individuals and to the Authority's reputation.

All use of social media must be consistent with the Authority's Code of Conduct, Data Protection Policy, Photo and Images Policy and Communications Policy. Employees and Board Members are responsible for ensuring their personal use of social media does not bring the Authority into disrepute.

This Policy will be reviewed periodically and may be updated earlier where required by changes in legislation, technology or operational requirements.

3. PURPOSE

The purpose of this Policy is to ensure that employees and Board Members understand the Authority's expectations regarding social media and digital communications, and are aware of the potential legal, reputational and personal consequences of

inappropriate use. It provides a framework for consistent and fair management of social media issues, and ensures compliance with data protection legislation, employment law and the Authority's governance requirements.

This Policy provides clear guidance regarding the acceptable use of social media, messaging applications and AI-generated content both within, and outside, of work. It applies to all those covered by the Scope section above.

There is a clear distinction between member information published by the Authority, such as the member pages on the Authority's website, and member blogs which are the sole responsibility of the individual Board Member.

There are important reasons for this distinction. Material published by the Authority is, for obvious reasons, restricted in terms of content. It must not contain party political material and, in relation to other material, should not seek to persuade the public to a particular view, promote the personal image of a particular Board Member, promote an individual Board Member's proposals, decisions or recommendations, or personalise issues. Nor should the Authority assist in the publication of any material that does any of the above.

The Authority takes the view that social media can make a positive contribution to improving community engagement and leadership. The following guidance is particularly relevant for Board Members considering setting up or running personal social media accounts. Many legal pitfalls can be avoided if content is objective, balanced, informative and accurate.

The Authority does not wish to prevent or restrict the personal use of social media by employees and Board Members in their own time and for their own purposes.

4. UNDERSTANDING THE RISKS OF SOCIAL MEDIA

The Authority allows, and encourages, the use of social media and digital channels of communication for business purposes.

Content posted online can be seen by a wide and unpredictable audience and, where the poster is identifiable as being connected to the Authority, can be traced back to it. Risks include:

- reputational damage to the Authority and to individual employees and Board Members;
- legal liability including defamation, breach of confidentiality, breach of data protection legislation or discrimination;
- disciplinary action or, in serious cases, dismissal; and
- criminal liability in cases involving harassment, malicious communications or incitement.

The rapid evolution of social media platforms and AI tools means that new risks emerge regularly. Employees and Board Members are expected to exercise judgement and seek guidance from the Chief Executive/Clerk if uncertain.

5. ACCEPTABLE USE AND MONITORING SOCIAL MEDIA

The Authority reserves the right to monitor the use of internet and social media on Authority systems and facilities to detect unauthorised use and ensure operational security. Employees should be aware that use of Authority systems and equipment

may be monitored, and should refer to the Internet and Email Policy and Procedures for further guidance.

Monitoring will be carried out in accordance with the Data Protection Policy and relevant legislation.

Acceptable use includes: official communications authorised by the Chief Executive/Clerk; professional networking relevant to an employee's or Board Member's role; accessing work-related information; and limited personal use during authorised break times that does not breach this Policy.

This Policy should be read together with the Code of Conduct, Internet and Email Policy and Procedures and Communications Policy. Activity on social media that could be deemed a breach of those policies will be subject to investigation in the same way as similar conduct in any other context.

The Authority does not routinely monitor personal accounts, but reserves the right to investigate material brought to its attention where references are made to the Authority or its employees.

6. OFFICIAL COMMUNICATIONS

The Authority's customers and others have a right to transparency and openness.

Only authorised employees may post on behalf of the Authority on official social media channels. All official communications must be approved in accordance with the Communications Policy. Posts must be accurate, professional, accessible and consistent with the Authority's values. Where AI tools are used in connection with Authority communications, the section on Artificial Intelligence and Generated Content should also be consulted.

Only those with delegated authority to issue statements should use social media to do so. Official communications prepared in advance with an embargo set must not be published via social media before the embargo date and time. No content published or distributed as an internal communication, or as a communication with trusted partners, may be copied or republished via social media without prior authorisation.

A Board Member or employee must not state or imply that a personal post, comment, interview, blog or message represents the Authority or the agreed position of the Board unless expressly authorised to do so.

Where a Board Member identifies themselves as a Commissioner, refers to Authority business or comments on a matter currently under consideration by the Authority, they should make clear whether the views expressed are personal.

A disclaimer will not excuse:

- disclosure of confidential or personal information;
- misrepresentation of an agreed Board decision;
- unlawful, defamatory, discriminatory or harassing content;
- conduct contrary to the applicable Code of Conduct; or
- use of Authority resources for personal or electoral purposes.

7. SOCIAL MEDIA FOR WORK USE

Where social media is used as part of an employee's or Board Member's role, its use must be proportionate, professional and consistent with this Policy. Employees and Board Members must not post confidential information, personal data about residents or third parties, or content that could bring the Authority into disrepute.

Employees and Board Members wishing to set up a new social media channel for Authority purposes must gain approval from the Chief Executive/Clerk after consultation with their line manager. The Authority's Crest must be used as the profile image for service-led accounts unless otherwise agreed. Passwords for all Authority social media accounts must be shared with the Senior Management Team. When signing up for a social media facility for work use, employees should use their Onchan District Commissioners' email address and job title.

Content should be published on the Authority's website first before a link is posted to social media. Employees and Board Members are entirely responsible for their actions, views, opinions and comments on social media, in the same way that they are responsible for their actions by email, phone or when wearing an Authority identification badge.

Professional networking sites such as LinkedIn should be used in a manner consistent with this Policy.

8. PERSONAL USE OF SOCIAL MEDIA

Employees and Board Members are free to use social media in their personal lives. However, they must not:

- identify themselves as an employee or Member of the Authority in a way that could create embarrassment or reputational risk;
- post anything that could be construed as the Authority's official view;
- reveal confidential or sensitive information about the Authority, its employees, residents or service users;
- make comments that could constitute harassment, bullying or discrimination against colleagues, Board Members, residents or service users; or
- post content that could undermine public confidence in local government or the Authority's ability to perform its functions impartially.

Board Members and employees must not comment on the merits, evidence or likely outcome of:

- a current complaint;
- a personnel or disciplinary matter;
- an active legal case;
- a live procurement exercise; or
- another matter being handled confidentially by the Authority.

The Authority's standards and codes of behaviour extend beyond the workplace in respect of any actions or communications that could bring the Authority into disrepute. Employees and Board Members should not assume that the use of anonymous or pseudonymous accounts removes their responsibilities under this Policy.

Employees and Board Members should be particularly careful about the reach and permanence of content posted on social media platforms.

9. MEMBER BLOGS

Board Members who maintain personal blogs or social media accounts must clearly distinguish between personal views and the Authority's official position. Board Members must comply with the Code of Conduct at all times and must not publish information that is confidential or that has been discussed in private session.

Board Members with a personal blog site should also consider: choosing a domain name that makes clear the site is personal and expresses their own opinions rather than those of the Authority; ensuring their site has an active SSL certificate so that visitor messages are transmitted securely; and ensuring their site is hosted on secure servers with regular checks to protect against fraud, hacking and spam.

Member blogs can make a positive contribution to community engagement and public debate. In the unlikely event that content amounts to harassment, discrimination, victimisation or hate speech, this will be treated as a serious breach of this Policy and dealt with in accordance with the Code of Conduct.

10. USE OF SOCIAL MEDIA AT WORK

Personal use of social media during working hours should be kept to a minimum and confined to authorised break times. Excessive personal use during working time may constitute misconduct and result in disciplinary action.

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Messaging applications such as WhatsApp, iMessage and similar platforms are subject to this Policy when used for Authority business, whether on Authority or personal devices. Employees and Board Members should be aware that:

- messages relating to Authority business may be disclosable under freedom of information requests, subject access requests or legal proceedings, regardless of whether sent on a personal or Authority device;
- group chats involving Authority business must be conducted in accordance with this Policy and the Code of Conduct; and
- confidential or sensitive Authority business should not be discussed via personal messaging applications.

Where messaging applications are used for official Authority communications, records must be retained in accordance with the Document Retention Schedule and Disposal Policy.

12. ARTIFICIAL INTELLIGENCE AND GENERATED CONTENT

The use of Artificial Intelligence (AI) tools to generate, edit or enhance social media content is subject to this Policy. When using AI tools in connection with Authority communications, employees and Board Members must:

- ensure all AI-generated content is reviewed for accuracy, tone and appropriateness before publication;
- not input confidential, personal or sensitive Authority data into public AI tools;
- not publish AI-generated images, audio or video that misrepresents individuals, including deepfake content; and
- consider whether it is appropriate to disclose that content has been AI-assisted, particularly in the context of public consultations or community engagement.

Employees and Board Members must not use AI tools or other technologies to impersonate another person or create misleading representations.

The Authority's AI Acceptable Use Policy (when adopted) should be read alongside this Policy.

13. SCREENSHOTS AND PRIVATE COMMUNICATIONS

Taking and sharing screenshots of private or internal communications, including emails, messaging app conversations or private social media exchanges, without the consent of all parties may constitute a breach of privacy, a breach of data protection legislation or a breach of confidentiality. Such actions may result in disciplinary action. Screenshots of content relating to Authority business must only be shared for legitimate purposes and in accordance with the Data Protection Policy.

The unauthorised recording or distribution of meetings, conversations or internal communications may constitute misconduct and may also give rise to civil or criminal liability.

14. REVIEWS AND RATINGS SITES

Reviews of the Authority or its services may be posted by members of the public on online review platforms. Employees and Board Members should not post reviews of the Authority on such platforms. Where the Authority chooses to respond to public reviews, responses must be authorised in accordance with the Communications Policy and must be professional, factual and proportionate.

Only authorised officers may respond to online reviews or complaints on behalf of the Authority.

15. ELECTIONS, PURDAH AND PRE-ELECTION PERIOD

During the pre-election period, additional restrictions apply to Authority communications including on social media. The Authority's official social media channels must not be used to promote the views of any political party, candidate or group.

Board Members who are candidates in elections must clearly distinguish between personal campaigning activity on social media and any activity undertaken in their capacity as a Board Member or on behalf of the Authority. Authority resources must not be used for electioneering purposes.

Employees must not use social media in a way that could be seen as supporting or opposing any candidate or political party, particularly during election periods. Guidance on the pre-election period will be issued by the Chief Executive/Clerk in advance of each scheduled election.

16. SAFETY

Employees and Board Members should not publish personal information about themselves or others that could compromise physical safety. Be aware of the risks of phishing, cyber-stalking, identity theft and location tracking. Employees should report any concerns about threatening, abusive or harassing online behaviour to their line manager or the Chief Executive/Clerk immediately. Board Members should report such concerns to the Chair of the Board or the Chief Executive/Clerk.

17. INFORMATION PROTECTION

Never disclose confidential or commercially sensitive information via social media or messaging applications. Never post personal data about individuals without their consent. All use of social media must comply with the Data Protection Policy and Isle of Man data protection legislation. This applies equally to AI-generated or AI-assisted content.

18. THE ACCEPTABLE USE OF SOCIAL MEDIA BY CUSTOMERS AND RESIDENTS

The Authority welcomes engagement with residents via social media and recognises that for some people it is their preferred method of contact. The Authority encourages public debate and has no intention of stifling discussion about the organisation. However, the Authority draws the line at posts or messages that cross into unacceptable behaviour, including targeting named members of staff with abusive, harassing or otherwise unacceptable criticism. Such behaviour will be reported to the relevant platform and, where appropriate, to the police. The Authority reserves the right to remove posts and block users who breach these standards. Unacceptable behaviour may also be addressed by restricting the way someone can communicate with the Authority, or their participation or attendance at meetings. The Authority may also report the matter to the police where behaviour amounts to abuse or harassment or a criminal offence is suspected. All decisions on these matters will be made by the Chief Executive/Clerk in consultation with the Chair of the Board.

AI-generated or automated responses to Authority posts should be treated with caution. Where the Authority's social media channels are subject to harassment or abuse, this should be reported to the Chief Executive/Clerk.

19. DATA PROTECTION

All use of social media must comply with the Data Protection Act 2018 (Isle of Man) and the Authority's Data Protection Policy. Photographs, videos and other content involving identifiable individuals must only be posted with the consent of those individuals (or their parent or guardian in the case of children under 18). See also the Photo and Images Policy.

Failure to comply with data protection legislation could lead to enforcement action and civil or criminal liability against the Authority and/or against the individual responsible. Individual Board Members are required to be personally registered with the Isle of Man Information Commissioner, and further guidance can be obtained from that office.

20. BREACHES OF THIS POLICY

Breaches of this Policy by employees will be dealt with in accordance with the Authority's Disciplinary Policy. Depending on the severity of the breach, action may range from a formal warning to dismissal. In the case of elected Board Members, breaches may be referred under the Code of Conduct. Serious breaches may also result in civil or criminal liability for the individual concerned.

Where a potential breach by a Board Member is reported, the matter will be referred to the Chief Executive/Clerk and handled under the applicable complaints and conduct arrangements. The Board Member concerned must not participate in determining the complaint.

The Authority reserves the right to require an employee or Board Member to remove any online content that it reasonably believes breaches this Policy or brings the Authority into disrepute.

21. REVIEW

This Policy will be reviewed every three years, or sooner if significant changes to social media platforms, AI technology, relevant Isle of Man legislation or employment tribunal decisions make an earlier review necessary. Any questions regarding this Policy should be directed to the Chief Executive/Clerk.

22. RELATED DOCUMENTS

This Policy should be read alongside the Authority's:

- AI Acceptable Use Policy (when adopted)
- Communications Policy;
- Disciplinary Policy;
- Internet and Email Policy and Procedures;
- Photo and Images Policy; and
- Privacy Policy.



ONCHAN DISTRICT COMMISSIONERS

SOCIAL MEDIA POLICY AND MEMBER BLOGS

Date: September 2026
Review: September 2029



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DRAFT 1.1

Policy Review - History:

Please be aware that a hard copy of this document may not be the latest available version, which is available in the Authority's document management system, and which supersedes all previous versions.

Those to whom this Policy applies are responsible for familiarising themselves periodically with the latest version and for complying with policy requirements at all times.

Effective from:	Replaces:	Originator:	Page X of Y
September 2026	Social Media Policy & Member Blogs 2020	Chief Executive/Clerk	1 to 10
Board Ratification:			

History or Most Recent Policy Changes		
Version:	Date:	Change:
1	18/11/2013	Original Document
2	10/02/2020	Modernised and Updated
3	September 2026	Reviewed and updated

1. SCOPE

This Policy applies to all employees of Onchan District Commissioners ("the Authority"), including full-time, part-time, temporary, and agency staff. It also applies to elected Members of the Board ("Board Members") and third-party suppliers working on behalf of the Authority. For the avoidance of doubt, this Policy applies to the following persons:

- elected Board Members;
- employees;
- an agency, temporary, or contract member of staff working for or on behalf of the Authority;
- staff of third-party suppliers contracted to and/or providing services to the Authority;
- volunteers working on the Authority's projects; and
- students on work placements with the Authority.

This Policy covers all social media platforms, messaging applications and digital communications tools, including but not limited to Facebook, X (formerly Twitter), Instagram, LinkedIn, TikTok, YouTube, Threads, Bluesky, WhatsApp, Teams, blogs, forums, and online review sites, whether accessed on Authority equipment or personal devices.

For the purpose of this Policy "social media" includes social networking sites, blogs, forums, review sites, messaging applications and emerging AI-enabled communication platforms.

In support of this Policy, employees and Board Members should also consult the Code of Conduct, Communications Policy and AI Acceptable Use Policy (when adopted).

Nothing in this Policy is intended to interfere with an individual's right to freedom of expression. However, employees and Board Members are expected to exercise that right responsibly and in a manner consistent with their legal obligations and responsibilities to the Authority and the wider community.

2. POLICY

The Authority recognises that social media is a powerful communications tool that can be used positively to engage with residents and promote Authority services. The Authority also recognises that misuse of social media can cause significant harm to individuals and to the Authority's reputation.

All use of social media must be consistent with the Authority's Code of Conduct, Data Protection Policy, Photo and Images Policy and Communications Policy. Employees and Board Members are responsible for ensuring their personal use of social media does not bring the Authority into disrepute.

This Policy will be reviewed periodically and may be updated earlier where required by changes in legislation, technology or operational requirements.

3. PURPOSE

The purpose of this Policy is to ensure that employees and Board Members understand the Authority's expectations regarding social media and digital communications, and are aware of the potential legal, reputational and personal consequences of

inappropriate use. It provides a framework for consistent and fair management of social media issues, and ensures compliance with data protection legislation, employment law and the Authority's governance requirements.

This Policy provides clear guidance regarding the acceptable use of social media, messaging applications and AI-generated content both within, and outside, of work. It applies to all those covered by the Scope section above.

There is a clear distinction between member information published by the Authority, such as the member pages on the Authority's website, and member blogs which are the sole responsibility of the individual Board Member.

There are important reasons for this distinction. Material published by the Authority is, for obvious reasons, restricted in terms of content. It must not contain party political material and, in relation to other material, should not seek to persuade the public to a particular view, promote the personal image of a particular Board Member, promote an individual Board Member's proposals, decisions or recommendations, or personalise issues. Nor should the Authority assist in the publication of any material that does any of the above.

The Authority takes the view that social media can make a positive contribution to improving community engagement and leadership. The following guidance is particularly relevant for Board Members considering setting up or running personal social media accounts. Many legal pitfalls can be avoided if content is objective, balanced, informative and accurate.

The Authority does not wish to prevent or restrict the personal use of social media by employees and Board Members in their own time and for their own purposes.

4. UNDERSTANDING THE RISKS OF SOCIAL MEDIA

The Authority allows, and encourages, the use of social media and digital channels of communication for business purposes.

Content posted online can be seen by a wide and unpredictable audience and, where the poster is identifiable as being connected to the Authority, can be traced back to it. Risks include:

- reputational damage to the Authority and to individual employees and Board Members;
- legal liability including defamation, breach of confidentiality, breach of data protection legislation or discrimination;
- disciplinary action or, in serious cases, dismissal; and
- criminal liability in cases involving harassment, malicious communications or incitement.

The rapid evolution of social media platforms and AI tools means that new risks emerge regularly. Employees and Board Members are expected to exercise judgement and seek guidance from the Chief Executive/Clerk if uncertain.

5. ACCEPTABLE USE AND MONITORING SOCIAL MEDIA

The Authority reserves the right to monitor the use of internet and social media on Authority systems and facilities to detect unauthorised use and ensure operational security. Employees should be aware that use of Authority systems and equipment

may be monitored, and should refer to the Internet and Email Policy and Procedures for further guidance.

Monitoring will be carried out in accordance with the Data Protection Policy and relevant legislation.

Acceptable use includes: official communications authorised by the Chief Executive/Clerk; professional networking relevant to an employee's or Board Member's role; accessing work-related information; and limited personal use during authorised break times that does not breach this Policy.

This Policy should be read together with the Code of Conduct, Internet and Email Policy and Procedures and Communications Policy. Activity on social media that could be deemed a breach of those policies will be subject to investigation in the same way as similar conduct in any other context.

The Authority does not routinely monitor personal accounts, but reserves the right to investigate material brought to its attention where references are made to the Authority or its employees.

6. OFFICIAL COMMUNICATIONS

The Authority's customers and others have a right to transparency and openness.

Only authorised employees may post on behalf of the Authority on official social media channels. All official communications must be approved in accordance with the Communications Policy. Posts must be accurate, professional, accessible and consistent with the Authority's values. Where AI tools are used in connection with Authority communications, the section on Artificial Intelligence and Generated Content should also be consulted.

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A disclaimer will not excuse:

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- use of Authority resources for personal or electoral purposes.

7. SOCIAL MEDIA FOR WORK USE

Where social media is used as part of an employee's or Board Member's role, its use must be proportionate, professional and consistent with this Policy. Employees and Board Members must not post confidential information, personal data about residents or third parties, or content that could bring the Authority into disrepute.

Employees and Board Members wishing to set up a new social media channel for Authority purposes must gain approval from the Chief Executive/Clerk after consultation with their line manager. The Authority's Crest must be used as the profile image for service-led accounts unless otherwise agreed. Passwords for all Authority social media accounts must be shared with the Senior Management Team. When signing up for a social media facility for work use, employees should use their Onchan District Commissioners' email address and job title.

Content should be published on the Authority's website first before a link is posted to social media. Employees and Board Members are entirely responsible for their actions, views, opinions and comments on social media, in the same way that they are responsible for their actions by email, phone or when wearing an Authority identification badge.

Professional networking sites such as LinkedIn should be used in a manner consistent with this Policy.

8. PERSONAL USE OF SOCIAL MEDIA

Employees and Board Members are free to use social media in their personal lives. However, they must not:

- identify themselves as an employee or Member of the Authority in a way that could create embarrassment or reputational risk;
- post anything that could be construed as the Authority's official view;
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- make comments that could constitute harassment, bullying or discrimination against colleagues, Board Members, residents or service users; or
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Board Members and employees must not comment on the merits, evidence or likely outcome of:

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Employees and Board Members should be particularly careful about the reach and permanence of content posted on social media platforms.

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Board Members who maintain personal blogs or social media accounts must clearly distinguish between personal views and the Authority's official position. Board Members must comply with the Code of Conduct at all times and must not publish information that is confidential or that has been discussed in private session.

Board Members with a personal blog site should also consider: choosing a domain name that makes clear the site is personal and expresses their own opinions rather than those of the Authority; ensuring their site has an active SSL certificate so that visitor messages are transmitted securely; and ensuring their site is hosted on secure servers with regular checks to protect against fraud, hacking and spam.

Member blogs can make a positive contribution to community engagement and public debate. In the unlikely event that content amounts to harassment, discrimination, victimisation or hate speech, this will be treated as a serious breach of this Policy and dealt with in accordance with the Code of Conduct.

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Personal use of social media during working hours should be kept to a minimum and confined to authorised break times. Excessive personal use during working time may constitute misconduct and result in disciplinary action.

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Messaging applications such as WhatsApp, iMessage and similar platforms are subject to this Policy when used for Authority business, whether on Authority or personal devices. Employees and Board Members should be aware that:

- messages relating to Authority business may be disclosable under freedom of information requests, subject access requests or legal proceedings, regardless of whether sent on a personal or Authority device;
- group chats involving Authority business must be conducted in accordance with this Policy and the Code of Conduct; and
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Where messaging applications are used for official Authority communications, records must be retained in accordance with the Document Retention Schedule and Disposal Policy.

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The use of Artificial Intelligence (AI) tools to generate, edit or enhance social media content is subject to this Policy. When using AI tools in connection with Authority communications, employees and Board Members must:

- ensure all AI-generated content is reviewed for accuracy, tone and appropriateness before publication;
- not input confidential, personal or sensitive Authority data into public AI tools;
- not publish AI-generated images, audio or video that misrepresents individuals, including deepfake content; and
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The unauthorised recording or distribution of meetings, conversations or internal communications may constitute misconduct and may also give rise to civil or criminal liability.

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The Authority welcomes engagement with residents via social media and recognises that for some people it is their preferred method of contact. The Authority encourages public debate and has no intention of stifling discussion about the organisation. However, the Authority draws the line at posts or messages that cross into unacceptable behaviour, including targeting named members of staff with abusive, harassing or otherwise unacceptable criticism. Such behaviour will be reported to the relevant platform and, where appropriate, to the police. The Authority reserves the right to remove posts and block users who breach these standards. Unacceptable behaviour may also be addressed by restricting the way someone can communicate with the Authority, or their participation or attendance at meetings. The Authority may also report the matter to the police where behaviour amounts to abuse or harassment or a criminal offence is suspected. All decisions on these matters will be made by the Chief Executive/Clerk in consultation with the Chair of the Board.

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Failure to comply with data protection legislation could lead to enforcement action and civil or criminal liability against the Authority and/or against the individual responsible. Individual Board Members are required to be personally registered with the Isle of Man Information Commissioner, and further guidance can be obtained from that office.

20. BREACHES OF THIS POLICY

Breaches of this Policy by employees will be dealt with in accordance with the Authority's Disciplinary Policy. Depending on the severity of the breach, action may range from a formal warning to dismissal. In the case of elected Board Members, breaches may be referred under the Code of Conduct. Serious breaches may also result in civil or criminal liability for the individual concerned.

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The Authority reserves the right to require an employee or Board Member to remove any online content that it reasonably believes breaches this Policy or brings the Authority into disrepute.

21. REVIEW

This Policy will be reviewed every three years, or sooner if significant changes to social media platforms, AI technology, relevant Isle of Man legislation or employment tribunal decisions make an earlier review necessary. Any questions regarding this Policy should be directed to the Chief Executive/Clerk.

22. RELATED DOCUMENTS

This Policy should be read alongside the Authority's:

- AI Acceptable Use Policy (when adopted)
- Communications Policy;
- Disciplinary Policy;
- Internet and Email Policy and Procedures;
- Photo and Images Policy; and
- Privacy Policy.



REPORT

Report to:	Board of Onchan District Commissioners
Reporting Officer:	Chief Executive/Clerk
Date of the Meeting:	21 st September 2026
Subject:	Eastern Civic Amenity Site Joint Committee – Request for Additional Funding
Public or Private Document:	Public

Introduction:

The Eastern Civic Amenity Site Joint Committee at its meeting held on 8th September 2026 considered whether additional staffing resources are required to support the continued safe and effective operation of the Site.

As any additional expenditure would require financial support from the constituent local authorities, the Board is requested to consider whether additional funding should be made available within the current financial year to support the proposed staffing arrangements.

Previously Considered by the Board:

Not applicable.

Recommendation/s or Action/s Taken:

Option 1

That the Board resolves to approve the provision of additional funding within the current financial year to support the proposed increased staffing arrangements at the Eastern Civic Amenity Site, at an additional cost to the Authority of £301.66 per month until 31st March 2026.

Option 2

That the Board resolves to decline the provision of additional funding within the current financial year to support the proposed increased staffing arrangements at the Eastern Civic Amenity Site.

Furthermore, notwithstanding this decision, the additional expenditure may still be incurred and payable should the other participating local authorities approve and vote in majority favour of funding the proposed increased staffing arrangements in accordance with the governance and cost-sharing arrangements of the Joint Committee.

Supporting Rationale:
See Section 4 (Supporting Rationale) of the enclosed Douglas City Council Eastern Civic Amenity Site Report.
Alternatives Considered but not Recommended:
Not applicable.
Standing Orders:
5.1 – Delegation of Power <i>"All Members of the Board acting in representation of the Board at a committee, association, or other body shall be subject to the full Board's approval where a resolution or decision is required."</i>
Resource Impact:
No significant resource implications are anticipated.
Financial Impact:
The proposed increase in staffing at the Site will result in an additional cost to the Authority of £301.66 per month until 31st March 2026. This expenditure was not included within the current financial year's approved budget and District Rate and, as such, no provision has been made for this additional cost.
Legal and/or Insurance Impact:
No adverse legal implications have been identified.
Equality Impact:
Following completion of Equality Impact Assessment screening, no adverse equality impacts have been identified.
Climate Change Impact:
No significant climate change impacts have been identified.
Consultation with Others:
• Eastern Civic Amenity Site Joint Committee. • Lead Member for Environmental and Technical Services – Onchan District Commissioners.
General Data Protection Regulation and/or Confidentiality Impact:
No adverse GDPR implications have been identified.

Appendices:

See enclosed the Douglas City Council Eastern Civic Amenity Site Report dated 8th September 2026.

For Members' Consideration.



**ROSS PHILLIPS
CHIEF EXECUTIVE/CLERK**



Douglas
CITY COUNCIL

Eastern Civic Amenity Site Report

CONTRACTOR'S REPORT TO	
Eastern Civic Amenity Site Joint Committee (ESACJC)	
DATE OF MEETING	
8 th September 2026	
REPORTING OFFICER	
SUBJECT	
Operation Manning Review	
1	PURPOSE FOR REPORT
The Contractor to undertake an operational manning review to ensure that sufficient staffing resources are in place to meet licensing, regulatory and customer service level requirements.	
2	RECOMMENDATION
It is recommended that the Committee approves option B for the increased cost of £20,500 per annum.	
3	FURTHER APPROVAL REQUIRED
Boards and Council.	
4	SUPPORTING RATIONALE
<u>Background</u> The current operating contract commenced on 1 April 2024 following a tender exercise undertaken by the Joint Committee in late 2023. The initial tender submission received was based upon a staffing model requiring four operatives on site at all times, together with a driver when required for skip movements. The resulting cost increase was considered excessive by the Committee, which subsequently resolved to amend the specification and undertake a further tender exercise. The revised specification reduced the staffing requirement to three operatives on site at all times, with a fourth employee available when required to undertake skip movements. Following a second tender exercise, the Committee accepted a tender	

from Douglas City Council based upon this staffing model, and this forms the basis of the current contract arrangements.

The staffing model approved by the Committee was designed to meet the operational requirements set out within the tender specification at that time. Subsequent changes to waste handling requirements, particularly in relation to Waste Electrical and Electronic Equipment (WEEE), were not anticipated during the tender process. Following the introduction of revised WEEE processing arrangements in January 2025, the Committee received a report outlining the implications for site operations and staffing resources. The report concluded that the existing staffing model left little capacity to undertake the additional processing, dismantling, storage, and administrative duties associated with the new arrangements and recommended the provision of an additional resource. The Committee subsequently approved a trial arrangement involving an additional operative to undertake the dismantling of Large Domestic Appliances (LDAs), such as washing machines, cookers, tumble dryers and dishwashers, enabling disposal costs to be reduced and helping to offset additional operating costs through the recovery of recyclable materials.

Current Operational Position

The Contractor previously reported to the Committee in May regarding concerns raised by Members about staffing levels at the site. During a site visit, it was observed that key operational areas did not always appear to be adequately staffed and concerns were raised that employees were unable to take uninterrupted lunch breaks during particularly busy periods.

The Contractor advised the Committee that the site is currently being operated broadly in accordance with the staffing levels envisaged in the accepted tender specification. The core staffing establishment remains consistent with the staffing model approved by the Committee during the tender process. However, operational requirements have evolved since the contract was awarded. In particular, the site now undertakes the additional handling, storage and processing of plasterboard, insulation materials, and small Waste Electrical and Electronic Equipment (WEEE), activities which were either not undertaken or to a lesser extent when the original staffing model was devised.

The Committee approved WEEE dismantling arrangements have generated efficiencies over time. As the Contractor has become increasingly more experienced and processes improved, the additional labour requirement has reduced over time. Consequently, staffing levels are now operating much closer to those envisaged within the original tender submission, whilst continuing to meet the Committee's WEEE processing requirements.

The concerns, however, remain regarding resilience of the current staffing model, particularly during periods of high customer demand, skip exchanges and employee rest breaks. Whilst the site continues to operate safely and effectively the current arrangements can result in reduced flexibility and put pressure on operations during peak periods.

This report has been prepared to provide the Committee with a range of revised staffing options which take account of Member and public concerns, whilst ensuring that employees are able to take their statutory rest breaks without compromising site operations, customer service standards, or regulatory compliance.

Current Staffing Arrangements

The existing direct labour establishment comprises:

- 2 x HGV Driver/Supervisors
- 2 x Assistant Supervisor/Operatives

Permanent employees work an average of 37 hours per week.

Due to the site's opening hours and the requirement to maintain operational cover throughout the day, the permanent establishment alone is insufficient to meet staffing requirements. Additional staffing requirements are met through the use of contracted agency workers.

Site opening hours

- **Summer period:** 68 hours per week – 0800 until 1800, 0800 to 1600 on Sundays
- **Winter period:** 56 hours per week – 0800 until 1600

Essential Operational Roles

The following functions must be covered at all times during site opening hours to ensure safe and effective operation of the site:

Gate / Reception

Responsibilities include:

- Customer reception and site access management.
- Provision of advice and guidance to customers.
- Conducting inspections and checks where required.
- Processing payments.

Gantry Operative

Responsibilities include:

- Assisting customers with waste disposal.
- Ensuring compliance with waste segregation requirements.
- Quality control, including the identification and separation of WEEE items.

General Site Duties

Responsibilities include:

- Skip compaction.
- WEEE dismantling and processing.
- Re-use area inspections.
- General housekeeping and operational duties.

HGV Driver / Supervisor

Responsibilities include:

- Skip movements and haulage operations.
- Material compaction activities.
- Overall site supervision and health and safety oversight.

Staffing Options

Original Tender Model (3 + 1)

Three operatives available on site at all times, with a fourth employee available on skip movement days.

This reflects the staffing model approved by the Committee as part of the 2024-2029 contract and is broadly consistent with the original tender assumptions.

This model provides sufficient coverage for the entrance, gantry operations, and general site duties. However, it offers limited resilience during staff breaks and high customer demand. As a result, this can limit the site's ability to maintain customer service standards, traffic management, and quality control during periods of high demand.

Current Agency Requirement: -

- Summer: 73.5 hours per week
- Winter: 34.5 hours per week

Option A - Enhanced Original Tender Model

A modified version of the original tender arrangement that incorporates the additional WEEE processing requirements and provides structured cover for statutory rest breaks.

This option maintains a minimum of three operatives on site at all times, with staffing adjusted to ensure statutory breaks are accommodated without compromising safe operational levels.

Agency Requirement: -

- Summer: 82 hours per week
- Winter: 44.5 hours per week

Option B - Enhanced Service Resilience - (Recommended)

A minimum of three operatives on site at all times, increasing to four during peak operating periods.

This option provides dedicated cover for staff breaks and improves operational resilience to maintain customer service levels, site supervision, and completion of general duties during busy periods.

Agency Requirement: -

- Summer: 100 hours per week
- Winter: 54.5 hours per week

This equates to an additional cost of £20,530 Per annum.

Option C - Maximum Operational Coverage

A minimum of four operatives on site at all times, increasing to five on skip movement days.

This option provides the greatest level of operational resilience and service capacity. It allows all operational functions, customer service activities, effective traffic management, and completion of all ancillary duties to be undertaken whilst providing effective cover for leave, sickness, and breaks.

Agency Requirement: -

- Summer: 135 hours per week
- Winter: 80.5 hours per week

This equates to an additional cost of £60,940 Per annum.

Option D - Site Closure During Lunch Breaks

Operate in accordance with Option A but close the site for forty-five minutes during staff lunch breaks.

This option would enable all employees to take uninterrupted statutory rest breaks whilst maintaining safe staffing levels and ensuring all essential duties are adequately covered. However, this option does not materially improve resilience during busy periods, and it would reduce customer convenience.

A similar arrangement is currently operated at:

- Western Civic Amenity Site: 1 hour 15-minute lunch closure
- Northern Civic Amenity Site: 45-minute lunch closure (excluding Saturdays)
- The Southern Civic Amenity Site currently remains open throughout the lunch period.

Agency Requirement: -

- Summer: 79.5 hours per week
- Winter: 43 hours per week

This equates to an annual saving of £660 Per annum.

Option E - Reduced Opening Hours

Any of the above staffing options could be combined with a reduction in opening hours, either by opening one hour later and/or closing one hour earlier (summer only).

This approach would reduce the requirement for agency labour and associated staffing costs whilst maintaining adequate cover for lunch breaks and essential operational duties.

At this stage, the financial implications of this option have not been fully modelled, as no reduction in opening hours is currently being recommended. Should the Committee wish to explore this approach further, a detailed analysis of the operational impact, agency staffing requirements and associated cost savings can be prepared and report back for consideration.

Financial Implications

The table below summarises the cost implications associated with each option.

CA site Operation - agency commitment options.

	Summer hours		Increased cost	Garff	Santon	Onchan	Braddan	Douglas
	Contractor	Agency	100%	5.41%	1.71%	17.62%	12.88%	62.38%
	(hrs/p/w)	(hrs/p/w)	£	£	£	£	£	£
Option A (current)	68	82	-	-	-	-	-	-
Option B	68	100	20,530	1,110	350	3,620	2,640	12,810
Option C	68	135	60,940	3,300	1,040	10,740	7,850	38,010
Option D	61	79.5	- 660	- 40	- 10	- 120	- 90	- 410

Risk

The principal risks associated with maintaining staffing levels close to those envisaged within the original tender relate to:

- Staff welfare
- Operational resilience
- Customer service standards
- Compliance with waste segregation requirements
- Staff Cover and business continuity and
- Traffic management

While these risks can be managed through agency staffing arrangements, Options B and C provide progressively greater resilience at increased cost.

Option D addresses staff welfare concerns through a temporary site closure during lunch periods but may reduce customer convenience.

The accompanying risk matrix below evaluates each option, using a simple rating based on the traffic light system, with red being high risk and green being of low impact.

Option	Staff Welfare	Customer Service	Operational Resilience	Financial Impact
Original Tender				
Option A (Current)				
Option B				
Option C				
Option D				

Conclusion

The site is currently operating in accordance with Option A, which provides a minimum of three operatives on site at all times and allows staff to take statutory rest breaks. Whilst this arrangement has addressed the additional workload associated with WEEE processing, concerns remain regarding resilience during peak periods.

Although the current arrangement has enabled the Contractor to meet operational requirements and accommodate additional waste processing activities, concerns remain regarding operational resilience during periods of high customer demand, employee absence, and peak seasonal usage.

Options B and C provide progressively greater levels of operational resilience and customer service at increased cost. Option D maintains the current staffing establishment but introduces a lunchtime closure to allow uninterrupted staff breaks, but a reduction in customer convenience.

The Committee is therefore asked to consider the operational, service, and financial implications of the options outlined above and determine its preferred approach. In doing so, Members should balance the need to maintain customer service standards, staff welfare, operational resilience, regulatory compliance and value for money whilst ensuring the long-term sustainability of the service.

5 ALTERNATIVES CONSIDERED BUT NOT RECOMMENDED

5.1 To continue as per the current arrangement – this is not recommended as whilst it addresses lunch break cover and WEEE dismantling, it offers no resilience during busy periods.

5.2 To implement Option C – this is not recommended as we do not consider it to be good value for money relative to option B or D. Equally option D is less likely to be favourable with the public than option B.

5.3 Implement a version of Option E – this is not recommended, as it reduces customer convenience with only marginal agency savings.

**EASTERN DISTRICT CIVIC AMENITY SITE JOINT COMMITTEE
Tuesday, 19th May 2026*****PART A – Public – Matters dealt with under delegated authority.*****A7. Operational Contractors Report**

7.13 Complaint Site Staffing Levels – The Contractor reported that the Council's Director of Environment & Regeneration had been contacted by a number of Douglas Councillors, including both the current and a former Chairpersons of the ECAS Committee, following a recent visit to the site.

Members had expressed concern regarding what they believed to be insufficient level of staffing on site, which they considered to be below the contractually agreed staffing requirement. Concerns were also raised regarding staff welfare, specifically that staff had reportedly advised that they were not consistently able to take their required breaks.

The Contractor was therefore requested to investigate whether there had been any discrepancy between the scheduled staffing levels, and the number of operatives present on the day in question.

Following investigation, the Contractor confirmed that three operatives had been scheduled to be on site on that day, in accordance with the current contractual arrangements. At the time the Councillors attended the site, one operative had sought permission to briefly leave the premises for operational reasons. The Site Manager had authorised the request and was travelling to the site to provide temporary cover until the operative returned. However, the operative had returned before the Site Manager arrived.

It was reported that this was considered to be a rare and one isolated occurrence and that, under normal circumstances, such situations would ordinarily be covered by a scheduled relief operative from the Council's Cleansing Team.

The Contractor further advised that the matter had highlighted a wider issue, namely that some Members appeared to be operating under the expectation that four operatives should be present on site at all times. Accordingly, the Contractor considers it appropriate to restate the current contractual staffing requirements.

Members were reminded that, in November 2023, Douglas City Council Waste Services submitted a tender for the operation of the Eastern Civic Amenity Site. The original specification sought the following staffing arrangements:

- Winter Operations: 0800 to 1600, Monday to Sunday with four operatives on site at all times and a fifth HGV driver/ supervisor present on skip movement days.
- Summer Operations: 0800 to 1800, Monday to Saturday, and 0800 to 1600 on Sundays with four operatives on site at all times with a fifth HGV driver/ supervisor present on skip movement days.

However, having considered the tendered costs submitted by Waste Services, the Contractor advised that Waste Services had subsequently been requested to resubmit its pricing based upon the staffing arrangements contained within the previous contract, namely:

- Three staff on site at all times; and

- An HGV driver/supervisor present on skip movement days only.

It was noted that skip movements currently take place on Mondays, Wednesdays, Fridays, and Saturday's.

It was further noted that a number of significant changes have occurred since the contract was awarded and that these changes should be reflected in the review, namely, plasterboard handling, insulation and small WEEE.

It was agreed:

That the Contractor undertake an operational manning review to ensure that sufficient staffing resources are in place to meet licensing, regulatory and customer service level requirements.

ECASJC – 18th November 2025

The Contractor advised for noting at this point that Isle of Man Government has advised that from 1st January 2026 clean, dry plaster board will no longer be landfilled, instead it will be shipped to the UK. A full analysis of the impact of this change will be undertaken by the Contractor and circulated to Committee for approval. It was not yet known if this would result in additional costs to the Committee.

ECASJC – 18th February 2025

It was agreed:

1. That, all Local Authorities approve that the paper recycling services continue and is funded.

ECASJC – 19TH November 2024

It was agreed:

1. That the report and statistics be noted.
2. That the relevant Authorities have approved the request to the uplifted replacement skip programme ahead of the 2024/25 budget round;
3. That the relevant Authorities have approved a paper recycling service at the Eastern Civic Amenity Site with associated cost to each Authority;
4. That a report is brought back to Committee outlining the financial impact of allowing other parishes to join and contribute to their site; and
5. That the administrator arranges a meeting between the Vice Chair and an officer with the Managing Director, Isle of Man Creameries.

ECASJC – 15th October 2024

It was agreed:

1. That the report be noted.
2. That the relevant Authorities have approved the request to the uplifted replacement skip programme ahead of the 2024/25 budget round;
3. That the Committee acknowledges the defects have been completed and the retention monies released.
4. That the Contractor monitors the situation closely over the coming months regarding use of the site by those living outside the Eastern area.

And,

1. That the relevant Authorities seek approval from their Boards for the Contractor to continue to provide a paper recycling service at the Eastern Civic Amenity Site in the sum of £40 per tonne or an estimated £1,200 per annum ahead of the 2024/25 budget round.

ECASJC – 19th December 2023

It was agreed:

1. That the tender submitted by Douglas City Council, Option 1 be accepted; 2. That each Member take the recommendation to their respective Boards for approval; and 3. That a breakdown of each Local Authority budget implications be sent to them by the Secretary.	
7	CAPITAL COST AND FUNDING SOURCE
Not applicable.	
8	CHANGES TO REVENUE ESTIMATES AND FUNDING SOURCE
If Committee were to select Option B as per the recommendation this would be an increase £20,530k p.a. This equates to the following per authority: • Garff - £1,110 • Santon - £350 • Onchan - £3,620 • Braddan - £2,640 • Douglas - £12,810	
9	STAFFING/HUMAN RESOURCES IMPLICATIONS
No material change to existing arrangement.	
10	LEGAL IMPLICATIONS
No change.	
11	EQUALITY ACT COMPLIANCE
There is nothing contained within this proposal that breaches the Equality Act.	
12	BUSINESS RISK IMPLICATIONS
Options B and C improve the current operation in terms of welfare, customer service and operational resilience, both cost more than existing, albeit Option B offers a relatively modest increase. Option D improves the current situation in terms of staff welfare and operational costs, but reduces customer convenience and offers less resilience compared with options B & C.	
13	ENVIRONMENTAL /SOCIAL IMPACT
Moving from the current situation to Options B or C is likely to improve customer service and give greater resilience to the risks of contamination.	
14	SUBJECT TO APPROVAL FROM BOARDS/COUNCIL

Will require Board/ Council approval.	
15	IMPLICATIONS FOR ECONOMIC DEVELOPMENT (OF THE CITY OR ISLAND)
None identified.	
16	APPENDICES
Not applicable.	
17	REASON FOR CONFIDENTIALITY
Not applicable.	
CONTRACTOR'S REPRESENTATIVE	Douglas City Council Head of Waste Services
DATE	13th August 2026.

Ross Phillips

From: Ross Phillips
Sent: 11 September 2026 16:05
To: Ross Phillips
Subject: FW: Access to Government Valuer for Local Authorities

From: [REDACTED]
Sent: 11 September 2026 15:18
To: [REDACTED]
Cc: [REDACTED]
Subject: Access to Government Valuer for Local Authorities

Dear All

From late last year there were comments from some Local Authorities around the removal of access to valuation services previously offered by the Government Valuer. I have been seeking confirmation of the official position, and I am now in a position to convey that to you all.

Please find below the official response from the Government Valuer within Treasury.

The decision to withdraw valuation services to Local Authorities was made following a review of the Valuation Office remit and resource allocation.

The primary rationale was to encourage Local Authorities to seek independent professional advice where appropriate. This aligns with broader government policy and ensures that the Valuation Office can focus on its statutory responsibilities and core functions, particularly in relation to central government property and financial governance.

Unfortunately, the increasing demand from Local Authorities was placing pressure on our limited resources, which risked impacting our ability to deliver on these core duties. As a result, the review concluded that the Valuation Office should only undertake valuations for central government. This approach also supports the need to maintain independence and avoid any perception of conflict, especially where valuation advice may influence decisions involving public assets or funding.

I trust that this email provides an explanation which is hopefully clear.

Regards

[REDACTED]

[REDACTED]
 Central Support and Change Division | Department of Infrastructure
 Sea Terminal Building | Douglas | IM1 2RF | [REDACTED]





ONCHAN DISTRICT COMMISSIONERS

NOTICE OF MOTION

Proposed by: Commissioner Scott Wilson

To: Chief Executive/Clerk

Date: 24th August 2026

Standing Order 19.5: Any motion of which notice has been duly given, upon being moved and seconded, shall stand deferred without discussion until the next ordinary meeting of the Authority, this being Monday 21st September 2026.

Motion

That the Authority resolves to undertake and fund from the Authority's Housing Reserves a feasibility study into the potential redevelopment of the Hawthorn Villa site and the land within its curtilage, to assess the feasibility, viability and deliverability of a mixed-use scheme incorporating new social housing, appropriate accommodation for the Authority's operational requirements, and the impact on, and future provision of, existing income-generating commercial properties.

Supporting Information

The Authority faces ongoing demand for social housing and a corresponding need to increase the supply of suitable accommodation within the District. The Hawthorn Villa site, together with the land within its curtilage, represents a potentially valuable asset that may be capable of accommodating a residential development. While Hawthorn Villa currently accommodates the Authority's offices, parts of the site are considered underutilised and may offer scope for more effective use in support of the Authority's strategic housing objectives.

Any redevelopment would need to provide for the Authority's future office accommodation, and would also need to have regard to adjacent properties within the curtilage that are currently let for commercial rental income. The feasibility study should therefore address planning, housing capacity, site constraints, environmental and infrastructure matters, development costs and funding options, together with the implications for office provision and for the retention, incorporation or replacement of the income generating properties.

Commissioning a feasibility study does not commit the Authority to a future development scheme. It will provide the evidence base needed to inform future decision making and to establish whether redevelopment of the site can meaningfully contribute to addressing housing need, make more effective use of an underutilised Authority asset, and protect the Authority's commercial interests.

This Notice of Motion dated 24th August 2026 signed by:

Name Scott Wilson

Signed 



REPORT

Report to:	Board of Onchan District Commissioners
Reporting Officer:	District Surveyor
Date of the Meeting:	21 st September 2026
Subject:	Street Lighting Replacement Programme
Public or Private Document:	Public

Introduction:

This report presents the financial options available to the Board following the completion of the 2026 Non-Destructive Testing (NDT) survey of the Authority's street lighting column stock, the findings of which were reported to the Ordinary Board Meeting held on 7th September 2026.

The survey identified a number of columns that have reached the end of their safe operational life, together with others exhibiting varying degrees of corrosion and structural deterioration. The report outlines a prioritised, risk-based replacement programme, taking account of asset condition, location and public safety considerations, and seeks approval for the associated unbudgeted expenditure.

The Board is requested to consider the financial options presented and resolve upon the preferred approach for funding and delivering the proposed risk-based replacement programme, having regard to asset condition, public safety, and the Authority's financial position.

Previously Considered by the Board:

Ordinary Meeting held on Monday 7th September 2026.

Minute reference C26/09/01/14.

Recommendation/s or Action/s Taken:

Option 1

That the Board resolves:

- To fund the Phase 3 street lighting replacement works, as outlined in the District Surveyor's Report dated 21st September 2026, at a maximum budgeted cost of £202,078.32;
- That the required expenditure be met from the Authority's General Reserves;

- To make budget provision for the proposed Phase 4 street lighting replacement works as part of the 2027/28 draft budget and District Rate setting process; and
- To approve the procurement of materials from suppliers under exemption in accordance with the Authority's Standing Orders for the Making of Contracts 7.1(a)(i).

Option 2

That the Board resolves:

- To fund the Phase 3 street lighting replacement works, as outlined in the District Surveyor's Report dated 21st September 2026, at a maximum budgeted cost of £202,078.32;
- To fund the Phase 4 street lighting replacement works, as outlined in the District Surveyor's Report dated 21st September 2026, at a maximum budgeted cost of £330,355.41;
- That the required expenditure be met from the Authority's General Reserves; and
- To approve the procurement of materials from suppliers under an exemption in accordance with the Authority's Standing Orders for the Making of Contracts 7.1(a)(i).

Supporting Rationale:

The Authority's street lighting assets are an ageing stock, many of which are approaching or have exceeded their expected operational lifespan. A number of columns are becoming uneconomical to repair and do not meet current street lighting design standards and guidance. Failure to address these deficiencies could expose the Authority to increased liability in the event of injury, asset failure, or a road traffic collision where non-compliant or defective street lighting is identified as a contributing factor.

In light of the findings of the 2026 Non-Destructive Testing (NDT) survey, it is recommended that the following replacement programme be implemented based on assessed risk levels, structural condition, and public safety considerations:

Phase 3 – Emergency Repairs to Complete During 2026/27

Scheme 16 – Hague Crescent and Strathallan Road (budget of £41,670.08 to £50,438.63).

This scheme has 10 existing steel columns, and 7 of these have been highlighted as a risk of 4 or greater. 6 columns have already been removed as they failed the structural testing.

A design has been completed for this scheme, replacing all of the columns as required and including one additional column to ensure the area complies with the guidance BS5849.

The annual estimated energy saving is £574.48, and the annual estimated carbon dioxide reduction is 0.885 tonnes.

Scheme 25a – Eskdale Road (budget of £41,697.13 to £50,088.60).

This scheme has 11 existing steel columns, and 10 of these have been highlighted as a risk 4 or greater. 6 columns have already been removed as they failed the structural testing.

A design has been completed for this scheme, replacing all of the columns as required to ensure the area complies with the guidance BS5849.

The annual estimated energy saving is £401.45, and the annual estimated carbon dioxide reduction is 0.580 tonnes.

Scheme 31 – Howstrake Drive and Greeba Drive (budget of £85,191.87 to £101,551.09).

This scheme has 19 existing steel columns, and 15 of these have been highlighted as a risk of 4 or greater. 7 columns have already been removed as they failed the structural testing.

A design has been completed for this scheme, replacing all of the columns as required to ensure the area complies with the guidance BS5849.

The annual estimated energy saving is £496.47, and the annual estimated carbon dioxide reduction is 0.682 tonnes.

Phase 4 – Planned Repairs to Complete During 2027/28

Scheme 25b and 25c – Sunningdale Drive and Central Drive (budget of £93,338.18).

This scheme has 16 existing steel columns, and 11 of these have been highlighted as a risk of 4 or greater. 3 columns have already been removed as they failed the structural testing.

A design has been completed for this scheme, replacing all of the columns as required and including two additional columns to ensure the area complies with the guidance BS5849.

The annual estimated energy saving is £209.45, and the annual estimated carbon dioxide reduction is 0.780 tonnes.

Scheme 19 – Royal Avenue, Royal Avenue West and Royal Drive (budget of £160,393.74).

This scheme has 29 existing steel columns, and 18 of these have been highlighted as a risk 4 or greater. 1 column has already been removed as it failed the structural testing.

A design has been completed for this scheme, replacing all of the columns as required and including one additional column to ensure the area complies with the guidance BS5849.

The annual estimated energy saving is £643.54, and the annual estimated carbon dioxide reduction is 0.885 tonnes.

Scheme 32 – Mount View Road, Mount View Close and Victoria Avenue (budget of £76,623.49).

This scheme has 16 existing steel columns, and 12 of these have been highlighted as a risk 4 or greater. 3 columns have already been removed as they failed the structural testing.

A design has been completed for this scheme, replacing all of the columns as required and including 2 additional columns to ensure the area complies with the guidance BS5849.

The annual estimated energy saving is £275.57, and the annual estimated carbon dioxide reduction is 0.379 tonnes.

Financial Overview

Phase	Estimated Cost	Estimated Annual Electricity Saving	Estimated Annual Carbon Dioxide Reduction
Phase 3	£168,559.08 to £202,078.32	£1,472.40	2.147 tonnes
Phase 4	£330,355.41	£1,128.56	2.044 tonnes

Risk Overview

Completion of the proposed Phase 3 and Phase 4 replacement programme would result in the replacement of 25 of the 35 Category 6 (High Risk) columns and 41 of the 98 Category 4 (Medium Risk) columns identified through the 2026 Non-Destructive Testing (NDT) survey.

It is proposed that the remaining Category 6 columns be replaced on a responsive basis through the existing 2026/27 Street Lighting Revenue Budget as they reach the point where intervention is required. The remaining Category 4 columns would be monitored and prioritised within future planned replacement programmes.

Temporary Works

It should be noted that areas with the highest number of street lighting columns already removed from service require urgent attention and should be addressed as soon as practicable through the proposed Phase 3 replacement programme.

Where practicable, temporary measures will be implemented within areas identified for Phase 4 works that have been most significantly affected by the removal of street lighting columns. These measures will seek to provide an adequate level of illumination and maintain public safety until the permanent replacement works can be funded and completed.

Procurement

The proposed exemption under Standing Orders for the Making of Contracts 7.1(a)(i) relates to the procurement of feeder pillars and 6 metre galvanised street lighting columns. The recommended suppliers were originally selected during the earlier phases of the Authority's street lighting replacement programme following a competitive quotation process for comparable products. The proposed materials have since been successfully utilised throughout the District and have proven suitable for the Authority's operational and maintenance requirements.

It is proposed that Valmont Industries be approved as the supplier of 6 metre galvanised columns, to be supplied directly by the manufacturer. Continued use of this product will ensure consistency in asset specification, installation, maintenance and replacement arrangements, while also achieving efficiencies through direct procurement from the manufacturer.

It is proposed that Lucy Zodian be approved as the supplier of feeder pillars. These units are available in the required specifications and incorporate Authority identification plates. The products have been successfully used across previous schemes and repairs within

the District, and direct procurement from the manufacturer provides additional cost efficiencies.

The prices offered by both suppliers are considered reasonable and represent good value for money when compared with quotations previously obtained for similar products. Furthermore, the Authority's Street Lighting Policy supports the standardisation of street lighting assets to improve maintenance efficiency, reduce whole-life costs and ensure consistency across the street lighting network.

Alternatives Considered but not Recommended:

Option 3

That the Board resolves not to undertake the replacement of failed street lighting columns and to leave affected areas without street lighting provision.

Standing Orders:

Standing Orders on the Making of Contracts

7.0 EXEMPTIONS

"7.1 Nothing in these Standing Orders shall require tenders or quotes to be invited where:

(a) In case of contracts for the supply of goods or materials:

- (i) the goods or materials are proprietary articles supplied only by one person or company, and are sold only at a fixed price and no reasonably satisfactory alternative is available; and*
- (ii) the subject matter of the contract is considered by the appropriate Chief Executive/Clerk as being required so urgently as not to permit the invitation of tenders, provided that the consent of the Board to such action is obtained."*

Resource Impact:

The continued replacement and modernisation of the Authority's street lighting assets will deliver operational efficiencies and reduce the resource burden on officers.

As additional assets are upgraded and incorporated into the Authority's Computerised Maintenance Management System (CMMS), faults can be identified, monitored and addressed more efficiently, reducing the number of enquiries and complaints received from the public. This enables defects to be rectified at an earlier stage and improves overall service delivery.

The replacement programme will also reduce the frequency of reactive maintenance interventions, resulting in less officer time being spent managing ad hoc failures, emergency repairs and associated public enquiries.

The continued use of standardised equipment and approved suppliers will further support operational efficiency by:

- Maintaining a consistent stock of street lighting assets and replacement components across the District.

• Simplifying inspection, repair and maintenance activities. • Reducing the range of spare parts required to be held in stock. • Improving procurement efficiencies and supplier relationships; and • Reducing labour and maintenance costs over the lifecycle of the assets.
Financial Impact: • Procurement directly from UK manufacturers and the purchase of materials in bulk quantities provides greater flexibility in securing competitive pricing and achieving value for money. • The Authority's General Reserves were budgeted at approximately £1,500,000 for 2025/26 and £1,400,000 for 2026/27. Whilst the Authority's accounts for these financial years have yet to be finalised, current projections indicate that sufficient General Reserves are available to fund either the proposed Phase 3 works within the current financial year or both Phase 3 and Phase 4 works, should the Board determine this to be the preferred option.
Legal and/or Insurance Impact: • Health and Safety at Work Act 1974. • British Standard BS 5489-1:2020, Design of Road Lighting – lighting of roads and public amenity areas, Code of Practice. • The Authority's Combined Insurance policy does provide cover for accidents that may occur relating to public liability but will not cover any costs of prosecution from the Health and Safety Inspectorate.
Equality Impact: Following completion of Equality Impact Assessment screening, no adverse equality impacts have been identified.
Climate Change Impact: From the data included in the "Supporting Rationale" section of this report, it is estimated that Phases 3 and 4 will save a total of 4.191 tonnes of carbon dioxide emissions per annum. This is equivalent to approximately 25,700 flight miles.
Consultation with Others: • Chief Executive/Clerk and Chief Finance Officer – Onchan District Commissioners. • Lead Member for Environmental and Technical Services – Onchan District Commissioners. • Thorn Lighting – the Authority's chosen street lighting designer.

General Data Protection Regulation and/or Confidentiality Impact:
Not applicable.
Appendices:
Not applicable.

For Members Consideration.



**RYAN FORGIE
DISTRICT SURVEYOR**