

## 3.8 Policy on development contributions

### 3.8.1 Introduction

This document sets out the Council's policy on development contributions under the Local Government Act 2002 ("LGA"). The Council is required under section 102(4) of the LGA to adopt a policy on development contributions or financial contributions as part of its Long Term Plan (LTP)

Section 197 of the LGA defines a development contribution as a contribution:

- a. provided for in a development contribution policy included in the Long Term Plan of a territorial authority; and
- b. calculated in accordance with the methodology; and
- c. comprising:
  - i. money; or
  - ii. land, including a reserve or esplanade reserve (other than in relation to a subdivision consent), but excluding Maori land within the meaning of Te Ture Whenua Maori Act 1993, unless that Act provides otherwise; or
  - iii. both.

This policy has been drafted to meet the requirements for development contribution policies set out in sections 106, 197-211, and Schedule 13 of the LGA. Broadly speaking the policy:

- identifies the Council activities which will be funded by development contributions (initially, only roading in eight specified roading "catchments" and water and wastewater infrastructure in one catchment specified for this purpose);
- summarises the capital expenditure on these activities that the Council expect to incur as a result of household growth in the district from 2006 to 2026;
- states the proportion of that capital expenditure that will be funded by development contributions, and the rationale for using this method of funding;
- describes conditions and criteria applying to exemption from, remission, postponement, and refund of development contributions;
- specifies the level of contribution payable in different parts of the City (catchments) the Council has defined;
- specifies when a development contribution will be required.

More specifically, the policy:

- Provides for the Council to take development contributions to fund capital expenditure on roading in eight specified catchments. This expenditure is required to address the effects on roading infrastructure of increased traffic in those catchments resulting from household growth or, in the case of the Alexander Road catchment, resulting from commercial development;

- Provides for the Council to take development contributions to recoup capital expenditure on reticulated water supply and wastewater networks in the Mangaroa catchment, which it has already incurred in anticipation of growth;
- For information purposes only, signals the Council's intention in the future to widen the policy to recoup the cost to the Council of providing capacity in roading, water supply, wastewater and stormwater networks for areas of new (greenfields) and infill subdivision.

This development contribution policy is distinct from, and should be read alongside, the provisions in the Upper Hutt District Plan regarding financial contributions under the Resource Management Act 1991. As well as requiring development contributions under the LGA and financial contributions under the Resource Management Act 1991, the Council will continue to seek to avoid, remedy, or mitigate adverse effects of subdivision and development through appropriate conditions of resource consent imposed under sections 108 and 220 of the Resource Management Act 1991.

### 3.8.2 Growth in Upper Hutt

The population of Upper Hutt City at the last census in 2006 was 38,916. The City population has been relatively stable throughout the past two decades, however, has experienced significant growth in the past six years, beyond the highest projections then available. Current predictions are for the population to grow to between 40,800 and 43,500 based on a medium and high population projection respectively. Population is projected to plateau thereafter. A low growth projection would see the population remain relatively constant, with a slight increase in population. For the purposes of this policy the Council has assumed the "medium" growth scenario under which the population of Upper Hutt City grows and plateaus at approximately 45,600 in 2021.

Correspondingly, there has been significant growth in the number of households in the City over the past decade, which has resulted in residential occupancy rates falling from an average of 2.92 persons per residential dwelling in 1991 to 2.75 persons per residential dwelling in 2001 and 2.6 in 2006. This occupancy is projected to drop to 2.4 by 2021. Based on the medium growth scenario outlined above, projections indicate that approximately 17,000 dwellings will be required in Upper Hutt at 2021. This is an increase from 14,253 (occupied dwellings) on Census night 2006. Under a high growth scenario the number of dwellings will be 18,125.

Even without population growth, household growth results in increased demand for Council-provided infrastructure. In particular, greenfields subdivisions on the perimeters of the urban area, and continuing one-off subdivisions to create rural residential "lifestyle" blocks, result in pressure for the Council:

- in the case of new greenfields subdivision, to provide adequate water supply, wastewater and stormwater disposal and roading infrastructure to service those subdivisions;
- in respect of rural residential lifestyle properties, to upgrade existing rural roads to accommodate increased traffic generated by subdivision and development of those properties.

New greenfields subdivision in particular also creates a demand for the provision of reserves, open space and leisure facilities in the vicinity of the new subdivision. The Council will continue to address this demand through financial contributions in the form of land, money, or both,

taken in accordance with the provisions of the Upper Hutt District Plan and the Resource Management Act 1991.

Other activities undertaken by the Council include the provision of civic and recreational facilities such as halls, libraries, the aquatic centre H<sup>2</sup>O Xstream and the Expressions Arts and Entertainment Centre. Existing civic and recreational facilities are considered to be reasonably accessible to all residents of the district. Without population growth, it may be unnecessary to provide more of these facilities, or to increase the capacity of existing facilities. On the other hand, even with a stable population there may be a demand for improved levels of service in relation to civic and recreational facilities: but this would normally be funded out of rates. Accordingly this policy does not provide for a development contribution in relation to civic and recreational facilities.

In addition to greenfields and rural residential subdivision, there is also infill development of urbanised parts of the City. The impact of infill development on Council infrastructure is currently less significant than other forms of development because of the spare capacity that still exists in water supply, wastewater and roading infrastructure serving the urban area. However this will be reviewed for projected growth. There is no spare capacity in the Council's stormwater disposal infrastructure, but the vast majority of projected capital expenditure on stormwater infrastructure currently relates to improving the level of service (including the level of flood protection) provided by that infrastructure rather than increasing the capacity of the network for growth. For these reasons this policy does not currently provide for the Council to recover development contributions from infill subdivision and development in the urban area.

The Council will continue to require any adverse effects of infill subdivision and development to be addressed through appropriate conditions of resource consent, including works and services conditions imposed under section 108(2)(c) of the Resource Management Act 1991. In some circumstances this may involve undertaking off-site works and services to address the impact of the subdivision and development on Council infrastructure.

### **3.8.3 Funding the costs of growth**

Because the Council provides reserves, roading, wastewater, stormwater, and water supply infrastructure to the population of Upper Hutt on an on-going basis, household growth imposes costs on the Council in terms of providing new items of infrastructure, or increasing the capacity of existing infrastructure, to meet the needs of these new households.

Assuming it would be unacceptable for the Council not to provide reserves, roading and reticulated services to new households, the real choice is between on the one hand funding growth costs through development contributions and/or financial contributions; and on the other hand funding these costs through general funding mechanisms such as borrowing and rates. Funding the cost of a development through development contributions and financial contributions is seen as the more equitable way of allocating costs to those responsible for the Council incurring those costs, and who benefit from the Council's capital expenditure.

### 3.8.4 Capital expenditure in response to growth

Section 106(2)(a) of the LGA requires the Council's development contributions policy, in relation to the purposes for which development contributions may be required, to summarise and explain the capital expenditure identified in the LTP that the Council expects to incur to meet the increased demand for "community facilities" resulting from growth. Community facilities are defined in section 5 of the LGA, including reserves, network infrastructure (which includes roads, water, wastewater, and stormwater collection and management), and community infrastructure. Refer to the glossary to this policy for a full list of defined terms.

Section 106(2)(b) requires the development contributions policy to state the proportion of that capital expenditure that will be funded by development contributions and other sources of funding. In addition, section 106(2)(d) requires each activity for which a development contribution will be taken to be identified, along with the total amount of development contribution funding sought for that activity.

At this stage the only activities for which the Council will require development contributions are roading in the eight catchments specified in this policy and, in a single catchment (Mangaroa), water supply and wastewater. The information required under sections 106(2)(a), 106(2)(b) and 106(2)(d) is provided in the following table:

#### 3.8.4.1 20-Year estimated total capital expenditure and funding for growth

	Total Cost of Capital Works	Other Sources of Funding	Total Improved Level of Service Component	Total Growth Component	Amount to be Funded through Development Contributions
<b>Roading in Specified Catchments</b>	\$15,504,967	Rates/loans	\$8,853,279	\$6,651,688	\$5,377,934
<b>Wastewater and Water in Mangaroa Catchment</b>	\$1,969,975	Rates/loans	\$922,871	\$1,047,104	\$1,047,104

The Council intends in future years to widen the scope of this policy to allow for the taking of development contributions to recoup Council expenditure to purchase spare capacity in roading, stormwater, water supply and wastewater infrastructure in areas of greenfields and infill subdivision.

### **3.8.5 Rationale for funding growth through Development Contributions**

Section 106(2)(c) of the LGA requires the development contributions policy to explain why the Council has determined to use development contributions as a funding source, by reference to matters referred to in section 101(3) of the LGA.

The Upper Hutt City Vision, identified within the 'Overarching Guiding Elements' section of this Long Term Plan, identifies five vision priority areas.

The provision of roading infrastructure in the eight catchments specified, and the provision of wastewater and water infrastructure in the Mangaroa catchment (in each case funded through development contributions) to all five of Upper Hutt's vision areas.

#### **3.8.5.1 Distribution of benefits**

The Council considers it appropriate that development contributions are required to fund the addition of capacity in roading, stormwater, wastewater and water supply networks. The benefits of this additional capacity accrue to the residents of new households generating the demand for that capacity; development contributions paid by developers can be passed on through section prices to the residents of the new households who will benefit from the additional capacity. By contrast, existing landowners gain no benefit from the addition of capacity to existing networks that adequately meet their needs: accordingly they should not be required to fund the addition of that capacity through rates.

The cost of maintaining or improving levels of service provided by Council infrastructure to the existing population has been stripped out of the capital expenditure to be funded out of development contributions, as this expenditure does not benefit developers or new households who will be bearing the cost of development contributions.

#### **3.8.5.2 The Period in which benefits are expected to occur**

The benefits of capital expenditure to accommodate the effects of growth are likely to accrue beyond the 20-year timeframe of the development contributions policy, given the longevity of roads and piped networks. Nevertheless a 20-year period is seen as an adequate planning timeframe for the purposes of this policy.

#### **3.8.5.3 Extent to which Individuals contribute to a particular activity**

The need to install new capacity in Council-provided roading, stormwater, wastewater and water supply networks is caused by those undertaking subdivision and development in the district resulting in the creation of new lots and household units. Accordingly it is appropriate for the costs of installing additional capacity to be passed on through development contributions payable by developers on the granting of resource or building consents.

#### **3.8.5.4 Costs and benefits of funding the activity distinctly from other activities**

Development contributions can be imposed at relatively little cost, with the major costs lying in the preparation of a suitable methodology for the assessment of contributions. The benefits of funding the addition of capacity in Council infrastructure to meet the effects of growth through development contributions include greater transparency through quantifying the cost of growth to the Council in terms of providing additional infrastructure, and then passing on that cost to developers through development contributions. The use of catchments also aids transparency by signalling the variations in the cost of providing infrastructure according to the characteristics of the particular locality and the nature of the works required.

### **3.8.5.5 Overall impact on community wellbeing**

Ensuring adequate sources of funding to provide appropriate infrastructure is central to promoting the social, economic, environmental and cultural wellbeing of the district. Funding the cost of providing increased capacity in Council infrastructure through development contributions ensures equity between existing residents and those responsible for the Council incurring these additional costs.

Council has decided that the rural roading development levy should be imposed only on subdivision and in respect of each new lot created. The Council has decided not to implement a proposal to impose a levy at the building consent stage, for a new dwelling, because it considers that those people owning rural land and intending to build are already paying through rates for services.

Council has set a cap on development contributions for rural roading in recognition of the potentially high individual new allotment costs arising from the difficult topography and limited potential for further subdivision within certain rural catchments and as they do not wish to stifle such development.

## **3.8.6 Activities for which Development Contributions will be required**

### **3.8.6.1 Roading**

Council funded capital works associated with the provision of a safe and efficient roading network in the following roading catchments (refer to the map at the end of this policy for the location and boundaries of these catchments):

- Akatarawa Rd
- Kaitoke
- Mangaroa
- Katherine Mansfield extension
- Blue Mountains
- Moonshine Hill Rd
- Alexander Rd
- Swamp Rd

### **3.8.6.2 Water and Wastewater**

Council funded capital works associated with the provision of reticulated water supply and wastewater networks in the Mangaroa catchment (refer to the table at the end of this policy for the location and boundaries of this catchment).

## **3.8.7 How Development Contributions have been calculated**

Section 201 (1) (a) of the LGA requires the development contributions policy to include, in summary form, an explanation of and justification for the way each development contribution in the schedule to the policy is calculated.

In summary, each contribution (apart from the Alexander Road catchment roading contribution, and the Mangaroa water and wastewater contribution: see below) has been calculated in accordance with the methodology set out in Schedule 13 of the LGA, and then in respect of certain contributions applying an upper “cap”, namely:

#### **3.8.7.1 Stage 1:**

The Council has first, within each catchment, estimated the number of new lots/household units likely to be created over the next 20 years. This is based on existing trends in population and household growth and the development potential of each catchment (see the table in paragraph 10.1 below).

#### **3.8.7.2 Stage 2:**

It has, within each catchment, identified the total cost of the capital expenditure it expects to incur on roading over the next 20 years (this figure is drawn from the Council's asset management documentation and is referred to in the Council's LTCCP).

#### **3.8.7.3 Stage 3:**

It has identified the share of that capital expenditure attributable to growth. This involves identifying whether the "driver" for individual items of capital expenditure (projects) is improvement in levels of service, the provision of additional capacity, or a mixture of both; and then aggregating the expenditure attributable to providing additional capacity on individual projects into a single figure for each catchment (the "growth component"). The Council intends the entire growth component to be funded out of development contributions.

#### **3.8.7.4 Stage 4:**

In each catchment the Council has divided the growth component by the projected number of new lots/households units in that catchment to derive a per lot/household unit contribution.

#### **3.8.7.5 Stage 5:**

Having assessed a theoretical development contribution per additional lot/household unit, Council then considered the impact of such a contribution on the wellbeing of the community, and modified the requirements for rural roading development contributions by:

- a. Resolving not to levy development contributions at the building consent stage.  
Council will now only impose the levy on new rural lots created by subdivision.
- b. Resolving to place a cap on the maximum levy payable in the Moonshine Hill road and Akatarawa road catchments at \$9,690 and noting that in the other catchments the property owner will pay the actual levy assessed.

Council will now only impose the levy on new rural lots created by subdivision.

The Mangaroa water and wastewater contribution has been calculated in the same way, with the exception that at stage 2 above, instead of apportioning the cost of future capital works attributable to growth over the next 20 years the Council has, in reliance on section 199(2) of the LGA, apportioned the cost of capital expenditure already incurred in anticipation of growth (see the table in paragraph 10.2 below).

The Alexander Rd roading contribution has also been calculated in a similar way to the methodology set out in paragraph 7.2 above. The difference is that at stage 1, instead of estimating the number of new lots/household units likely to be created over the next 20 years,

because this is an area of anticipated commercial/industrial growth rather than residential growth, the Council has estimated the amount of developed commercial floor space. This has led to the basic unit of demand in this catchment being each additional 100m<sup>2</sup> of developed floor space created. Under stage 4, the Council has then divided the growth component of capital works in the Alexander Rd catchment amongst the amount of new floor space anticipated, to arrive at a contribution of \$256/each additional 100m<sup>2</sup> of developed floor space created.

Since households in the Katherine Mansfield extension and Swamp Road catchments also have to use the Mangaroa catchment for access their total levy is their own catchment plus Mangaroa.

The Council is required to adopt the methodology for calculating development contributions set out in Schedule 13 of the LGA; and considers it to be an appropriate way to fund the impact of household growth and, in the Alexander Road catchment commercial development, on the Council's roading infrastructure.

### **3.8.8 Significant assumptions**

Section 201 (1)(b) of the LGA requires the development contributions policy to state significant assumptions underlying the calculation of the schedule of development contributions. This must include an estimate of potential effects, if there is significant uncertainty as to the scope and nature of those effects.

#### **3.8.8.1 Population and household growth projections**

The Council has relied on projections of households and population growth, as it is required to do under the LGA. In particular the Council has assumed that over the 20 year period of this policy, the population of Upper Hutt is expected to increase from an estimated 41,000 at June 2010 up to 45,600 by 2021 or 48,400 by 2031, but that over that period, the number of rateable properties will grow by an average of 0.82 percent per annum. Assumptions have also been made about the increase in household units in each of the roading catchments, and the Mangaroa water and wastewater catchment, over the 20 year period of the policy.

#### **3.8.8.2 Cost of individual items of capital expenditure**

The Council has used the best information available at the time of developing this policy to estimate the cost of individual items of capital expenditure on roading that will be funded in whole or in part out of development contributions. It is likely that actual costs will differ from estimated costs due to factors beyond the Council's ability to predict such as changes in the price of raw materials, labour etc. and the timing of capital works.

The Council will review its estimates of capital expenditure at least every 3 years when it reviews its LTP.

#### **3.8.8.3 Inflation**

All figures are in today's dollars and development contributions from 2012 – 2013 onwards have been adjusted in accordance with the note under Accounting Assumptions.

### **3.8.9 Exemption, Remission, Postponement and Refund of Development Contributions**

#### **3.8.9.1 Exemptions**

In accordance with section 200 of the LGA, the Council will not require a development contribution if, and to the extent that:

- a. It has, under section 108(2)(a) of the Resource Management Act 1991, imposed a condition on a resource consent in relation to the same development for the same purpose; or
- b. The developer will fund or otherwise provide for the roading infrastructure to which the development contribution relates; or
- c. The Council has received or will receive funding from a third party.

#### **3.8.9.2 Remission and postponement**

The Council will not usually remit or postpone payment of a development contribution but reserves its right to do so in an exceptional case.

#### **3.8.9.3 Refunds**

The Council will refund a development contribution to the consent holder or to his or her personal representative in the circumstances set out in section 209 of the LGA, namely:

- a. If the contribution was taken upon the granting of a resource consent, the resource consent lapses under section 125 of the Resource Management Act 1991 or is surrendered under section 138 of that Act; or
- b. If the contribution was taken upon the granting of a building consent, the building consent lapses under section 41 of the Building Act 2004; or
- c. The development or building in respect of which the resource consent or building consent was granted does not proceed; or
- d. The Council does not provide the network infrastructure for which the development contribution was required.

### 3.8.10 Schedule of Development Contributions

#### 3.8.10.1 Level of contributions – Roading

The development contributions for roading payable for each additional unit of demand created are shown in the tables below:

##### a. Additional Lots

Roading Catchment	Growth Component of 20 Year Capital Works Projects*	Total Units of Demand (Additional Lots)	Calculated Cost of Construction * (Per Additional Lot)	Development Contribution Charged * (Per Additional Lot)
Akatarawa Rd	\$1,694,082	96	\$17,647	\$9,690
Kaitoke	\$615,961	67	\$9,193	\$9,193
Mangaroa	\$775,390	266	\$2,915	\$2,915
Katherine Mansfield Extension^	\$1,478,929	74	\$19,986	\$19,986
Blue Mountains	\$700,854	74	\$9,471	\$9,471
Moonshine Hill Rd	\$635,882	13	\$48,914	\$9,690
Swamp Rd^	\$232,300	56	\$4,148	\$4,178

^Also incur the Mangaroa Levy \* GST exclusive

##### b. Additional floor area

Roading Catchment	Growth Component of 20 Year Capital Works Projects*	Total Additional Developed Floor Area	Development Contribution* (Per 100m <sup>2</sup> of Additional Floor Area)
Alexander Rd	\$518,290	192,100 m <sup>2</sup>	\$270

\* GST exclusive

### 3.8.10.2 Level of contributions – Water and Wastewater

The development contribution for water and wastewater payable for each additional unit of demand created in the Mangaroa catchment is shown in the table below:

<b>Water and Wastewater Catchment</b>	<b>Growth Component of 20 Year Capital Works Projects<sup>^</sup></b>	<b>Total Units of Demand (Additional Lots/ House-Hold Units)</b>	<b>Development Contribution* (Per Additional Lot or Household Unit)</b>
Mangaroa	\$1,047,104	59	\$17,747

<sup>^</sup>Capital expenditure already incurred by the Council in anticipation of growth

\* GST exclusive

### 3.8.10.3 When Development Contributions will be required - Roading

Development contributions will be imposed upon the granting of a resource consent for subdivision or development that authorises the creation of one or more additional lots in the catchments listed below:

- Akatarawa Road
- Kaitoke
- Mangaroa
- Katherine Mansfield extension
- Blue Mountains
- Moonshine Hill Road
- Swamp Rd (Note: the development contribution from this catchment is its share of upgrading the link road between catchments 4 and 3. All other infrastructure in this catchment is the responsibility of the developers).

In accordance with section 208 of the LGA, until a development contribution has been paid the Council may:

- In the case of a subdivision, withhold a certificate under section 224(c) of the Resource Management Act 1991; or
- In the case of a development, prevent the commencement of a resource consent for the development under the Resource Management Act 1991.

Development contributions will be imposed upon the granting of building consent to create an additional 100m<sup>2</sup> or more of developed floor space (if not already imposed on the granting of resource consent) in the catchment listed below:

- Alexander Road

In accordance with section 208 of the LGA, until a development contribution has been paid the Council may withhold a code compliance certificate in respect of building work to which the building consent relates under section 43 of the Building Act 1991.

#### 3.8.10.4 When Development Contributions will be required – Water and Wastewater

A development contribution for water and wastewater in the Mangaroa catchment will be required:

- upon the granting of a resource consent for subdivision or development that authorises the creation of one or more lots or household units in the Mangaroa catchment; or
- upon the granting of a building consent regarding the creation of one or more household units in the Mangaroa catchment; or
- upon the Council granting an authorisation for an existing lot or existing household unit in the Mangaroa catchment to connect to the Council's water supply or wastewater system.

In accordance with section 208 of the LGA, until a development contribution has been paid the Council may:

- In the case of a contribution required upon the granting of subdivision consent, withhold a certificate under section 224(c) of the Resource Management Act 1991; or
- In the case of contribution required upon the granting of resource consent for a development, prevent the commencement of the resource consent under the Resource Management Act 1991; or
- In the case of a contribution required upon the granting of building consent, withhold a code compliance certificate in respect of building work to which the building consent relates under section 43 of the Building Act 1991; or
- In the case of a contribution required upon the granting of an authorisation to connect to the Council's water supply or wastewater system, withhold a connection to that system.

#### 3.8.11 Glossary

In this policy:

**“Allotment”** has the meaning given to it in section 218(2) of the Resource Management Act 1991, and lot has the same meaning;

**“Community facilities”** means reserves, network infrastructure, or community infrastructure for which development contributions may be required in accordance with section 199 of the LGA;

**“Community infrastructure”** means:

- a. land, or development assets on land, owned or controlled by the Council to provide public amenities; and
- b. includes land that the Council will acquire for that purpose;

**“Development”** means:

- a. any subdivision or other development that generates a demand for reserves, network infrastructure, or community infrastructure; but
- b. does not include the pipes or lines of a network utility operator;

**“Development contribution”** means a contribution:

- a. provided for in this development contribution policy; and
- b. calculated in accordance with the methodology;

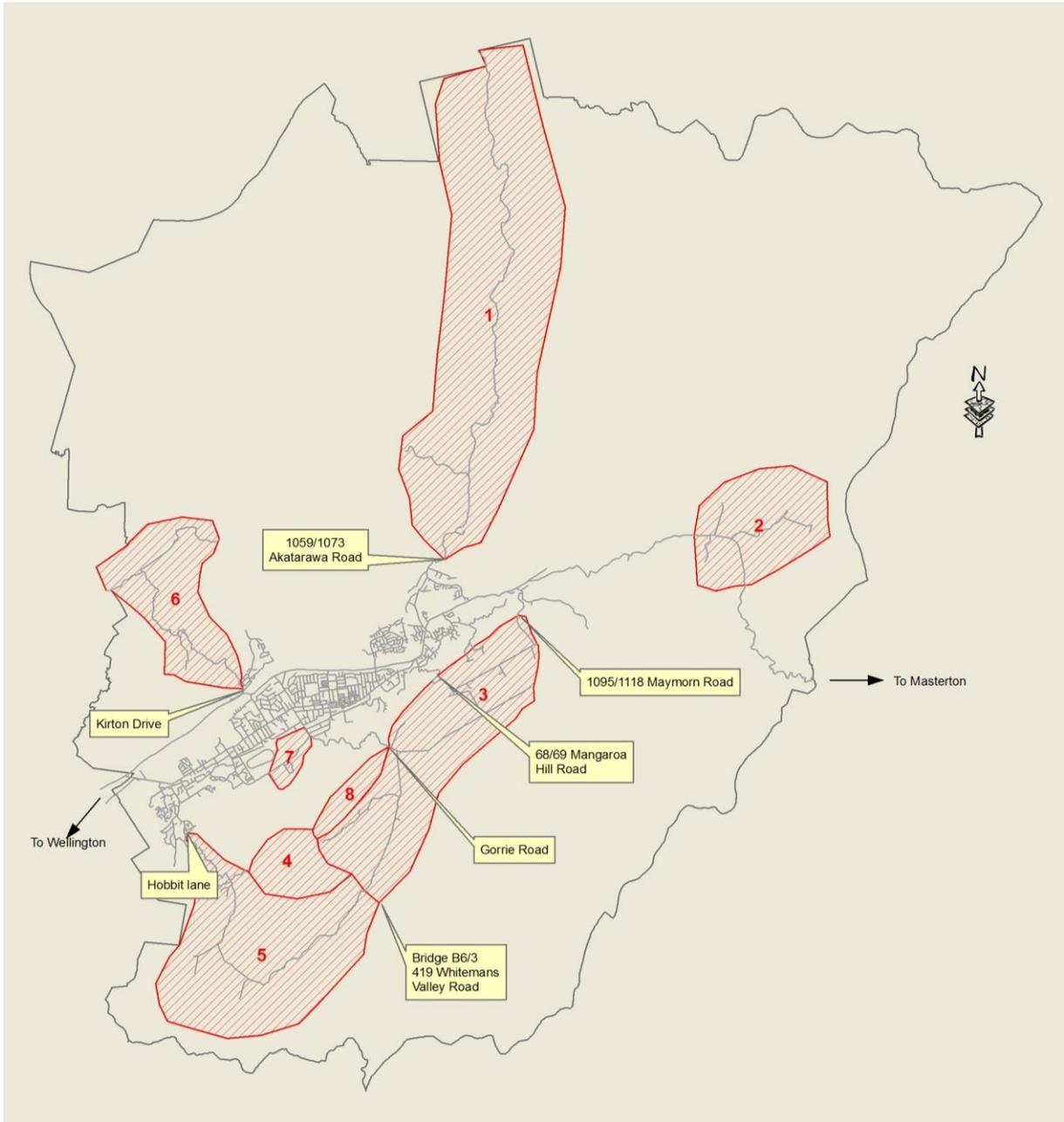
**“Development contribution policy”** means the policy on development contributions included in the long-term council community plan of a territorial authority under section 102(4)(d) of the LGA;

**“Methodology”** means the methodology for calculating development contributions set out in Schedule 13 to the LGA;

**“Network infrastructure”** means the provision of roads and other transport, water, wastewater, and stormwater collection and management;

**“Network utility operator”** has the meaning given to it by section 166 of the Resource Management Act 1991;

**“Service connection”** means a physical connection to a service provided by, or on behalf of, the Council.



## **3.9 Equal Employment Opportunities (EEO) Policy**

### **3.9.1 Purpose**

The Council's Equal Employment Opportunity (EEO) policy is intended to foster a culture within Council where the values of merit and fairness underpin all decisions relating to employment. The focus of this policy is to value diversity within the workplace and to create a work environment where all employees are given the opportunity to develop to their full potential.

### **3.9.2 Definition of Equal Employment Opportunity**

EEO refers to the operation of the principle that no employee or applicant for employment, who is appropriately skilled and qualified, may be discriminated against on employment related matters due to some personal characteristic, belief or association that is irrelevant to the employment decision.

### **3.9.3 Guiding principles**

Council will comply with its obligations under the Local Government Act 2002, Human Rights Act 1993 and Employment Relations Act 2000.

For any given employment decision – including recruitment and selection, training and development, promotion and remuneration, the decision will be based on the grounds of merit, skills and qualifications irrespective of age; race; colour; ethnic or national origins; sex; disability, religious, ethical or political beliefs; employment status; marital or family status; sexual orientation; or other personal characteristics that do not relate to skills or qualifications.

Council is committed to recognising and valuing different skills, talents and perspectives of employees.

There is on-going commitment to identify/eliminate discrimination barriers that cause or perpetuate inequality in employment.

All staff are made aware of Council's EEO policy and the principles of EEO and diversity.

Council will encourage the establishment of an EEO staff committee as a vibrant and active body that will be available to deal with complaints of discrimination and will have procedures in place to deal with such complaints.

### **3.9.4 Practices**

Council will assess what appropriate action needs to be taken in regard to changes in employees' personal circumstances where the change is EEO related.

All Council communications related to human resource must not be inconsistent with the EEO policy.

Council will provide employees involved in the hiring of staff with information on recruitment and selection practices that support the Council's EEO policy.