COTSWOLD
District Council

Wednesday, 2 September 2026

Tel: 01285 623181
e-mail: democratic@cotswold.gov.uk

# CABINET

A meeting of the Cabinet will be held in the Council Chamber - Council Offices, Trinity Road, Cirencester, GL7 1PX on **Thursday, 10 September 2026 at 6.00 pm.**

J H Portman

Jane Portman
Chief Executive

To: Members of the Cabinet
(Councillors Mike Evemy, Juliet Layton, Patrick Coleman, Tony Dale, Paul Evans, Mike McKeown, Andrea Pellegram and Tristan Wilkinson)

Recording of Proceedings – The law allows the public proceedings of Council, Cabinet, and Committee Meetings to be recorded, which includes filming as well as audio-recording. Photography is also permitted.

As a matter of courtesy, if you intend to record any part of the proceedings please let the Committee Administrator know prior to the date of the meeting.

# AGENDA

1. **Apologies**
   To receive any apologies for absence. The quorum for Cabinet is 3 members.

2. **Declarations of Interest**
   To receive any declarations of interest from Members relating to items to be considered at the meeting.

3. **Minutes** (Pages 9 - 28)
   To approve the minutes of the previous two meetings of Cabinet.

   1. To approve the minutes of the meeting of Cabinet held on 1 July 2026.
   2. To approve the minutes of the meeting of Cabinet held on 6 August 2026.

4. **Leader's Announcements**
   To receive any announcements from the Leader of the Council.

5. **Public Questions**
   To deal with questions from the public within the open forum question and answer session of fifteen minutes in total. Questions from each member of the public should be no longer than one minute each and relate to issues under the Cabinet's remit. At any one meeting no person may submit more than two questions and no more than two such questions may be asked on behalf of one organisation.

   The Leader will ask whether any members of the public present at the meeting wish to ask a question and will decide on the order of questioners.

   The response may take the form of:
   a) a direct oral answer;
   b) where the desired information is in a publication of the Council or other published work, a reference to that publication; or
   c) where the reply cannot conveniently be given orally, a written answer circulated later to the questioner.

6. **Member Questions**
   No Member Questions have been submitted prior to the publication of the agenda.

   A Member of the Council may ask the Leader or a Cabinet Member a question on any matter in relation to which the Council has powers or duties or which affects the Cotswold District. A maximum period of fifteen minutes shall be allowed at any such meeting for Member questions.

A Member may only ask a question if:

a) the question has been delivered in writing or by electronic mail to the Chief Executive no later than 5.00 p.m. on the working day before the day of the meeting; or
b) the question relates to an urgent matter, they have the consent of the Leader to whom the question is to be put and the content of the question is given to the Chief Executive by 9.30 a.m. on the day of the meeting.

An answer may take the form of:

a) a direct oral answer;
b) where the desired information is in a publication of the Council or other published work, a reference to that publication; or
c) where the reply cannot conveniently be given orally, a written answer circulated later to the questioner.

7. **Issue(s) arising from Overview and Scrutiny and/or Audit and Governance**

To receive any recommendations from the Overview and Scrutiny Committee and to consider any matters raised by the Audit and Governance Committee.

8. **Schedule of Decisions taken by the Leader of the Council and/or Individual Cabinet Members** (Pages 29 - 34)

To note the decisions taken by the Leader and/or Individual Cabinet Members since the agenda for Cabinet on 1 July 2026 was published.

9. **Suitable Alternative Natural Greenspace Spending 2026** (Pages 35 - 52)

<u>Purpose</u>

For Cabinet to review officer recommendations on external bids for funding from the Suitable Alternative Natural Greenspace (Cotswold Beechwoods SAC) funds held by the Council.

<u>Recommendation</u>

That Cabinet resolves to:

1. Agree to fund the following bid:
    - Sherborne Big Nature, Better Access (National Trust)

10. **Corporate Performance Report - Q1 2026/27** (Pages 53 - 168)

<u>Purpose</u>

To set out the financial and service performance, and the strategic risk register for Q1 2026/27.

<u>Recommendations</u>

That Cabinet resolves to:

1. Review and notes the financial position set out in Annex A and Annex A-1 of this report.
2. Approve an increase of £27,000 to the Capital Programme for the installation of pool covers at Bourton on the Water and Chipping Campden Leisure Centres funded from the remaining balance of the Community Municipal Investment, as detailed in Section 4 of Annex A.
3. Approve the additional transfers to earmarked reserves, (transfer any year-end Planning Fee income (over and above the budgeted level) to the Planning Appeals earmarked reserve, transfer any year end investment income over and above the budgeted level to the Treasury Management earmarked reserve, transfer any remaining year-end surplus to the Capacity Building earmarked reserve).
4. That authority is delegated to the Strategic Head of Housing, Property and Assets, Deputy Chief Executive and Section 151 Officer in consultation with the Cabinet Member for Finance to progress to disposal, as set out in paragraph 4.12 of Annex A-1.
5. Note overall progress on the Council priorities and service performance for Q1 2026-27 (April – June 2026), as set out in Annex B.
6. Reviews the Strategic Risk Register and mitigation measures, as set out in Annex C.

11. **Establishing a Voluntary Joint Committee - Local Government Reorganisation** (Pages 169 - 188)

Purpose

To seek approval for Cotswold District Council to establish and participate in a Joint Committee with the other Gloucestershire councils to oversee and co-ordinate the transition to the new single unitary Gloucestershire Council, due to become operational on 1 April 2028.

Recommendations

That Cabinet resolves to:

1. Approve the establishment of a Joint Committee for the area identified to form Gloucestershire Council in MHCLG's letter dated 16 July 2026 (attached at Annex A).
2. Approve delegated authority to the Chief Executive Officer, in consultation with Leader of the Council, to agree the terms of reference for the Joint Committee, in accordance with the draft terms of reference as set out in Annex B, to include that:
   (i) the Joint Committee takes the form and is authorised to undertake such

functions as are expected to be required of a joint committee established under a Gloucestershire (Structural Changes) Order (SCO), as made under the Local Government and Public Involvement in Health Act 2007, together with such other functions as may be agreed with the other existing Gloucestershire Councils by the Chief Executive in consultation with the Leader of the Council and

(ii) the Joint Committee is in place until such time as the SCO comes into force, from which point onwards the Joint Committee shall continue and undertake responsibility for those functions as may be specified in the SCO, until the day following that on which the Gloucestershire Council holds its first meeting in shadow authority form.

3. Approve the nomination of one representative and one substitute as the Council's representatives to the Gloucestershire Council Joint Committee.
4. Approve delegated authority to the Chief Executive Officer, in consultation with the Leader of Council, to agree any other matters to support the establishment, operation and decision making in support of the Gloucestershire Council Joint Committee.

That Cabinet recommends to Council the:

5. The establishment of a Joint Committee with the other seven Gloucestershire Councils noting Cabinet's approval to delegate functions in accordance with Part 4 of the Local Authorities (Arrangements for the Discharge of Functions) (England) Regulations 2012"; and
6. Appointment of Councillor Mike Evemy as the Council's representative and Councillor Tristan Wilkinson as substitute representative to the Gloucestershire Council Joint Committee.

12. **People and Culture Strategy Implementation Plan Years 2 and 3** (Pages 189 - 210)

Purpose

To present the Year 2 and 3 People & Culture Strategy Implementation Plan (August 2026 – March 2028) to Cabinet for approval.

Recommendations

That Cabinet resolves to:

1. Approve the years 2 & 3 implementation plan as detailed in Annex A (August 2026 – March 2028).
2. Delegate authority to the Director of Governance & Development, in consultation with the Leader of the Council, to make minor amendments to the plan in response to emerging organisational or legislative changes.

13. **Private Sector Housing Civil Penalty Policy** (Pages 211 - 268)

Purpose

To ask Cabinet to review and approve the changes made to the Cotswold District Council Housing Civil Penalties Policy (Private Sector), reflecting the new powers and duties arising from the Renters' Rights Act 2025. The revised Policy will provide an up-to-date framework for the Council's enforcement activity

Recommendation

That Cabinet resolves to:

1. Approve the updated CDC Housing Civil Penalties Policy

14. **Health and Safety Delegated Responsibility Framework** (Pages 269 - 290)

Purpose

To submit the Health and Safety Delegated Responsibility Framework to Cabinet for approval.

Recommendations

That Cabinet resolves to:

1. Approve the implementation of the Health and Safety Delegated Responsibility Framework (Annex A)
2. Delegate Authority to the Chief Executive Officer to approve health and safety policies in line with the Framework (Annex A).

15. **Review and approval of Grants Management Policy** (Pages 291 - 314)

Purpose

To present Cabinet with a new Grant Management Policy for approval and adoption.

To provide an over-arching Policy that provides guidance to employees on the Council's governance and approach for administration and management of grant income, in order to ensure that we are maximising outcomes, minimising risk and delivering the greatest benefit to our communities.

Recommendations

That Cabinet resolves to:

1. Approve and adopt the Grant Management Policy attached to this report.
2. Delegate authority to the Deputy Chief Executive and Chief Finance Officer to approve future minor amendments to the Policy, in consultation with the Cabinet Member for Finance, Assistant Director Counter Fraud and Legal Services.

16. **Review and approval of updated Counter Fraud and Anti-Corruption Policy**

(Pages 315 - 338)

Purpose

To present Cabinet with a revised Counter Fraud and Anti-Corruption Policy for approval and adoption. The Policy has been reviewed to ensure the content reflects current legislation and the Council's Policies and Procedures.

Recommendations

That Cabinet resolves to:

1. Approve and adopt the Counter Fraud and Anti-Corruption Policy attached to this report.
2. Delegate authority to the Deputy Chief Executive and Chief Finance Officer to approve future minor amendments to the Policy, in consultation with the Cabinet Member for Finance, Assistant Director Counter Fraud and Legal Services.

17. **Review and approval of updated Proceeds of Crime and Anti Money Laundering Policy** (Pages 339 - 354)

Purpose

To present Cabinet with a revised Proceeds of Crime and Anti-Money Laundering Policy for approval and adoption. The Policy has been reviewed to ensure the content reflects current legislation and the Council's Policies and Procedures.

Recommendations

That Cabinet resolves to:

1. Approve and adopt the Proceeds of Crime and Anti-Money Laundering Policy attached to this report.
2. Delegate authority to the Deputy Chief Executive and Chief Finance Officer to approve future minor amendments to the Policy, in consultation with the Cabinet Member for Finance, Assistant Director Counter Fraud and Legal Services.

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COTSWOLD
District Council

Cabinet
01/July2026

**Minutes of a meeting of Cabinet held on Wednesday, 1 July 2026**

Members present:

| | | |
|---|---|---|
| Mike Evemy (Leader) | Juliet Layton | |
| Patrick Coleman | Paul Evans | Andrea Pellegram |
| Tony Dale | Mike McKeown | Tristan Wilkinson |

Officers present:

| | |
|---|---|
| Harrison Bowley, Head of Planning Services | Jane Portman, Chief Executive Officer |
| Tyler Jardine, Trainee Democratic Services Officer | Stuart Rawlinson, Business Manager Resources, Data and Growth |
| Geraldine LeCointe, Assistant Director - Planning Services | David Stanley, Deputy Chief Executive and Chief Finance Officer |
| Nickie Mackenzie-Daste, Senior Democratic Services Officer | |

Observers:
Councillor Angus Jenkinson

## 252 Apologies

There were no apologies for absence.

## 253 Declarations of Interest

There were no declarations of interest from Members or officers present.

## 254 Minutes

The purpose of this item was to consider the minutes of Cabinet held on 4 June 2026.

Councillor Andrea Pellegram requested that the word sacks be used in the place of containers on Page 7 of the draft minutes.
Councillor Coleman requested the addition of the word ‘to’ before the word seek in the Abberley House recommendations on Page 9 of the draft minutes.

The recommendation to approve the amended minutes was proposed by Councillor Juliet Layton and seconded by Councillor Paul Evans.

RESOLVED that, subject to the two amendments above, the minutes of the meeting of the 4 June be approved as a correct record.

Voting
7 For, 0 Against 1 Abstention

| **To APPROVE the minutes of a meeting of Cabinet held on 4 June 2026. (Resolution)** | | |
|---|---|---|
| Cabinet resolved to APPROVE the minutes of the meeting of Cabinet held on 4 June 2026, subject to the two amendments being made. | | |
| For | Patrick Coleman, Tony Dale, Paul Evans, Mike Evemy, Juliet Layton, Mike McKeown and Andrea Pellegram. | 7 |
| Against | None | 0 |
| Conflict Of Interests | None | 0 |
| Abstain | Tristan Wilkinson | 1 |
| **Carried** | | |

## 255 Leader's Announcements

There were no announcements from the Leader.

## 256 Public Questions

There were no Public questions.

## 257 Member Questions

There were no Member questions.

## 258 Schedule of Decisions taken by the Leader of the Council and/or Individual Cabinet Members

The purpose of the report was for Cabinet to note the decisions taken by the Leader and/or Individual Cabinet Members since the agenda for Cabinet 4 June 2026 was published.

It was noted that the following non-key decisions had been taken by the Cabinet Member for Housing and Planning, Councillor Juliet Layton under delegated authority:

1. Deputy Leader and Cabinet Member for Housing and Planning - Decision meeting 15 June 2026

Decision taken regarding: The Cotswold District Council response to the Reg. 14 Siddington Neighbourhood Plan consultation.

The Cabinet Member for Housing and Planning had considered the recommendations within the report, noted that the consultation had followed due process and accepted the officer recommendations.
The Cabinet Member for Housing and Planning had confirmed their decision to approve the Council's response to the Regulation 14 consultation on the Siddington Draft Neighbourhood Plan 2025–2031 for submission to Siddington Parish Council.
In approving the response, the Cabinet Member had noted that the comments represented a supportive package of officer observations intended to assist Siddington Parish Council in refining the Plan and ensuring that it met the relevant legal and basic conditions prior to its submission under Regulation 15.

Date decision effective: 24 June 2026.

## 259 Issue(s) Arising from Overview and Scrutiny and/or Audit and Governance

Cabinet noted that the Overview and Scrutiny Committee had met earlier in the week and had pre-scrutinised the following items:

- Financial Performance Report Q4 2025/26
- Service Performance Report Q4 2025/26
- Planning Enforcement Report

As a result of this scrutiny recommendations were made. The recommendations and the Cabinet’s response are set out in Annex to this item.
The Leader thanked the Overview and Scrutiny Committee for its scrutiny and confirmed that its recommendations would be referenced during consideration of the relevant agenda items.

## 260 Planning Enforcement Update

The purpose of this item was to provide an update on the performance, staffing, and capacity of the Planning Enforcement Team following the transition of planning services back into the Council in November 2024 and the subsequent PAS Peer Review.

It summarised progress against the PAS Action Plan, identified continuing service pressures including recruitment challenges and backlog management, and set out the measures underway to improve resilience, service efficiency, and performance.  Cabinet was asked to consider the progress made, note the areas where performance remained constrained and endorse the Chief Executive's delegated decision to establish a time-limited enforcement leadership role to support service improvement.

Councillor Juliet Layton, Cabinet Member for Planning and Housing, introduced the report and referred to the detailed discussion that had previously taken place at the Overview and Scrutiny Committee. The challenges associated with the Council's existing planning systems and data retrieval processes were highlighted and it was noted that these had become increasingly apparent following the transfer of the service back in-house. It was explained that a temporary leadership post, until 31 March 2028, would provide additional capacity and expertise to oversee improvements to the service, support the implementation of the PAS recommendations, and strengthen the transition arrangements. The additional budget provision for the post would be met from the Council's earmarked Capacity Building Reserve.

The Leader, Councillor Mike Evemy, advised that the Overview and Scrutiny Committee had considered the wider Planning Enforcement performance report at its meeting on 29 June and invited the Vice-Chair of the Committee to summarise the Committee's observations and recommendations.

Members recognised the significant value of the Planning Compliance and Enforcement service in providing assurance to Members, residents and the wider public, and expressed strong support for further strengthening the service. It was acknowledged that planning enforcement was a high-profile area of the Council's work and one that generated considerable public interest and expectation.

Members welcomed the findings of the PAS review and recognised that substantial work remained to address weaknesses in systems, processes and data management. They supported the appointment of an experienced officer to provide additional leadership and to undertake a comprehensive review of current working practices, with a view to improving performance, resilience and efficiency. The importance of ensuring that adequate resources were made available to support both the review and the reduction of the existing case backlog was emphasised, particularly in advance of local government reorganisation.

Several Members noted that improved digital systems and reporting arrangements would help officers manage cases more effectively, provide greater transparency for Members and residents, and reduce unnecessary administrative activity. It was recognised that the new post should not only address current operational challenges but also identify longer-term improvements to processes and service delivery.

Members also acknowledged the complexity of planning enforcement work, recognising that cases often involved lengthy legal processes, careful consideration of proportionality and expediency, and close collaboration across planning, legal and other Council services. Whilst there was broad support for strengthening enforcement activity, Members recognised that enforcement remained a discretionary function and that resources should continue to be focused on those cases where formal action was justified and in the public interest.

Cabinet Members expressed confidence that the appointment would provide valuable additional leadership during a period of significant organisational change and welcomed the opportunity to build a more resilient and effective enforcement service before transition to the future unitary authority.

In summing up the discussion, the Leader thanked officers for their work in managing the service during a challenging period and acknowledged the commitment shown by both the Planning Enforcement Team and the wider planning service. He emphasised the importance of monitoring progress following the appointment and proposed that a performance update be brought back to Cabinet in January 2027. The update would report on service performance, progress against the improvement programme, the impact of the additional leadership capacity, and identify any further resource requirements should they become necessary.

The recommendations were proposed by Councillor Juliet Layton, Cabinet Member for Housing and Planning, seconded by Councillor Mike Evemy and put to the vote.

Voting record:

8 For, 0 Against, 0 Abstentions.

<table>
<tr><th colspan="3">To APPROVE the recommendations of the Planning Update Report (Resolution)</th></tr>
<tr><td colspan="3">Cabinet RESOLVED to:<br><br>1. Endorse the Chief Executive’s decision under delegated authority (Part C4 of the Constitution and section 112 of the Local Government Act 1972) to establish and appoint to a time-limited Enforcement Leadership role and approve the additional budget provision required to fund the role to be funded from the Council’s earmarked ‘Capacity Building Reserve’.<br><br>2. Consider a further report, at January 2027 Cabinet which would outline the service performance and highlight any problems or particular highlights.</td></tr>
<tr><td>For</td><td>Patrick Coleman, Tony Dale, Paul Evans, Mike Evemy, Juliet Layton, Mike McKeown, Andrea Pellegram and Tristan Wilkinson</td><td>8</td></tr>
<tr><td>Against</td><td>None</td><td>0</td></tr>
<tr><td>Conflict Of Interests</td><td>None</td><td>0</td></tr>
<tr><td>Abstain</td><td>None</td><td>0</td></tr>
<tr><td colspan="3">Carried</td></tr>
</table>

## 261 Service Performance Report - Q4 2025/26

The purpose of this item was to provide an update on progress against the Council's priorities and service performance for Quarter 4 of 2025/26.

Councillor Mike Evemy, Leader of the Council, introduced the regular quarterly performance report. He noted that overall performance against the Corporate Plan targets remained positive, with a number of indicators exceeding target. In particular, missed bin collections remained below target levels, reflecting continued improvements in waste collection performance. Strong gym membership figures and lower levels of residual household waste were also highlighted as positive outcomes, indicating continued progress in reducing general waste.

Members noted that a small number of performance measures remained below target and had been considered in detail by the Overview and Scrutiny Committee, whose recommendations accompanied the report. Particular concern had been expressed regarding land charges turnaround times, which had not consistently met the 10-day target. It was noted that recruitment to the team had recently taken place and that performance was expected to improve as additional capacity became established.

Members also noted that historic pressures relating to housing benefit and council tax support processing continued to improve, with in-quarter performance showing positive progress. In relation to planning appeals, Members acknowledged that a greater proportion of appeals had been allowed than the Council's target of 30%. Whilst this reflected the continuing impact of the Council's reduced five-year housing land supply, it was noted that performance remained above the Government's threshold for designation. Members also recognised the continued strong performance of the planning service in managing a high volume of applications and noted that planning income had exceeded expectations.

In discussing environmental performance, Members welcomed the continued reduction in residual household waste and acknowledged that, although recycling rates had declined slightly in line with national trends, the Council continued to perform well compared with other authorities and remained within the top quartile nationally. Members also commended the work of the Environmental Services team and Ubico in responding promptly to fly-tipping incidents and undertaking proactive enforcement activity.

Members further welcomed the strong financial performance of a number of climate initiatives, noting that the Council's rooftop solar installation and electric vehicle charging infrastructure had both exceeded projected income and savings, delivering environmental benefits alongside reduced operating costs.

The Leader also highlighted improvements in council tax support processing times and provided additional context regarding long-term empty homes. Members noted that a significant proportion of empty properties were either actively being marketed for sale or rent, formed part of retirement housing stock, or were subject to probate or other transitional circumstances. It was further noted that officers continued to work proactively with owners to bring long-term empty properties back into use, supported by the Council Tax premium applied to qualifying empty homes.

Cabinet RESOLVED to note the overall progress on the Council's priorities and service performance for Quarter 4 of 2025/26 (January to March 2026).

## 262 Financial Performance Report - Q4 2025/26

The purpose of this item was to present the final budget monitoring position and financial outturn for the 2025/26 financial year.

Councillor Patrick Coleman, Cabinet Member for Finance, introduced the report, which presented the Council's final financial position for the year ending 31 March 2026. Cabinet was asked to review and note the outturn position, approve the proposed transfers to and from earmarked reserves, and approve the carry forward of an unspent capital budget of £858,000 into the 2026/27 Capital Programme.

Members noted that the financial year had concluded broadly in line with previous quarterly forecasts, with the Council delivering an overall positive financial outcome. It was recognised that prudent financial management throughout the year, together with earlier strategic decisions, had contributed to a strong and resilient financial position. Members also noted the importance of maintaining a transparent, accurate and financially sustainable position in advance of local government reorganisation.

The Deputy Chief Executive highlighted a number of positive financial outcomes, including higher than anticipated planning fee income, stronger than budgeted car parking income, and the benefits arising from vacancy management measures introduced during the year. Members also noted the proposed increase in earmarked reserves, reflecting the Council's prudent approach to managing financial risk, supporting future priorities, and preparing for the transition to local government reorganisation. This included provision for Local Government Reorganisation costs, future Local Plan work, treasury management risks and other identified financial pressures.

Members also considered areas where financial performance had been less favourable. Particular concern was noted regarding the financial outturn reported by UBICO, where the final overspend had increased significantly compared with the Quarter 3 forecast. Officers advised that discussions had already taken place with UBICO management to address forecasting accuracy and financial management, with further meetings planned to ensure closer monitoring and improved budget control during the current financial year.

The Leader drew Members' attention to the comments of the Overview and Scrutiny Committee, which had expressed concern regarding the UBICO financial outturn and requested that Cabinet continue to monitor the position closely. Members also noted the Committee's support for the allocation of £2 million from reserves towards the Council's share of Local Government Reorganisation costs, whilst recognising that only limited Government funding had been made available and that councils would therefore need to meet a significant proportion of these costs themselves pending future efficiencies arising from reorganisation.

Members welcomed the positive overall financial outturn and recognised the importance of maintaining strong financial resilience during a period of significant organisational change. It was noted that the Council's healthy reserve position provided flexibility to respond to emerging priorities and enabled investment in key service improvements where required. Members also welcomed the prudent approach taken in setting aside funding to manage future risks and support strategic priorities ahead of local government reorganisation.

Cabinet placed on record its appreciation for the work of the Finance Team throughout the year in managing, monitoring and reporting the Council's financial position. Particular thanks were expressed to officers for the quality of financial planning and analysis which had supported informed decision-making and contributed to the Council's continued strong financial standing.

The recommendation was proposed by Councillor Patrick Coleman, seconded by Councillor Tristan Wilkinson and put to the vote.

Voting record:

8 For, 0 Against, 0 Abstentions.

| **To APPROVE the recommendations of the Financial Performance Report of Q4 2025/26 (Resolution)** | | |
|---|---|---|
| Cabinet RESOLVED to:<br>1. Review and note the outturn financial position set out in this report.<br>2. Approve the transfer to and from reserves as set out in Section 6 and Annex C.<br>3. Approve the carry forward of unspent capital budget included in paragraph 7.5 of £0.858m into the 2026/27 Capital Programme. | | |
| For | Patrick Coleman, Tony Dale, Paul Evans, Mike Evemy, Juliet Layton, Mike McKeown, Andrea Pellegram and Tristan Wilkinson | 8 |
| Against | None | 0 |
| Conflict Of Interests | None | 0 |
| Abstain | None | 0 |
| **Carried** | | |

## 263 Strategic Risk Register - Q4 2025/26

The purpose of this item was to provide an update on the Strategic Risk Register for Q4 2025/26 and the mitigation measures in place.

Councillor Mike Evemy, Leader of the Council, introduced the report, noting that the Strategic Risk Register would also be considered by the Audit and Governance Committee at its meeting on 27 July. Members were advised that, in accordance with the Council's Constitution, responsibility for overseeing the Council's strategic risks and risk appetite rested with the Audit and Governance Committee. However, it was emphasised that good governance practice also required Cabinet, as the Council's principal decision-making body, to have oversight of the Corporate Risk Register and the opportunity to review, question and challenge its contents.

Members considered the register and sought clarification on terminology used within the document, including references to previous resilience exercises. Officers explained that these referred to multi-agency emergency planning exercises undertaken to test the Council's preparedness for significant incidents, including a prolonged national power outage and a pandemic scenario.

Members noted the importance of maintaining awareness of the Council's principal strategic risks and the actions in place to mitigate them. It was further noted that the Strategic Risk Register would continue to be reviewed on a regular basis and that Cabinet Members, together with the Corporate Leadership Team, had an important role in maintaining oversight of the Council's strategic risks.

Members also noted that the Corporate Risk Register formed part of a wider framework of risk management, with more detailed operational and service-level risk registers maintained across individual service areas. Where appropriate, Members could seek further information on these from the relevant senior officers.

Cabinet RESOLVED to note the Strategic Risk Register and the mitigation measures in place.

## 264 Next Meeting

It was confirmed that the next meeting of Cabinet would be an Extraordinary Cabinet to consider the draft Local Plan on 6 August 2026, starting at 6.00pm.

The following meeting of Cabinet  would be held on 10 September 2026, starting at 6.00pm.

The Meeting commenced at 6.00 pm and closed at 6.55 pm

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Cabinet
06/August2026

COTSWOLD
District Council

# Minutes of a meeting of Cabinet held on Thursday, 6 August 2026

Members present:

| | | |
|---|---|---|
| Mike Evemy (Chair) | Juliet Layton | |
| Patrick Coleman | Paul Evans | Andrea Pellegram |
| Tony Dale | Mike McKeown | Tristan Wilkinson |

Officers present:

| | |
|---|---|
| Angela Claridge, Director of Governance and Development (Monitoring Officer) | David Stanley, Deputy Chief Executive and Chief Finance Officer |
| Julia Gibson, Democratic Services Officer | Matt Abbott, Head of Communications |
| Nickie Mackenzie-Daste, Senior Democratic Services Officer | Assistant Director Planning Services - Geraldine LeCointe |
| Helen Martin, Director of Communities and Place | Matthew Britton, Principal Planning Policy Officer |
| Jane Portman, Chief Executive Officer | Andrew Maxted, Head of Planning, Policy and Infrastructure |

Observers:
Councillor Gina Blomefield and Councillor Jon Wareing

## 265 Apologies

There were no apologies for absence.

## 266 Declarations of Interest

Councillor Andrea Pellegram declared, for reasons of transparency, an interest in Agenda Item 5 arising from her position as a retired professional planner and a director of Andrea Pellegram Limited, a planning consultancy. She advised that this interest was recorded in her Register of Interests and that the company provided planning services to a range of clients, including town and parish councils.

Councillor Pellegram acknowledged that there could be a perception of overlap between her professional role and her responsibilities as a Cabinet Member. She confirmed that she maintained a clear separation between those roles, did not use her position as a councillor to promote the interests of her company or its clients, and did not use or disclose confidential Council information for business purposes.

She informed the Cabinet that, in relation to the draft Local Plan, her company had provided planning support to Honeybourne Parish Council during the Regulation 18 consultation. Honeybourne Parish Council, whilst outside the Cotswold District, was a statutory consultee. She advised that the work had been undertaken by another consultant within the company and that she had had no involvement in preparing or submitting the representations or in seeking to influence their consideration by the Council.

Councillor Pellegram further confirmed that neither she nor her company held any land interest affected by the draft Local Plan or any financial interest dependent upon its outcome. Having considered the matter carefully and taken advice from the Monitoring Officer, she advised that she had also agreed with her business partner that her company would not accept any commission from within Cotswold District to prepare representations on the draft Local Plan.

Councillor Pellegram confirmed that she had spoken with the Monitoring Officer  and was satisfied she did not have a Disclosable Pecuniary Interest or any other interest requiring her to withdraw from the meeting and therefore remained in the meeting, participated in the discussion and voted on the item.

The Leader of the Council invited any further declarations of interest. No further declarations were made.

## 267 Public Questions

Councillor Mike Evemy, Leader of the Council, opened the public questions session by acknowledging the anxiety and concern caused by the publication of the proposed Local Plan on 24 July 2026. He recognised that the proposals had come as a surprise to some communities and anticipated that these concerns would be reflected in the public questions.
Those present were reminded that the Council was required to respond to Government-imposed housing targets, which had increased from fewer than 500 homes per year to 1,054 homes per year. As a consequence, the Council's existing Local Plan housing policies were considered out of date, creating a presumption in favour of development until a new Local Plan was adopted.
Councillor Evemy explained that he had written to three Government Ministers requesting that the housing target be reconsidered, with support from members across political groups and evidence submitted through the Regulation 18 consultation. However, the Government had confirmed that the target would remain unchanged.
Cabinet was also reminded that Full Council had unanimously agreed twelve months earlier to prepare an updated Local Plan, noting that an adopted Local Plan was the

principal means by which the Council could resist speculative planning applications. Recent planning appeals where decisions to refuse speculative developments had been overturned were referred to, emphasising the importance of progressing the Local Plan before opening the floor to public questions.

**1. Councillor Adam Crawford – Down Ampney Parish Council**
Councillor Adam Crawford referred to a question he had previously raised at the Overview and Scrutiny Committee regarding military aircraft noise associated with RAF Fairford and the potential impact of USAF (United States Air Force) operations on proposed development sites. He asked whether the Council's discussions with the Ministry of Defence (MOD) had specifically considered the noise impact of B-1B Lancer aircraft operating from RAF Fairford, given the proximity of the proposed development to the take-off flight path.
He further asked, in light of the fact that independent assessments of aircraft noise, health impacts and aviation safety had not yet been completed or published, what evidence the Cabinet had relied upon in concluding that the proposed Down Ampney allocation represented sustainable development.

The Leader of the Council deferred to the Interim Head of Planning Policy and Infrastructure who confirmed that the Ministry of Defence had been consulted and would be expected to advise the Council on any operational concerns relating to proposed development. While the MOD had raised issues regarding some sites, it had not identified concerns relating to this proposal. Officers confirmed that engagement with the MOD and other statutory consultees would continue throughout the plan-making process.
The Leader acknowledged the concerns raised and confirmed that representations submitted during the Regulation 19 consultation would be fully considered. Should further evidence from the MOD identify a fundamental issue, this would be addressed through the Local Plan process.

**2. Councillor Richard Harrison – Fairford Town Council**
Councillor Harrison stated that Fairford Town Council had identified significant issues within the published assessments and proposals, particularly regarding bottlenecks on the A417. He asked whether the Cabinet acknowledged these concerns and whether amendments could be made before submission of the Local Plan, including consideration of a short delay to allow detailed evidence to be provided.
The Leader advised that the timetable for preparing the Local Plan was constrained by Government deadlines and that amendments could not be made before publication. He encouraged Fairford Town Council to submit detailed representations during the Regulation 19 consultation, which officers would consider.
The Interim Head of Planning Policy and Infrastructure advised that the evidence supporting the Local Plan was considered proportionate and appropriate for the stage reached. Engagement with statutory consultees, including the Highway Authority, would continue throughout the process, and modifications could be proposed where

necessary. The Planning Inspector would ultimately determine whether any changes to the Plan were required.

**3. John Forshaw – Driffield Parish Council**
Speaking on behalf of Councillor Norris, Mr Forshaw referred to correspondence requesting withdrawal of the proposed new settlement south of Driffield from the Regulation 19 Local Plan. He argued that the proposal represented a substantial urban extension rather than a genuine new settlement, had not been consulted upon during Regulation 18, and that residents and the Driffield and Harnhill Parish Council had therefore been denied an opportunity to comment at an earlier stage. He asked whether the Cabinet would withdraw the allocation pending further consultation and reassessment.
The Leader confirmed that Councillor Norris would receive a written response to his correspondence, noting that it raised legal matters requiring advice before a detailed reply could be issued.
He advised that Cabinet did not intend to withdraw the Driffield allocation. He explained that, while the site had entered the process following Regulation 18, time constraints prevented undertaking a further Regulation 18 consultation before the Government's submission deadline. He confirmed that the proposal would instead be tested through the Regulation 19 consultation, during which residents would be able to submit representations. Public engagement sessions would also be arranged for Driffield residents.
Mr Forshaw posed a supplementary question, expressing concern that residents were effectively required to prove why the allocation should be removed once it had entered the Regulation 19 Plan.
The Leader explained that the Regulation 19 consultation formed part of the statutory planning process. Representations received would be considered by the Planning Inspector during examination of the Local Plan. He acknowledged local opposition but confirmed that the Council was required to follow the prescribed planning process.

**4. Richard Gunner**
Mr Gunner asked why climate change and environmental protection were not more prominent throughout the Local Plan, despite the Council having declared a climate emergency. He also asked whether the Council recognised that the proposed Very Light Rail project sought only protection of a future transport corridor rather than Council funding.
The Leader advised that climate considerations were embedded throughout the draft Local Plan, including policies promoting zero-carbon housing, sustainable development, public transport and active travel. He encouraged respondents to suggest further improvements during consultation if they considered additional measures necessary.
Regarding Very Light Rail, Councillor Evemy confirmed that an amendment would be proposed to Policy CP14 to safeguard a corridor for a potential Very Light Rail connection (or successor technology) between Kemble and Cirencester.

**5. Katharine Kilworth**
Ms Kilworth asked whether the transport evidence supporting the proposed Driffield allocation assessed only development planned to 2043, representing approximately half of the ultimate proposed allocation, and whether the Cabinet considered this sufficient to satisfy the tests of soundness.
She further asked what assessment had been made of the risk that unresolved transport evidence could result in the Local Plan being found unsound, similar to the experience of Stroud District Council.

The Leader invited the Interim Head of Planning Policy and Infrastructure to respond. He explained that development beyond 2043 would be considered through future Local Plans and that further opportunities would exist to assess longer-term growth. It was also advised that, should preparation of a new Local Plan become necessary, the process would take a minimum of approximately four years, with a Gloucestershire-wide plan expected around 2033.

**6. Tony Berry – Cotswold Community Railway**
Mr Berry advised that, following earlier confirmation that the proposed amendment safeguarding the Very Light Rail corridor would be included within the Local Plan, he no longer wished to ask a substantive question. He thanked the Cabinet for its support and expressed sympathy regarding the housing targets imposed by Government.

The Leader thanked Mr Berry for his comments.

**7. Henry Kilworth**
Mr Kilworth asked whether the Council held written confirmation from National Highways confirming satisfaction with the cumulative highway assessment relating to the A417 and A419, including the full Driffield housing allocation, and whether this information could be made available before Council considered the Local Plan.
He also asked how the proposed new settlement south of Driffield identified in the draft Local Plan as a principal settlement could be justified within the settlement hierarchy given that at the recent Overview and Scrutiny Committee officers had indicated that it might be more appropriately classified as a non-principal settlement and that its designation could be reviewed in a future plan.

The Interim Head of Planning Policy and Infrastructure advised that the proposed settlement would become a principal settlement as services and facilities were delivered over time. He clarified that the proposed allocation was separate from the existing settlement of Driffield, which remained classified as open countryside.
He further confirmed that National Highways had been engaged throughout preparation of the transport evidence and that discussions would continue as the Local Plan progressed.

**8. Neil White – Driffield Parish Council**
Mr White spoke about the likely impact of the proposed development upon the existing community of Driffield, stating that it would fundamentally change the character of the village and expressed concern for residents who had lived there for many years.

Councillor Evemy acknowledged the strength of feeling expressed by Mr White and recognised the anxiety experienced by communities affected by the proposals. He confirmed that members understood these concerns and would take all relevant matters into account when considering the Local Plan. He noted that councillors had a responsibility to weigh all evidence carefully before reaching a decision.

The Leader thanked the members of the public who had spoken  for their questions and comments.

## 268 Member Questions

**1. Councillor Jon Wareing**
Councillor Wareing began by commending officers and members for producing what was described as an infrastructure-led draft Local Plan, recognising the importance of planning, delivering and maintaining infrastructure alongside development.
He noted that many communities across the Cotswolds were already experiencing infrastructure deficits arising from previous development and argued that housing growth, economic development and tourism all created demands on infrastructure that should be planned for according to their impacts, rather than solely their sources.
He observed that, while the draft Local Plan recognised the effects of tourism in the Cotswold Lakes and included policies for managing visitor impacts in that area, it did not contain an equivalent strategic policy framework for settlements experiencing sustained visitor pressures, such as Bourton-on-the-Water and Bibury. He referred to the National Planning Policy Framework and examples from the Lake District National Park Authority, suggesting that the concept of "settlement carrying capacity" should form part of the Council's spatial planning strategy.
He therefore asked whether the Cabinet would amend the draft Local Plan by introducing settlement carrying capacity as a strategic planning consideration through a new core policy. He proposed that such a policy should establish a framework for identifying settlements experiencing exceptional and sustained visitor pressure and ensure that the environmental, physical, social and community impacts of visitor demand, together with infrastructure capacity and settlement resilience, were recognised within the District's spatial strategy, thereby providing an enduring planning framework for the future unitary authority.

The Leader thanked Councillor Wareing for his question and invited officers to respond to the technical aspects before asking the Cabinet Member for Tourism to comment.

The Director of Communities and Place advised that the draft Local Plan already contained policies addressing tourism-related development, specifically Policies 46 and 47. The Local Plan was not the principal mechanism through which visitor activity or tourism levels could be controlled. Officers considered that the proposed policies represented the fullest extent to which such matters could appropriately be addressed within planning policy.
The Director further confirmed that the Cotswold National Landscape Management Plan also contained relevant policies, including Policies CB15 and CE14, which addressed aspects of visitor management within the National Landscape. Councillor Evemy requested that these policies be shared with Councillor Wareing for reference.

**2. Councillor Tony Dale**, Cabinet Member for Leisure , Culture and Visitor Experience acknowledged the significant challenges experienced by communities affected by high visitor numbers, including Bourton-on-the-Water, Bibury, South Cerney, Siddington, Fairford, Lechlade, Meysey Hampton and other settlements across the district. He advised that the planning system was not designed to regulate visitor numbers directly and that the principal challenge lay in managing the impacts of tourism rather than controlling demand.
Councillor Dale stated that officers had extended planning controls as far as was considered appropriate within the Local Plan while remaining consistent with planning legislation and the requirements of the Planning Inspectorate. He also appealed for visitors to respect local communities by parking responsibly, complying with regulations and protecting the environment, noting that further powers to manage visitor numbers would require action by central Government.

**3. Councillor Tristan Wilkinson**, Cabinet Member for Economy and Council Transformation supported the points raised, stating that although the Local Plan might not be the appropriate planning mechanism, the issue of tourism impacts should not be overlooked. He referred to the increasing pressures experienced in Bibury since the COVID-19 pandemic and noted that Fairford had also experienced increased visitor activity associated with RAF Fairford. He observed that the global profile of the Cotswolds meant visitor numbers were likely to continue increasing and that destinations could rapidly become popular through social media. He concluded that the impact of tourism on local communities should be addressed through an appropriate policy or other mechanism.
Councillor Evemy agreed that the issue represented a significant challenge, referring to the phenomenon of "TikTok tourism" experienced in Bourton-on-the-Water and Bibury, where locations attracted very large numbers of short-stay visitors through social media exposure. He noted that the Council had supported local research into tourism impacts through funding generated by the Bourton-on-the-Water tourism parking levy and confirmed that the Council would continue working with Gloucestershire County Council and other partners to identify possible solutions.

Councillor Wareing asked a supplementary question clarifying that his concern extended beyond tourism to the wider issue of settlement carrying capacity and the cumulative impact of increased activity on infrastructure. He referred to existing traffic pressures in settlements such as Moreton-in-Marsh and noted that planned housing growth would place further demands on the strategic north–south transport corridor. He asked that, if settlement carrying capacity was not considered an appropriate matter for inclusion within the Local Plan, how and through what mechanism such issues should be addressed.

The Leader, acknowledged that the impacts on the A429 corridor, including Moreton-in-Marsh and Stow-on-the-Wold, would form an important part of the forthcoming consultation. He agreed that the challenges faced by Moreton were particularly acute but recognised that similar issues affected a number of settlements across the district. He confirmed that officers had noted the points raised and would consider whether any additional guidance, including supplementary planning guidance or other planning mechanisms, could assist. Whilst the draft Local Plan could not be amended before consideration by Council the following week, he encouraged Councillor Wareing, local residents and the Parish Council to submit detailed representations during the Regulation 19 consultation so that these issues could be considered through the examination process.

**269 Local Plan**

The purpose of the report was to seek approval of a series of recommendations relating principally to the Publication of the Cotswold Local Plan at Regulation 19 for a six-week consultation from 24 August to 5 October 2026 and its submission to the Secretary of State in December 2026 for independent examination.

Councillor Juliet Layton, Deputy Leader and Cabinet Member for Housing and Planning, introduced the report. It was noted that the Regulation 19 consultation represented the final consultation stage before independent examination and that the Plan needed to be complete, justified and ready for examination by a Planning Inspector.
The Local Plan would replace the 2018 Plan and provide an evidence-based planning framework for the delivery of new homes, employment land, infrastructure and environmental improvements over the coming years. It was noted that the Plan had been informed by extensive engagement and previous consultations with residents, businesses, statutory bodies and community organisations.
The timing of the submission was critical, as failure to submit the Plan by December 2026 would require it to restart under the new planning system and could delay adoption by several years. It was further noted that, without an up-to-date Local Plan and with the Council unable to demonstrate a five-year housing land supply, the district would remain subject to the presumption in favour of sustainable development, increasing the risk of speculative and fragmented development.

Members noted the significant increase in assessed housing need following changes to the National Standard Method in 2024. It was noted that the Plan sought to identify how this need could be accommodated within the district's environmental and infrastructure constraints, while recognising that some unmet need might need to be identified.

The Chair of the Overview and Scrutiny Committee was invited to speak and addressed Cabinet to explain the committees recommendations.

Cabinet considered the recommendations and comments made by the Overview and Scrutiny Committee which included the importance of providing infrastructure identified for strategic sites in a timely manner, where possible before development commenced; further consideration of transport infrastructure; ensuring that the consultation was accessible to all; clear communication about the need for the Plan and the risks associated with not having an up-to-date plan; concerns regarding water supply and sewage capacity; and the impact of tourism on infrastructure.
Recommendations of the Overview and Scrutiny Committee
The Leader invited Member questions, there were none, and then opened the debate.

Members noted that infrastructure, including schools, roads, GP surgeries, water and sewage capacity, was a key concern in relation to planned growth. Members were advised that the Infrastructure Delivery Plan set out the infrastructure required to support sustainable growth and that further work on transport infrastructure could continue alongside the Regulation 19 consultation.
Arrangements were being made to support public engagement during the consultation, including public exhibitions and meetings, the availability of hard copies of documents at Council offices, libraries and Town and Parish Council premises, and a newsletter to be distributed to households across the district.
The concerns raised regarding the national housing targets were noted, including the view that national targets did not necessarily reflect the specific housing needs of local communities, particularly in relation to affordability and the types of homes required. It was noted that the Plan sought to provide for affordable housing and support the delivery of sustainable, infrastructure-led communities.
Members then considered a number of proposed material changes to the Plan, including amendments to housing site allocations, changes to the Cirencester Central Area Strategy, the inclusion of a corridor for potential very light rail or successor technology between Kemble and Cirencester, and amendments relating to habitat sites. The changes were published during the meeting as Supplement E - Proposed Material Changes to the draft Local Plan - 6 August.
It was noted that the examination of the draft Local Plan was anticipated in 2027, with adoption of the Plan expected in March 2028. Members also acknowledged the significant work undertaken by the Planning Policy team in preparing the Plan and its supporting documents.

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The recommendation was proposed by Councillor Juliet Layton, Cabinet Member for Housing and Planning and seconded by Councillor Paul Evans, Cabinet Member for Health and Communities.

Voting record:
8 For, 0 Against, 0 Abstentions.

| **To APPROVE the recommendations of the draft Local Plan report (Resolution)** | | |
|---|---|---|
| Cabinet RESOLVED to recommend to Council to:<br>1. Agree that the Cotswold Local Plan 2026 – 2043 (Regulation 19) document, including the material changes agreed by Cabinet (supplement E), be published for six weeks consultation from 24 August 2026 to 5 October 2026.<br>2. Agree that thereafter, the Cotswold Local Plan 2026 – 2043 (Regulation 19) document be submitted to government for independent examination.<br>3. Provide delegated authority for the Director of Communities and Place in consultation with the Portfolio Holder for Housing and Planning, to make any minor corrections prior to consultation, including for typographical and formatting purposes AND following the Regulation 19 consultation to prepare an 'Additional Modifications' Schedule for submission if required.<br>4. Note the technical supporting evidence in preparation for publication alongside the Cotswold Local Plan 2026 – 2043 for consultation. | | |
| For | Patrick Coleman, Tony Dale, Paul Evans, Mike Evemy, Juliet Layton, Mike McKeown, Andrea Pellegram and Tristan Wilkinson | 8 |
| Against | None | 0 |
| Conflict Of Interests | None | 0 |
| Abstain | None | 0 |
| **Carried** | | |

The Meeting commenced at 6.00 pm and closed at 7.40 pm

COTSWOLD
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**Cabinet – 10 September 2026**

**SCHEDULE OF DECISION(S) TAKEN BY THE LEADER OF THE COUNCIL AND/OR INDIVIDUAL CABINET MEMBERS**

Note:

- Any decision that is still subject to call-in by the Overview and Scrutiny Committee is marked with the expiry date of call-in at the standard close of business time of 5pm.
- Further information on the decision taken and the webcast link can be found within the hyperlink for each 'subject'.



| Cabinet Member | Meeting date | Subject | Decision(s) |
|---|---|---|---|
| Cabinet Member for Finance | 25/06/2026 | Consideration of an application for Discretionary Council Tax discount submitted under Section 13A of the Local Government Finance Act 1992, as amended. | The Cabinet Member confirmed that, having taken into account the information contained within the report and the responses provided to questions raised, they were satisfied they were in a position to make a decision.<br><br>It was stated that, in reaching the decision, all relevant factors had been taken into account, including the particular circumstances and needs of the individual concerned.<br><br>The Cabinet Member declared that he accepted the recommendations of the officer and APPROVED the application for Discretionary Council Tax Discount as submitted in the report.<br><br>*Subject to call-in.<br>Call-in deadline 3 July 2026<br>Action embargoed until 4 July 2026. |

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| Cabinet Member for Finance | 25/06/2026 | Consideration of three new applications and thirteen renewal applications for Discretionary Rate Relief submitted under Section 47 of the Local Government Finance Act 1988 for the financial years 2026/2027. | The Cabinet Member stated that, having considered all the evidence presented, they accepted the recommendations of the officer and APPROVED the three new applications and thirteen renewal applications for Discretionary Rate Relief in relation to business rates liabilities for the 2026/27 financial year<br>It was stated that the applications concerned the following entities:<br>1. Headspace<br>2. GWAS Ambulance<br>3. Bourton Gymnastics Club Ltd<br>4. Palmer Hall Management<br>5. Churn Project<br>6. Cirencester Opportunity Group<br>7. New Brewery Arts Ltd<br>8. Bourton-on-the-Hill Old School Village Hall<br>9. Lechlade Library Ltd<br>10. North Cotswold Foodbank<br>11. Heart Safe Clinical Academy<br>12. The Village Committee<br>13. Trustees Old School Committee<br>14. Cirencester Citizens Advice<br><br>*Subject to call-in.<br>Call-in deadline 3 July 2026<br>Action embargoed until 4 July 2026. |

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| Deputy Leader and Cabinet Member for Housing and Planning | 30/06/2026 | [Consideration of Neighbourhood Plan updates for Chipping Camden, Moreton-in-Marsh and Cirencester](). | **Moreton-in-Marsh**<br>The Cabinet Member for Housing and Planning resolved to:<br>1. APPPROVE the CDC response (Annex A) to the Reg. 16 Moreton NP consultation.<br>2. CONFIRM that CDC would procure through a bid process an Independent Examiner to undertake examination of the Moreton NP (Reg. 17). The appointment would have to be consented by the qualifying body (Moreton-in-Marsh Town Council).<br>3. CONFIRM that the comments agreed at part 1 (Annex A) and those submitted by other stakeholders (Annex H; collated and redacted), and the submission documents for Moreton (Annexes B-G), would be sent to the IE once appointed.<br>**Cirencester**<br>The Cabinet Member for Housing and Planning resolved to:<br>1. APPROVE the CDC response (Annex I) to the Reg. 16 Cirencester NP consultation.<br>2. CONFIRM that CDC would procure through a bid process an Independent Examiner to undertake examination of the Cirencester NP (Reg. 17). The appointment would need to be consented by the qualifying body (Cirencester Town Council).<br>3. CONFIRM that the comments agreed at part 1 (Annex I) and those submitted by other stakeholders (Annex O; collated and redacted), and the submission documents for Cirencester (Annexes J-N), would be sent to the IE once appointed. |

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| | | | **Chipping Campden**<br>The Cabinet Member for Housing and Planning considered the Examiner's recommended modifications (Annex R) to the Chipping Campden Neighbourhood Plan, to ensure it met the basic conditions and RESOLVED to :<br>1. ACCEPT the Independent Examiners proposed modifications for Policies 1, 2, 3, 5 and 6.<br>2. PARTIALLY ACCEPT the proposed Policy 4 modification (rejecting reference to Policy EN12 limitation).<br>3. APPROVE a Referendum on the Chipping Campden Neighbourhood Plan (with accepted modifications), should take place on Thursday 13 August 2026.<br><br>**Date of Publication: 01/07/2026**<br>**Closing Date for Call-In: 9/07/2026**<br>**Action Embargoed until: 10/07/2026** |
| Deputy Leader and Cabinet Member for Housing and Planning | 03/07/2026 | Consideration of the submission of Siddington's Parish Council Neighbourhood Plan and subsequent public consultation. | The Cabinet Member accepted the officer recommendations and confirmed their decision to approve the Siddington Neighbourhood Plan and to approve the related public consultation commencing 13 July. In approving the response, the Cabinet Member noted that the contents of the Plan as submitted met the requirements listed in the report and confirmed that the documents were suitable and in order as suggested by the Officer. The Cabinet Member also acknowledged that the timelines for this Neighbourhood Plan and the in-development Local Plan for the Cotswolds had made the process more complex, and thanked Officers for their |

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| | | | efforts and wished Siddington Parish Council well for the next stage of the consultation process.<br><br>**Date of Publication: 8 July 2026**<br>**Closing Date for Call-In: 15 July 2026**<br>**Action Embargoed until: 16 July 2026** |
| Cabinet Member for Finance | 28/07/2026 | [Consideration of the Crisis and Resilience Fund distribution for 2026] | The Cabinet Member confirmed that, having reviewed the information and analysis provided within the report, they were satisfied that the proposed allocations would support the Council's objectives and provide meaningful benefits to residents and communities across the district. It was noted that the organisations identified for funding were well-established and highly regarded providers of support within the Cotswold District. The Cabinet Member expressed their view that the proposed expenditure represented good value for money and would contribute positively to the wellbeing and resilience of local people.<br><br>**RESOLVED:**<br>1. The activity enabled by the Crisis and Resilience Fund be noted.<br>2. The proposed distribution of the 2026 Crisis and Resilience Fund allocation be approved.<br>3. Delegated authority be granted to the Head of Economic Development and Communities, in consultation with the Cabinet Member, to determine the distribution of smaller grants to support the community coordination theme. |

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| | | | 4. Delegated authority be granted to the Head of Economic Development and Communities, in consultation with the Section 151 Officer, to finalise grant terms and conditions, including arrangements relating to the Cotswold Food Network.<br><br>The Cabinet Member noted that the report clearly set out the evidence, analysis and rationale supporting the recommended allocations. The proposals were considered to align with the Council's aims and objectives, with the funding levels being reasonable, proportionate and targeted towards areas of identified need. The approved allocations were expected to deliver tangible benefits for individuals, families and communities across the district through the provision of preventative support, financial wellbeing initiatives and crisis intervention services. The Cabinet Member also recognised the strong reputation and value of the organisations receiving funding and was satisfied that the allocations represented an effective and prudent use of public funds.<br><br>**Date of Publication: 28 July 2026**<br>**Closing Date for Call-In: 5 August 2026**<br>**Action Embargoed until: 6 August 2026** |

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| Council name | **COTSWOLD DISTRICT COUNCIL** |
| Name and date of Committee | **CABINET – 10 SEPTEMBER 2026** |
| Subject | **SUITABLE ALTERNATIVE NATURAL GREENSPACE SPENDING 2026** |
| Wards affected | All |
| Accountable member | Councillor Juliet Layton, Cabinet Member & Deputy Leader for Housing & Planning<br>Email: Juliet.Layton@cotswold.gov.uk |
| Accountable officer | Helen Martin, Director of Communities & Place<br>Email: Helen.Martin@Cotswold.gov.uk |
| Report author | Ruby Moore, Infrastructure Delivery Officer<br>Email: Ruby.Moore@Cotswold.gov.uk |
| Summary/Purpose | For Cabinet to review officer recommendations on external bids for funding from the Suitable Alternative Natural Greenspace (Cotswold Beechwoods SAC) funds held by the Council. |
| Annexes | Annex A – Scoring Matrix |
| Recommendation(s) | That Cabinet resolves to:<br>1. Agree to fund the following bid:<br>• **Sherborne Big Nature, Better Access (National Trust)** |
| Corporate priorities | • Responding to the Climate Emergency<br>• Supporting Communities |
| Key Decision | NO |
| Exempt | NO |
| Consultees/ Consultation | None |

## 1. EXECUTIVE SUMMARY

**1.1** From 1 March to 7 June 2026, the Council invited bids from infrastructure providers and other relevant partners to access available Suitable Alternative Natural Greenspace (SANG) (Cotswold Beechwoods Special Area of Conservation) funds.

**1.2** The Council received one bid for the SANG fund: Accessibility improvements at Sherborne Park from the National Trust.

**1.3** The bid would create a project that the Council supports. The officers' panel recommends that the Council funds the bid as it scored above the minimum of 75/100 (86/100) and enough funds are available.

## 2. BACKGROUND

**2.1** From 1 March to 7 June 2026, the Council invited bids from infrastructure providers and other relevant partners to access available Suitable Alternative Natural Greenspace (SANG) (Cotswold Beechwoods Special Area of Conservation) funds.

**2.2** The CDC Cotswold Beechwoods Special Area of Conservation (SAC) Suitable Alternative Natural Greenspace Fund is funded from financial contributions from planning applicants. These contributions are provided in order to deliver the Cotswold Beechwoods SAC Recreational Mitigation Strategy, ensuring that new development does not lead to increased recreational impacts on this internationally important wildlife site. The fund is aimed at delivering mitigation that will encourage potential users of the SAC to visit other sites and not the SAC itself. Not only will this help prevent impacts on the SAC but should also benefit biodiversity and local communities by creating new and improved existing greenspaces that will be accessible to all.

**2.3** The Council received one bid in total:

- One bid from the National Trust to access funds from the *CDC Cotswold Beechwoods Special Area of Conservation* (SAC) *Suitable Alternative Natural Greenspace Fund.*

**2.4** The bid was reviewed by an Officers' panel consisting of Harrison Bowley (Head of Planning Services), Danielle Berry (Head of Natural, Built and Historic Environment), Allan Keller (Sustainable Transport Lead), James Tyson (Tree Officer), Harry Brown (Infrastructure and Housing Monitoring Officer), and Ruby Moore (Infrastructure Delivery Officer).

**2.5** A scoring matrix was used to assess the bid; the matrix had been made public in advance for transparency. A completed matrix showing the scoring for the bid can be found in Annex A.

## 3. Sherborne Big Nature, Better Access (National Trust)

**3.1** A bid was received from the National Trust for £20,000 from the CDC Cotswold Beechwoods Special Area of Conservation (SAC) Suitable Alternative Natural Greenspace Fund.

**3.2** The bid if successful, will be used to improve accessibility across the Sherborne Estate as part of the National Trust's Sherborne Big Nature Better Access project. The proposed works include upgrading a 425-metre section of path ("missing link") by replacing the existing poor-quality woodchip path by installing a fully accessible permanent gravel surface. The aim of this improvement is to increase the attractiveness of the site as a destination in the Cotswold District, thereby diverting recreational pressure away from the Cotswold Beechwoods SAC.

**3.3** Officers recommend funding the bid.

## 4. CONCLUSIONS

**4.1** The bid would deliver mitigation consistent with the mitigation outlined within the Cotswold Beechwoods SAC Recreation Mitigation Strategy (2022) and scores highly against the scoring matrix. The officers' panel recommends that the Council funds the bid as it scored above the minimum of 75/100 (86/100) and sufficient funds are available:

- One bid from the National Trust to access funds from the *CDC Cotswold Beechwoods Special Area of Conservation* (SAC) *Suitable Alternative Natural Greenspace Fund.*

**4.2** The total amount of funding proposed in £20,000 in regards to SANG.

**4.3** Officers will continue to collaborate with potential partners to develop further SANG projects.

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## 5. FINANCIAL IMPLICATIONS

**5.1** There are no direct financial implications on the Council's base revenue budget as a result of this report.

**5.2** Funding is held by the Council from financial mitigation contributions received under the habitats regulations assessment legislation. The funding will be used for the purpose(s) made in point 2.2 of this report. The report proposes to allocate £20,000 in SANG funds.

## 6. LEGAL IMPLICATIONS

**6.1** The Council has a statutory duty in relation to European Protected Sites, known as Habitat Sites under the Conservation of Habitats and Species Regulation 2017 (as amended). To enable the Council to discharge this duty, all new residential and holiday accommodation developments located within 15.4 km Zone of Influence (ZoI) of the Cotswold Beechwoods SAC are required to provided mitigation measures to address the increased recreational pressures arising from additional housing.

**6.2** To support applicants and developers in meeting this requirement, the Council in collaboration with neighbouring local authorities has prepared and adopted the Cotswold Beechwoods SAC Recreation Mitigation Strategy (2022). The Council, working in partnership with neighbouring authorities and external stakeholder deliver the mitigation measures identified within the strategy through the collection of financial contributions from applicants and developers.

**6.3** In order for the Council to fulfil its statutory obligations, two key mitigation elements must be delivered. This section relates to the Suitable Alternative Natural Greenspace (SANG) element of the mitigation strategy.

**6.4** Any funding agreement will require review and advice from the legal services team.

## 7. RISK ASSESSMENT

**7.1** If no suitable SANG projects come forward (or the Council does not agree to support suitable projects from the fund) the Council will not be able to show that potential recreational impacts on the SAC are being mitigated and therefore, under the relevant legislation, planning applications may have to be refused.

**7.2** As noted in Section 6 of this report, the Council has a statutory duty in relation to European Protected Sites (Habitat Sites). To fulfil this duty, the Council must be able to demonstrate that financial contributions secured from development are being used to deliver mitigation measures in accordance with the adopted Recreation Mitigation Strategy.

**7.3** If the Council is unable to evidence that these contributions are being appropriately applied and therefore cannot demonstrate that the necessary mitigation is being delivered, it may be considered to have failed to discharge its statutory obligations. In such circumstances, Natural England, as the Statutory Nature Conservation Body, may object to planning applications that would result in a net increase in residential or holiday accommodation within the identified Zone of Influence (ZoI) around the Cotswold Beechwoods SAC.

**7.4** Failure to deliver the required mitigation could also have wider implications for the Council's planning functions, including potential consequences for the progression and soundness of the emerging Local Plan.

## 8. EQUALITIES IMPACT

**8.1** The proposal will have a positive impact on a wide range of users, particularly people with disabilities and limited mobility, by improving access along the route. Replacing the existing surface with a fully accessible path will provide a more reliable route for wheelchair users, families with pushchairs, and dog walkers. The enhanced accessibility will help ensure that a wider range of users can safely access and enjoy the site throughout the year.

## 9. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS

**9.1** The proposal will replace the existing woodchip path with a fully accessible gravel path. The current woodchip surface requires annual replacement therefore the proposed gravel path will provide a longer-lasting, more sustainable solution.

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**9.2** No significant negative climate or ecological impacts have been identified.

**9.3** In Gloucestershire, the Local Nature Partnership and Climate Leadership Gloucestershire advocate for all residents to live within 15 minutes of accessible, biodiversity-rich green space. The ambition seeks to reduce inequalities in access to nature, improve public health, boost the local economy, and enhance biodiversity. This bid, if successful, will support this ambition.

## 10. BACKGROUND PAPERS

**10.1** None

(END)

COTSWOLD
District Council

# Annex A -

## Cotswold Beechwoods SAC -
## Suitable Alternative Natural Greenspace Fund

**Guidance notes for submitting an expression of interest form**

## 1. Introduction

The CDC Cotswold Beechwoods Special Area of Conservation (SAC) Suitable Alternative Natural Greenspace Fund is available to projects which encourage new and existing residents and visitors to visit other greenspace sites, rather than the Cotswold Beechwoods SAC. This should ensure that recreational pressures and ecological damage are minimised at the Cotswold Beechwoods SAC.

## 2. Background

Residents and visitors of new developments within the District have the potential to impact on internationally important biodiversity sites, in particular the Cotswold Beechwoods SAC. The SAC has been designated because it supports wildlife that is valuable on an international scale. Unfortunately, the site is being damaged by the very people that go there to enjoy it – walking, biking, exercising their dogs etc. and that damage will increase as more houses and holiday accommodation are built, leading to more visitors.

Cotswold District Council, as a "competent authority", is legally obliged under the Conservation of Habitats and Species Regulations 2017 (as amended) to consider whether a project or proposal, including planning applications would affect the biodiversity of any SAC. This consideration is undertaken by a process called Habitats Regulations Assessment (HRA).

To assist planning applicants to progress their applications and to ensure that there is a strategic approach to delivering mitigation for recreational impacts at the Cotswold Beechwoods SAC, the Local Authorities in the area and Natural England have worked together to prepare a recreation mitigation strategy for the Cotswold Beechwoods SAC (Footprint 2022). This strategy details mitigation measures along with costings for these measures. A calculation has then been made to assess what level of financial mitigation contribution is required from planning applicants within the Zone of Influence (ZoI) of the Cotswold Beechwoods.

The financial mitigation contributions will be used to fund -

- On-site measures, e.g. rangers, signage, and notice boards.
- Off-site measures – the provision of Suitable Alternative Natural Greenspaces (SANGs).

To enable effective delivery of SANGs through a wide range of partners, Cotswold District Council has set up the CDC Cotswold Beechwoods SAC Suitable Alternative Natural Greenspace Fund. This Fund, made up of the SANG component of the financial mitigation contributions from planning applicants, is available to support projects that meet the relevant criteria.

It is important that the Fund delivers SANGs and other infrastructure that provide realistic alternatives which new residents and visitors are likely to use in preference to the Cotswold Beechwoods SAC, i.e. that will reduce recreational pressures on the biodiversity of the SAC. These SANGs are likely to be within the District but could potentially also be within other nearby Districts. The Council is working in partnership with other neighbouring Councils and Natural England and will consult them on project proposals.

The type of projects that might be eligible for this Fund include provision of –

- A new country park or similar.
- Large scale dog walking sites.

- Dedicated cycle routes or linking up existing cycle routes.
- Dedicated cycling facilities, particularly for mountain bikes.
- Dedicated walking routes or linking up of existing walking routes, particularly if these attract walkers away from footpaths (including the Cotswold Way) within the Cotswold Beechwoods SAC.
- Improvements to existing parks and other green infrastructure, such as footpaths (including changes to parking, signposts, promotion of existing greenspace sites etc.) that would decrease usage of the Cotswold Beechwoods.

## 3. Who Can Apply To The Fund?

The fund is not open to private individuals or organisations/companies operating for profit. The types of organisations that would be eligible include –

- Charities
- Not for profit organisations
- Parish and Town Councils
- Voluntary and Community Organisations
- Cotswold District Council
- Other Local Authorities

Any organisation applying must have a constitution or equivalent and been in existence for at least 6 months prior to the application and to have a good track record in delivering ecologically based projects.

## 4. Criteria For Applications

Applications should be for bids between £5,000 and £50,000.

All applications should meet all or most of the following criteria and demonstrate how. There is some overlap between these criteria.

All bids received will be scored against the criteria set out in this guidance note. Bids that score over 75 will be taken to Cabinet to make a final decision, a scoring matrix for the relevant funds can be found in the criteria tables in this guidance. Please note that depending on the amount involved, approval from Full Council might also be required.

| **Essential Criteria**<br><br>(Maximum score 80) 60 | |
|---|---|
| ***Criteria***<br><br>Bids that score 0 for any of the essential criteria will be rejected regardless of their total score. | ***How to demonstrate?*** |
| Lead bid partner must have a constitution or equivalent; been in existence for at least 6 months prior to the application; have a good track record of delivering relevant projects.<br><br>Maximum score -10 | Provide information on constitution of lead partner and examples of previous successful projects.<br><br>***The National Trust was founded in 1895 and therefore has been established for more than six months and has a proven track record of successfully securing and delivering external funding projects. Previous SANG funded schemes have been approved and implemented in accordance with the approved proposals, demonstrating effective project management, governance, and delivery. The organisation operates under an established constitution and has the experience, capacity, and financial controls necessary to manage funding and deliver the proposed project successfully.***<br><br>***Score: 10/10*** |
| The project must be deliverable within the submitted time frame.<br><br>Maximum score -10 | Set out the time frame for your project and provide evidence your project is deliverable within this time frame. Demonstrate your project has a clear |

| | |
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| | delivery programme and is financially viable.<br><br>***The project has a clear and achievable delivery programme and is financially viable. Due to delays in the funding application process, works have already commenced, providing strong evidence that the project is deliverable within the required timeframe. The remaining works will be completed upon receipt of funding, ensuring the project can be delivered promptly and efficiently.***<br><br>***The National Trust, as the landowner, fully supports the project and has confirmed the site's suitability for SANG funding. The project benefits from established project management arrangements, and a clear scope of works, providing confidence that the scheme will be completed as proposed.***<br><br>***Score: 10/10*** |
| Deliver the requirements of the Cotswold Beechwoods Recreation Mitigation Strategy.<br><br>Maximum score - 30 | Provide information on how the project delivers the mitigation strategy, including data on predicted visitor number increases at your site.<br><br>***The project supports the objectives of the Cotswold Beechwoods Recreation Mitigation Strategy by improving the quality, accessibility, and usability of an alternative recreational site. The replacement of the existing woodchip path with a durable, fully accessible gravel surface will provide a safer and*** |

| | |
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| | ***more attractive route for visitors, encouraging greater use of the site by a wider range of people, including those with mobility impairments, families with pushchairs, and dog walkers. Project delivers the mitigation strategy, improvements across the site – change of materials etc., satisfied actions within the ecological emergency action plan.***<br><br>***The scheme represents a tangible enhancement to the visitor experience and will help increase the site's capacity to accommodate recreational use. In addition, the project contributes to the Council's Ecological Emergency Action Plan by delivering sustainable infrastructure improvements that reduce long-term maintenance requirements and improve accessibility to greenspace. While the proposal involves improvement of an existing route rather than the creation of a new path, it will significantly enhance the quality, longevity, and inclusivity of the site's recreational offer, helping to meet the aims of the mitigation strategy.***<br><br>***Score: 20/30*** |
| Lead to a reduction in the number of visitors to the Cotswold Beechwoods, particularly those visitors that originate from within the 15.4km ZoI. | Data on existing and predicted visitor numbers at your site. Analysis of types of visitors and their point of origin.<br><br>***The project will contribute to reducing recreational pressure on the Cotswold*** |

| | |
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| Maximum score - 30 | ***Beechwoods by improving the accessibility and quality of an alternative greenspace within the Zone of Influence (ZoI).***<br><br>***While the project is an upgrade to an existing route rather than the creation of a new recreational infrastructure, it will improve the site's capacity and usability, helping to retain and attract local visitors who might otherwise visit the Cotswold Beechwoods.***<br><br>***Score: 20/20*** |
| **Desirable Criteria**<br><br>(Maximum score 25) 26 | |
| ***Criteria*** | ***How to demonstrate?*** |
| Deliver on the actions in the Council's<br>Ecological Emergency Action Plan<br><br>Maximum score -10 | Provide information on how the project would meet all or some of the actions.<br><br>***The project supports a number of actions within the Ecological Emergency Action Plan, particularly in relation to improving accessibility to greenspaces and promoting health and wellbeing. By upgrading the existing path to a durable, fully accessible surface, this enables a wide range of users to safely access and enjoy the natural environment.***<br><br>***The proposal aligns with the overarching aims of the plan by enhancing green infrastructure and*** |

| | |
|---|---|
| | ***reducing long-term maintenance impacts. While the Ecological Emergency Action Plan is due for update, the project remains consistent with its key principles and objectives.***<br><br>***Score: 7/10*** |
| Support and contribute to the deliver of the Gloucestershire Local Nature Recovery Strategy (in the Cotswold District area).<br><br><br>Maximum score - 10 | Illustrate what habitats are going to be created and where and how that fits in with the potential measures of the Gloucestershire Local Nature Recovery Strategy.<br><br>***The project supports the aim of the Gloucestershire Local Nature Recovery Strategy by improving access to and engagement with the natural environment. While the proposal does not create new habitats, it enhances existing green infrastructure, making the site more accessible to a wide range of users. Improved access encourages responsible use of natural spaces and greater awareness and appreciate of local habitats, supporting the strategy's objectives around connecting people with nature.***<br><br>***The scheme complements the wider ambitions of the strategy by ensure that green spaces are inclusive, usable, and valued by the community, which is an important component of long-term nature recovery.***<br>***GLNRS – Accessibility is important for nature.*** |

| | |
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| | ***Score: 7/10*** |
| Deliver the Cotswolds Nature Recovery Plan and/or Cotswold Water Park Nature Recovery Plan, where projects are located within the Cotswold National Landscape or the Cotswold Water Park.<br>Maximum score 5 | Provide information on how the project would meet all or some of the actions in the plans.<br><br>***The project supports the objectives of the Cotswold Nature Recovery Plan by enhancing access to and enjoyment of the Cotswold National Landscape. By improving the condition and accessibility of an existing path, the scheme enables a wide range of users to experience and engage with the landscape in a sustainable way, promoting appreciation and stewardship of the natural environment.***<br><br>***While the proposal does not directly create new habitats, it contributes to the plan's broader aims of connecting people with nature and improving the quality and usability of key green infrastructure within the designated landscape.***<br><br>***Score: 4/5*** |
| Deliver other benefits – for example ecosystems services or natural capital benefits; climate change adaptation and mitigation benefits; community benefits. | Describe the multiple benefits that your project would bring to the wider environment and to the community.<br><br>***The project will deliver a range of wider environmental and community*** |

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| Maximum score - 5 | ***benefits. By replacing the existing woodchip surface with a durable, all-weather path, it will improve year-round accessibility and usability, particularly during wetter periods when the current route can become difficult to use. This supports increased access to green space, encouraging physical activity, wellbeing, and community use.***<br><br>***From a climate perspective, the scheme reduces the need for frequent material replacement and associated maintenance, lowering long-term emissions and resource use. The improved surface also supports climate adaptation by providing a more resilient route that can withstand changing weather conditions.***<br><br>***Score: 3/5*** |
| Deliver the Cotswold District Green Infrastructure Strategy and the Strategic Framework for Green Infrastructure in Gloucestershire.<br><br>Maximum score - 5 | Describe how your project would help deliver these strategies.<br><br>***The project supports these strategies by improving accessibility to an alternative greenspace and enhancing existing green infrastructure. The upgraded path will make the site more inclusive and attractive to a wider range of users, helping to encourage greater use of local natural areas and supporting the wider green infrastructure network.***<br><br>***Score: 4/5*** |

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| Secure match funding to increase potential outputs from the project.<br><br>Maximum score - 10 | Provide evidence of match funding and whether it is dependent on a successful bid to this Fund.<br><br>***A small amount of match funding has been identifies; however, this is limited in comparison to the overall funding request and is dependent on a successful SANG bid. As such, the level of secured match funding is currently low.***<br><br>***Score: 1/10*** |

**Total: 86/100**

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|---|---|
| Council name | **COTSWOLD DISTRICT COUNCIL** |
| Name and date of Committee | **CABINET – 10 SEPTEMBER 2026** |
| Subject | **RES26009 CORPORATE PERFORMANCE REPORT – Q1 2026/27** |
| Wards affected | All |
| Accountable member | Councillor Mike Evemy, Leader of the Council<br>Email: mike.evemy@cotswold.gov.uk<br><br>Councillor Patrick Coleman, Cabinet Member for Finance<br>Email: patrick.coleman@cotswold.gov.uk |
| Accountable officer | David Stanley, Deputy Chief Executive and Section 151 Officer<br>Email: david.stanley@cotswold.gov.uk<br><br>Jane Portman, Chief Executive<br>Email: jane.portman@cotswold.gov.uk |
| Report author | David Stanley, Deputy Chief Executive and Section 151 Officer<br>Email: david.stanley@cotswold.gov.uk |
| Summary/Purpose | To set out the financial and service performance, and the strategic risk register for Q1 2026/27 |
| Annexes | Annex A – Financial Performance<br>Annex B – Service Performance<br>Annex C – Strategic Risk Register |
| Recommendation(s) | That Cabinet resolves to:<br>1. Review and notes the financial position set out in Annex A and Annex A-1 of this report.<br>2. Approve an increase of £27,000 to the Capital Programme for the installation of pool covers at Bourton on the Water and Chipping Campden Leisure Centres funded from the remaining balance of the Community Municipal Investment, as detailed in Section 4 of Annex A. |

| | |
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| | 3. Approve the additional transfers to earmarked reserves, (transfer any year-end Planning Fee income (over and above the budgeted level) to the Planning Appeals earmarked reserve, transfer any year end investment income over and above the budgeted level to the Treasury Management earmarked reserve, transfer any remaining year-end surplus to the Capacity Building earmarked reserve).<br>4. That authority is delegated to the Strategic Head of Housing, Property and Assets, Deputy Chief Executive and Section 151 Officer in consultation with the Cabinet Member for Finance to progress to disposal, as set out in paragraph 4.12 of Annex A-1.<br>5. Note overall progress on the Council priorities and service performance for Q1 2026-27 (April – June 2026), as set out in Annex B.<br>6. Reviews the Strategic Risk Register and mitigation measures, as set out in Annex C. |
| Corporate priorities | All |
| Key Decision | NO |
| Exempt | NO |
| Consultees/ Consultation | N/A |

## 1. EXECUTIVE SUMMARY

**1.1** This report sets provides summary commentary on the Council's Corporate Performance covering Financial Performance, Service Performance, and the Strategic Risk Register.

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**1.2** The purpose of this report is to notify members of any significant variations to budgets, highlight any key financial issues, and to inform members of options and further action to be taken

## 2. BACKGROUND

**2.1** The Government notified the councils in Gloucestershire of its decision to establish a single unitary council for Gloucestershire, with effect from 01 April 2028. Although residents will continue to receive services as normal during the transition period, the decision marks the start of a significant implementation programme requiring substantial officer time and resources to support service integration, governance, workforce and financial planning, and organisational change. The financial and capacity implications of LGR will continue to be monitored closely through the Council's budget monitoring process.

## 3. COMBINED SUMMARY

**3.1** Overall, the Council has delivered a positive performance in the first quarter of 2026/27, with service delivery remaining strong, the financial position forecasting a favourable year-end surplus, and strategic risks being actively managed. However, a number of interconnected pressures remain, particularly around Local Government Reorganisation (LGR), workforce capacity, Local Plan delivery, Land Charges performance and the financial sustainability of key services.

**3.2** From a financial perspective, the Council is forecasting an underspend of £0.122m at year end, supported by strong income performance across several key revenue streams. Planning fee income, car park income, EV charging income, treasury management returns and business rates collection have all exceeded expectations in the first quarter, providing resilience against pressures elsewhere. Net expenditure at Q1 was £3.945m against a profiled budget of £4.327m, demonstrating sound budgetary control.

**3.3** The strongest financial performance is closely linked to strong operational delivery. Development Management has benefited from high planning application activity, generating significant additional fee income while simultaneously achieving excellent determination times for major and other planning applications. Business Rates collection exceeded target, benefits processing times remained significantly better than target, customer satisfaction levels were high, and waste collection services maintained low levels of missed bins. Affordable housing delivery also exceeded target, with leisure participation continuing to grow.

**3.4** Performance against the Council's Corporate Plan also remains strong, with 42 actions on target, two completed and only one currently off target. Significant progress was made on strategic priorities including the Local Plan, climate action, affordable housing delivery, fleet replacement, digital transformation and community programmes. The completion of the Electric Vehicle Charge Point programme and continued progress on housing and community initiatives demonstrate delivery against long-term corporate objectives.

**3.5** Despite this positive picture, several areas require focused management attention. Financially, the most notable pressure is the forecast £0.171m overspend on the Ubico contract, driven by fleet-related vehicle hire costs, fuel prices and agency staffing requirements. Recruitment and retention challenges, particularly within planning services, are contributing to a forecast staffing variance and remain a key risk to sustaining service performance over the medium term. Income shortfalls are also forecast within investment properties, Council offices and Land Charges.

**3.6** These operational challenges are reflected in the Council's strategic risk profile. The highest-rated risks remain Local Plan delivery, Cyber Security, Health and Safety Compliance, and Civil Contingency/Major Events, all retaining red risk ratings. Although the risk score for Financial Sustainability has reduced, financial resilience remains a significant consideration given the demands of LGR, future funding uncertainty and the need to maintain sufficient organisational capacity. Several workforce-related risks, including recruitment, retention and staff capacity, continue to be assessed as amber risks and are directly linked to service pressures and the ability to deliver the Corporate Plan.

**3.7** The clearest example of the connection between financial, service and risk performance is Land Charges. Performance has deteriorated significantly against target, with only 39.7% of searches completed within ten days and average turnaround times increasing. This has coincided with reduced application volumes and an emerging income shortfall. The service has responded with a strategic recovery plan focused on process redesign, customer access, operational efficiency and future financial sustainability.

**3.8** Looking ahead, the Council's overall position remains positive, but success will depend on maintaining delivery momentum while managing the organisational impact of Local Government Reorganisation. Continued strong income performance, delivery of the Corporate Plan, implementation of workforce initiatives and targeted recovery actions in underperforming services will be critical to sustaining both financial resilience and service outcomes during a period of significant change.

## 4. FINANCIAL PERFORMANCE

**4.1** The Quarter 1 monitoring report presents an encouraging financial position for 2026/27, with the Council forecasting a net revenue underspend of £0.294 million by year end. This favourable position provides an opportunity to strengthen financial resilience and support preparation for Local Government Reorganisation (LGR) ahead of the creation of a single Gloucestershire unitary authority on 01 April 2028.

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| Revenue Budget | 2026/27 Latest Net Budget (£'000) | 2026/27 Outturn Forecast (£'000) | 2026/27 Outturn Variance (£'000) |
|---|---|---|---|
| D01: Governance | 3,352 | 3,327 | (25) |
| D02: Resources | 3,327 | 3,041 | (287) |
| D03: Communities and Place | 11,745 | 11,846 | 101 |
| D04: Chief Executive | 922 | 953 | 31 |
| **Subtotal Services** | **19,346** | **19,167** | **(179)** |
| Less: Reversal of accounting adjustments | (2,164) | (2,164) | 0 |
| **Revised Subtotal Services** | **17,182** | **17,003** | **(179)** |
| Corporate Income & Expenditure | 1,274 | 1,442 | 169 |
| **Subtotal Non-Service Expenditure** | **18,456** | **18,446** | **(10)** |
| **Net Budget Requirement** | **18,456** | **18,446** | **(10)** |
| Less: Funding from Earmarked Reserves | (1,245) | (1,357) | (112) |
| **Net Revenue Budget to be financed** | **17,211** | **17,089** | **(122)** |
| **Funded by:** | | | |
| Council Tax | (7,420) | (7,420) | 0 |
| Retained Business Rates | (1,433) | (1,433) | 0 |
| Revenue Support Grant (RSG) | (5,818) | (5,818) | 0 |
| Government Funding - Grants | (1,558) | (1,558) | 0 |
| Extended Producer Responsibility (EPR) | (1,721) | (1,721) | 0 |
| Collection Fund (surplus) / Deficit | 740 | 740 | 0 |
| **TOTAL Funding** | **(17,211)** | **(17,211)** | **0** |
| **Budget shortfall/(surplus)** | **0** | **(122)** | **(122)** |

**4.2** **Key revenue message/variations:** The Council's Q1 assessment indicates a forecast underspend of £0.122 million, despite several budget pressures. Positive variances are being driven primarily by strong income performance in a number of services:

- **Development Management fees** are forecast to exceed budget by £0.200 million, reflecting a high volume of major planning applications. Five major applications were determined in Q1 all within agreed timescales. 85% of minor and 90% of other applications were determined within agreed timescales
- **Car parking income** continues to outperform expectations, with a forecast net favourable variance of approximately £0.300 million. 314,277 tickets sold across the district. Average season tickets for quarter 17,170 and average permits at 58. A total of 1699 PCNs were issued in Q1.

- **Licensing income**, particularly taxi licensing, is expected to exceed budget by £0.030 million.
- **Building Control performance** remains strong, with income forecast to be around £0.050 million above budget. Market share averaged 74% over the quarter with 162 applications processed. Of the 5 responses to the satisfaction survey, 3 were completely satisfied and all suggestions for improvement are being considered.
- **Electric Vehicle Charging Point (EVCP) income** is forecast to exceed budget by £0.030 million. The project to expand the network of EVCP has concluded and all units are operational.
- **Treasury Management** performance and loan interest income are also contributing positively to the overall position.

**4.3** These favourable variances are partially offset by several pressures:

- A forecast **£0.147 million adverse vacancy factor/staffing variance**, primarily resulting from agency costs and recruitment challenges.
- **Reduced rental income** from the Council's commercial property portfolio and Trinity Road offices, creating a combined adverse variance of approximately £0.067 million.
- Ongoing pressures within the **Ubico environmental services contract**, with an estimated overspend of £0.171 million, driven by fleet costs, fuel prices and agency staffing requirements. However, this pressure can currently be accommodated within existing contingency budgets if necessary.

**4.4** **Key capital message/variations**: The approved capital programme totals £11.354 million, with expenditure of £0.547 million incurred by 30 June 2026. The year-end capital forecast shows an overall underspend of £0.381 million. Key forecast variances include:

- Delays to the **Bromford Joint Venture** scheme due to drainage issues, resulting in a forecast underspend of £0.220 million.
- Deferral of expenditure on the **Planning Document and Scanning Solution**, creating a further £0.200 million underspend.
- An overspend of £0.040 million on **Waste and Recycling receptacles** due to housing growth and increased replacement demand.

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**4.5** Cabinet are asked to approve an increase the capital programme by £27,000 to install pool covers at Bourton-on-the-Water and Chipping Campden leisure centres, funded from the remaining Community Municipal Investment balance.

**4.6** Paragraphs 4.9 through to 4.13 of **Annex A** outline the current position regarding the potential disposal of the Council's out-of-district investment properties following the decision taken by Cabinet at their meeting in June to actively market all 3 properties.

**4.7** It is likely that the disposal one property (Eign Gate, Hereford) is likely to complete in the coming weeks. Given the nature of the transaction and that contracts could be exchanged mid-September, it is recommended that authority is delegated to the Strategic Head of Housing, Property and Assets, Deputy Chief Executive and Section 151 Officer in consultation with the Cabinet Member for Finance to progress to disposal

## 5. SERVICE PERFORMANCE

**5.1** **Overall performance in Q1 2026/27 was positive**, with strong delivery across most services and continued progress against the Council's Corporate Plan priorities. Of the 45 Corporate Plan actions monitored during the quarter, 42 were on target, two had been completed and one was off target, with corrective action in place.

**5.2** **Significant progress was made on key strategic priorities**. The Staff Retention Strategy was approved by Cabinet, the draft Local Plan was published, and digital transformation programmes continued to advance. The Electric Vehicle Charge Point programme was completed, climate change initiatives progressed, and major fleet procurement for waste and recycling services moved forward. Affordable housing partnerships continued to develop, homelessness prevention work remained largely on track, and community engagement initiatives successfully reached a wide range of residents.

**5.3** **Financial and operational performance was particularly strong.** Business Rates collection exceeded target, while Council Tax collection was only marginally below expectations. Planning income significantly outperformed budget, reflecting strong development activity and demand for planning services.

5.4 **Customer-facing services continued to deliver excellent outcomes.** Benefits processing times substantially exceeded targets, telephone customer satisfaction reached 97%, and 94% of Freedom of Information requests were answered within statutory timescales. Regulatory services maintained full compliance, achieving 100% completion of both high-risk food inspections and one-day risk assessments.

5.5 **Planning performance remained a key strength.** All major planning applications were determined within agreed timescales, significantly exceeding target, while other applications also surpassed performance expectations. Appeal outcomes remained favourable, indicating robust decision making. Minor application performance was slightly below the new local target but remained within the second quartile of national benchmarking.

5.6 **Positive outcomes were also achieved in housing, waste and leisure services.** Twenty-seven affordable homes were delivered against a target of 25. Residual household waste levels remained below target, missed bin rates were better than expected, and leisure participation continued to grow, with both memberships and visitor numbers exceeding quarterly targets. Long-term empty properties reduced to 878, including 375 vacant for more than two years.

5.7 **A small number of indicators require improvement.** Recycling performance reached 57% against a target of 61%, although this was broadly consistent with the previous year. Housing Benefit overpayment levels were above the local target but remained below the national threshold, with improvement expected during the next quarter.

5.8 **The most significant performance concern remains Land Charges,** where only 39.67% of official searches were completed within ten days against a 90% target. Average turnaround time was 13 days. A comprehensive recovery plan has been implemented, focusing on revised processes, triage arrangements and service redesign, with improvements planned over the coming months. Building Control customer satisfaction was also below target at 76%; however, this result was based on a very small survey sample.

## 6. STRATEGIC RISK REGISTER

**6.1** Robust and mature process in place to review strategic risks (CLT, EMT) with reporting through to Audit & Governance Committee and Cabinet four times a year.

**6.2** Q1-Q2 review of risks undertaken (June-August) with revised risk definitions and assessment of further mitigation.

| | | | | | | |
|---|---|---|---|---|---|---|
| Likelihood | 5 | 5 | 10 | 15 | 20 | 25 |
| | 4 | 4 | 8 | 12 | 16 | 20 |
| | 3 | 3 | 6 | 9 | 12 | 15 |
| | 2 | 2 | 4 | 6 | 8 | 10 |
| | 1 | 1 | 2 | 3 | 4 | 5 |
| | | 1 | 2 | 3 | 4 | 5 |
| | Impact | | | | | |

**6.3** Overall position is summarised as below

- 1 risk scored 16 (Red) – Local Plan (No Change)
- 3 risks scored 15 (Red) – Cyber Security, Health and Safety Compliance, Civil Contingency/Major Event (No Change).
- 7 risks scored 9 (Amber) – Financial Sustainability (reduction in risk score from 12), Contractor Failure, Compliance GDPR/Data breach, Staff recruitment and retention, Service Standards (LGR impact), Staff capacity (LGR workload), Fraud & Corruption.
- 3 risks scored 6 (Amber) – Corporate Plan Delivery (reduction in score of 3), Resilience – Democracy (reduction in score of 3), Procurement (no change).
- 1 risk was de-escalated – PCI/DSS compliance

## 7. CONCLUSIONS

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**7.1** Overall, the Council has delivered a positive performance in the first quarter of 2026/27, with service delivery remaining strong, the financial position forecasting a favourable year-end surplus, and strategic risks being actively managed.

**8. FINANCIAL IMPLICATIONS**

**8.1** The detailed financial implications arising from the Quarterly Performance reporting are set out in Annexes A, A-1, A-2 and A-3.

**9. LEGAL IMPLICATIONS**

**9.1** Under Part 2 Local Government Act 2003, the Council must, from time to time during the year review the calculations it has used to set its budget. The Council's Chief Financial Officer is required to report to the Council on the robustness of estimates made for the purposes of calculating the annual budget, and on the adequacy of proposed financial reserves. Members must have regard to that report when making decisions about the calculations in connection with which it is made

**10. RISK ASSESSMENT**

**10.1** As set out in each report

**11. EQUALITIES IMPACT**

**11.1** None

**12. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS**

**12.1** None

**13. BACKGROUND PAPERS**

**13.1** None

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# CORPORATE PERFORMANCE REPORT 2026/27 Q1 – ANNEX A

COTSWOLD
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## 1. EXECUTIVE SUMMARY

**1.1** This report sets out the outturn forecast for the financial year informed by Q1 budget monitoring. Overview and Scrutiny Committee considered this report at their meeting on 07 September 2026.

**1.2** Based on Q1 budget monitoring and an assessment of risks and uncertainties, the outturn forecast is a positive variation of £0.122m. This provides an opportunity to strengthen the Council's financial sustainability over the MTFS period and supports its transition towards Local Government Reorganisation (LGR) from 1 April 2028.

**Table ES1 – Revenue Budget Outturn Forecast (Q1)**

| Revenue Budget | 2026/27 Latest Net Budget (£'000) | 2026/27 Profiled Budget to Q1 (£'000) | 2026/27 Actuals to Q1 (£'000) | 2026/27 Outturn Forecast (£'000) | 2026/27 Outturn Variance (£'000) |
|---|---|---|---|---|---|
| D01: Governance | 3,352 | 1,319 | 1,690 | 3,327 | (25) |
| D02: Resources | 3,327 | 1,517 | 809 | 3,041 | (287) |
| D03: Communities and Place | 11,745 | (230) | 5,147 | 11,846 | 101 |
| D04: Chief Executive | 922 | 379 | 428 | 953 | 31 |
| **Subtotal Services** | **19,346** | **2,986** | **8,074** | **19,167** | **(179)** |
| Less: Reversal of accounting adjustments | (2,164) | 0 | 0 | (2,164) | 0 |
| **Revised Subtotal Services** | **17,182** | **2,986** | **8,074** | **17,003** | **(179)** |
| Corporate Income & Expenditure | 1,274 | 0 | 0 | 1,442 | 169 |
| **Subtotal Non-Service Expenditure** | **18,456** | **2,986** | **8,074** | **18,446** | **(10)** |
| **Net Budget Requirement** | **18,456** | **2,986** | **8,074** | **18,446** | **(10)** |
| Less: Funding from Earmarked Reserves | (1,245) | 0 | 0 | (1,357) | (112) |
| **Net Revenue Budget to be financed** | **17,211** | **2,986** | **8,074** | **17,089** | **(122)** |
| **Funded by:** | | | | | |
| Council Tax | (7,420) | 0 | 0 | (7,420) | 0 |
| Retained Business Rates | (1,433) | 0 | 0 | (1,433) | 0 |
| Revenue Support Grant (RSG) | (5,818) | 0 | 0 | (5,818) | 0 |
| Government Funding - Grants | (1,558) | 0 | 0 | (1,558) | 0 |
| Extended Producer Responsibility (EPR) | (1,721) | 0 | 0 | (1,721) | 0 |
| Collection Fund (surplus) / Deficit | 740 | 0 | 0 | 740 | 0 |
| **TOTAL Funding** | **(17,211)** | **0** | **0** | **(17,211)** | **0** |
| **Budget shortfall/(surplus)** | **0** | **2,986** | **8,074** | **(122)** | **(122)** |

**1.3** As set out in paragraph 1.2 and Table ES1, the initial outturn forecast for the year is favourable with a surplus likely at the end of the financial year.

**1.4** The revenue budget is likely to be under pressure over the next two years as the Council supports the Local Government Reorganisation (LGR) transition plan whilst ensuring services to residents continue to be delivered as normal. There will be a demand on key staff to support the assessment of final proposal and plan for a new unitary structure in Gloucestershire. Following the Government's decision in July for a single unitary authority in Gloucestershire, implementation activity is expected to accelerate, placing further demands on key staff and corporate resources.

**1.5** Additional capacity will be needed to support the Corporate Plan, ensure services continue to be provided to residents, and support LGR. Therefore, it is proposed to maximise the level of resources available over the next 2 years, any additional budget surplus or one-off benefit is transferred to the Capacity Building earmarked reserves at year end, subject to the final outturn position.

**1.6** The material forecast variations are listed below with further details in Annex A-1 of this report.

**D01: Governance**

- Democratic Services – LGPS Employer Pension Contributions. Opt-in requests have been lower than budgeted (provision was made for all members) resulting in forecast underspend of £49k.

**D02 Resources**

- Commercial Property rental income and vacant property costs (£49k net adverse variation)
- Car Parks net income from car park fees, fines and permit above budget (£370k), EVCP income (£30k)

**D03: Communities and Place**

- Development Management, net overspend on salary costs (agency staff costs higher than vacant post budget savings) offset by £200k additional planning fee income (£119k net additional income)

- Planning & Infrastructure – net overspend on salary costs (agency staff costs higher than vacant post budget savings) and an underachievement of vacancy factor (£177k net overspend).
- CIL (£65k net underspend)
- Climate Change (£45k net underspend
- Waste & Recycling (Ubico) (£171k overspend)
- Forecast income variations – underachievement: Land Charges (£23k)

**D04: Chief Executive**

- Chief Executive's Officer – underachievement of vacancy factor (£31k overspend)

**D05: Non-Service Expenditure, Funding**

- Treasury Management and interest receivable performance (£83k positive variation).

**1.7** The 2026/27 pay award was agreed on 24 September 2026. Although the National Employers' offer of 3.3% had initially been rejected by the recognised trade unions, the pay award offer of 3.3% has been accepted. A 3% assumption was included in the 2026/27 budget and MTFS. Chief officers pay awards were confirmed in June 2026 at 3.3%. The settlement at this level is broadly in line with the assumptions included within the budget and MTFS.

**1.8** A summary of the Capital Programme outturn forecast is shown in the table below.

**Table ES3 – Capital Programme Outturn Forecast**

| Capital Programme | 2026/27 OB (£'000) | Slippage From 2025/26 (£'000) | 2026/27 Schemes approved in year (£'000) | 2025/26 LAB (£'000) | 2025/26 Actuals to Q1 (£'000) | 2026/27 Outturn (£'000) | 2026/27 Outturn Variance (£'000) |
|---|---|---|---|---|---|---|---|
| Leisure & Communities | 1,451 | 6 | 27 | 1,484 | 0 | 1,484 | 0 |
| Strategic Housing | 1,839 | 237 | 0 | 2,076 | 459 | 1,856 | (220) |
| Environment | 6,349 | 353 | 0 | 6,702 | 54 | 6,741 | 39 |
| ICT, Change and Customer Services | 350 | 0 | 0 | 350 | 0 | 150 | (200) |
| UK Rural Prosperity Fund | 0 | 8 | 0 | 8 | 8 | 8 | 0 |
| UK Shared Prosperity Fund Projects | 0 | 34 | 0 | 34 | 26 | 34 | 0 |
| Assets and Property | 500 | 200 | 0 | 700 | 0 | 700 | 0 |
| **TOTAL Capital Programme** | **10,489** | **838** | **27** | **11,354** | **547** | **10,973** | **(381)** |

**1.9** The capital programme is a forecast underspend of £0.381m. Further details are provided in Section 4 of this report.

**1.10** This report includes a recommendation for members to approve an increase of £27,000 to the Capital Programme for the installation of pool covers at Bourton on the Water and Chipping Campden Leisure Centres, to be funded from the remaining balance of the Community Municipal Investment. Further detail included in **Annex A-2.**

**1.11** Paragraphs 4.9 through to 4.13 outline the current position regarding the potential disposal of the Council's out-of-district investment properties following the decision taken by Cabinet at their meeting in June to actively market all 3 properties.

**1.12** It is likely that the disposal one property (Eign Gate, Hereford) is likely to complete in the coming weeks. Given the nature of the transaction and that contracts could be exchanged mid-September, it is recommended that authority is delegated to the Strategic Head of Housing, Property and Assets, Deputy Chief Executive and Section 151 Officer in consultation with the Cabinet Member for Finance to progress to disposal

**1.13** Financial Performance reports will be presented to members at the January 2027 and March 2027 Cabinet meeting with the outturn position likely to be finalised for the July 2027 Cabinet meeting.

## 2. EXTERNAL ECONOMIC ENVIRONMENT

### Inflationary Pressures

**2.1** The level of inflation, as measured by the Consumer Prices Index, for June 2026 fell to 2.6% (from 2.8% in May 2026). Although it is not the Government's preferred measure of inflation, the Retail Prices Index is 4.3%, unchanged from May 2026. Core inflation (as defined by the Office for National Statistics as the CPI Rate excluding energy, food, alcohol, and tobacco) fell to 2.6%, unchanged from May 2026. Inflation data for July is due for release on 19 August 2026.

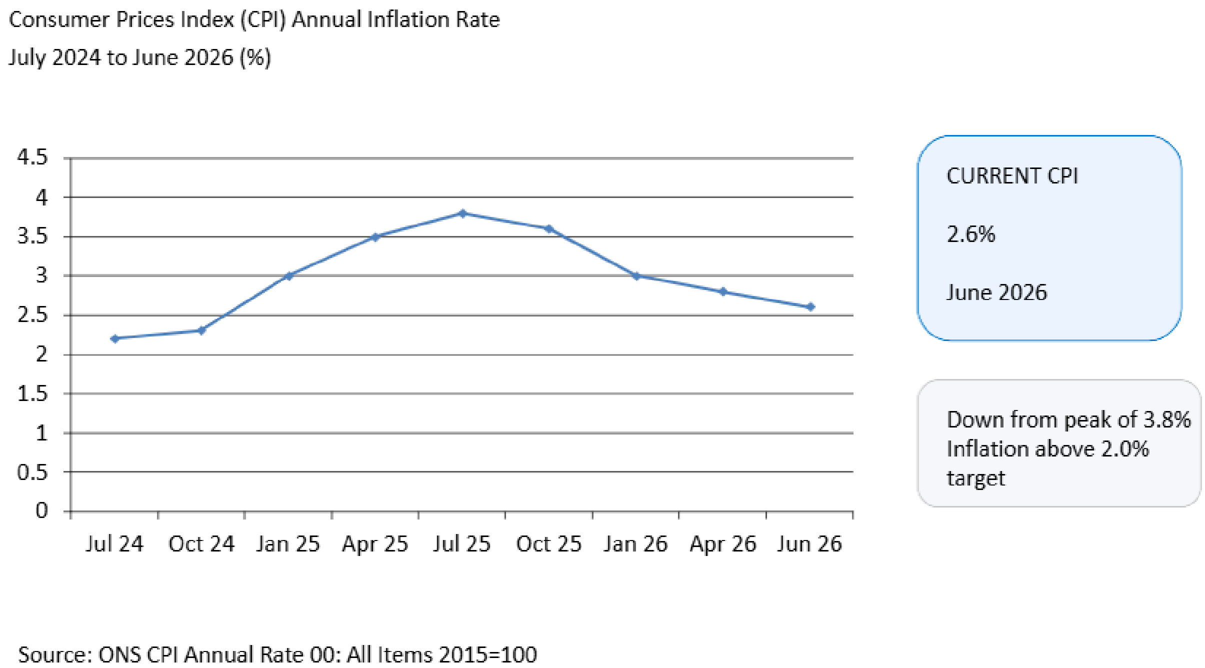
# CORPORATE PERFORMANCE REPORT 2026/27 Q1 – ANNEX A

COTSWOLD
District Council

## CORPORATE PERFORMANCE REPORT 2026/27 Q1 – ANNEX A

COTSWOLD
District Council

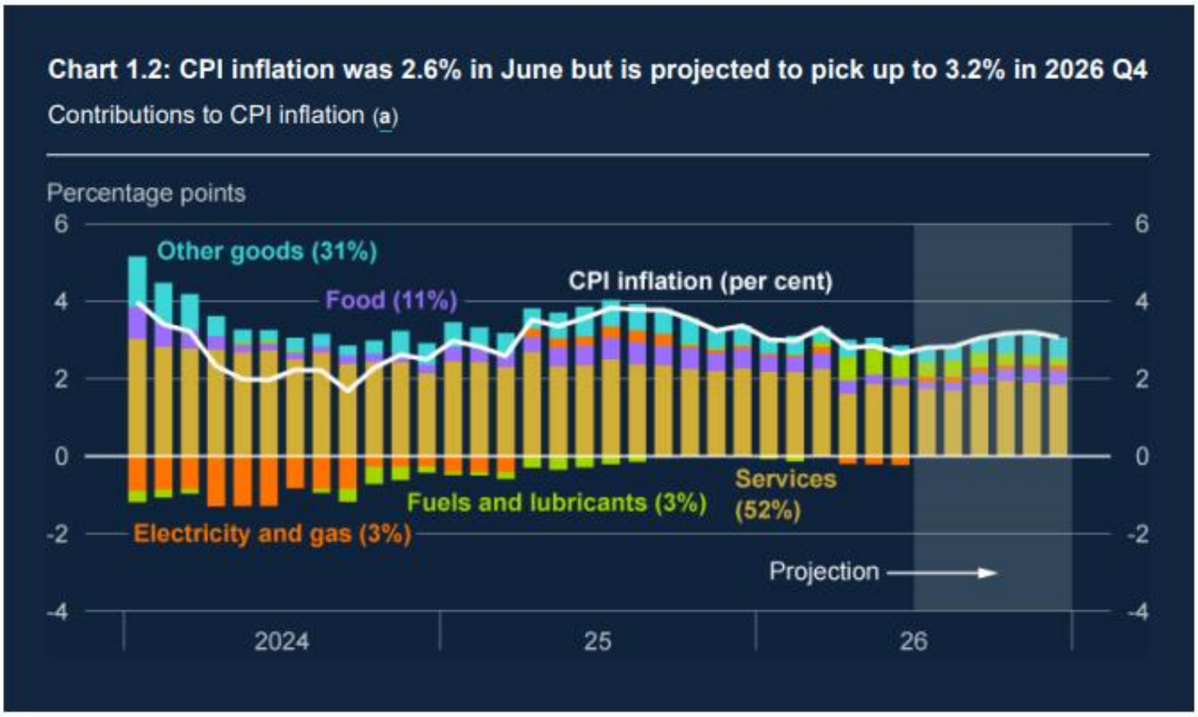
### Graph A – CPI Inflation




**2.2** Whilst the inflation outlook has improved significantly from the peaks experienced in recent years, continued volatility in global energy markets, labour costs and wider geopolitical factors means that inflationary risks remain. The Council will therefore continue to monitor economic conditions closely given the potential impact on pay awards, contract inflation and service delivery costs.

**2.3** The Bank of England's Monetary Policy Committee (MPC) considers that underlying inflationary pressures continue to moderate, supported by a loosening labour market and weaker economic growth. However, the MPC expects CPI inflation to rise temporarily during the second half of 2026, primarily reflecting the pass-through of higher energy prices. While the medium-term outlook remains consistent with inflation returning sustainably towards the 2% target, the Bank continues to highlight upside risks arising from energy market volatility and wider geopolitical developments.

**Graph B – Bank of England Chart - Inflation** *Source: Bank of England, Monetary Policy Report, July 2026, Chart 1.2.*




**Interest Rates**

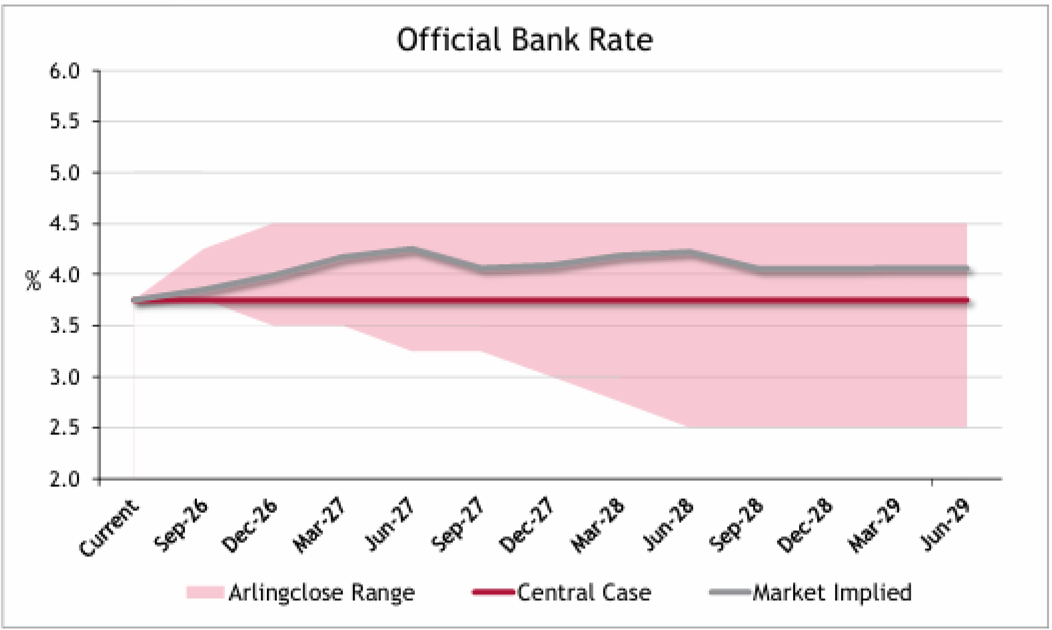
**2.4** Bank Rate has remained at 3.75% since December 2025, with the MPC maintaining a cautious approach in response to ongoing inflation risks. Although underlying inflation has moderated, the Bank expects a temporary increase in inflation over the remainder of 2026 and has therefore retained a restrictive monetary policy stance. This suggests that interest rates are likely to remain elevated relative to historic norms in the near term, continuing to affect borrowing costs for both households and organisations.

**2.5** The council's treasury management advisors central forecast is that Bank Rate will remain at 3.75% in the near term. However, the outlook remains highly uncertain and is dependent on developments in the Middle East, particularly whether the Strait of Hormuz remains open and the extent of any disruption to global energy infrastructure. These factors could significantly influence inflationary pressures and the future path of interest rates.

**CORPORATE PERFORMANCE REPORT 2026/27 Q1 – ANNEX A**

COTSWOLD District Council

**Graph C – Interest Rate Forecast (July 2026)**




## 3. 2026/27 REVENUE BUDGET FORECAST

**3.1** The Revenue Budget was approved by Council at their meeting on 23 February 2026. No adjustments made during the financial year to date.

**Table 1 – Revenue Budget reconciliation**

| Budget Item | (£'000) |
|---|---|
| Original Budget (Council, 23 February 2026) | 17,211 |
| Adj: | |
| Adj: | |
| Adj: | |
| Adj: | |
| **Latest Budget** | **17,211** |

**3.2** As of 30 June 2026 (Q1) the Council's net expenditure (excluding Funding and Parish Precepts) was £2.053m against the profiled budget of £2.992m.

**3.3** The outturn forecast for 2026/27 is an underspend of £0.122m. **Annex A-1** provides members with detailed analysis of the revenue budget outturn forecast, material variations, and an analysis of cross-cutting service financial performance on vacancy management and income streams.

**Table 2 – Revenue Budget Outturn Forecast Summary**

| Revenue Budget | 2026/27 Latest Net Budget (£'000) | 2026/27 Profiled Budget to Q1 (£'000) | 2026/27 Actuals to Q1 (£'000) | 2026/27 Outturn Forecast (£'000) | 2026/27 Outturn Variance (£'000) |
|---|---|---|---|---|---|
| D01: Governance | 3,352 | 966 | 907 | 3,327 | (25) |
| D02: Resources | 3,327 | 705 | 339 | 3,041 | (287) |
| D03: Communities and Place | 11,745 | 1,301 | 954 | 11,846 | 101 |
| D04: Chief Executive | 922 | 268 | 282 | 953 | 31 |
| **Subtotal Services** | **19,346** | **3,240** | **2,482** | **19,167** | **(179)** |
| Less: Reversal of accounting adjustments | (2,164) | 0 | 0 | (2,164) | 0 |
| **Revised Subtotal Services** | **17,182** | **3,240** | **2,482** | **17,003** | **(179)** |
| Corporate Income & Expenditure | 1,274 | (248) | (429) | 1,442 | 169 |
| **Subtotal Non-Service Expenditure** | **18,456** | **2,992** | **2,053** | **18,446** | **(10)** |
| **Net Budget Requirement** | **18,456** | **2,992** | **2,053** | **18,446** | **(10)** |
| Less: Funding from Earmarked Reserves | (1,245) | 0 | 0 | (1,357) | (112) |
| **Net Revenue Budget to be financed** | **17,211** | **2,992** | **2,053** | **17,089** | **(122)** |
| **Funded by:** | | | | | |
| Council Tax | (7,420) | 0 | 0 | (7,420) | 0 |
| Retained Business Rates | (1,433) | 4,949 | 5,345 | (1,433) | 0 |
| Revenue Support Grant (RSG) | (5,818) | (1,571) | (1,571) | (5,818) | 0 |
| Government Funding - Grants | (1,558) | 0 | 0 | (1,558) | 0 |
| Extended Producer Responsibility (EPR) | (1,721) | (461) | (461) | (1,721) | 0 |
| Collection Fund (surplus) / Deficit | 740 | 0 | 0 | 740 | 0 |
| **TOTAL Funding** | **(17,211)** | **2,917** | **3,313** | **(17,211)** | **0** |
| **Budget shortfall/(surplus)** | **0** | **5,909** | **5,366** | **(122)** | **(122)** |

**CORPORATE PERFORMANCE REPORT 2026/27 Q1 – ANNEX A**

COTSWOLD District Council

# 4. CAPITAL PROGRAMME

**4.1** Council approved the Capital Programme for 2026/27 at their meeting on 23 February 2026. The Capital Programme has been updated to reflect adjustments as set out in Table 3 below and was approved by Cabinet in July 2026.

**4.2** The capital programme for 2026/27 is £11.354m with a total net spend at £0.547m as at 30 June 2026.

**Table 3 – Capital Programme budget reconciliation**

| Capital Programme Reconciliation | 2026/27 (£'000) |
|---|---|
| Original Budget (Council, 23 February 2026) | 10,489 |
| Slippage from 2025/26 | 838 |
| Proposed change (Cabinet, September 2026) | 27 |
| | |
| | |
| | **11,354** |

**Table 4 – Capital Programme Outturn Forecast**

| Capital Programme | 2026/27 OB (£'000) | Slippage From 2025/26 (£'000) | 2026/27 Schemes approved in year (£'000) | 2025/26 LAB (£'000) | 2025/26 Actuals to Q1 (£'000) | 2026/27 Outturn (£'000) | 2026/27 Outturn Variance (£'000) |
|---|---|---|---|---|---|---|---|
| Leisure & Communities | 1,451 | 6 | 27 | 1,484 | 0 | 1,484 | 0 |
| Strategic Housing | 1,839 | 237 | 0 | 2,076 | 459 | 1,856 | (220) |
| Environment | 6,349 | 353 | 0 | 6,702 | 54 | 6,741 | 39 |
| ICT, Change and Customer Services | 350 | 0 | 0 | 350 | 0 | 150 | (200) |
| UK Rural Prosperity Fund | 0 | 8 | 0 | 8 | 8 | 8 | 0 |
| UK Shared Prosperity Fund Projects | 0 | 34 | 0 | 34 | 26 | 34 | 0 |
| Assets and Property | 500 | 200 | 0 | 700 | 0 | 700 | 0 |
| **TOTAL Capital Programme** | **10,489** | **838** | **27** | **11,354** | **547** | **10,973** | **(381)** |

**4.3** The outturn forecast for the current year is an underspend of £0.381m. **Annex A-2** sets out the detailed forecast outturn with commentary from budget holders and is summarised in the table above.

**4.4** Private Sector Housing Renewal (Disabled Facilities Grant) - The estimated expenditure for this year is £1.7m, this exceeds the funding currently available. The situation is being monitored closely. S151 Officers from across the district are aware, and in discussions with Gloucestershire County Council, as lead of the pooled arrangement for DFG, on how to manage the expected demands of the fund across the county council.

**4.5** Purchase Orders have been raised and placed for new kerbside sort vehicles as part of the £6m Ubico fleet replacement programme, with a total value of £3.281m. The tender process for the electric recycling vehicle has not yet commenced, pending progress on the installation of EV charging infrastructure. The tender for the compact sweeper has also not yet commenced while operational trials are being completed and evaluated. The profiled expenditure for 2026/27 and 2027/28 will be reviewed as part of the 2027/28 budget-setting process.

**4.6** The significant variations forecast on the Capital Programme are:

- **Bromford Joint Venture - (£0.220m)** Planning consent was granted on the 12 March, However Bromford need to resolve issues around drainage which is delaying the commencement of the work. This may delay commencement of works until 2027 unless Thames Water will bring their upgrade plans forward.
- **Waste and Recycling Receptacles -** The rolling budget for the purchase of waste and recycling receptacles is forecast to overspend by £0.040m in 2026/27 (£0.046m 2025/26). This pressure reflects continued growth in the number of properties and an increase in replacement container requests. The unit pricing for all containers has also increased significantly in recent years, and this will need to be reflected in the budget in 2027/28. Benchmarking undertaken as part of a waste review identified that replacement rates are in line with the ranges set by the Waste and Resources Action Programme (WRAP). The overspend for 2026/27 will be funded from capital receipts.
- **Planning Document and Scanning Solution -** Planning service and ICT are scoping improvements to the IDOX system as part of a wider service transformation agenda to focus on delivering service efficiencies through ICT. No expenditure is anticipated in 2026/27, with the £0.200m budget provision expected to be required in a later year.

**4.7** A recommendation included in the covering report includes a request for members to approve an increase of £27,000 to the Capital Programme for the installation of pool covers at Bourton on the Water and Chipping Campden Leisure Centres, to be funded from the remaining balance of the Community Municipal Investment. This would result in a total capital budget for 2026/27 of £11.354m as detailed in table 7 and 8 above. Further detail included in **Annex A-2.**

**4.8** At their meeting on 31 October 2023 Overview and Scrutiny Committee recommended that the Capital Programme should be kept under review to ensure the revenue impact of capital expenditure and financing decisions were fully considered.

**Capital Receipts and Disposals**

**4.9** There have been no disposals of assets during the first quarter of the financial year.

**4.10** As members will be aware, Cabinet agreed at their meeting in June 2026 to actively market the out-of-district investment properties for disposal. Initial interest was received on Eign Gate, Hereford with officers progressing the disposal. It is likely that the disposal terms of sale will be finalised in early September.

**4.11** In accordance with the Council's constitution, Cabinet are required to "Agree a property acquisition or disposal (other than following CPO) where the value is over £250,000 and up to £1,000,000." The Net Book Value (NBV) of the property as reported to Cabinet in June 2026 was £320,000. Offers were received in excess of the NBV but significantly below the threshold set out in the constitution where a Council decision is required to dispose (value exceeding £1,000,000).

**4.12** Given the nature of the transaction and that contracts could be exchanged mid-September, it is recommended that authority is delegated to the Strategic Head of Housing, Property and Assets, Deputy Chief Executive and Section 151 Officer in consultation with the Cabinet Member for Finance to progress to disposal.

**4.13** In terms of financial implications, a disposal would generate a net capital receipt that can be utilised as part of the financing of the capital programme. The Medium-Term Financial Strategy (February 2026) included a provision from 2027/28 for a reduction in commercial property income of £100,000. The disposal of the Hereford property would reduce the Council's commercial property income by £36,000 per annum.

**Table 5 – Capital Financing Forecast**

| Capital Financing Statement | 2026/27 OB (£'000) | Slippage From 2025/26 (£'000) | 2026/27 Schemes approved in-year (£'000) | 2026/27 LAB (£'000) | 2026/27 Actuals to Q1 (£'000) | 2026/27 Variance to Q1 (£'000) | 2026/27 Forecast Outturn (£'000) | 2026/27 Forecast Outturn Variance (£'000) |
|---|---|---|---|---|---|---|---|---|
| Capital receipts | 4,308 | 564 | 0 | 4,872 | 54 | (4,818) | 4,437 | (381) |
| Capital Grants and Contributions | 2,640 | 209 | 0 | 2,849 | 493 | (2,356) | 2,356 | 0 |
| Earmarked Reserves | 1,829 | 0 | 0 | 1,829 | 0 | (1,829) | 1,829 | 0 |
| Revenue Contribution to Capital Outlay (RCCO) | 1,712 | 0 | 0 | 1,712 | 0 | (1,712) | 1,712 | 0 |
| Community Municipal Investments (CMI) | 0 | 65 | 27 | 92 | 0 | (92) | 92 | 0 |
| Prudential Borrowing | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | **10,489** | **838** | **27** | **11,354** | **547** | **(10,807)** | **10,426** | **(381)** |

**4.14** The Capital Financing position set out in the table above will be reviewed by the s151 Officer as part of the financial year end closedown process as expenditure forecasts are updated to ensure a balanced use of capital resources and mitigation of current and future interest rates.

## 5. NON-TREASURY MANAGEMENT SUMMARY

**5.1** The CIPFA Code was updated in 2021 and includes the new requirement, mandatory from 01 April 2023, of quarterly reporting of the treasury management prudential indicators. The non-treasury prudential indicators are expected to be included in the Council's usual revenue and capital monitoring reports.

### Prudential Indicators

**5.2** The detailed Non-Treasury Management prudential indicators are included in **Annex A-3** with the commentary below providing members with a high-level summary.

**5.3** Whilst there is no underlying need to borrow with the Capital Programme financed through internal resources and external grants and contributions, any additional capital expenditure proposed during the year will need to consider the availability and cost of capital financing. The mid-year Treasury Management report to Audit and Governance Committee will set out the wider impact on the Capital Financing Requirement.

## 6. LOCAL GOVERNMENT REORGANISATION

**6.1** Council approved the 2026/27 Revenue Budget, Capital Programme and Medium Term Financial Strategy report at their meeting on 23 February 2026. The report included the recommendation that £2m is set aside in a new earmarked reserve Council Priority: LGR Transition through the releasing of £2m of the balance currently held in the Financial Resilience Reserve. This would provide the Council's share of funding towards the LGR Transition Programme.

**6.2** As indicated in the February report, contributions into the programme costs (£21.285m 1UA proposal) were agreed on the following basis:

- 55% of the fund to be provided by Gloucestershire County Council (£11.707m)
- 45% of the fund to be provided by the six Gloucestershire district councils, each contributing an equal amount (£1.596m per district).

**6.3** The Government confirmed the support for the single unitary authority proposal for Gloucestershire in their letter to Leaders and Chief Executives in July 2026.

**6.4** Following the decision and taking into account the £0.900m funding from MHCLG, the profile of contributions has been reviewed and agreed by LGR Portfolio Board and the LGR Member Steering Group. An initial contribution equivalent to 25% of the currently agreed 2026/27 contribution (50% of the total £21.285m) for the financial year was proposed. This results in revised contributions of £1.464m from Gloucestershire County Council, £0.200m from the district councils. It was also agreed that due to the Exceptional Financial Support circumstances at Gloucester City Council, their contribution has been deferred until Q4 2027/28.

**6.5** The remaining contributions would be subject to a future Portfolio Board decision following development of the implementation plan and budget.

**6.6** Gloucestershire County Council, as the accountable body, are finalising the recharging process so that the 50% share of Programme Lead costs can be invoiced by councils and reimbursed from the LGR Transition Programme budget.

**6.7** As per the most recent budget monitoring report on the LGR Transition budget to Member Steering Group,

## 7. RISKS AND UNCERTAINTIES

**7.1** The report outlines several risks and uncertainties around the wider economic environment.

**7.2** Development Management fee income has continued the trend from 2025/26 with a significant increase in applications and fee income. There remains a risk that a proportion of the planning applications received may result in planning decision appeals (given the more speculative applications lodged ahead of the Council's updated Local Plan being adopted in 2027). Therefore, it is prudent to set aside potential additional income against planning appeals costs. This will be reviewed during the financial year, with consideration also given to the financing of additional capacity and local plan costs.

**7.3** Income may not continue to hold up as strongly in areas such as planning and car parking as it has done during quarter 1, which could have an adverse impact on the forecast outturn position.

**7.4** Private Sector Housing Renewal (Disabled Facilities Grant) - The estimated expenditure for this year is £1.7m and exceeds the funding currently available. The situation is being monitored closely.

**7.5** Vacancy management may improve the financial position through staff turnover and delayed recruitment. However, given the LGR context, difficulties in filling vacant posts could lead to increased reliance on agency staff and higher associated costs

**7.6** Ongoing inflationary pressures remain a risk to the Council's revenue budget, particularly in relation to employee pay awards, energy costs, contracted services, insurance premiums and other operational expenditure. Whilst provision has been made within the MTFS for anticipated inflationary increases, there remains a risk that actual cost increases exceed budget assumptions. The Council will continue to monitor inflation trends and budget performance closely, taking corrective action where necessary to mitigate any adverse impact on the Council's financial sustainability.

## 8. CONCLUSIONS

**8.1** Members should note that whilst the outturn forecast is favourable there remain concerns around financial performance in certain service areas – particularly services where the Council's net revenue budget is dependent on income from fees and charges.

**8.2** Officers will continue to challenge and support Ubico with the expectation that the service should be delivered within the contract sum and the forecast overspend should be mitigated through compensating management action across the wider contract.

**8.3** The Council's revenue budget is likely to face additional pressures during 2026/27 and 2027/28 as preparations for Local Government Reorganisation (LGR) progress, while ensuring that services to residents continue to be delivered as normal.

**8.4** This monitoring report presents an update on the Council's financial position. As the report sets out, an underspend of £0.122m is forecast for the financial year which will result in a transfer to the Capacity Building Reserve at year end in order to fund capacity in preparation for LGR.

# CORPORATE PERFORMANCE REPORT 2026/27 Q1 – ANNEX A-1

COTSWOLD District Council

## 1. 2026/27 REVENUE BUDGET FORECAST

**1.1** The Revenue Budget was approved by Council at their meeting on 23 February 2026. No adjustments made during the financial year to date.

**Table 1 – Revenue Budget reconciliation**

| Budget Item | (£'000) |
|---|---|
| Original Budget (Council, 23 February 2026) | 17,211 |
| Adj: | |
| Adj: | |
| Adj: | |
| Adj: | |
| **Latest Budget** | **17,211** |

**1.2** As of 30 June 2026 (Q1) the Council's net expenditure (excluding Funding and Parish Precepts) was £2.053m against the profiled budget of £2.992m.

**1.3** The outturn forecast for 2026/27 is an underspend of £0.122m – this assumes that the contingency budget is not applied to the £0.171m forecast overspend on the Ubico contract sum. For the purposes of this report, it is assumed that the contingency budget (£0.256m) remains available to support the Council throughout the financial year and utilised to mitigate any budget overspends at this stage.

**1.4** Table 2 provides members with an overview of the material outturn variations forecast across services. Table 3 provides additional detail on the non-service revenue expenditure and income budgets.

**CORPORATE PERFORMANCE REPORT 2026/27 Q1 – ANNEX A-1**

COTSWOLD District Council

**Table 2 – Revenue Budget Outturn Forecast Summary**

| Revenue Budget | 2026/27 Latest Net Budget (£'000) | 2026/27 Profiled Budget to Q1 (£'000) | 2026/27 Actuals to Q1 (£'000) | 2026/27 Outturn Forecast (£'000) | 2026/27 Outturn Variance (£'000) |
|---|---|---|---|---|---|
| D01: Governance | 3,352 | 966 | 907 | 3,327 | (25) |
| D02: Resources | 3,327 | 705 | 339 | 3,041 | (287) |
| D03: Communities and Place | 11,745 | 1,301 | 954 | 11,846 | 101 |
| D04: Chief Executive | 922 | 268 | 282 | 953 | 31 |
| **Subtotal Services** | **19,346** | **3,240** | **2,482** | **19,167** | **(179)** |
| Less: Reversal of accounting adjustments | (2,164) | 0 | 0 | (2,164) | 0 |
| **Revised Subtotal Services** | **17,182** | **3,240** | **2,482** | **17,003** | **(179)** |
| Corporate Income & Expenditure | 1,274 | (248) | (429) | 1,442 | 169 |
| **Subtotal Non-Service Expenditure** | **18,456** | **2,992** | **2,053** | **18,446** | **(10)** |
| **Net Budget Requirement** | **18,456** | **2,992** | **2,053** | **18,446** | **(10)** |
| Less: Funding from Earmarked Reserves | (1,245) | 0 | 0 | (1,357) | (112) |
| **Net Revenue Budget to be financed** | **17,211** | **2,992** | **2,053** | **17,089** | **(122)** |
| **Funded by:** | | | | | |
| Council Tax | (7,420) | 0 | 0 | (7,420) | 0 |
| Retained Business Rates | (1,433) | 4,949 | 5,345 | (1,433) | 0 |
| Revenue Support Grant (RSG) | (5,818) | (1,571) | (1,571) | (5,818) | 0 |
| Government Funding - Grants | (1,558) | 0 | 0 | (1,558) | 0 |
| Extended Producer Responsibility (EPR) | (1,721) | (461) | (461) | (1,721) | 0 |
| Collection Fund (surplus) / Deficit | 740 | 0 | 0 | 740 | 0 |
| **TOTAL Funding** | **(17,211)** | **2,917** | **3,313** | **(17,211)** | **0** |
| **Budget shortfall/(surplus)** | **0** | **5,909** | **5,366** | **(122)** | **(122)** |

## CORPORATE PERFORMANCE REPORT 2026/27 Q1 – ANNEX A-1

COTSWOLD
District Council

### Table 3 – Corporate Income and Expenditure

| Revenue Budget | 2026/27 Latest Net Budget (£'000) | 2026/27 Outturn Forecast (£'000) | 2026/27 Outturn Variance (£'000) |
|---|---|---|---|
| FIE010 Interest Payable and Similar Charges | 3 | 3 | 0 |
| FIE030 Interest and Investment Income | (1,157) | (1,240) | (83) |
| Minimum Revenue Provision | 32 | 32 | 0 |
| Savings and Contingency | 256 | 225 | (31) |
| Parish Precepts | 5,598 | 5,598 | 0 |
| Capital expenditure funded from revenue | 1,547 | 1,547 | 0 |
| Budgeted Transfers to reserves | 593 | 593 | 0 |
| Proposed Transfers to reserves | 0 | 283 | 283 |
| | **6,871** | **7,040** | **169** |

**1.5** As set out in paragraph 1.3 and Table ES1, the initial outturn forecast for the year is favourable with a surplus likely at the end of the financial year.

**1.6** The Council must ensure it can address the financial challenges arising from Local Government Reorganisation ("LGR") over the MTFS-period. The revenue budget is likely to be under pressure over the next two years as the Council supports the Local Government Reorganisation (LGR) transition plan whilst ensuring services to residents continue to be delivered as normal. There will be a demand on key staff to support the assessment of final proposal and plan for a new unitary structure in Gloucestershire. Following the Government's decision in July for a single unitary authority in Gloucestershire, implementation activity is expected to accelerate, placing further demands on key staff and corporate resources.

**1.7** Additional capacity will be needed to support the Corporate Plan, ensure services continue to be provided to residents, and support LGR. Therefore, it is proposed to maximise the level of resources available over the next 2 years, any additional budget surplus or one-off benefit is transferred to the Capacity Building earmarked reserves at year end, subject to the final outturn position.

**1.8** A key assumption is that there are no additional expenditure commitments that would require support from the Financial Resilience Reserve (FRR). For the avoidance of doubt, the working assumption in the outturn forecast is:

- there is no material deterioration in the outturn forecast in Q2-Q4.
- additional expenditure in any particular service area is offset by a corresponding decrease in expenditure in other service areas.

**Key Variations**

**1.9** The material items which have had an impact on the Council's revenue budget are summarised below with narrative explaining the reasons(s) for the variation. The Council's revenue budgets have been summarised according to the organisational structure using a multi-level hierarchy. This ensures that financial reporting reflects each Director's and Head of Service's area of responsibility.

COTSWOLD District Council

**Table 4 – Significant Variations (Q1)**

| Revenue Budget | 2026/27 Latest Net Budget (£'000) | 2026/27 Outturn Forecast (£'000) | 2026/27 Outturn Variance (£'000) |
|---|---|---|---|
| **D01: Governance** | | | |
| D0121: Democratic Services | 788 | 739 | (49) |
| Other Governance Services | | | 24 |
| **Subtotal D01: Governance** | | | **(25)** |
| | | | |
| **D02: Resources** | | | |
| D0212: Investment Property | (493) | (444) | 49 |
| D0224: Council Offices - Property R&M | 355 | 397 | 42 |
| D0281: Car Parks - xxxx | (2,176) | (2,577) | (401) |
| Other Resources Services | | | 24 |
| **Subtotal D02: Resources** | | | **(287)** |
| | | | |
| **D03: Communities and Place** | | | |
| D0312: Planning Services (DM) | 203 | 84 | (119) |
| D0313: Planning & Infrastructure | 541 | 719 | 177 |
| D0314: Natural, Built & Historic Environment | 695 | 727 | 31 |
| D0315: CIL | 0 | (65) | (65) |
| D0321: Climate Change | 118 | 73 | (45) |
| D0341: Waste & Recycling Services (Ubico) | 6,765 | 6,931 | 166 |
| D0353: Land Charges etc | (113) | (84) | 29 |
| Other Communities and Place Services | | | (74) |
| **Subtotal D03: Communities and Place** | | | **101** |
| | | | |
| **D04: Chief Executive** | | | |
| D0411: Chief Executive's Office | 698 | 730 | 31 |
| Other Chief Executive Services | | | 0 |
| **Subtotal D04: Chief Executive** | | | **31** |
| | | | |
| **Subtotal Services** | | | **(179)** |
| Less: Reversal of accounting adjustments | | | 0 |
| **Revised Subtotal Services** | | | **(179)** |

## D01: GOVERNANCE

**D0121: Democratic Services – (£49k) net underspend**

1.10 **LGPS Employer Pension Contributions (Members)** – The 2026/07 budget included provision for increased costs arising from eligible elected members being able to join the Local Government Pension Fund (LGPS). Eligibility commenced on 11 May 2026, with membership being voluntary and requiring members to opt into the scheme. Take up has been lower than originally anticipated and, as a result a full year underspend of £0.042m is currently forecast.

**D02: RESOURCES**

**D0212: Investment Property - £49k net income shortfall**

**1.11** **Investment Properties** - The Council is not expected to achieve the budgeted level of commercial rental income from its portfolio due to continued economic pressures within the retail and office sectors, which are impacting rental values and occupancy levels. A forecast income shortfall of £0.035m is anticipated, primarily arising from void periods at Abberley House (£0.022m) following the end of a tenancy. The vacant accommodation is not expected to be re-let until essential roof repairs have been completed later in the financial year.

**D0224: Council Offices – Property R&M - £42k net overspend/income shortfall**

**1.12** Rental income from the tenanted areas of Trinity Road Offices is currently below the budgeted target of £0.083m for 2026/27 and is forecast to achieve £0.050m, resulting in an anticipated shortfall of £0.033m. Officers continue to monitor performance closely through updates provided by Watermoor Point's live data dashboard, which provides information on occupancy levels and enquiry activity, alongside more formal quarterly performance review meetings. Current occupancy levels are 50% of office units and 51% of available desks, with efforts continuing to increase take-up and improve income generation during the remainder of the financial year.

**D0281: Car Parks – (£400k) income surplus**

**1.13** Income from the Council's Car Parks has performed positively in the first quarter of 2026/27 exceeding budget by £0.760m (net of transactional fees). Assuming current performance continues net income is expected to exceed budget by £0.300m for the full financial year.

**1.14** Income performance for both parking permits and Penalty Charge Notices (PCNs) is currently ahead of budget at Quarter 1. Based on current activity levels and income trends, permit income is forecast to exceed budget by £0.010m over the full financial year, whilst PCN income is forecast to be £0.058m above budget. The position will continue to be monitored throughout the year, recognising that income levels remain dependent on parking demand, enforcement activity and compliance rates.

**1.15** **EVCP income** has continued to perform strongly, generating net income of £0.012m in Quarter 1 and is forecast to result in an overachievement of £0.030m for the 2026/27 financial year.

**D03: COMMUNITIES AND PLACE**

**D0312: Planning Services (DM) – (£119k) net underspend/income surplus**

**1.16** Q1 Development Management income is exceeding budget, with planning fee income of £0.356m received against a budget of £0.231m, generating a favourable variance of £0.125m. This comprises fees from 6 major (11 in Q1 2025/26), 92 minor (82 in Q1 2025/26) and 305 (236 in Q1 2025/26) other planning applications. In addition, £0.054m of pre application fee income has been received from 106 enquiries (129 in Q1 2025/26), against a budget of £0.049m. Based on current activity levels and income trends Development Management fee income is forecast to exceed the annual budget by £0.200m for the full financial year.

**1.17** During Q1 2026/27, the Local Planning Authority (LPA) has continued to experience higher than anticipated levels of planning activity, particularly in relation to major housing developments. This has resulted in planning application fee income continuing to exceed budget forecasts. As in 2025/26, this overachievement has primarily arisen from speculative housing proposals and other significant development schemes being brought forward for consideration.

**1.18** The service also continues to receive a large number of pre-application enquiries relating to potential future developments. In addition, work on the emerging Local Plan is expected to encourage the early submission of applications relating to potential site allocations, with a number of schemes currently at pre-application stage anticipated to progress to full applications.

**1.19** As a large number of these schemes are speculative, it is likely that a number will be refused permission and will therefore result in appeals. Given the scale of development, there is a high chance appeals are dealt with as informal hearings or inquiries which bring greater costs to the Council.

**1.20** Subject to the final outturn position for Development Management Fees remaining positive (i.e. income received in the year is above the budgeted level), it is proposed that 100% of the variation is transferred to the Planning Appeals reserve.

**D0313: Planning & Infrastructure - £177k net overspend**

**1.21** The net forecast staff overspend reflects higher-than-budgeted staffing costs resulting from agency staff expenditure and the underachievement of the vacancy factor target.

**1.22** The Council has spent £0.078m on the Local Plan in Q1 2026/27, including staff, consultancy and IT licence costs with a further £0.3m of commitments. This will be fully funded from the Local Plan reserve and will therefore have no impact on the Council's forecast outturn position.

**D0314: Natural, Built & Historic Environment - £31k net overspend**

**1.23** Overspend due to interim staff costs and vacancy factor not achieved.

**D0315: Community Infrastructure (CIL) Levy – (£65k) net underspend**

**1.24** Budget that provides administrative support to the CIL process to be utilised to fund Planning and Infrastructure staff overspend (DO313)

**D0321: Climate Change- (£45k) net underspend**

**1.25** Salary underspend net of vacancy factor. An element of this underspend may be utilised to support the wider Climate Change work across the Council. The forecast will be updated in subsequent reports to reflect any utilisation of this budget.

**D0341: Waste & Recycling Services (Ubico) - £166k net overspend**

**1.26** The Council's Environmental (grounds maintenance, street cleaning, domestic waste collection, recycling collections etc) are provided by Ubico Ltd. The contract with Ubico for 2026/27 of £9.173m is forecast to cost £9.344m – an adverse variation of £0.171m This is predominantly due to:

- Vehicle hire costs (£0.094m) due to age of fleet on Refuse, Reycling and Street Cleaning.
- Fuel costs (£0.030m) – Diesel price remains above budgeted assumption of £1.20 p/l (excl VAT) this is offset by an underspend in use following a detailed review of historic data which has enabled excess volume in the budget to be removed by 44,000L. Net overspend forecast of £0.030m.
- Employment costs (£0.027m) – Staffing costs are above budget due to increased agency expenditure arising from employee sickness and increased requirement for additional loaders due to light duties for return-to-work needs. Agency spending is expected to add an extra £0.106m in forecast costs over the full year. This is offset by savings because of vacancies within Street Cleaning, producing a net saving of £0.058m

**1.27** Officers will continue to challenge and support Ubico with the expectation that the service should be delivered within the contract sum and the forecast overspend should be mitigated through compensating management action across the wider contract. Table 5 provides members with an overview of the financial performance of the Ubico Contract.

**1.28** Should the forecast Ubico contract overspend of £.0171m continue, it could be offset from the wider contract contingency budget of £0.178m that has been set aside within the Council's approved budget for 2026/27. This would leave a remaining contingency balance of £0.007m, although efforts will be made to reduce the forecast overspend before any contingency is required.

**Table 5 – Ubico Contract**

| Waste, Recycling, Street Cleaning and Grounds Maintenance Services | Ubico Contract Costs OB (£'000) | Ubico Contract Costs CS (£'000) | 2026/27 Outturn Forecast (£'000) | 2026/27 Outturn Variance (£'000) |
|---|---|---|---|---|
| Car Parks GM [CTW668] | 65,839 | 65,839 | 66,447 | 608 |
| CCM001 Cemetery/Churchyards GM [CTW688] | 182,498 | 182,498 | 184,184 | 1,686 |
| RYC002 Garden Waste Collection [CTW634] | 1,323,443 | 1,323,443 | 1,356,139 | 32,696 |
| WST001 Household Waste [CTW611] | 1,864,805 | 1,864,805 | 1,960,230 | 95,425 |
| RYC001 Recycling [CTW633] | 3,488,214 | 3,488,214 | 3,539,554 | 51,340 |
| RYC003 Refuse/Recycling/Food Waste [CTW635] | 755,464 | 755,464 | 787,018 | 31,554 |
| STC001 Street Cleaning [CTW666] | 1,476,189 | 1,476,189 | 1,434,182 | (42,007) |
| Trinity Road Offices GM [CTW668] | 16,737 | 16,737 | 16,891 | 154 |
| | **9,173,188** | **9,173,188** | **9,344,645** | **171,458** |

**1.29** Garden Waste fee income has exceeded the budgeted income target. Income totalled £1.607m at the end of July 2026, £0.019m above the budget of £1.588m. Whilst income was £0.011m below the profiled budget at Quarter 1, the sale of additional licences during July resulted in the budget being exceeded.

**D0353: Land Charges - £29k Income Shortfall**

**1.30** **Land Charges** income at Quarter 1 is currently £0.010m below budget, reflecting a reduction in application volumes. During the quarter, 407 applications were received, compared with 446 applications in Quarter 1 of 2025/26, representing a 9% year-on-year decrease. Performance has also been impacted, with average turnaround times increasing from 5.25 days in Quarter 1 of 2025/26 to 12.78 days in Quarter 1 of 2026/27, against a target of 10 days.

**1.31** Land Charges performance has been volatile in recent years, with a combination of resource-intensive processes, product complexity and staffing challenges contributing to the current position. In response, the service has developed a strategic recovery plan focused on four key areas: improving customer access routes into the service; enhancing triage and processing arrangements; reviewing products and service delivery; and assessing fees and charges. The recovery plan will focus on developing and testing new ways of working over the summer, with implementation and refinement scheduled for the autumn, with the aim of improving both service performance and financial sustainability.

**D04: CHIEF EXECUTIVE**

**D0411: Chief Executive's Office – £31k net overspend**

**1.32** Vacancy Factor not met.

**CROSS-CUTTING ANALYSIS OF SERVICE VARIATIONS**

**Vacancy Management**

**1.33** The tables below set out the consolidated financial performance against the Council's salary budgets, taking into account agency staff costs and the 3.5% vacancy factor that was applied to all staffing budgets for 2026/27.

**1.34** The application of the vacancy factor in effect front-loaded the revenue budget with a vacancy management savings target. In previous years, vacancy management savings have been achieved through 'churn' (as staff leave there will be an inevitable delay in filling the role due to recruitment and market challenges). Significant vacancy management savings were achieved in 2025/26 (£0.710m) and in prior financial years.

**1.35** The Q1 budget monitoring has identified an initial adverse variation of £0.150m across the Council's net salary budgets of £7.581m (£7.769m less £0.187m vacancy factor). The tables show the breakdown against salary costs, agency staff and vacancy factor budgets.

**1.36** The majority of the adverse position can be attributed to the recruitment and retention challenges within Planning Services, which have resulted in a greater reliance on agency staff and associated costs exceeding the approved salary budget.

**1.37** The Council continues to experience recruitment and retention challenges within Planning Services, reflecting wider pressures across the local government sector. In response the Council has adopted a Retention Strategy 2026-28 (approved by Cabinet on 16 April 2026) aimed at improving workforce stability, career development and staff retention, although delivery of these benefits is expected to take time.

# CORPORATE PERFORMANCE REPORT 2026/27 Q1 – ANNEX A-1

COTSWOLD
District Council

| Income Budget | 2026/27 Salary costs LAB (£) | 2026/27 Agency staff LAB (£) | 2026/27 Vacancy Factor LAB (£) | 2026/27 Net Salary LAB (£) | 2026/27 Profiled Budget to Q1 (£) | 2026/27 Salary costs ACT (£) | 2026/27 Agency staff ACT (£) | 2026/27 Vacancy Factor ACT (£) | 2026/27 Net Salary ACT (£) | 2026/27 Outturn Forecast (£) | 2026/27 Outturn Variance (£) |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | Budget | | | | | Actual Expenditure to date | | | | | |
| **D01: Governance** | | | | | | | | | | | |
| D0111: Legal Services | 379,359 | 0 | 0 | 379,359 | 158,066 | 116,319 | 0 | 0 | 116,319 | 379,359 | 0 |
| D0121: Democratic Services | 246,153 | 0 | (8,281) | 237,872 | 99,114 | 76,713 | 0 | 0 | 76,713 | 230,595 | (7,277) |
| D0122: Elections | 164,764 | 0 | (5,767) | 158,997 | 66,249 | 41,467 | 0 | 0 | 41,467 | 148,997 | (10,000) |
| D0131: Communications | 310,109 | 0 | (10,854) | 299,255 | 124,689 | 96,076 | 0 | 0 | 96,076 | 310,109 | 10,854 |
| D0142: Publica HR | 122,975 | 0 | (4,304) | 118,671 | 49,446 | 40,189 | 0 | 0 | 40,189 | 118,671 | 0 |
| **Subtotal D01: Governance** | **1,223,360** | **0** | **(29,206)** | **1,194,154** | **497,564** | **370,764** | **0** | **0** | **370,764** | **1,187,731** | **(6,423)** |
| | | | | | | | | | | | |
| **D02: Resources** | | | | | | | | | | | |
| D0215: Counter Fraud & Enforcement Unit | 802,000 | 0 | 0 | 802,000 | 334,167 | 259,820 | 0 | 0 | 259,820 | 802,000 | 0 |
| D0219: Publica Financial Services | 329,681 | 49,202 | (11,539) | 367,344 | 153,060 | 79,094 | 9,147 | 0 | 88,241 | 367,344 | 0 |
| D0221: Strategic Housing | 163,257 | 0 | (5,714) | 157,543 | 65,642 | 53,992 | 0 | 0 | 53,992 | 163,257 | 5,714 |
| D0222: Property & Assets Team | 543,826 | 0 | (19,034) | 524,792 | 218,664 | 148,580 | 0 | 0 | 148,580 | 528,418 | 3,626 |
| D0261: Homelessness & Temporary Accommodation | 0 | 0 | 0 | 0 | 0 | 0 | 5,908 | 0 | 5,908 | 0 | 0 |
| **Subtotal D02: Resources** | **1,838,764** | **49,202** | **(36,287)** | **1,851,679** | **771,533** | **541,486** | **15,055** | **0** | **556,541** | **1,861,019** | **9,340** |

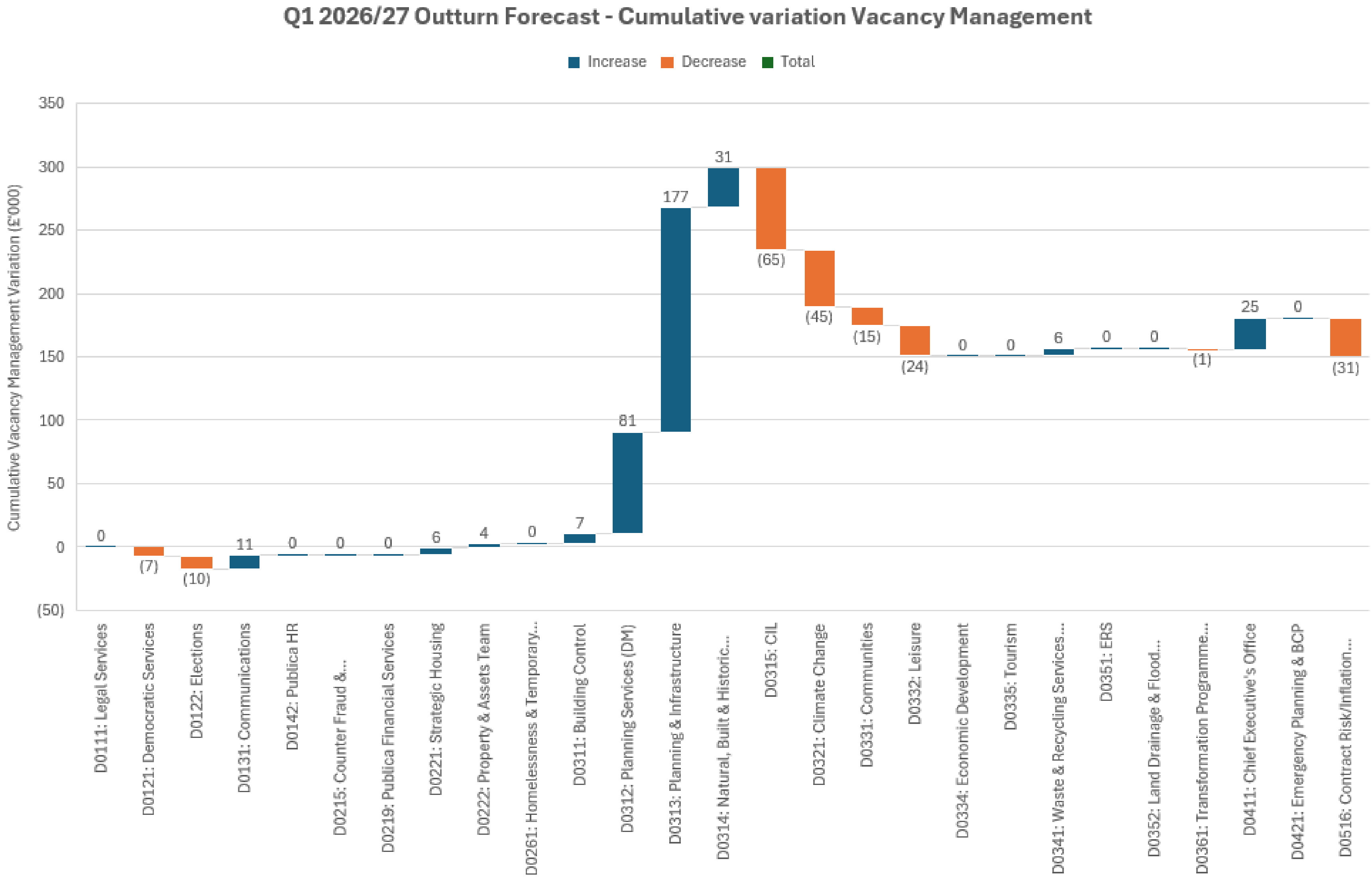
# CORPORATE PERFORMANCE REPORT 2026/27 Q1 – ANNEX A-1

COTSWOLD
District Council

| | Budget | | | | | Actual Expenditure to date | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| **Income Budget** | **2026/27 Salary costs LAB (£)** | **2026/27 Agency staff LAB (£)** | **2026/27 Vacancy Factor LAB (£)** | **2026/27 Net Salary LAB (£)** | **2026/27 Profiled Budget to Q1 (£)** | **2026/27 Salary costs ACT (£)** | **2026/27 Agency staff ACT (£)** | **2026/27 Vacancy Factor ACT (£)** | **2026/27 Net Salary ACT (£)** | **2026/27 Outturn Forecast (£)** | **2026/27 Outturn Variance (£)** |
| **D03: Communities and Place** | | | | | | | | | | | |
| D0311: Building Control | 241,654 | 0 | (9,999) | 231,655 | 96,523 | 76,215 | 0 | 0 | 76,215 | 239,154 | 7,499 |
| D0312: Planning Services (DM) | 1,236,222 | 0 | (43,268) | 1,192,954 | 497,065 | 306,876 | 100,148 | 0 | 407,024 | 1,273,472 | 80,518 |
| D0313: Planning & Infrastructure | 549,009 | 0 | (19,215) | 529,794 | 220,747 | 163,712 | 43,528 | 0 | 207,240 | 707,121 | 177,327 |
| D0314: Natural, Built & Historic Environment | 622,399 | 0 | (21,784) | 600,615 | 250,256 | 171,051 | 19,483 | 0 | 190,534 | 631,953 | 31,338 |
| D0315: CIL | 112,106 | 0 | (3,924) | 108,182 | 45,076 | 0 | 0 | 0 | 0 | 43,182 | (65,000) |
| D0321: Climate Change | 97,636 | 0 | (3,417) | 94,219 | 39,257 | 22,090 | 0 | 0 | 22,090 | 49,259 | (44,960) |
| D0331: Communities | 406,919 | 0 | (14,242) | 392,677 | 163,615 | 100,504 | 0 | 0 | 100,504 | 377,730 | (14,947) |
| D0332: Leisure | 111,970 | 0 | (3,919) | 108,051 | 45,021 | 26,973 | 0 | 0 | 26,973 | 84,182 | (23,869) |
| D0334: Economic Development | 66,530 | 0 | (2,329) | 64,201 | 26,751 | 21,565 | 0 | 0 | 21,565 | 64,201 | 0 |
| D0335: Tourism | 269,893 | 0 | 0 | 269,893 | 112,456 | 88,911 | 0 | 0 | 88,911 | 269,893 | 0 |
| D0341: Waste & Recycling Services (Ubico) | 179,290 | 0 | (6,275) | 173,015 | 72,089 | 45,786 | 0 | 0 | 45,786 | 179,290 | 6,275 |
| D0351: ERS | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| D0352: Land Drainage & Flood Defence | 0 | 0 | 0 | 0 | 0 | 27,735 | 0 | 0 | 27,735 | 0 | 0 |
| D0361: Transformation Programme Management | 47,281 | 0 | 0 | 47,281 | 19,700 | 14,247 | 0 | 0 | 14,247 | 46,281 | (1,000) |
| **Subtotal D03: Communities and Place** | **3,940,909** | **0** | **(128,372)** | **3,812,537** | **1,588,556** | **1,065,665** | **163,159** | **0** | **1,228,824** | **3,965,718** | **153,181** |
| | | | | | | | | | | | |
| **D04: Chief Executive** | | | | | | | | | | | |
| D0411: Chief Executive's Office | 709,358 | 0 | (24,692) | 684,666 | 285,278 | 238,964 | 79,308 | 0 | 318,272 | 709,358 | 24,692 |
| D0421: Emergency Planning & BCP | 7,177 | 0 | 0 | 7,177 | 2,991 | 2,595 | 0 | 0 | 2,595 | 7,177 | 0 |
| **Subtotal D04: Chief Executive** | **716,535** | **0** | **(24,692)** | **691,843** | **288,269** | **241,559** | **79,308** | **0** | **320,867** | **716,535** | **24,692** |
| | | | | | | | | | | | |
| **Subtotal Non-Service Expenditure** | **7,719,568** | **49,202** | **(218,557)** | **7,550,213** | **3,145,922** | **2,219,474** | **257,522** | **0** | **2,476,996** | **7,731,003** | **180,790** |
| | | | | | | | | | | | |
| **D05: Non-Service Expenditure** | | | | | | | | | | | |
| D0516: Contract Risk/Inflation Provision | 0 | 0 | 31,222 | 31,222 | 13,009 | 0 | 0 | 0 | 0 | 0 | (31,222) |
| | | | | | | | | | | | |
| **TOTAL Vacancy Management** | **7,719,568** | **49,202** | **(187,335)** | **7,581,435** | **3,158,931** | **2,219,474** | **257,522** | **0** | **2,476,996** | **7,731,003** | **149,568** |

## CORPORATE PERFORMANCE REPORT 2026/27 Q1 – ANNEX A-1

COTSWOLD District Council



## Income Streams

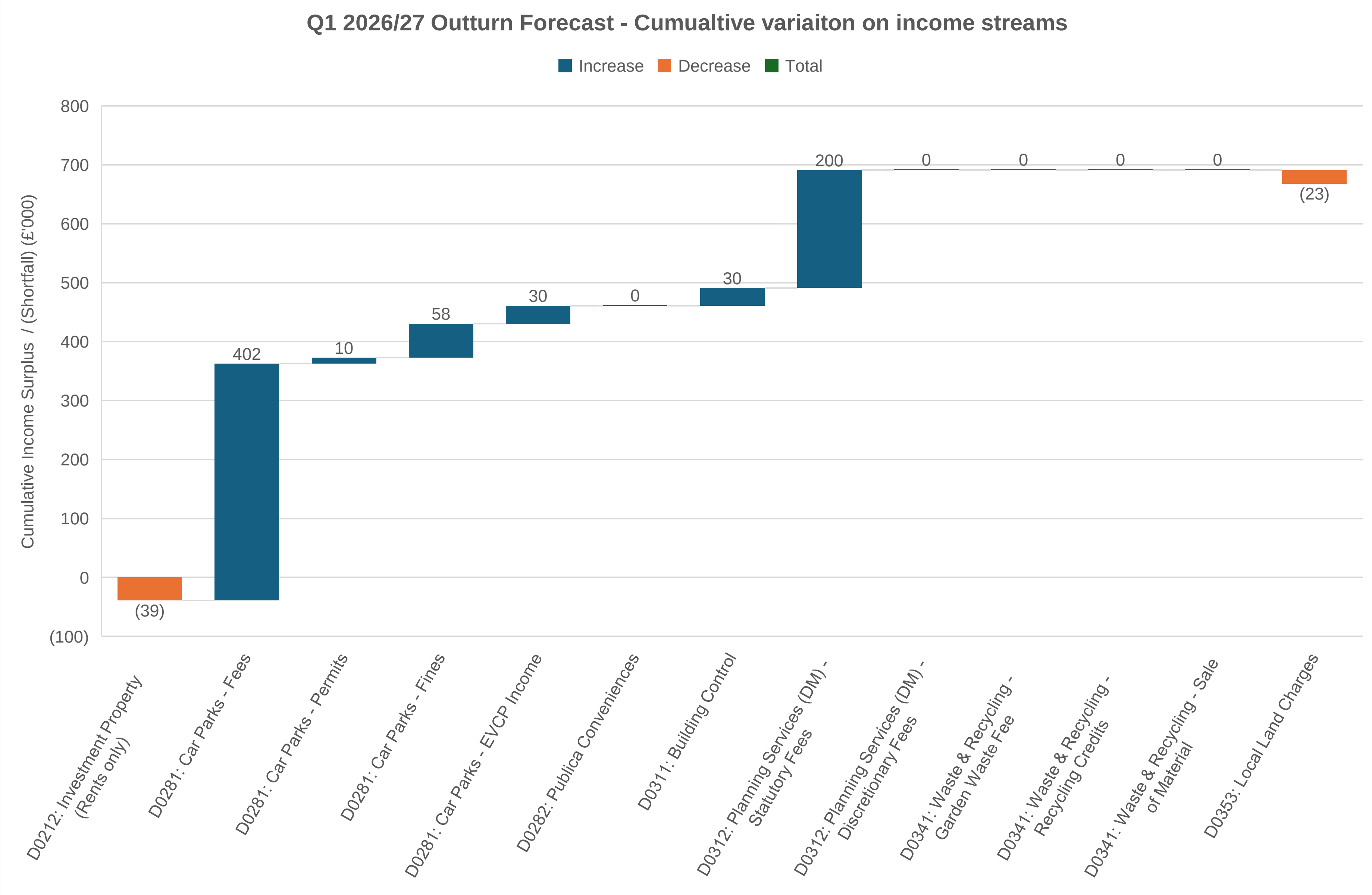
**1.38** The table below and accompanying charts provides analysis of the financial performance across the Council's major income streams. Net additional income of £0.668m is anticipated by the end of the financial year and has been included in the wider outturn forecast.

**1.39** Income from Car Parks (Fees, Permits, Fines) has remained above the budgeted level. Whilst this was the case in 2025/26 this improved position was not reflected in the 2026/27 budget with the prudent assumption that until a longer-term trend was clear, the council should continue to assume a level of car park income in-line with activity levels from 2024/25.

**1.40** As highlighted in para 1.16, income from planning fees has continued to be above budgeted levels. As with car park income, this increased level of activity was not reflected in the 2026/27 in part due to the progress of the Council's Local Plan likely to reduce the level of speculative planning applications.

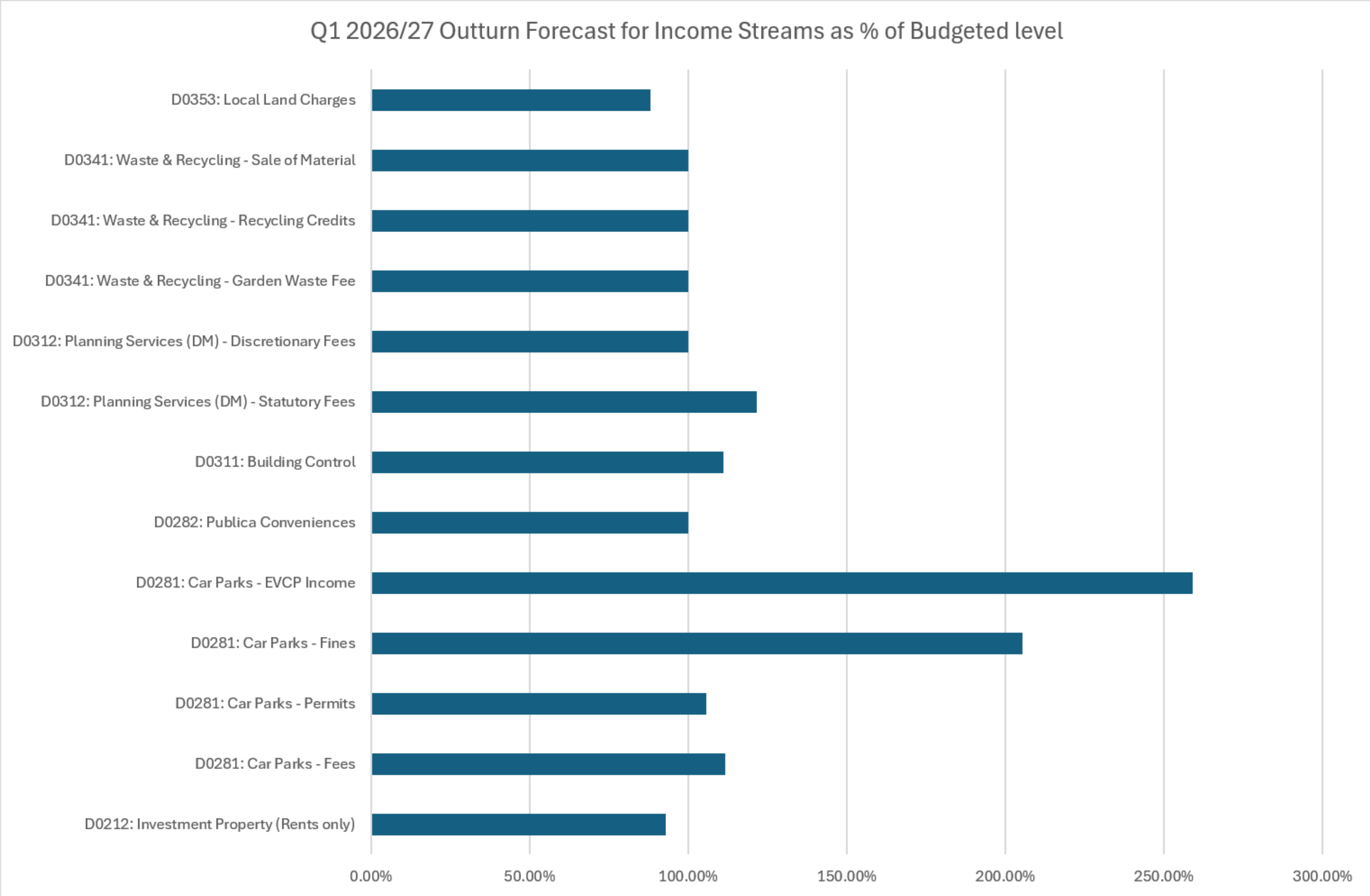
| Income Budget | 2026/27 Latest Income Budget (£'000) | 2026/27 Profiled Budget to Q1 (£'000) | 2026/27 Actuals to Q1 (£'000) | 2026/27 Outturn Forecast (£'000) | 2026/27 Outturn Variance (£'000) |
|---|---|---|---|---|---|
| D0212: Investment Property (Rents only) | (556) | 0 | (221) | (517) | 39 |
| D0281: Car Parks - Fees | (3,468) | (834) | (933) | (3,869) | (402) |
| D0281: Car Parks - Permits | (177) | (42) | (55) | (187) | (10) |
| D0281: Car Parks - Fines | (55) | (10) | (31) | (113) | (58) |
| D0281: Car Parks - EVCP Income | (19) | 0 | 2 | (49) | (30) |
| D0282: Public Conveniences | (138) | (35) | (42) | (138) | 0 |
| D0311: Building Control | (270) | (68) | (89) | (300) | (30) |
| D0312: Planning Services (DM) - Statutory Fees | (924) | (231) | (354) | (1,124) | (200) |
| D0312: Planning Services (DM) - Discretionary Fees | (197) | (49) | (54) | (197) | 0 |
| D0341: Waste & Recycling - Garden Waste Fee | (1,596) | (1,596) | (1,585) | (1,596) | 0 |
| D0341: Waste & Recycling - Recycling Credits | (600) | (100) | (186) | (600) | 0 |
| D0341: Waste & Recycling - Sale of Material | (242) | (40) | 21 | (242) | 0 |
| D0353: Local Land Charges | (195) | (49) | (38) | (172) | 23 |
| | **(8,436)** | **(3,053)** | **(3,564)** | **(9,104)** | **(668)** |

COTSWOLD District Council



# CORPORATE PERFORMANCE REPORT 2026/27 Q1 – ANNEX A-1

COTSWOLD
District Council



**D05: NON-SERVICE**

**Treasury Management**

**1.41** Dividends from the Council's longer-term investments (Pooled funds and Real Estate Investment Trusts) of £0.124m were received in the three months to the 30 June 2026 year achieving a return of 4.54%. Interest from short term cash deposits including the Debt Management Office (DMO) totalled £0.212m. Overall investment income for Q1 was overachieved by £0.085m. However, a year end underachievement of £0.015m is forecast due to reducing surplus cash balances being available for investment and higher dividend distribution from two pooled funds being received in Quarter one.

**1.42** It should be noted that the budgeted level of net investment income for 2026/27 is £1.075m – a decrease of £0.133m over the 2025/26 budgeted level and recognises the current interest rate position. This is a prudent estimate for the year and is lower than the final 2025/26 level of investment income achieved of £1.507m.

**1.43** It is not expected that the current interest rate level will be maintained over the MTFS period, as set out in Section 3 of this report, with expectations of investment income in 2027/28 reducing to around £0.500m.

**1.44** A prudent forecast of investment income has been included in the outturn forecast of £1.159m. This includes the expectation that the base rate will remain at 3.75% through the remainder of the financial year.

**1.45** The level of investment income for the year will depend on the performance of both short-term investments (Money Market Funds, deposits with the DMO) and dividends from the long-term investment. The table below provides members with a high-level overview of the Council's Treasury Management investments on 30 June 2026.

**1.46** Interest from loans is forecast to be £0.099m overachieved as a result of higher than anticipated interest income following the securitisation of the Cottsway Housing

Association Loan in June 2026. This triggered the receipt of interest that had initially been expected in 2025/26, resulting in additional income being recognised in 2026/27.

**Table 6 – Treasury Management Investments**

| Investment type | Balance Invested at 30/06/26 (£'000) | Investment Income received 2026/27 (£'000) | Interest Rates at 30/06/26 (%) | Expected Annual Interest 2026/27 |
|---|---|---|---|---|
| Bank of England DMADF | 2,190 | 86 | 3.88 | 165,933 |
| **Money Martket Funds** | | | | |
| Federated Money Market Fund | 3,000 | 29 | 3.83 | 94,053 |
| DGLS Money Market Fund | 3,000 | 28 | 3.82 | 112,994 |
| Insight Liquidity Money Market Fund | 3,000 | 27 | 3.76 | 68,045 |
| Lloyds Instant Access | 215 | 3 | 3.51 | 4,379 |
| Santander Call Account | 1 | - | 1.73 | 1,316 |
| Other Short-term deposits | 2,000 | 39 | 3.93 | 38,794 |
| **Real Estate Investment Trusts (REIT)** | | | | |
| Fundamentum Housing REIT | 640 | - | 3.01 | 30,000 |
| **Cash Plus Fund** | | | | |
| Federated Cash Plus Fund | 1,277 | - | N/A | - |
| **Pooled Funds** | | | | |
| CCLA Property Fund | 2,170 | 0 | 4.16 | 100,000 |
| Schroders Income Maximiser Fund | 956 | 12 | 4.46 | 65,000 |
| CCLA Cautious Multi Assets Fund | 919 | 10 | 4.10 | 30,000 |
| M&G UK Income Fund | 2,140 | 60 | 5.22 | 100,000 |
| Ninety-One (Investec) Diversified Fund | 1,849 | 22 | 4.17 | 90,000 |
| Columbia Threadneedle Bond Fund | 1,951 | 20 | 4.07 | 90,000 |
| | **25,309** | **336** | **3.96** | **990,514** |

**1.47** Council approved the Capital Strategy and the Treasury Management Strategy (including the Non-Treasury Management Investment Strategy) at their meeting on 23 February 2026. Audit and Governance Committee have responsibility for reviewing and monitoring treasury management arrangements in accordance with the CIPFA Treasury Management Code and receiving performance reports. The Council adopted the Chartered Institute of Public Finance and Accountancy's Treasury Management in the Public Services: Code of Practice (the CIPFA Code) which requires the Council to approve, as a minimum, treasury management semi-annual and annual outturn reports.

**1.48** The CIPFA Code was updated in 2021 and includes the new requirement, mandatory from 01 April 2023, of quarterly reporting of the treasury management prudential indicators. The non-treasury prudential indicators are expected to be included in the Council's usual revenue and capital monitoring reports. Section 6 and **Annex A-2** of this report provide members with an overview on the non-treasury position.

**Corporate Income and Expenditure, Provisions, and Risk**

**1.49** As outlined in Table 3 there are variations forecast across the Corporate Income and Expenditure budgets. These budgets support the General Fund Revenue budget and are typically the non-service items such as Treasury Management, financing, contingency budget, and provisions for risk.

**1.50** As outlined earlier in this section, the overachievement of the Council's investment income is attributable to higher than anticipated interest income following the securitisation of the Cottsway Housing Association Loan in June 2026. This triggered the receipt of interest that had initially been expected in 2025/26, resulting in additional income being recognised in 2026/27.

**1.51** The forecast outturn assumes the salary contingency of £0.031m will not be used.

**1.52** Corporate Income and Expenditure includes a proposed transfer of £0.283m to earmarked reserves. This comprises £0.200m of Planning income to be transferred to the Planning Appeals Reserve and £0.83m of additional interest from the Cottsway Loan to be transferred to the Treasury Management Reserve

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**Annex A-2 - Capital Programme 2026/27 - Q1**

| Capital Programme by Service Area | 2026/27 OB (£'000) | Slippage From 2025/26 (£'000) | 2026/27 Schemes approved in-year (£'000) | 2026/27 Actuals to Q1 (£'000) | 2026/27 Variance to Q1 (£'000) | 2026/27 Commitments to Q1 (£'000) | 2026/27 Forecast Variance (£'000) | Commentary |
|---|---|---|---|---|---|---|---|---|
| **Leisure and Communities:** | | | | | | | | |
| Replacement Leisure Equipment | 500 | | | 0 | (500) | 0 | 0 | The project is underway, and the full allocation of the approved budget is expected to be utilised. Installation activities are anticipated to take place during December 2026.. |
| Spa pool - Bourton Leisure Centre | | 6 | | 0 | (6) | 6 | 0 | During 2026/27, contractors encountered several challenges during the installation of the spa pool. One leak was identified and repaired; however, a second leak was subsequently discovered. Although Freedom Leisure commissioned multiple contractor investigations, the source of the second leak could not be identified. As a result, installation works could not progress until the issue was resolved.<br><br>Remedial works have now been commissioned, with the approved quotation remaining within the available budget. The contractor is currently undertaking the works, and the project is expected to be completed shortly, subject to no further unforeseen issues arising. |
| | | | | | | | | |
| Pool cover installation at Chipping Campden and Bourton-on-the-Water leisure centres | 0 | | 27 | 0 | (27) | 27 | 0 | Proposed to seek approval to fund pool covers at leisure centre to fund from the Council's Community Municipal Investment (CMI). A functioning pool cover is one of the most effective ways of reducing the heating cost of a swimming pool, the cover helps to retain heat within the body of the pool tank which significantly reduces heat loss to the surrounding pool hall. |
| | | | | | | | | |
| CIL - Cycle path provision | 28 | | | 0 | (28) | 0 | 0 | Draft CIL Legal Agreement currently with GCC awaiting their agreement. |

| Capital Programme by Service Area | 2026/27 OB (£'000) | Slippage From 2025/26 (£'000) | 2026/27 Schemes approved in-year (£'000) | 2026/27 Actuals to Q1 (£'000) | 2026/27 Variance to Q1 (£'000) | 2026/27 Commitments to Q1 (£'000) | 2026/27 Forecast Variance (£'000) | Commentary |
|---|---|---|---|---|---|---|---|---|
| CIL - Farmors School 3G Pitch | 723 | | | 0 | (723) | 723 | 0 | CDC Legal Team have been instructed to sign and seal the CIL Legal Agreements, this will then allow for funds to be transferred to Farmors School. |
| CIL -Redesdale Hall - Improvements | 200 | | | 0 | (200) | 200 | 0 | CDC Legal Team have been instructed to sign and seal the CIL Legal Agreements, this will then allow for funds to be transferred to Redesdale Hall. |
| | | | | | | | | |
| | | | | | | | | |
| UK Rural Prosperity Fund Projects | 0 | 8 | | 8 | 0 | 0 | 0 | Funding now utilised in full. |
| UK Shared Prosperity Fund Projects | 0 | 34 | | 26 | (8) | 8 | 0 | It is expected that the last couple of grants will complete by the end of Q.2. |

| Capital Programme by Service Area | 2026/27 OB (£'000) | Slippage From 2025/26 (£'000) | 2026/27 Schemes approved in-year (£'000) | 2026/27 Actuals to Q1 (£'000) | 2026/27 Variance to Q1 (£'000) | 2026/27 Commitments to Q1 (£'000) | 2026/27 Forecast Variance (£'000) | Commentary |
|---|---|---|---|---|---|---|---|---|
| | | | | | | | | |
| **Strategic Housing:** | | | | | | | | |
| Private Sector Housing Renewal Grant (DFG) | 1,689 | 167 | | 459 | (1,397) | 518 | 0 | The estimated expenditure for this year is £1.7mm, this exceeds the funding currently available. The situation is being monitored closely. S151 Officers from across the district are aware, and in discussions with Gloucestershire County Council, as lead of the pooled arrangement for DFG, on how to manage the expected demands of the fund across the county. |
| Bromford Joint Venture Partnership | 150 | 70 | | 0 | (220) | 0 | (220) | Project slippage on the wider programme by Bromford (drainage requirements - Thames Water). Options are being discussed re: drainage solution. |
| | | | | | | | | |
| **Environment:** | | | | | | | | |
| Waste & Recycling receptacles | 84 | | | 40 | (44) | 0 | 40 | Rolling budget for the purchase of waste receptacles due to growth in properties or replacements. Budget to be reviewed for 2027/28. |

| Capital Programme by Service Area | 2026/27 OB (£'000) | Slippage From 2025/26 (£'000) | 2026/27 Schemes approved in-year (£'000) | 2026/27 Actuals to Q1 (£'000) | 2026/27 Variance to Q1 (£'000) | 2026/27 Commitments to Q1 (£'000) | 2026/27 Forecast Variance (£'000) | Commentary |
|---|---|---|---|---|---|---|---|---|
| Provision for financing of Ubico Vehicles | 6,000 | 273 | | 0 | (6,273) | 3,554 | 0 | Due to slippage the 5 x 3.5t cage vehicles ordered last year are expected for delivery during July/August. Orders have been placed for new kerbside sort vehicles as part of the fleet replacement programme, to the value of £3.281m.<br><br>Tender not yet started for electric recycling vehicle as waiting for progress on installation of EV charger.<br><br>Tender not yet started for compact sweeper whilst awaiting outcome of operational trials.<br><br>We will review 2026/27 and 2027/28 profiled spend as part of 2027/28 budget setting. |
| Fuel Bunkering (Ubico) | 100 | | | 0 | (100) | 0 | 0 | A report on the fuel tank installation, aimed at enabling the purchase of HVO and reducing carbon emissions, was presented to Cabinet in January 2026. The fuel tank location has now been confirmed at the depot, and further due diligence is underway, including obtaining estimates for associated civils work and updating the costs for the tank, fuel management system, and security requirements. |
| In cab technology (Waste) | 0 | 15 | | 14 | (1) | 15 | (1) | 40 tablets have been purchased to run the In-Cab software across the Waste and Recycling fleet. |
| On Street Residential Chargepoint Scheme (ORCS) | 0 | 65 | | 0 | (65) | 65 | 0 | EVCP now installed and operational at Brewery Court |

| Capital Programme by Service Area | 2026/27 OB (£'000) | Slippage From 2025/26 (£'000) | 2026/27 Schemes approved in-year (£'000) | 2026/27 Actuals to Q1 (£'000) | 2026/27 Variance to Q1 (£'000) | 2026/27 Commitments to Q1 (£'000) | 2026/27 Forecast Variance (£'000) | Commentary |
|---|---|---|---|---|---|---|---|---|
| Replace/Upgrade Pay and Display machines | 165 | | | 0 | (165) | 0 | 0 | The tender process is now complete. Site surveys are underway prior to final installation roll-out. It is expected that installations will complete during Q.2/Q.3. |
| **ICT, Change and Customer Services** | | | | | | | | |
| ICT Capital | 150 | | | 0 | (150) | 0 | 0 | Funds the rolling replacement of laptops and other associated hardware. |
| Planning Documents and Scanning Solution | 200 | | | 0 | (200) | 0 | (200) | Planning service and ICT are scoping improvements to the IDOX system as part of a wider service transformation agenda to focus on delivering service efficiencies through ICT.No expenditure is anticipated in 2026/27, with the £0.200m budget provision expected to be required in a later year. |
| **Assets and Property:** | | | | | | | | |
| Asset Management Strategy | 400 | 200 | | 0 | (600) | 50 | 0 | £50k is committed to fund asbestos removal works at 27/27a Dyer Street. In addition, roof replacement works at Abberley House are estimated to cost between £400k and £500k. While these works have not yet commenced, they are currently in the planning stage, and it is anticipated that the project will be completed by the end of the financial year. |
| Cirencester LC Lift Replacement | 100 | | | 0 | (100) | 0 | 0 | Feasibility works and tender process have taken place. Work has not yet started but it is expected that the replacement will complete during this financial year. |
| | **10,489** | **838** | **27** | **547** | **(10,807)** | **5,166** | **(381)** | |

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**ANNEX A-3**
**NON-TREASURY MANAGEMENT PRUDENTIAL INDICATORS**

**ANNEX A-3: Non-Treasury Prudential Indicators**

## I. BACKGROUND

**1.1** The Council measures and manages its capital expenditure, borrowing and commercial and service investments with reference to the following indicators. It is a requirement of the CIPFA Prudential Code that these are reported on a quarterly basis

## 2. CAPITAL EXPENDIUTRE

**2.1** Cotswold District Council has undertaken and is planning capital expenditure as summarised below.

| Capital Expenditure | 2025/26 Outturn (£) | 2026/27 Forecast (£) | 2027/28 Budget (£) | 2028/29 Budget (£) |
|---|---|---|---|---|
| General Fund Services | 2,604,000 | 10,973,000 | 4,057,000 | 2,130,000 |
| Capital Investments | 0 | 0 | 0 | 0 |

**2.2** The main General Fund capital projects this year include expenditure in respect of Disabled Facilities Grants, purchase of Ubico Vehicles, CIL approved project (Farmors School 3G Pitch) and replacement leisure expenditure.

## 3. CAPITAL FINANCING REQUIREMENT

**3.1** The Council's cumulative outstanding amount of debt finance is measured by the capital financing requirement (CFR). This increases with new debt-financed capital expenditure and reduces with Minimum Revenue Provision (MRP) and capital receipts used to replace debt.

| Capital Financing Requirement (CFR) | 2025/26 Outturn (£) | 2026/27 Forecast (£) | 2027/28 Budget (£) | 2028/29 Budget (£) |
|---|---|---|---|---|
| General Fund Services | 449,000 | 428,000 | 396,000 | 363,000 |
| Capital Investments | 0 | 0 | 0 | 0 |

## 4. GROSS DEBT AND THE CAPITAL FINANCING REQUIREMENT

**4.1** Statutory guidance is that debt should remain below the capital financing requirement, except in the short term. The Council has complied and expects to continue to comply with this requirement in the medium term as is shown below.

**ANNEX A-3**
**NON-TREASURY MANAGEMENT PRUDENTIAL INDICATORS**

| Gorss Debt and CFR | 31/3/2026 Outturn (£) | 31/3/2027 Forecast (£) | 31/3/2028 Budget (£) | 31/3/2029 Budget (£) | Debt at 30/6/26 |
|---|---|---|---|---|---|
| Debt (incl PFI and Leases) | 161,581 | 55,000 | 0 | 0 | 161,581 |
| Capital Financing Requirement | 449,000 | 428,000 | 396,000 | 363,000 | |

## 5. DEBT AND THE AUTHORISED LIMIT AND OPERATIONAL BOUNDARY

**5.1** The council is legally obliged to set an affordable borrowing limit (also termed the Authorised Limit for external debt) each year. In line with statutory guidance, a lower "operational boundary" is also set as a warning level should debt approach the limit.

| Gross Debt and CFR | 31/3/2026 Outturn (£) | Debt at 30/6/26 (£) | 2026/27 Authorised Limit (£) | 2026/27 Operational Boundary (£) | Complied? Yes/No |
|---|---|---|---|---|---|
| Debt (incl PFI and Leases) | 161,581 | 161,581 | 10,000,000 | 5,000,000 | Yes |
| Capital Financing Requirement | 0 | 0 | 0 | 0 | Yes |
| TOTAL Debt | 161,581 | 161,581 | 10,000,000 | 5,000,000 | |

**5.2** Since the operational boundary is a management tool for in-year monitoring it is not significant if the boundary is breached on occasions due to variations in cash flow, and this is not counted as a compliance failure.

## 6. NET INCOME FROM COMMERCIAL AND SERVICE INVESTMENTS TO NET REVENUE STREAM

**6.1** The Council's income from commercial and service investments as a proportion of its net revenue stream has been and is expected to be as indicated below.

| | 2025/26 Outturn (£) | 2026/27 Forecast (£) | 2027/28 Budget (£) | 2028/29 Budget (£) |
|---|---|---|---|---|
| Total net income from service and commercial investments | 357,992 | 501,014 | 521,937 | 529,234 |
| Proportion of net revenue stream | 2.14% | 2.91% | 3.16% | 3.21% |

## 7. PROPORTION OF FINANCING COST TO NET REVENUE STREAM

**7.1** Although capital expenditure is not charged directly to the revenue budget, interest payable on loans and MRP are charged to revenue.

**7.2** The net annual charge is known as financing costs, this is compared to the net revenue stream i.e., the amount funded from Council Tax, Business Rate, and general government grants.

**ANNEX A-3**
**NON-TREASURY MANAGEMENT PRUDENTIAL INDICATORS**

| | 2025/26 Outturn (£) | 2026/27 Forecast (£) | 2027/28 Budget (£) | 2028/29 Budget (£) |
|---|---|---|---|---|
| Financing costs (£) | 12,216 | 35,000 | 33,000 | 32,000 |
| Proportion of net revenue stream | 0.07% | 0.20% | 0.20% | 0.19% |

(END)

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# Q1 2026–27 COTSWOLD PERFORMANCE SUMMARY

Delivery remained positive overall during Q1 2026–27. Service performance was strong across most key areas, including planning income, Business Rates collection, benefits processing, customer satisfaction, regulatory compliance, waste collection reliability, affordable housing delivery and leisure participation. The principal pressures were Land Charges turnaround times, Building Control satisfaction, recycling performance. Long-term empty properties reduced to 878, 375 of those empty for over two years. Corporate Plan actions progressed well, 42 were on target, two were complete and one was off target with recovery action being taken.

## Corporate Plan Action Summary

- **Transformation and governance:** Digital and transformation workstreams progressed, the Staff Retention Strategy received Cabinet approval in April and the draft Local Plan was published on 24 July 2026 ahead of scrutiny consideration.
- **Waste and fleet:** Tenders were awarded for food waste, refuse collection and recycling vehicles. Online reporting for full litter bins and fly-tipping was expanded and integrated into Ubico processes.
- **Climate:** The Electric Vehicle Charge Point programme was completed. The Climate Change Programme was updated, depot works including HVO fuel provision progressed, and retrofit activity is being reviewed to maximise impact.
- **Housing:** The affordable housing partnership and rural exception site pipeline continued to develop. The Preventing Homelessness Strategy review is underway, with most actions on or ahead of target.
- **Communities & Youth:** Strong forum attendance, successful Easter HAF delivery and 14 community events engaged nearly 1,000 residents. Apprenticeships progressed, UKSPF and REPF projects neared completion, and the RAU Innovation Village outline application was approved.

## Service performance above target

- **Income & Collection Rates:** Non-Domestic Rates collection reached 28.28% against 27%. Council Tax collection was close to target at 32.95% against 33%. Planning income was £353,625 against £254,124, with pre-application income at £54,121 against £35,500.

- **Benefits processing:** Council Tax Support new claims averaged 13 days against 20 days; change events averaged 2 days against 5; and Housing Benefit changes averaged 5 days against a target of 9.
- **Customer and regulatory services:** Telephone satisfaction was 97% against 90%, 94% of FOI requests were answered within 20 days, and high-risk food inspections and one-day risk assessments both achieved 100%.
- **Planning:** Major applications achieved 100% within agreed timescales against 70%, other applications achieved 93% against 90%, and appeals allowed remained favourable at 24% against a target of 30%.
- **Housing, waste and leisure:** 27 affordable homes were delivered against a target of 25. Residual waste performed well at 88.83kg per household against a target of 97kg, missed bins were 68 per 100,000 against a target of 80, gym memberships reached 4,494 against 4,450 and leisure visits reached 155,785 against a Q1 target of 142,000.

### Service performance near target

- **Minor planning applications:** 85% were determined within agreed timescales against the new 90% service target, although performance remained within the second-quartile benchmark position.
- **Housing Benefit overpayment:** LA error and administrative delay was 0.45% against the 0.35% local target, but below the 0.48% national threshold; recovery is expected in Q2.
- **Recycling:** Household waste recycled was 57% against 61%, broadly stable compared with the same period last year.

### Performance below target

**Building Control satisfaction** was 76% against a target of 90%. The result was based on only five survey responses, three of which were completely satisfied. Market share averaged 74%, with 162 applications processed.

**Land Charges** recorded 39.67% of official searches completed within 10 days against the 90% target, with average turnaround at 13 days. A strategic recovery plan is now in place covering access routes, triage and processing, products, and fees and charges. New ways of working will be developed over the summer, followed by implementation and refinement in the autumn.

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Delivering great services locally

# PERFORMANCE REPORT:
# **April – June 2026**

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# Summary Index

COTSWOLD District Council

# Summary Index

COTSWOLD
District Council

# Summary Index

COTSWOLD District Council

| Area | KPI Name | RAG | Page |
|---|---|---|---|
| Waste and Environment | Number of fly tips collected and percentage that result in an enforcement action | | 32 |
| | Percentage of high-risk food premises inspected within target timescales | | 33 |
| | % High risk notifications risk assessed within 1 working day | | 34 |
| | Percentage of household waste recycled | | 35 |
| | Residual Household Waste per Household (kg) | | 36 |
| | Missed bins per 100,000 | | 37 |
| Leisure | Number of visits to the leisure centres & (Snapshot) Number of gym memberships | | 38 |

# A note on performance benchmarking

Benchmarking can be a useful tool for driving improvement; by comparing our performance with other similar organisations, we can start a discussion about what good performance might look like, and why there might be variations, as well as learning from other organisations about how they operate (process benchmarking).

When we embark on performance benchmarking, it is important to understand that we are often looking at one aspect of performance i.e. the level of performance achieved. It does not take into account how services are resourced or compare in terms of quality or level of service delivered, for example, how satisfied are residents and customers? Furthermore, each council is unique with its own vision, aim and priorities, and services operate within this context.

Benchmarking has been included wherever possible ranking against Chartered Institute of Public Finance and Accountancy (CIPFA) Nearest Neighbours model which uses a range of demographic and socio-economic indicators to identify the local authorities most similar to our own. Cotswold's identified Nearest Neighbours are Babergh, Chichester, East Hampshire, Horsham, Lewes, South Hams, Sevenoaks, Stratford-on-Avon, Stroud, Tewkesbury, West Devon, West Oxfordshire and Wychavon. Additional investigations are underway to provide it for those metrics that are missing comparisons.

A RAG (red, amber, green) status has been applied to each KPI to provide a quick visual summary of the status of that KPI for the quarter. Additionally, RAG status has been added to the direction of travel for each metric to show how the performance against last quarter and the same quarter compared to last year is progressing.

# A note on Standard Deviation

Standard deviation is included in this report to provide insight into the consistency of performance, not just the average results. While averages show overall trends, standard deviation highlights how much variation exists around those averages. A low standard deviation suggests performance is stable and predictable, whereas a high standard deviation indicates inconsistency, which may warrant further investigation. This helps identify areas where performance may be less reliable, supporting more informed decision-making and targeted improvements.

We have used 1 standard deviation in this report to help understand variation in performance and to monitor consistency over time. This approach highlights typical fluctuations around the average, allowing us to identify patterns and potential areas of concern without focusing solely on extreme outliers.

# Overall Performance

COTSWOLD
District Council

Overall, the Council delivered strong performance across most key services in Q1. Planning income target and Business Rates collection were above target, Council Tax was near target, major planning applications were processed well within agreed timescales, with minors and others near target. Customer satisfaction, regulatory compliance, waste services and leisure participation all remained strong. Affordable housing delivery also performed better than target. Processing times for Council Tax Support and Housing Benefit change events, performed excellently, and well below target.

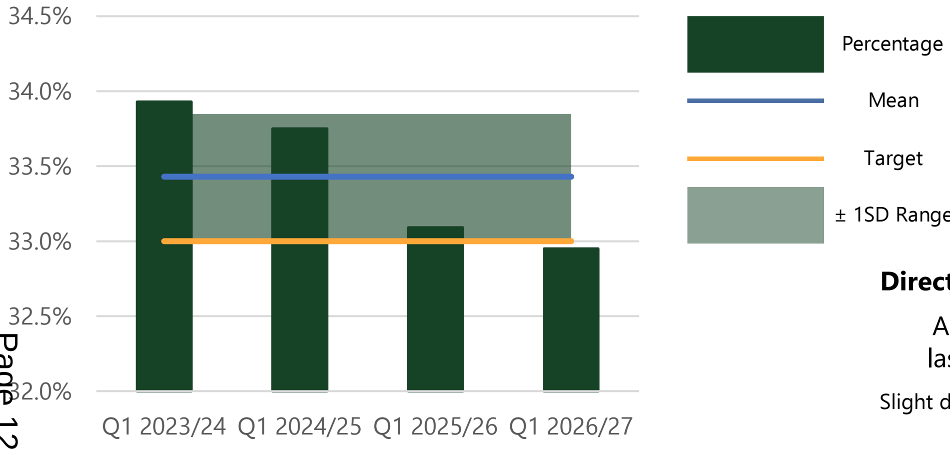
A smaller number of services experienced ongoing pressures. Land Charges performance dipped following staffing shortages but is now recovering, planning appeals allowed remain above target but expected to reduce into Q2. Recycling rates declined marginally.

The Council remains committed to further improving its performance and service delivery and actively investing in the development and implementation of automation and self-serve options for customers. By providing accessible and efficient self-help tools, customers can address their queries and concerns independently, leading to a decrease in the need for repeated interactions with services. It will continue to monitor and assess the impact of improvement programs in reducing customer contact and enhancing operational efficiency.

# Percentage of Council Tax Collected

COTSWOLD District Council

INDEX




**Higher is Good**

| | |
|---|---|
| Target | 33% |
| Actual | 32.95% |

**Direction of Travel**

Against last Year

Slight decrease since last year



**How do we compare?**

Benchmarking via Gov.uk Tables and Individual Council Websites using CIPFA Nearest Neighbours – Latest dataset is 2025-26 Collection Rates

| *2025-26 Benchmark* | % | CIPFA Rank | Quartile |
|---|---|---|---|
| South Hams | 98.51 | 1/16 | Top |
| Babergh | 98.26 | 3/16 | Top |
| **Cotswold** | **97.94** | **9/16** | **Third** |
| Sevenoaks | 97.77 | 11/16 | Third |
| Chichester | 97.07 | 16/16 | Bottom |

Council Tax Collection remained strong in Q1, with only a small year-on-year decline of 0.14%.
A refreshed Direct Debit campaign is planned to boost uptake and support future performance. Recovery work is fully up to date, and processing times remain steady at around five working days.

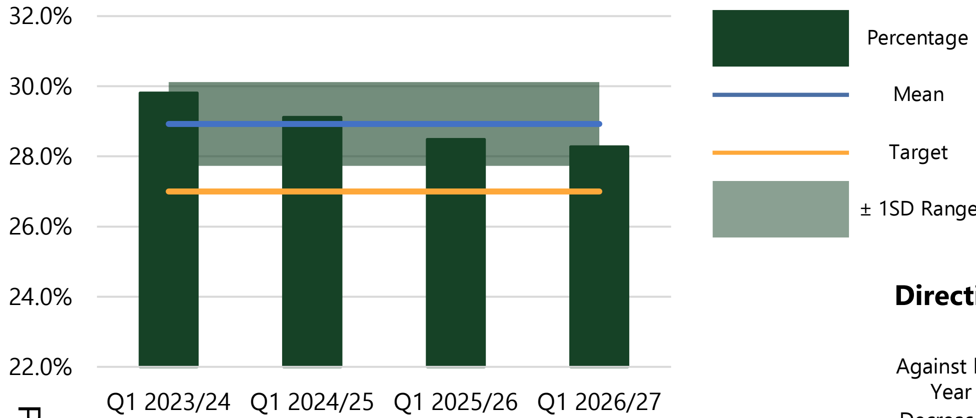
The table below shows historic Council Tax collection rates alongside outstanding balances.

| | **2023-2024** | **2024-2025** | **2025-2026** | **Total Outstanding** |
|---|---|---|---|---|
| Balance at Quarter End | 718,452.13 | 907,848.83 | 1,746,732.98 | **3,373,033.94** |
| % Collected | 99.30% | 99.10% | 98.20% | |

# Percentage of Non-domestic rates collected

COTSWOLD District Council

INDEX




**Higher is Good**

| | |
|---|---|
| Target | 27% |
| Actual | 28.28% |

**Direction of Travel**

Against last Year

Decreased since last year



**How do we compare?**

Benchmarking via Gov.uk Tables and Individual Council Websites using CIPFA Nearest Neighbours - Latest dataset is 2025-26 Collection Rates

| *2025-26 Benchmark* | % | CIPFA Rank | Quartile |
|---|---|---|---|
| Babergh | 98.92 | 2/16 | Top |
| South Hams | 98.68 | 4/16 | Top |
| **Cotswold** | **96.83** | **13/16** | **Bottom** |
| Chichester | 96.44 | 14/16 | Bottom |
| Sevenoaks | 95.83 | 15/16 | Bottom |

Cotswold collected 28.28% in Q1, a variance of 0.21% compared to same period last year. Performance has been supported by recent work to keep billing and account updates fully up to date, helping performance remain above target despite the small year-on-year movement. Operationally, NDR recovery work remains fully up to date, with processing backlogs stable at around 10 working days.

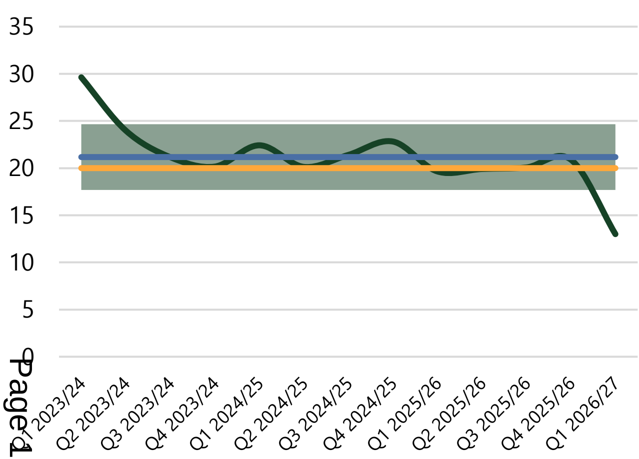
The table below displays the percentage of Non-Domestic Rates collected in respect of previous years, along with the outstanding amount:

| | **2023-2024** | **2024-2025** | **2025-2026** | **Total Outstanding** |
|---|---|---|---|---|
| **Balance at Quarter End** | £194,146.19 | £294,327.88 | £774,147.36 | £1,262,621 |
| **% collected** | 99.49% | 98.87% | 97.20% | |

# Processing times for Council Tax Support new claims

COTSWOLD
District Council

[INDEX](#)




**Lower is Good**

| | |
|---|---|
| Target | 20 |
| Actual | 13 |

**Direction of Travel**

Against last Quarter

Against last Year

Decreased since last quarter and since last year

**How do we compare?**

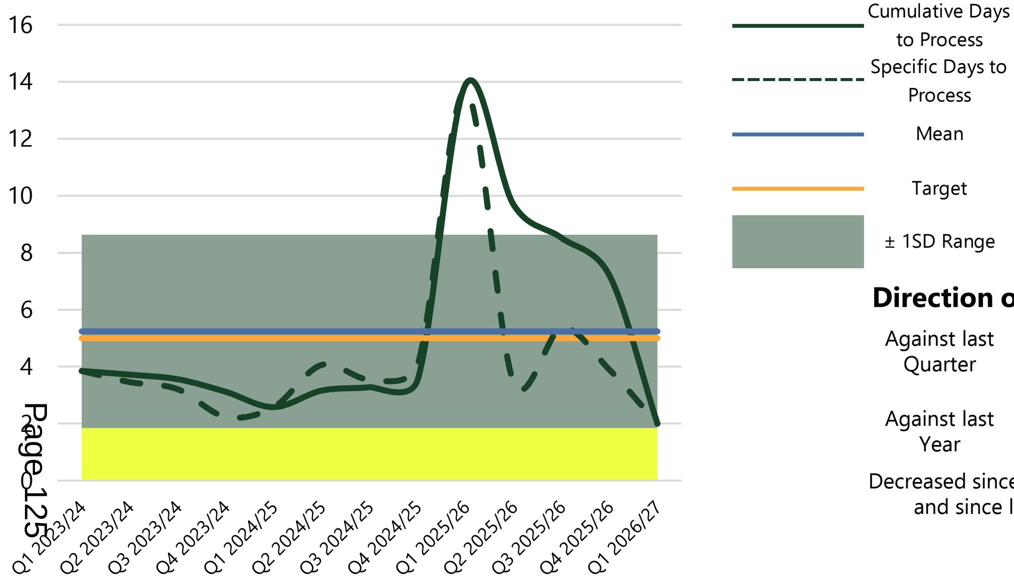
Gov.uk produces tables to show a snapshot of the number of CTS claimants at the end of each financial year. The below table shows number of claimants at the end of April 2026 and the percentage change from April 2025 for each authority.

| Q4 2025–26 *Benchmark* | Number of Claimants at end of April 2026 | Percentage Change since April 2025 |
|---|---|---|
| **Cotswold** | **3,742** | **-3.6%** |
| Babergh | 4,564 | -1.72% |
| South Hams | 4,844 | -1.08% |
| Sevenoaks | 5,708 | -3.3% |
| Chichester | 6,308 | -1.02% |

Processing times for Council Tax Support (CTS) new claims remained consistent across the year, with performance better than target in Q1.

# Processing times for Council Tax Support Change Events

INDEX

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**Lower is Good**

| | |
|---|---|
| Target | 5 |
| Actual | 2 |

**Direction of Travel**

Against last Quarter

Against last Year

Decreased since last quarter and since last year

Processing times for Council Tax Support changes continued to improve through Q1, with steady week-on-week reductions strengthening the position.

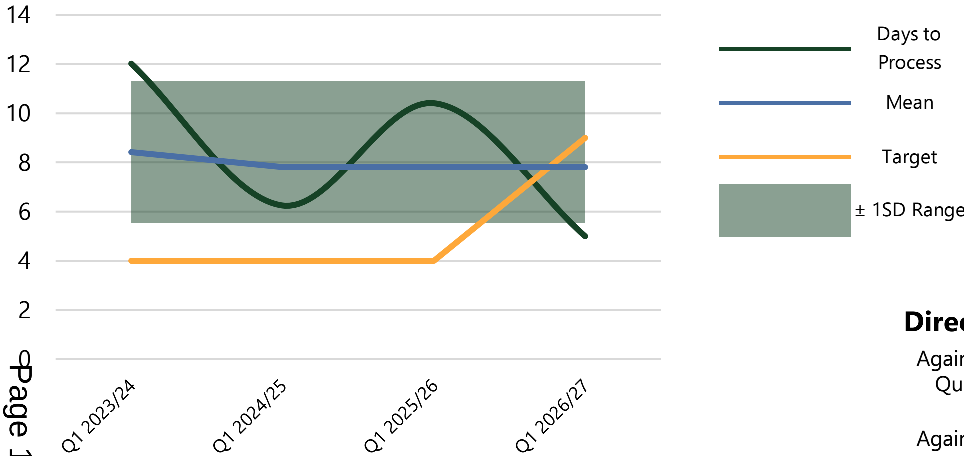
Q1 specific processing time was at 2 days, its lowest levels since last year.

How do we compare?

*Benchmarking currently not available. The Data & Performance Team will investigate options.*

# Processing times for Housing Benefit Change of Circumstances

INDEX




## Lower is Good

| | |
|---|---|
| Target | 9 |
| Actual | 5 |

## Direction of Travel

Against last Quarter

Against last Year

Decreased since last quarter and since last year

**How do we compare?**

Speed of processing for HB CoCs – LG Inform. Latest dataset is September - December (Q3 2025-26)

| *Q3 2025-26 Benchmark* | Days | CIPFA Nearest Neighbours Rank | Quartile |
|---|---|---|---|
| Babergh | 4 | 5/16 | Top |
| South Hams | 6 | 8/16 | Second |
| West Oxfordshire | 9 | 9/16 | Third |
| **Cotswold** | **12** | **12/16** | **Third** |
| Sevenoaks | 17 | 15/16 | Bottom |

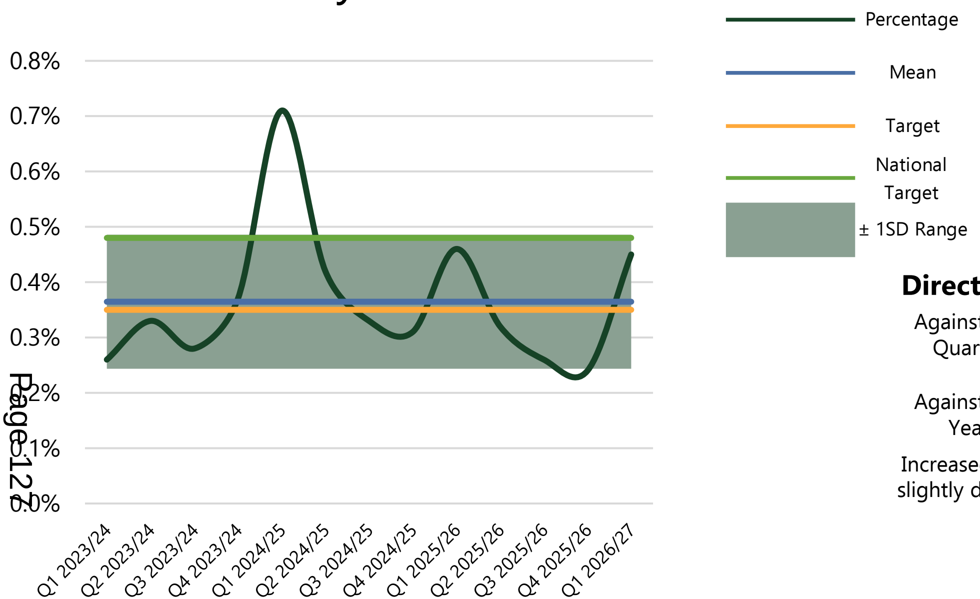
During Q1, the average processing times for Housing Benefit change of circumstances continued to improve, reaching its lowest levels since last year. New targets were set for the service this year, to account for backlogs and processing delays in previous years.

UC automation is now active, this alongside automated 7-day evidence prompts, are expected to encourage faster evidence submission and reduce processing timelines.

# Percentage of Housing Benefit overpayment due to LA error/admin delay

COTSWOLD District Council

INDEX

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**Lower is Good**

| | |
|---|---|
| Target | 0.35% |
| Actual | 0.45% |

**Direction of Travel**

Against last Quarter ↑

Against last Year ↓

Increased since last quarter and slightly decreased since last year

The Council is above its local target of 0.35% but remains below the national threshold of 0.48%.

Performance is expected to return within local tolerance in Q2, with no subsidy loss at this rate.

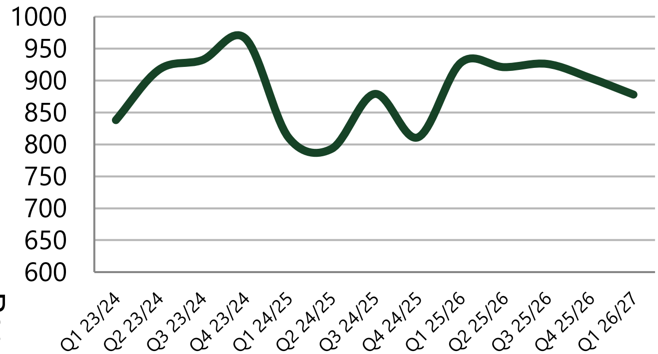
How do we compare?

*Benchmarking currently not available. The Data & Performance Team will investigate options.*

# (Snapshot) Long Term Empty Properties

COTSWOLD District Council

INDEX




**Direction of Travel**

Against last Quarter ⇩

Against last Year ⇩

Decreased since last quarter and since last year

**Lower is Good**

*No Target*

878



**How do we compare?**
Long Term Vacant Properties within districts - Benchmarking via Gov.uk

| *2025 Benchmark* | Properties | CIPFA Nearest Neighbours Rank | Quartile |
|---|---|---|---|
| Tewkesbury | 228 | 1/16 | Top |
| West Devon | 246 | 3/16 | Top |
| South Hams | 434 | 7/16 | Second |
| Stroud | 671 | 11/16 | Third |
| **Cotswold** | **938** | **14/16** | **Bottom** |
| Stratford-on-Avon | 1,181 | 16/16 | Bottom |

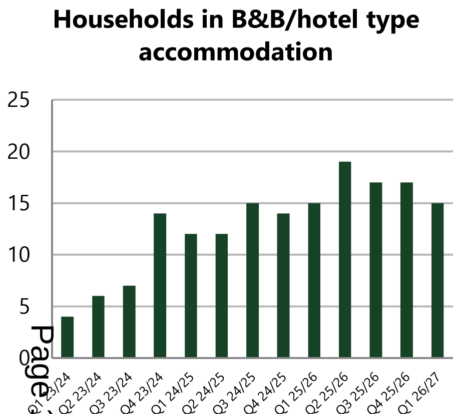
During Q1, the Council recorded a decrease in the number of long-term empty properties (defined as those vacant for six months or more).

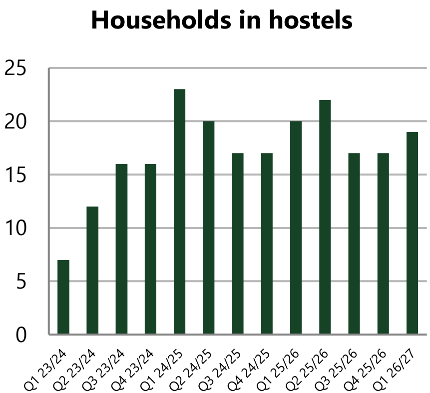
Most long-term empty properties have been vacant for less than two years, with 61% falling into this timeframe. If the measure focused solely on properties empty for more than two years, the figures would reduce significantly to 375 properties.

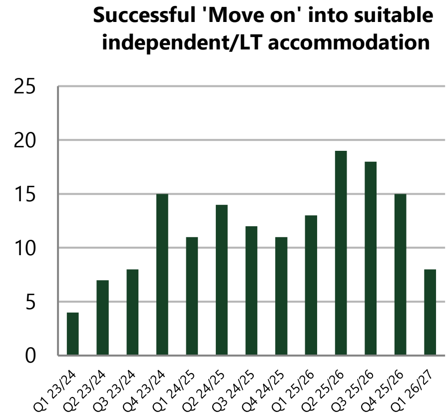
# (Snapshot) Number of households in B&B/hotel-type accommodation & Hostels (LA owned or managed); and Number of successful 'Move On' into suitable independent/long-term accommodation from B&Bs/hotels/hostels

COTSWOLD District Council

INDEX




## Direction of Travel

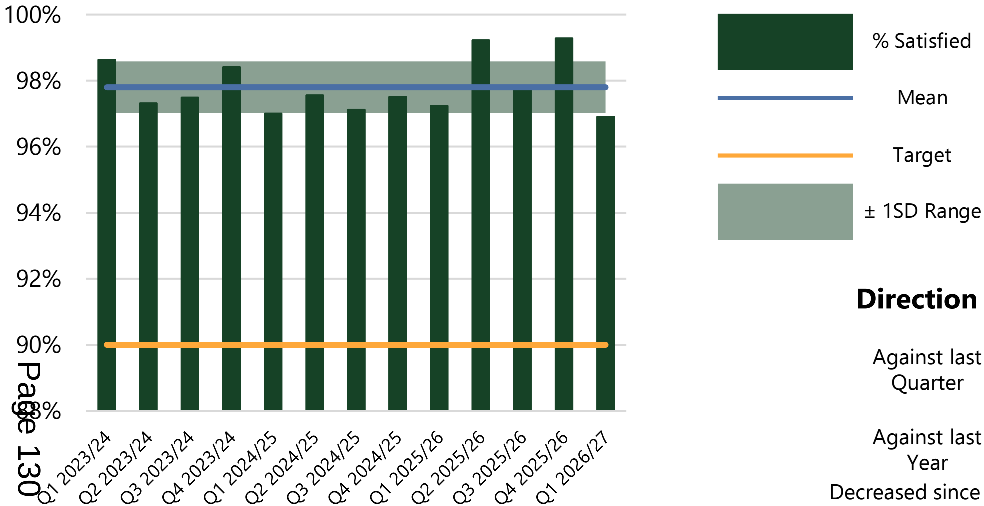
| | | |
|---|---|---|
| Against Last Quarter | B&Bs/Hotels | ↓ |
| Against Last Year | B&Bs/Hotels | → |
| Against Last Quarter | Hostels | ↑ |
| Against Last Year | Hostels | ↓ |
| Against Last Quarter | Move Ons | ↓ |
| Against Last Year | Move Ons | ↓ |

At the end of Q1, B&B/hotel use reduced from last quarter, hostel use increased and move-ons reduced. This shows continued pressure on temporary accommodation and lower move-on activity than recent quarters.

**How do we compare?**
**The Institute for Government Homelessness Performance Tracker compares demand, funding and outcomes over time.**

# Customer Satisfaction - Telephone

[INDEX](#)




## Higher is Good

| | |
|---|---|
| Target | 90% |
| Actual | 97% |

### Direction of Travel

Against last Quarter

Against last Year

Decreased since last quarter and steady since last year

**How do we compare?**

The Govmetric Channel Satisfaction Index is a monthly publication of the top performing councils across the core customer access channels. At least 100 customers need to be transferred to the survey to be included in the league table so even if satisfaction is high, it may not be included.

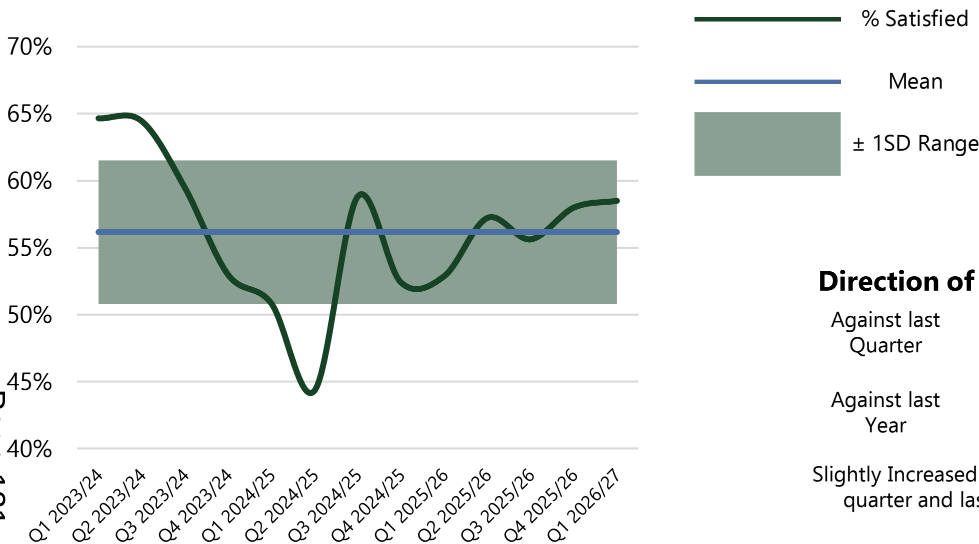
| | Apr. Rank | Apr. Net Sat. | May. Rank | May. Net Sat. | June. Rank | June. Net Sat. |
|---|---|---|---|---|---|---|
| Cotswold | 3 | 93% | 3 | 96% | N/A | N/A |
| Forest | N/A | N/A | N/A | N/A | N/A | N/A |
| West | 1 | 95% | 1 | 99% | 1 | 98% |

Telephone satisfaction remained consistently high throughout Q1, supported by efforts to encourage survey participation and gather valuable feedback.

A total of 355 residents participated in the survey, of these, 344 customers reported being satisfied with the service, reflecting a high level of overall satisfaction.

# Customer Satisfaction - Email

INDEX

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**Higher is Good**

*No Target*

58%

**Direction of Travel**

Against last Quarter ⇧

Against last Year ⇧

Slightly Increased since last quarter and last year

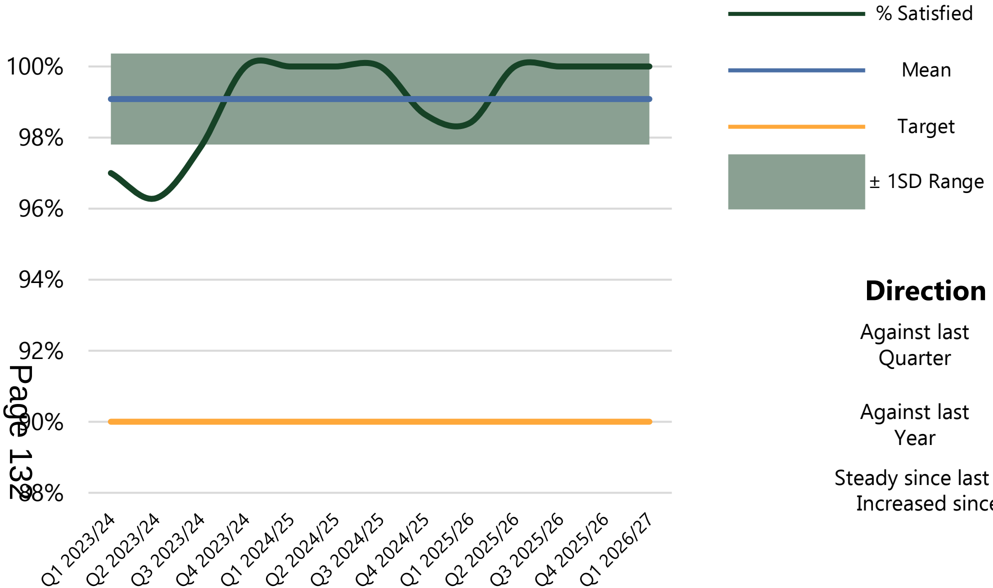
**How do we compare?**
No benchmarking currently available. The Data & Performance Team will investigate options

A total of 530 residents participated in the email satisfaction survey, with 310 respondents indicating they were satisfied with the service received.
As part of efforts to strengthen customer insight, all customer service emails issued through Salesforce include a built-in survey link, enabling residents to provide feedback quickly and easily.

# Customer Satisfaction - Face to Face

COTSWOLD District Council

INDEX

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## Higher is Good

| | |
|---|---|
| Target | 90% |
| Actual | 100% |

## Direction of Travel

Against last Quarter ⇨

Against last Year ⇧

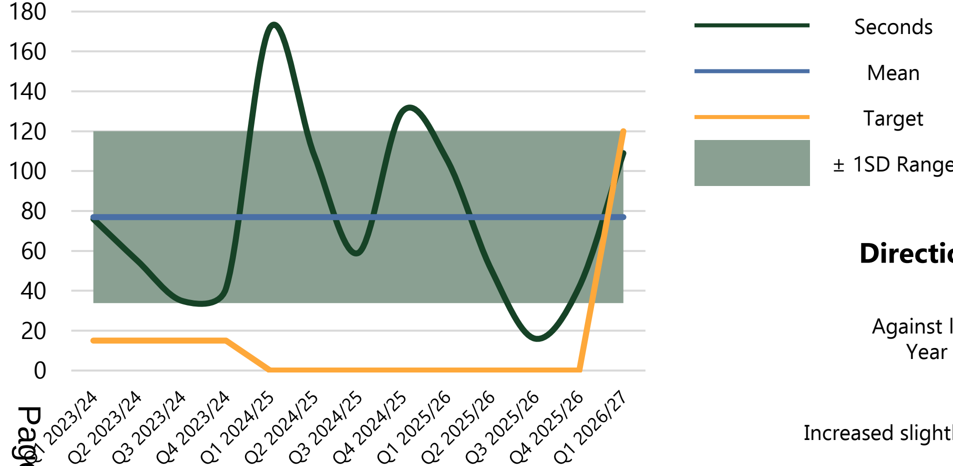
Steady since last quarter and Increased since last year

**How do we compare?**
No benchmarking currently available. The Data & Performance Team will investigate options

Customer satisfaction with face-to-face interactions remains consistently strong. This continued performance underlines the value of maintaining accessible in-person services as a key part of delivering a positive and inclusive customer experience.

# Customer Call Handling - Average Waiting Time

[INDEX](#)




**Lower is Good**

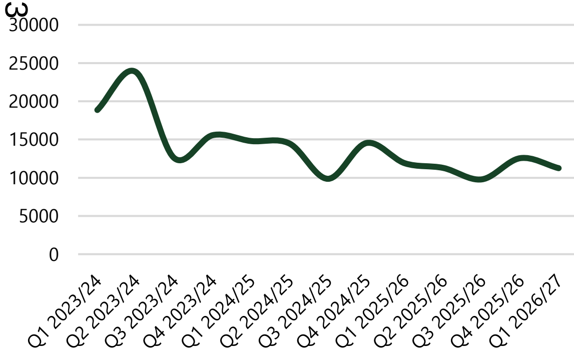
| | |
|---|---|
| Target | 120s |
| Actual | 109s |

**Direction of Travel**

Against last Year

Increased slightly since last year

**Call Volume Over Time**




In Q1, average call waiting times in Cotswold increased by 3 seconds compared with the same period last year. Sickness, leavers and four new starters contributed to longer waits; new starter training also reduced available capacity.
Three additional starters in August should strengthen performance once training is completed.
Call volumes in Cotswold remain broadly in line with last year, and the seasonal peaks typical of Q1.

**How do we compare?**

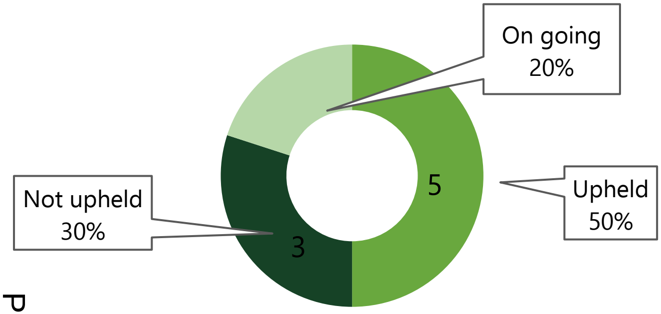
SPARSE are investigating pulling together Customer Services benchmarking data and if there is sufficient demand and suitably similar metrics to provide comparison across similarly rural local authorities we will work with them to assess any crossover in metrics and potential presentation.

# Number of complaints upheld

COTSWOLD District Council

INDEX

**Complaints by Status**




**Direction of Travel**

Complaints upheld or partly upheld at Stage 1

Against last Quarter

Against last Year

Increased since last quarter and decreased since last year

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**How do we compare?**

The table outlines the complaints received by the Ombudsman over the period, the decisions made on these cases, and the Council's compliance with any recommendations issued by the Ombudsman during this time.

Complaints received by the Ombudsman reflect cases where customers, having completed the Council's complaint process (see to the right), feel that the Council has not satisfactorily resolved the matter.

| ***2024-25*** | Complaints Investigated | % Upheld | Upheld decision per 100,000 residents | % Compliance with Recommendations | % Satisfactory Remedy | CIPFA Rank | Quartile |
|---|---|---|---|---|---|---|---|
| **Cotswold** | **1** | **0%** | **0** | **N/A** | **N/A** | **1/13** | Top |
| Stroud | 1 | 100% | 0.8 | 100% | 0% | 4/13 | Second |
| Chichester | 2 | 100% | 1.6 | 100% | 0% | 9/13 | Third |
| South Hams | 2 | 100% | 2.2 | 100% | 50% | 13/13 | Bottom |

See the following slide for a breakdown of upheld and partially upheld complaints.

A new Customer Feedback Procedure went live on 1 April 2025:

Stage 1: Operational Manager review; response within 10 working days.

Stage 2: Escalation acknowledged within five working days; Complaints Team investigation and final response within 20 working days. Customers can then refer complaints to the LGO.

# Complaints Upheld or Partially Upheld Breakdown

COTSWOLD District Council

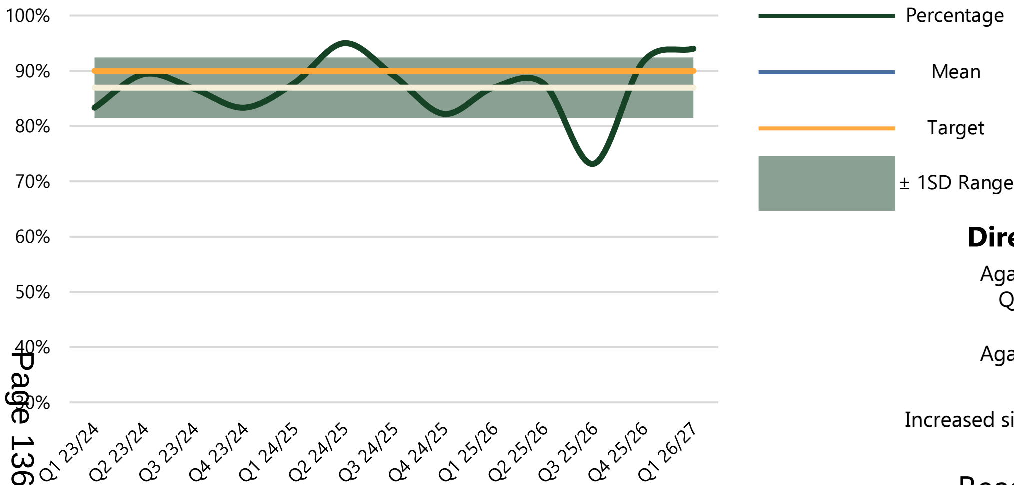
INDEX

| Service area | Description | Outcome/learning | Decision | Response time (days) |
|---|---|---|---|---|
| **Cotswold** | | | | |
| Housing | Request for waiver – Local connection requirement to Shared Ownership property | Review of processes within the Platform Housing Team to ensure requests of this nature can be handled without delay | Upheld | 8 |
| Housing | Delay in Stage 1 review | Process Review of Stage 1 reviews, how issues are logged and tracked | Upheld | 8 |
| Planning | Failure to communicate in timely manner | Fault accepted, review communication flow within the team | Upheld | 10 |
| Planning | Delays in communication plus issues with planning service | Fault accepted, review communication flow within the team | Upheld | 9 |
| Council Tax | Unhappy with legacy Council Tax charges | System errors made debt recovery more complex, this is being reviewed and permission sought to write off the debt | Upheld | 10 |

# Percentage of FOI requests answered within 20 days

COTSWOLD District Council

INDEX




## Higher is Good

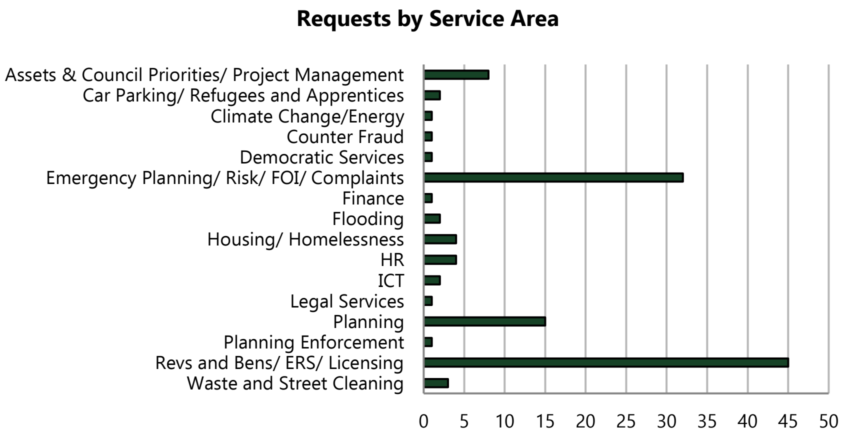
| | |
|---|---|
| Target | 90% |
| Actual | 94% |

## Direction of Travel

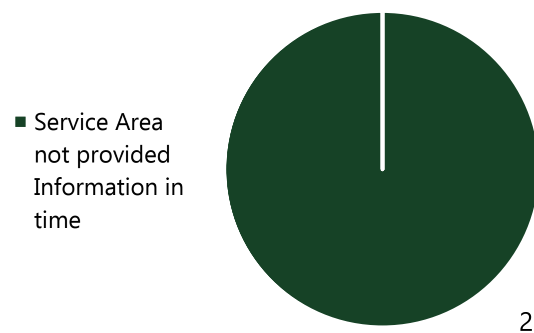
Against last Quarter

Against last Year

Increased since last quarter and since last year



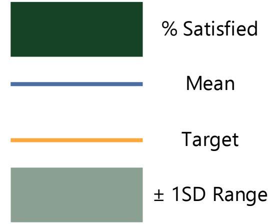

## Reasons for Delays in Responding to FOI Requests Beyond the 20-Day Deadline

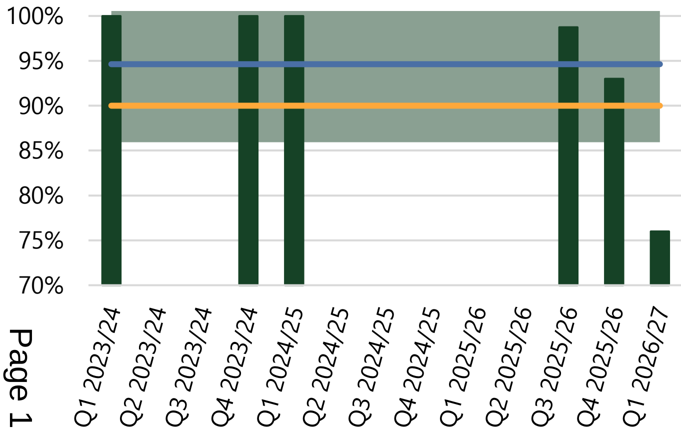


# Building Control Satisfaction

COTSWOLD District Council

INDEX




**Higher is Good**

| | |
|---|---|
| Target | 90% |
| Actual | 76% |

**Direction of Travel**

| | |
|---|---|
| Against last Quarter | |
| Against last Year | N/A |

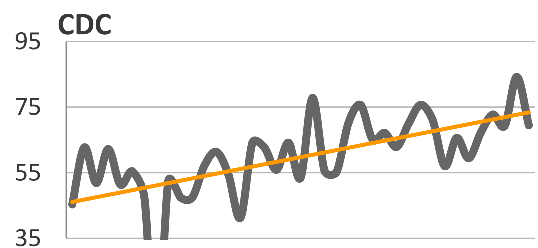


In Q1, Building Control satisfaction was below target, of the 5 responses received, only 3 were completely satisfied. Market share averaged 74%, with 162 applications processed, reflecting a 6% decrease in market share compared to last quarter.

**The below chart shows market share over time from April 2023**

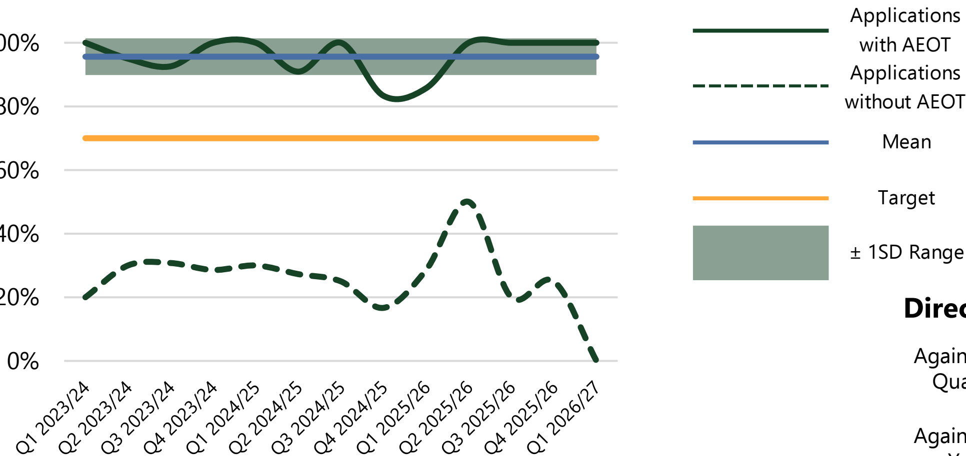
**How do we compare?**
Percentage of share in the market

| Apr | May | Jun | Number of Apps for Quarter |
|---|---|---|---|
| 69.33% | 84.21% | 69.44% | 162 |



# Percentage of major planning applications determined within agreed timescales (including Agreed Extensions of Time (AEOT))








**Higher is Good**

| | |
|---|---|
| Target | 70% |
| Actual | 100% |

**How do we compare?**
Major Developments - % within 13 weeks or agreed time – LG Inform. Latest dataset is January – March '26 (Q4 2025-26)

**Direction of Travel**

Against last Quarter

Against last Year

Steady since last quarter and increased since last year

| *Q4 25-26 Benchmark* | % | CIPFA Rank | Quartile |
|---|---|---|---|
| Sevenoaks | 100 | Joint - 7/16 | Top |
| South Hams | 100 | Joint - 8/16 | Top |
| **Cotswold** | **100** | **Joint - 11/16** | **Top** |
| Babergh | 83 | 14/16 | Bottom |
| Chichester | 80 | 16/16 | Bottom |

The service has maintained strong performance in processing Major applications within the agreed timeframes.

During Q1, five major applications were determined.

See the Minor Developments slide for further narrative

# Percentage of minor planning applications determined within agreed timescales (including AEOT)

COTSWOLD District Council

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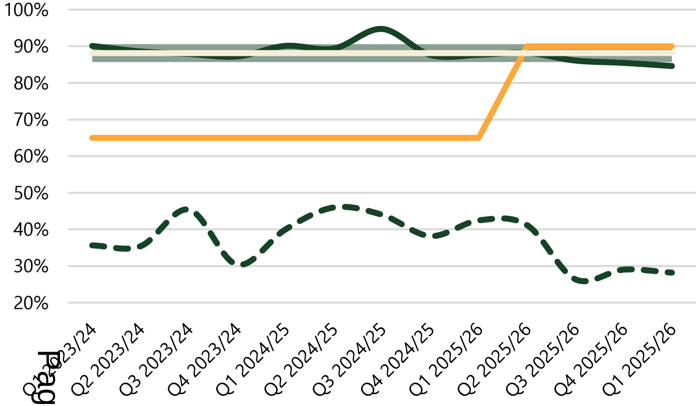


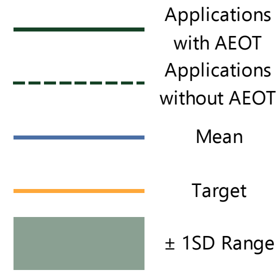


## Higher is Good

| | |
|---|---|
| Target | 90% |
| Actual | 85% |

## Direction of Travel

Against last Quarter

Against last Year

Slightly declined since last quarter and last year

**How do we compare?**

Minor Developments - % within 8 weeks or agreed time – LG Inform. Latest dataset is January – March '26 (Q4 2025-26)

| *Q4 25-26 Benchmark* | % | CIPFA Rank | Quartile |
|---|---|---|---|
| Chichester | 98 | 1/16 | Top |
| South Hams | 96 | 3/16 | Top |
| Sevenoaks | 96 | 4/16 | Top |
| **Cotswold** | **85** | **10/16** | **Second** |
| Babergh | 84 | 12/16 | Third |

This quarter, the Council maintained strong performance in processing minor planning applications within statutory timeframes. However, results fell short of the newly introduced 90% service target, which was implemented following recommendations in the Planning Advisory Service (PAS) report. The Planning team continues to make steady progress with key priorities include the staffing restructure and improvements to enforcement.

A Pre-planning Application Agreement (PPA) strategy review is underway, with a draft template already produced. Revised fees and charges were agreed by Cabinet in January.

# Percentage of other planning applications determined within agreed timescales (including AEOT)

COTSWOLD District Council

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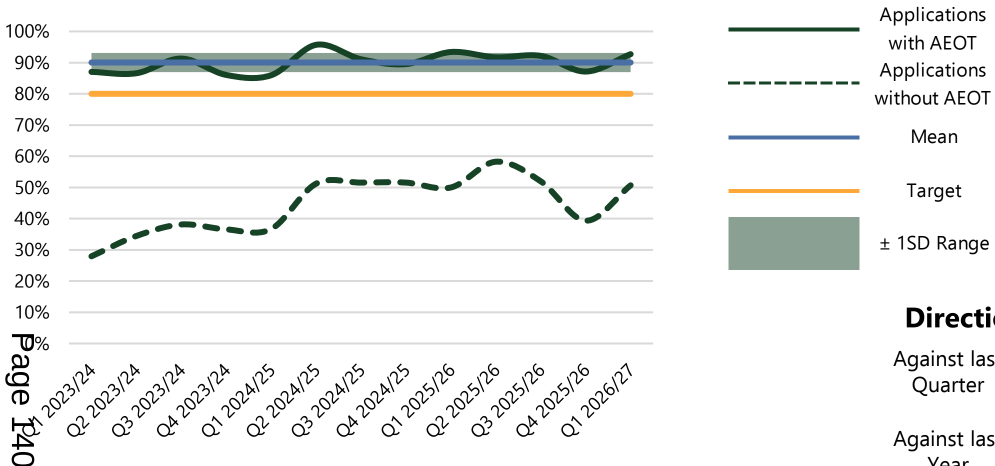


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**Higher is Good**

| | |
|---|---|
| Target | 90% |
| Actual | 93% |

**Direction of Travel**

Against last Quarter

Against last Year

Slightly increased since last quarter and steady since last year

**How do we compare?**

Other Developments - % within 8 weeks or agreed time – LG Inform. Latest dataset is January - March'26 (Q4 2025-26)

| *Q4 25-26 Benchmark* | % | CIPFA Rank | Quartile |
|---|---|---|---|
| South Hams | 99 | 1/16 | Top |
| Chichester | 99 | 2/16 | Top |
| Babergh | 96 | 5/16 | Second |
| Sevenoaks | 94 | 6/16 | Second |
| **Cotswold** | **87** | **13/16** | **Bottom** |

The Council has performed very well in processing Other applications within agreed timeframes.

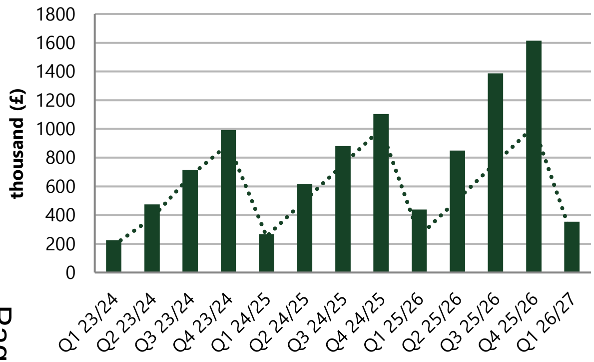
In Q1, a total of 288 Other applications were determined.

See the Minor Developments slide for additional narrative

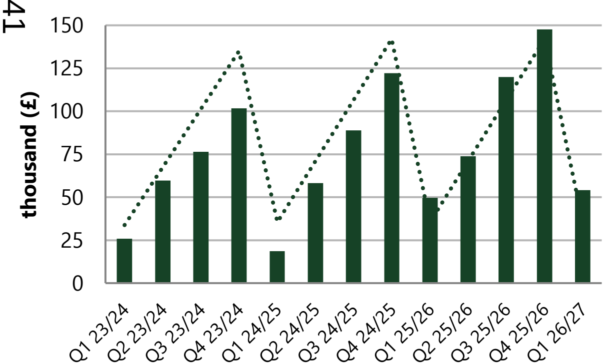
# Total Income achieved in Planning & Income from Pre-application advice



**Total planning income**




**Pre-application income**




## Direction of Travel

Total Planning Income

Against last Year ↓

Pre-Application Income

Against last Year ↑

### Higher is Good

Total Planning Income (£)

| | |
|---|---|
| Target | 254,124 |
| Actual | 353,625 |

Pre-Application Income (£)

| | |
|---|---|
| Target | 35,500 |
| Actual | 54,121 |

Total Income – Decreased since last year
Pre-App Income – Increased since last year

The Council exceeded total planning income targets by about £99k delivering a strong performance for the quarter.

Q1 witnessed a significant surge in applications in January, driven by applicants submitting ahead of fee increases and increased speculative development activity.

Progress was made on the Planning Advisory Service (PAS) Action Plan, including the successful go live of a new enterprise IT case management system on 1 April, expected to improve workflow visibility and officer efficiency going forward.

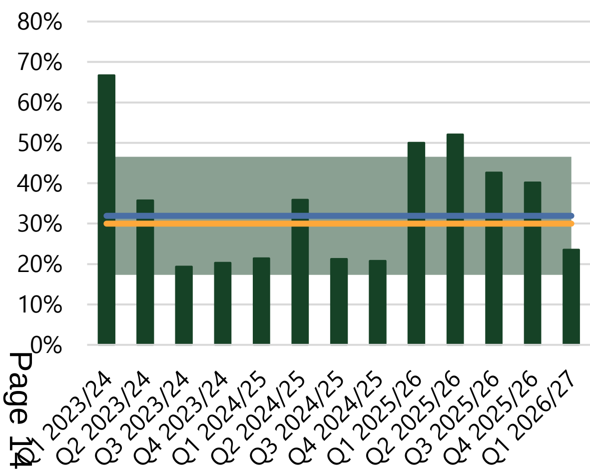
**How do we compare?**

*Planning Advisory Service (PAS) planned to benchmark back in [2021](). No data is available in the public domain.*

# Percentage of Planning Appeals Allowed (cumulative)

COTSWOLD District Council

[INDEX]






Percentage

Mean

Target

± 1SD Range

**Lower is Good**

| | |
|---|---|
| Target | 30% |
| Actual | 24% |

**Direction of Travel**

Against last Quarter

Against last Year

Improved since last quarter and since last year

**How do we compare?**

Percentage of planning appeals allowed (Specifically Q4 2025-26)

| *Q4 25-26 Benchmark* | % | CIPFA Rank | Quartile |
|---|---|---|---|
| South Hams | 14 | 1/16 | Top |
| Malvern Hills | 27 | 4/16 | Top |
| Sevenoaks | 29 | 6/16 | Second |
| Babergh | 30 | 8/16 | Second |
| **Cotswold** | **50** | **15/16** | **Bottom** |

This indicator aims to ensure that no more than 30% of planning appeals are allowed in favor of the applicant, with a lower percentage being more favorable. According to the latest statistics from the Planning Inspectorate, the national average for Section 78 planning appeals granted is 28% (source: gov.uk).

In Q1, seventeen appeals were decided, with four allowed in favour of the applicant, resulting in a 24% allowance rate for the quarter.

# (Snapshot) Planning Enforcement Cases

COTSWOLD District Council

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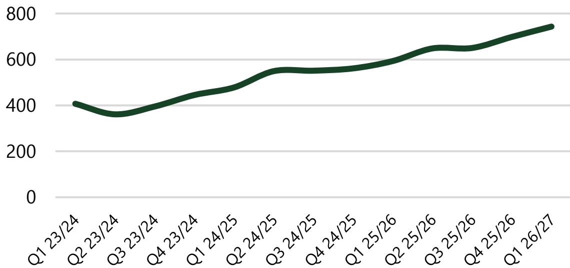
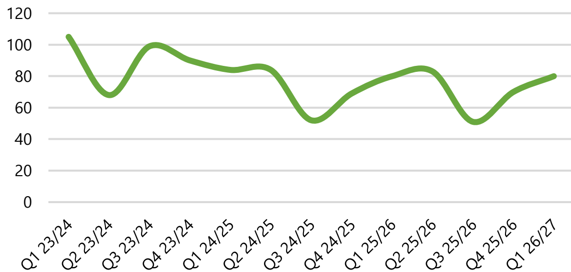
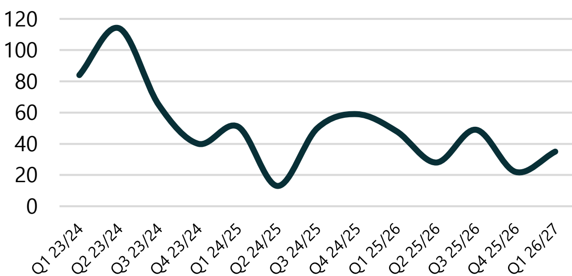
Open Cases at end of Quarter over Time




Number of Cases Opened During the Quarter over Time




Number of Cases Closed During the Quarter over Time




## Direction of Travel for Open Cases at end of Quarter

Against last Quarter

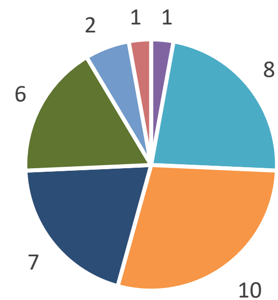
Against last Year

## Lower is Good

*No Target*

Open Cases at End of Quarter 743

**Reasons Cases Closed**




During Q1, the Enforcement team continued improvement work. The Transformation team is mapping key processes to identify quick wins and support a more streamlined service. This combined work is helping to strengthen capacity and improve the team's overall resilience.

# Percentage of official land charge searches completed within 10 days

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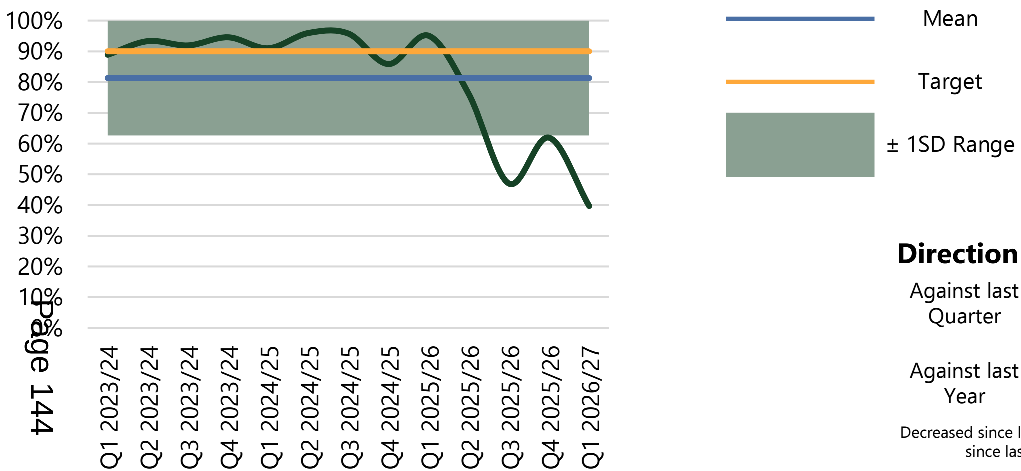



**Higher is Good**

| | |
|---|---|
| Target | 90% |
| Actual | 39.67% |

**Direction of Travel**

Against last Quarter ⇩

Against last Year ⇩

Decreased since last quarter and since last year

The Council experienced a decline in performance compared to Q4 against the 10-day target for completing official Land Charges searches with an average turnaround time of 13 days in Q1.

Land Charges performance has been volatile, a combination of resource intensive processes, products and staffing challenges have led to the current position. The service now has a strategic recovery plan, across 4 areas:

Initial access – the routes customers access the service

Triage and processing

Products

Review of fees and charges.

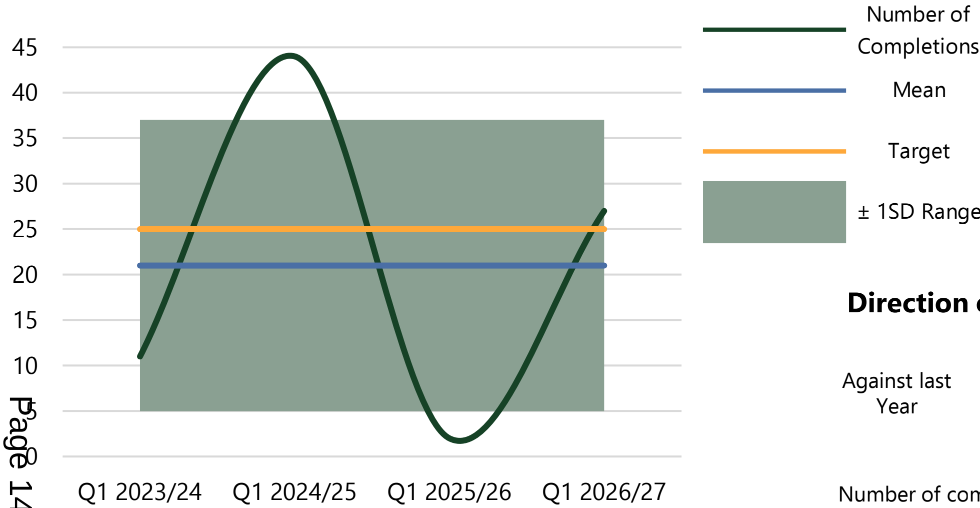
The plan focusses on developing new ways of working over the summer, with implementation and refinement in the Autumn.

**How do we compare?**

No benchmarking currently available. The Data & Performance Team will investigate options

# Number of affordable homes delivered (cumulative)






## Higher is Good

| | |
|---|---|
| Target | 25 |
| Actual | 27 |

## Direction of Travel

Against last Year ↑

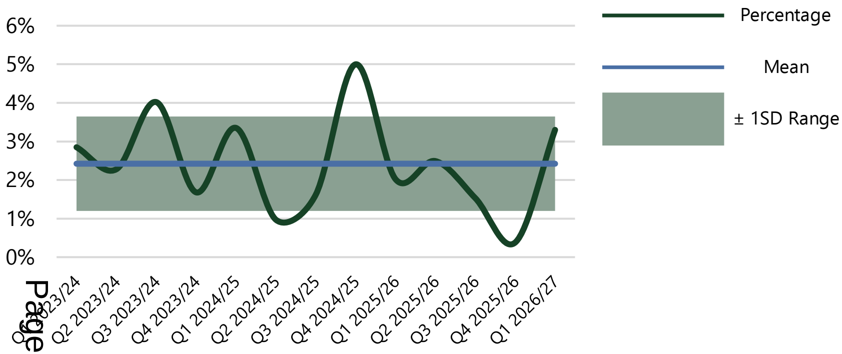
Number of completions increased since last year

In Q1, 27 affordable homes were completed.
These completions were delivered across schemes in South Cerney and Tetbury, Dunstall Farm, and Down Ampney.

**How do we compare?**
No benchmarking currently available. The Data & Performance Team will investigate options

# Number of fly tips collected and percentage that result in an enforcement action

(defined as a warning letter, fixed penalty notice, simple caution or prosecution)

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## Direction of Travel

**Number of Fly Tips**

Against last Quarter ⇧

Against last Year ⇩

**Percentage Enforcement Action**

Against last Quarter ⇧

Against last Year ⇧

*No Target*

Number of Fly Tips Collected

211

Percentage Enforcement Action

3%

Fly Tips – Increased since last quarter and decreased since last year
Enforcement Action – Increased since last quarter and last year

**How do we compare?**

Number of Fly Tips reported for year 2024-25 for Local Authorities in England – Gov.uk. The latest dataset available is 2024-25

| 2024-25 Benchmark | Total Fly Tips | Total FPNs | % FPNs per Fly Tip | CIPFA Nearest Neighbours Rank | Quartile |
|---|---|---|---|---|---|
| Babergh | 430 | 13 | 3.02 | 1/16 | Top |
| **Cotswold** | **922** | **12** | **1.23** | **10/16** | **Second** |
| Chichester | 816 | 1 | 0.12 | 6/16 | Bottom |
| South Ham | 662 | 0 | 0 | 16/16 | Bottom |

In Q1, the Council achieved a high enforcement rate of 3%, 7 enforcement actions in Q1.
3 FPNs Duty of Care, 2 FPN fly-tipping and 2 Warning Letters. Two multi-agency joint stop-and-search operations were carried out in Bourton-on-the-Water and Aston Down, where 86 vehicles were stopped in total.
A directed surveillance operation (RIPA) has been re-issued for another 13 weeks, targeting offenders fly-tipping large quantities of cannabis waste. Proposals to introduce a civil enforcement regime are being drafted to prevent littering from vehicles.

# Percentage of high risk food premises inspected within target timescales

COTSWOLD District Council

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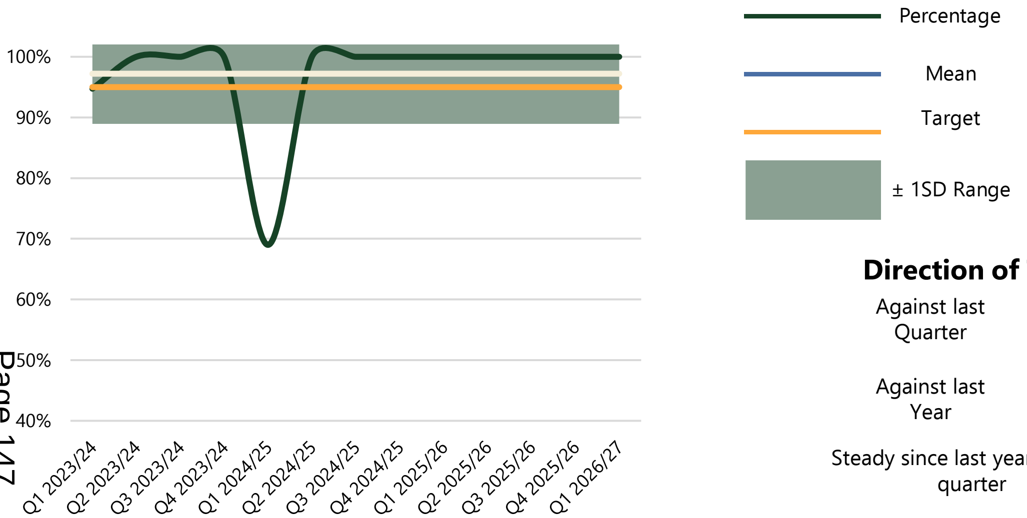


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## Higher is Good

| | |
|---|---|
| Target | 95% |
| Actual | 100% |

### Direction of Travel

Against last Quarter 

Against last Year 

Steady since last year and last quarter

The Council conducted seven inspections during Q1.
High-risk food inspections are prioritised due to their greater potential impact on public health and safety, enabling issues to be addressed swiftly. However, this focus can occasionally delay scheduled inspections for lower-risk food businesses. To mitigate this, the service uses a dashboard to track both high- and lower-risk inspections, ensuring that, despite the emphasis on high-risk establishments, lower-risk inspections are still completed promptly to maintain overall compliance and safety standards.

**How do we compare?**
No benchmarking currently available. The Data & Performance Team will investigate options

# % High risk notifications risk assessed within 1 working day

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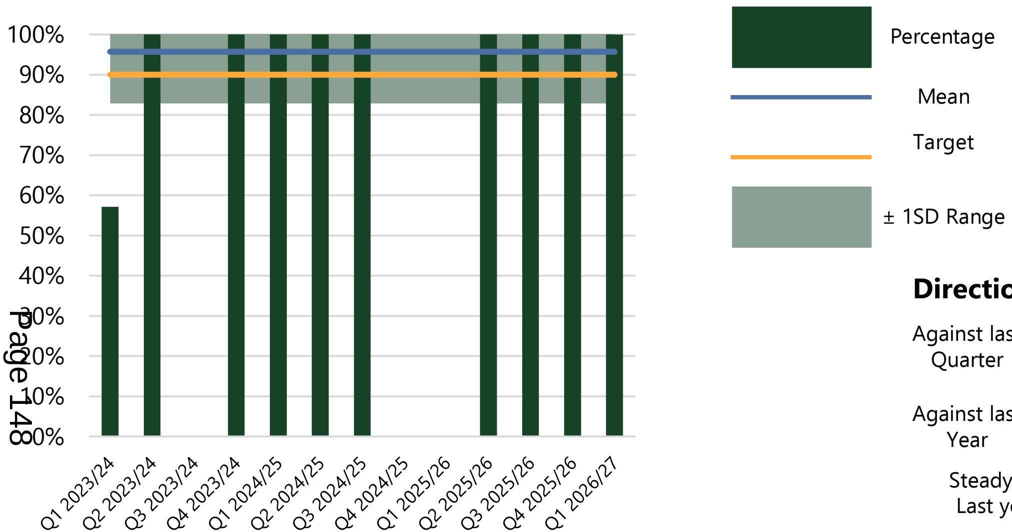
(including food poisoning outbreaks, anti-social behaviour, contaminated private water supplies, workplace fatalities or multiple serious injuries)




**Higher is Good**

| | |
|---|---|
| Target | 90% |
| Actual | 100% |

**Direction of Travel**

Against last Quarter 

Against last Year N/A

Steady since last quarter
Last year: N/A

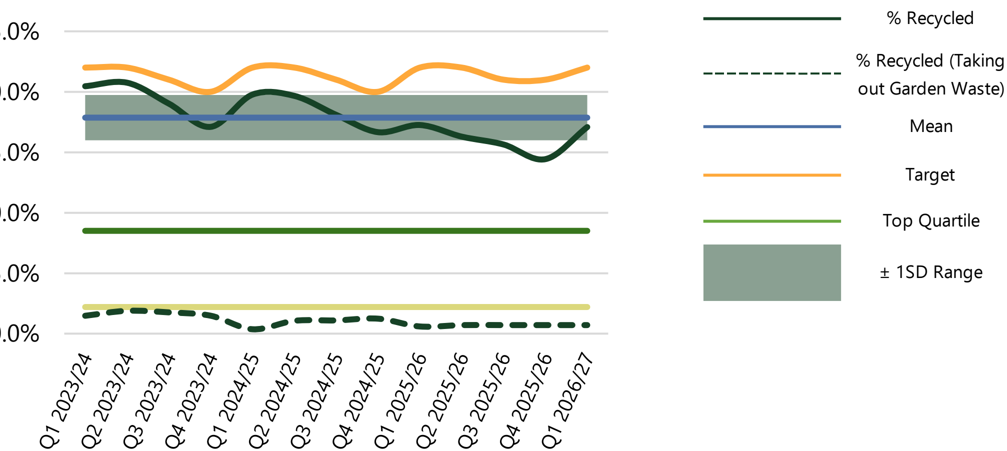
Seven high-risk notifications were received during Q1 relating to toilet waste, possible illegal eviction, asbestos removal and food alerts.

All were assessed within the target timescale.

**How do we compare?**
No benchmarking currently available. The Data & Performance Team will investigate options

# Percentage of household waste recycled






## Higher is Good

| | |
|---|---|
| Target | 61% |
| Actual | 57% |

## Direction of Travel

Against last Quarter

Against last Year

Increased since last quarter and steady since last year

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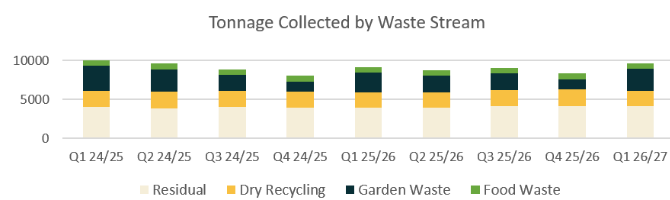
**How do we compare?**
Percentage of household waste sent for reuse, recycling or composting – Gov.uk.

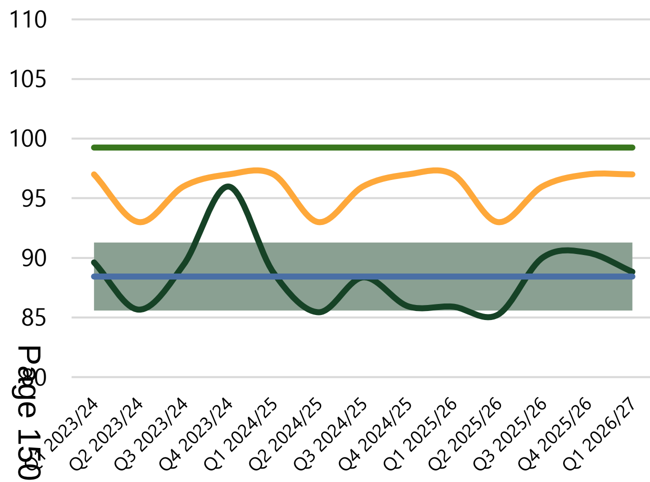
| *2024-25 Benchmark* | % | CIPFA Rank | Quartile |
|---|---|---|---|
| Stratford-on-Avon | 63.9 | 1/16 | Top |
| Maldon | 57.8 | 2/16 | Top |
| **Cotswold** | **56.7** | **4/16** | **Top** |
| Derbyshire Dales | 51.4 | 6/16 | Second |
| South Hams | 49.3 | 10/16 | Bottom |
| East Hampshire | 34.8 | 16/16 | Bottom |

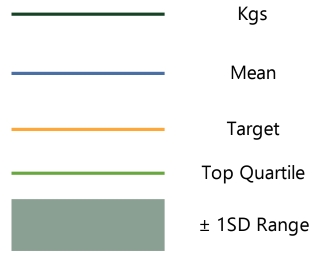
The Council's recycling rate remained broadly stable compared with the same period last year, while staying below the 61% target. In 2024/25, household recycling rates across England varied widely, ranging from 17% to 63.9% among local authorities. The national average recycling rate is 41.23%.



# Residual Household Waste per Household (kg)

COTSWOLD
District Council
[INDEX]




## Lower is Good

| | |
|---|---|
| Target | 97 |
| Actual | 88.83 |

## Direction of Travel

Against last Quarter

Against last Year

Decreased since last quarter and increased slightly since last year

**How do we compare?**
Residual household waste per household (kg/household) – Gov.uk. The latest dataset available in 2023-2024

| *2023-24 Benchmark* | Kg | CIPFA Rank | Quartile |
|---|---|---|---|
| Stroud | 298.6 | 1/16 | Top |
| Stratford-on-Avon | 320.0 | 4/16 | Top |
| Maldon | 350.2 | 8/16 | Second |
| **Cotswold** | **358.0** | **9/16** | **Third** |
| Wychavon | 436.5 | 13/16 | Bottom |
| Babergh | 461.4 | 16/16 | Bottom |

Residual household waste levels typically follow seasonal patterns, and targets are set accordingly.

In Q1, the Council remained below the residual waste targets and outperformed the Shire Districts' median of 111 kg per household. The Council also ranked within the top quartile of English District Local Authorities, with residual waste levels below the 99.25 kg threshold.

This continued strong performance highlights the Council's effective waste reduction efforts and their position as national leaders in managing household waste.

# Missed bins per 100,000

COTSWOLD District Council

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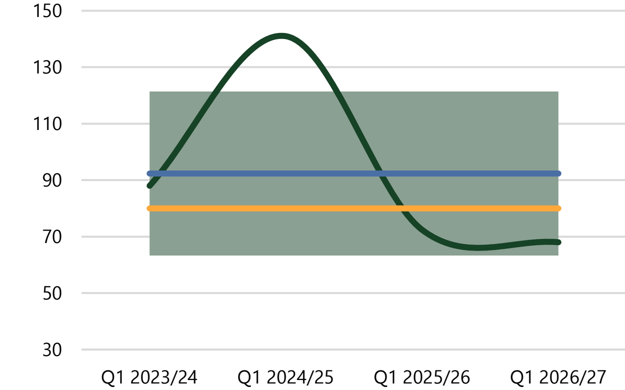
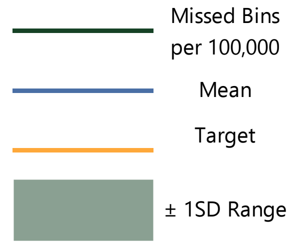



## Lower is Good

| | |
|---|---|
| Target | 80 |
| Actual | 68 |

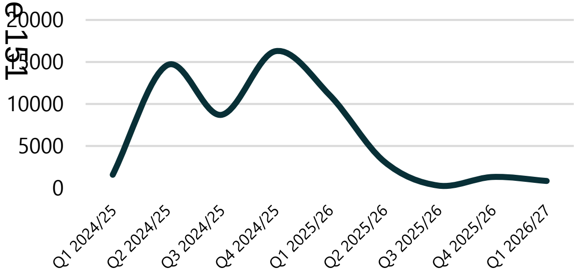
## Direction of Travel

Against last Quarter

Against last Year

Decreased since last quarter and since last year

## Household Service Failures




**Unique Instances of Households being Affected by Service Failures This Quarter**

820

How do we compare?

*Missed collections per 100,000 collections (full year) - APSE*

| *2022-23 Benchmark* | Missed collections per 100,000 collections | Family Group Rank | Family Group Quartile | Whole Service Rank | Whole Service Quartile |
|---|---|---|---|---|---|
| Cotswold | 109.89 | 12/14 | Bottom | 39/45 | Bottom |

Missed bins per 100,000 collections remained steady in Q1, remaining below the target of 80.

During the quarter, staff and process changes, along with improved communication through memos and toolbox talks, helped reinforce the importance of returning to missed collections.

Cabinet have approved a new waste fleet replacement strategy, which should address the ageing fleet problem contributing to breakdowns and service reliability.

# Number of visits to the leisure centres & (Snapshot) Number of gym memberships

COTSWOLD District Council

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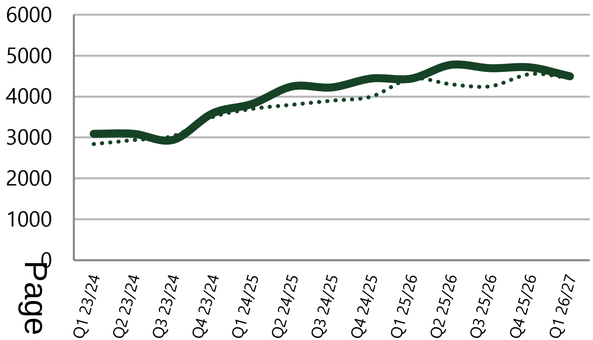
**Number of gym memberships**

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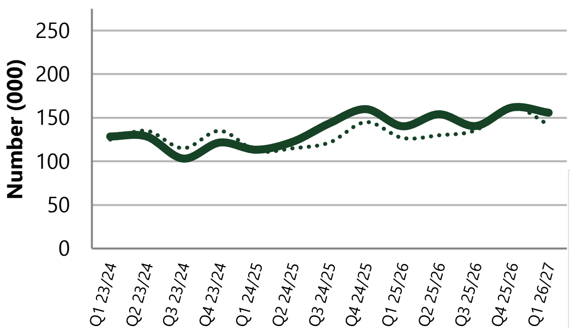
**Visits to leisure facilities**




## Direction of Travel

Gym Memberships

Against last Quarter ↓

Against last Year ↑

Leisure Visits

Against last Quarter ↓

Against last Year ↑

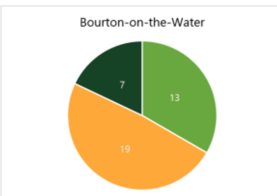
Gym Memberships – Decreased since last quarter and increased since last year
Leisure Visits – Decreased since last quarter and increased since last year

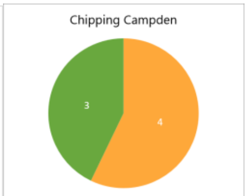
**Higher is Good**

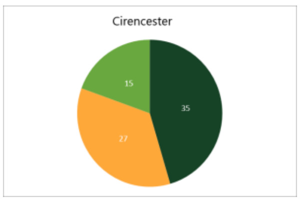
| Gym Memberships | |
|---|---|
| Target | 4450 |
| Actual | 4,494 |

| Leisure Visits | |
|---|---|
| Target | 142,000 |
| Actual | 155,785 |

Cotswold gym memberships exceeded target by 1%, while leisure visits exceeded target by 10%, reflecting strong usage and demand for the facilities.
A renewed focus on engagement this quarter has supported encouraging improvements in survey participation.




Comment Complaint Compliment

How do we compare?
*The Data Team are currently working with partners to compile the data return for APSE performance networks which will then provide benchmarking for this metric.*

| Priorities | Sub-Priority | Action | Portfolio Holder | Accountable Officer(s) | Updated By | Start date | End date | Status | Q1 Update |
|---|---|---|---|---|---|---|---|---|---|
| Preparing for the Future | **Driving organisational and cultural change to be be fit for the future** | Transformation - Develop Strategy Action Plan | Cllr Mike Evemy<br>Cllr Tristan Wilkinson | Helen Martin | Helen Martin | Aug-25 | Mar-28 | On Target | ICT programme has kicked off, In house projects are awaiting kick off. |
| Preparing for the Future | **Driving organisational and cultural change to be be fit for the future** | Transformation through changing existing or creating new service delivery models, and/or making changes to the organisation structure, roles, processes or technology to improve outcomes, as a result of introducing new ways of working, and/or to reduce the costs of services. | Cllr Tristan Wilkinson | Helen Martin | Helen Martin | Oct-25 | Mar-28 | On Target | Workstream 2 of the technical programme is progressing well with further project completion.<br>- BACS/Bottomline system migration project is now complete.<br>- Extract AI by MHCLG is now complete.<br>- DPIF is progressing well, kicking off testing on the 23rd of July and on track for completion by the 8th of September 2026.<br>- IDOX Unimap web implementation is complete, planning and related services configuration are complete as well. |
| Preparing for the Future | **Driving organisational and cultural change to be be fit for the future** | Digital Transformation: accelerating the use of digital technology to improve council services, enhance accessibility, and promote digital inclusion across communities. | Cllr Tristan Wilkinson | Helen Martin | Helen Martin | Oct-25 | Mar-28 | On Target | Workstream 1 of technical programme is progressing with some concerns.<br>- Windows 11 Rollout is ongoing.<br>- Microsoft global secure access has been put on hold due to concerns about resources.<br>- Microsoft Copilot; ICT Virtual Implentation team: A copilot agent is being tested for HR policies and forms using documents uploaded from sharepoint. |
| Preparing for the Future | **Preparing for Local Government Reorganisation** | Prepare the LGR submission to government. Prepare the next phase of the LGR Programme. Implement the governments decision. | Cllr Mike Evemy | Jane Portman | Jane Portman | already commenced | Mar-28 | On Target | The Portfolio and Programme team has been strengthened further and work is progressing very well in preparation for the government's decision which is due in Q2. |
| Preparing for the Future | **Preparing for Local Government Reorganisation** | Consult with other local authorities to inform possible options for establishing a Strategic Authority | Cllr Mike Evemy | Jane Portman | Jane Portman | already commenced | Mar-28 | On Target | We await the government's decision as part of their devolution programme. |
| Preparing for the Future | **Developing our workforce** | Deliver the People and Culture Strategy | Cllr Mike Evemy | Angela Claridge | Angela Claridge | Sep-25 | Mar-28 | On Target | Implementation Plan on target. In April, Cabinet approved a Staff Retention Strategy, recognising that retaining skilled and experienced employees is vital to maintaining high-quality services and organisational resilience in the run up to Local Government Reorganisation in 2028. The strategy aims to improve employee engagement, development and wellbeing, helping to reduce turnover and retain valuable knowledge and expertise within the organisation. |

| | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Preparing for the Future | **Developing our workforce** | Deliver the Internal Communications Plan, to keep staff informed and engaged in organisational development and LGR | Cllr Mike Evemy | Matt Abbott | Helen Hillier/Clara Wiggins | Sep-25 | Mar-28 | On Target | The council's internal communications strategy for the first quarter of 26/27 continues to build on the success of the previous year. The KPIs were updated in April to reflect small stretch targets for the new calendar year. So far, results for internal communications performance are very positive and are achieving or exceeding set targets. An average of 34 pieces of content were posted to the council's portal per month - exceeding the target of 30. Visitor numbers were slightly below target but page views and engagement rate were all above target. Staff briefings have continued every 4 – 6 weeks and all have seen attendance hold steady at more than 100 per event. Through the LGR Portfolio and Programme Office, fortnightly updates on LGR have continued every other Wednesday, a new LGR Hub has been launched, and two LGR all-staff briefings have been held. A new manager's event series, managers section of the portal, and manager's newsletter is being developed by the team and will be delivered in September, as will a second staff pulse survey. |
| Preparing for the Future | **Developing our workforce** | Consideration of a small number of functions currently in Publica in light of their focus core function delivery | Cllr Mike Evemy | Jane Portman | Jane Portman | Jul-25 | Dec-25 | On Target | In Q1, we transferred back the Flood Risk Management function and welcomed the staff to the council. The statutory safeguarding duties also transferred into the council. In preparation for Local Government Reorganisation almost all Publica provided services have been thoroughly reviewed. |
| Preparing for the Future | **Deliver the new Local Plan** | Adopt the new Local Plan, providing a robust development framework for the Cotswold area post 2028 that provides affordable housing, employment and infrastructure for present and future generations whilst conserving and enhancing the national landscape. | Cllr Juliet Layton | Geraldine LeCointe | Andrew Maxted | already commenced | Dec-27 | On Target | The draft local plan was published on 24th July 2026 in preparation for O&S committee on 3rd August. This addresses the provision of affordable housing, employment and infrastructure, within the Cotswold District area to 2043. |
| Delivering good services | **Ensure value for money and good standards** | Develop a Fleet Replacement programme | Cllr Andrea Pellegram | Peta Johnson | Peta Johnson | already commenced | Apr-26 | On Target | Tenders have been awarded for the food waste vehicles, the 7.5t RCVs and the recycling/ food waste vehicles. The design of the recycling/ food waste vehicles is under review e.g. adding a material (plastics bags and wrapping) and consideration of changing waste streams e.g. mixing paper and card, including the potential for more card to be in the waste stream in the future (increased trend towards home deliveries). Tenders are still to be issued for a mechanical sweeper and one electric recycling/ food vehicle. |
| Delivering good services | **Ensure value for money and good standards** | Improve and digitise engagement with the customers of the Waste and Environment Services | Cllr Andrea Pellegram | Peta Johnson | Peta Johnson | already commenced | Mar-28 | On Target | As previously indicated, residents can now report full litter bins via the website. This integration was completed in March 2026. Residents select the bin from a map and the instruction to empty the bin is issued directly to Ubico. This functionality has been extended to include fly tip reporting. This integration was completed in June 2026. Residents can see if a fly tip has already been reported. They can then report a fly tip and describe the type and amount of material present. The information is reviewed prior to being issued to Ubico to ensure that reports are not duplicate (fly tips can be reported via a range of channels) |

| | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Delivering good services | **Ensure value for money and good standards** | Adapt to changes in Waste legislation | Cllr Andrea Pellegram | Peta Johnson | Peta Johnson | already commenced | Mar-28 | On Target | Plans for the roll out of plastic bags and wrapping collections have been further developed. The compartment on the vehicle has been designed, and the method of presentation by residents has been through Cabinet. Residents will present the material in self supplied plastic bags. The communication programme is in the early stages of development, including discussions at the county wide level to ensure that services can be harmonised where possible. Although service harmonisation is not possible at this stage, the collection authorities across Gloucestershire have committed to a standard name for the material (plastic bags and wrapping), a standard colour for bags - blue (where these are issued), and a standard list of target materials. |
| Delivering good services | **Ensure value for money and good standards** | Implement the Planning Advisory Service action plan | Cllr Juliet Layton | Geraldine LeCointe | Harrison Bowley | already commenced | Aug-26 | On Target | O&S Committee on 29th June noted the progress on the PAS action plan and made recommendations for Cabinet to consider. |
| Delivering good services | **Enhance financial resilience and make best use of our assets** | Maintain financial sustainability over the MTFS-period (2026/27 to 2029/30) following the outcome of the Fair Funding 2.0 review. | Cllr Patrick Coleman | David Stanley | David Stanley | Apr-26 | Mar-28 | On Target | 2027/28 MTFS timetable agreed and in progress. Initial discussions taken place with informal Cabinet, CLT and Ubico. Early budget setting work to take place in Q2 following steer from Cabinet. |
| Delivering good services | **Play our part in maintaining and enhancing the public realm** | Introduce charging to sustain Council owned public toilets. | Cllr Tony Dale | Claire Locke<br>Sue Hughes | Claire Locke | already commenced | Dec-25 | Complete | Awaiting transfer of public conveniences in Northleach to the Town Council. All other facilities have had charging mechanisms introduced and charges now apply. |
| Delivering good services | **Play our part in maintaining and enhancing the public realm** | Deliver the new Parking Strategy. | Cllr Tony Dale | Sue Hughes | Sue Hughes | already commenced | Mar-28 | On Target | Actions within Strategy progressing well including replacement of pay and display machines to council carparks - contract now awarded and installation being planned. |
| Delivering good services | **Play our part in maintaining and enhancing the public realm** | Invest in and maintain our car parks | Cllr Tony Dale | Alan Hope | Alan Hope | already commenced | Mar-28 | On Target | Capital investment works complete, inspections/maintenance ongoing. Collaboration between service areas to address issues as they arise. |
| Delivering good services | **Deliver the new Local Plan** | Ensure our planning policies deliver our corporate priorities and promote carbon neutral development and sustainable infrastructure for our communities | Cllr Juliet Layton | Geraldine LeCointe | Andrew Maxted | already commenced | Dec-26 | On Target | The draft local plan was published on 24th July 2026 in preparation for O&S committee on 3rd August. This recommends many ambitious policies in relation to climate change. |
| Responding to the climate emergency | **Support and Enable Residents & Businesses** | Expand the network of Electric Vehicle Charge Points | Cllr Mike McKeown | Tim Atkins | Tim Atkins | already commenced | Mar-28 | Complete | The Sim-touch issue has been cleared by Connected Kerb and the units are operational. The project is now completed. |

| | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| **Responding to the climate emergency** | **Decarbonise Council Operations** | Embed climate action into council services to reduce the council's operational carbon emissions | Cllr Mike McKeown | Tim Atkins | Tim Atkins | already commenced | Mar-28 | On Target | The Climate Board's meeting of June 26 agreed an update for the delivery of CDC Climate Change Programme. A workstream has been established for the Depot External works which includes the provision of a fuel tank for HVO. External expertise is sort to ensure compliance with all necessary considerations. A detailed project delivery plan will then be progressed. |
| **Responding to the climate emergency** | **Increase resilience to the effects of climate change** | Work in partnership to respond to the Climate Risk and Vulnerability Assessment | Cllr Mike McKeown | Tim Atkins | Tim Atkins | Oct-25 | Mar-28 | On Target | Awaiting CLG update |
| **Responding to the climate emergency** | **Deliver high quality retrofit advice and support installation of renewables across the district** | Deliver high quality retrofit advice and support installation of renewables across the district through policy, partnership working and initiatives | Cllr Mike McKeown | Tim Atkins | Tim Atkins | already commenced | Mar-28 | On Target | The drive & Thrive Event has been re-arranged for October 26 (due to a clash with 'Everything Electric' event at Cheltenham Racecourse in June). At the Climate Board's June Meeting it was agreed to review options of how the retrofit workstream could be expanded / refocused to maximise impact. A report will be taken to the next Climate Board in September 26. |
| **Delivering Housing** | **Deliver the new Local Plan** | Allocate sites in line with Government requirements that will boost housing delivery whilst taking account of the significant constraints across the district | Cllr Juliet Layton | Geraldine LeCointe | Andrew Maxted | already commenced | Dec-26 | On Target | The draft local plan was published on 24th July 2026 in preparation for O&S committee on 3rd August. This recommends the allocation of a member of strategic and non strategic sites to meet Government requirements. |
| **Delivering Housing** | **Working with our partners to deliver more affordable homes** | Move forward a Pipeline of Rural Affordable Housing Sites and develop ways to increase Affordable Housing delivery | Cllr Juliet Layton | Alan Hope | Alan Hope | already commenced | Mar-28 | On Target | Partnership working to deliver affordable housing ongoing. Rural Exception site Pipeline continues to be developed. NPPF consultation document potential 5% cap unhelpful - conclusion of consultation expected shortly. |
| **Delivering Housing** | **Understanding everyone's housing needs** | Adopt and implement the Preventing Homelessness Strategy | Cllr Juliet Layton | Claire Locke<br>Caroline Clissold | Caroline Clissold | Sep-25 | Mar-28 | On Target | A full review of the Preventing Homelessness strategy is underway, with most actions on target or ahead of target. A full review of the strategy against the MHCLG's National Plan to End Homelessness is also being undertaken to include newly introduced targets to increase Prevention, reduce the use of B&B for families and end rough sleeping. CDC already preform well in these area with little to no rough sleeping and no B&B use for families. |
| **Delivering Housing** | **Understanding everyone's housing needs** | Continue to monitor housing needs to inform the councils revised Housing Strategy | Cllr Juliet Layton | Claire Locke<br>Caroline Clissold | Caroline Clissold | already commenced | Mar-28 | On Target | Quarterly reviews of H-CLIC data are being carried out to inform housing trends and monitor increases in contacts. |
| **Delivering Housing** | **Understanding everyone's housing needs** | Refocus the Housing Strategy on Strategic Actions. | Cllr Juliet Layton | Alan Hope | Alan Hope | Aug-25 | Oct-25 | Off Target, but action being taken to ensure delivery | Document ready, awaiting decision on next steps. |

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|---|---|---|---|---|---|---|---|---|---|
| Supporting communities | **Strengthen our links with town and parish councils and key stakeholders** | Engage with and support town and parish councils to prepare for Local Government Reorganisation | Cllr Mike Evemy | Matt Abbott | Matt Abbott | Jun-25 | Mar-28 | On Target | TPC Forums held in May with good attendance; further sessions organised for August as well as exhibitions and public meetings. Ongoing correspondence via monthly newsletter |
| Supporting communities | **Encourage community health and wellbeing** | Enable networking and public engagement events to help local residents to access support services | Cllr Paul Evans | Joseph Walker | Clare Jobling | already commenced | Mar-28 | On Target | |
| Supporting communities | **Encourage community health and wellbeing** | Celebrate the contribution of individuals and local groups | Cllr Paul Evans | Joseph Walker | Clare Jobling | already commenced | Mar-28 | On Target | The Unsung Heros Scheme is now being run through three rounds, March, July and November. Nominations for the July round closed at the end of June and winners have been selected and notified for recognition at July Council. |
| Supporting communities | **Encourage community health and wellbeing** | Promote community activity through Crowdfund Cotswold | Cllr Patrick Coleman | Joseph Walker | Clare Jobling | already commenced | Mar-28 | On Target | Three projects launched campaigns from round 1, and were considered by CDC for grant support: The Barn Theatre, for its Barn Bus to support rural residents accessing their venue in Cirencester, the Phoenix Festival and Down Ampney Village Shop. At the time of writing, the Barn Theatre has surpassed its funding target, with 241 backers |
| Supporting communities | **Encourage community health and wellbeing** | Ensure the leisure and culture contracts deliver core provision and positive community outcomes | Cllr Tony Dale | Joseph Walker | Lisa Caton | already commenced | Mar-28 | On Target | Core contractual quality standards were maintained across both contracts. Cirencester Leisure Centre achieved a Very Good rating in its Quest Leisure Assurance Assessment, whilst Corinium Museum achieved a 92% VAQAS score, including 100% for visitor welcome and customer service. Project launched for the CDC Capital Project to upgrade fitness equipment at Cirencester and Bourton Leisure Centres, with design proposal being informed by over 250 customer survey responses. Corinium Museum also delivered a successful Easter programme, attracting residents and visitors, and enhanced its visitor offer through the introduction of Museum-branded merchandise. |
| Supporting communities | **Encourage community health and wellbeing** | Work with Cotswold Youth Network to champion to contribution and needs of young people | Cllr Paul Evans | Joseph Walker | Clare Jobling | Oct-25 | Mar-28 | On Target | World Jungle, who convene the Cotswold Youth Partnership and who historically held the HAF contract, were successful in being awarded the HAF contract to deliver this year. They have been working with partners, with support from CDC's community builder, to prepare and promote a summer activity programme. |

| | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Supporting communities | **Support our residents in crises** | Coordinate a partnership response to address financial hardship and the cost of living | Cllr Patrick Coleman | Joseph Walker | Clare Jobling | already commenced | Mar-28 | On Target | The Crisis and Resilience Fund launched at the beginning of the quarter, with the centralised crisis support offer from GCC. GCC confirmed a district allocation of £170k to support resilience and prevention. An indicative delivery plan was shared with, and agreed by GCC, so CDC is in the midst of liaising with local partners to agree the grant arrangements for delivery. |
| Supporting communities | **Support our residents in crises** | Work with the NHS Integrated Locality Partnership to improve the quality of life of children and vulnerable households | Cllr Paul Evans | Joseph Walker | Clare Jobling | already commenced | Mar-28 | On Target | The Council continues to work with system partners through the ILP - as example, officers have recently supported roadshows led by GRCC to take information about services out across the district. There is still some uncertainty over the future of the ILP model, following changes to the NHS England structure, but broad agreement round the table that there needs to be an opportunity space to coordinate activity. |
| Supporting communities | **Support our residents in crises** | Work with the Cotswold Community Safety Partnership to improve road safety and reduce antisocial behaviour | Cllr Paul Evans | Joseph Walker | Clare Jobling | already commenced | Mar-28 | On Target | The CSP met again in April, which provided useful opportunity for partnership discussion around working with young people. The Council's community builder has been working with the police and other partners to better coordinate activity and explore the potential for a grant bid to the OPCC to bring county training into the district. On road safety, the Gloucestershire Road Safety Partnership was able to recruit a new coordinator, who started in post in quarter and who will be attending the next CSP meeting. |
| Supporting communities | **Deliver the new Local Plan** | Through our Local Plan review aim to ensure that development provides the necessary infrastructure for communities and that this provision is aligned with the phasing and delivery of development | Cllr Juliet Layton | Geraldine LeCointe | Andrew Maxted | already commenced | Mar-28 | On Target | The draft plan (Regulation 19) will be consider by O&S on 3rd August, Cabinet on 6th August and full Council on 12th August. Subject to the Reg 19 being endorsed, the 6 week consultation period starts on 24th August. |
| Supporting the economy | **Develop the skills of our residents** | Support key sectors to create new highly skilled jobs, including through promotion of apprenticeship opportunities. | Cllr Tristan Wilkinson | Joseph Walker<br>Paul James | Paul James | already commenced | Mar-28 | On Target | The council is working with Cirencester Chamber of Commerce, through a UK Shared Prosperity funded programme, to enhance opportunities for young people, including promoting apprenticeships. The programme has been officially launched and is now underway. The Council has also been speaking to the Ministry of Defence and its contractors about opportunities at the Duke of Gloucester Barracks at South Cerney, which is having major investment to become the HQ of the Army's cyber regiment. |
| Supporting the economy | **Grow a strong and sustainable economy** | Deliver a programme of activities through the Shared Prosperity and Rural England Prosperity Funds | Cllr Tristan Wilkinson | Joseph Walker<br>Paul James | Paul James | Mar-25 | Mar-26 | On Target | All UKSPF & REPF funds are allocated and most projects are completed. The Government has extended the date for delivery to the end of September 2026. Only two projects are still to be completed and these will be finished in good time for the September deadline. |
| Supporting the economy | **Grow a strong and sustainable economy** | Deliver the actions set out in the refreshed Green Economic Growth Strategy. | Cllr Tristan Wilkinson | Joseph Walker<br>Paul James | Paul James | Jan-25 | Mar-28 | On Target | The Green Economic Growth Strategy is overseen by the Cotswold Economic Advisory Group. The refreshed strategy was adopted by Cabinet in March 2025 and delivery of the actions is underway. |

| | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| **Supporting the economy** | **Grow a strong and sustainable economy** | Work with the Royal Agricultural University on their aspiration for the Innovation Village | Cllr Tristan Wilkinson | Joseph Walker<br>Paul James | Paul James | already commenced | Mar-28 | On Target | An outline planning application was submitted in April 2024 and was approved at May's Planning Committee. A legal agreement now needs to be completed in order for the planning consent to be issued. Next steps sit with the RAU. These will include a 'relaunch' of the project in the coming months. |
| **Supporting the economy** | **Grow a strong and sustainable economy** | Promote the Growth Hub to support existing businesses and encourage the growth of start-ups | Cllr Tristan Wilkinson | Joseph Walker<br>Paul James | Paul James | already commenced | Mar-28 | On Target | The UK Shared Prosperity Fund support for the Growth Hub has now come to an end. Reduced funding from the County Strategic Economic Development Fund has taken its place. This has meant there is now just one part-time Business Navigator per Hub. The Cirencester Growth Hub has moved from the Alliston Centre to the Emrys Jones Centre on the main RAU campus. The co-working space and offices will remain at the Alliston Centre and Growth Hub events will still take place there. The Council will continue to work closely with the Growth Hub to ensure businesses in the district get the support they need. |
| **Supporting the economy** | **Grow a strong and sustainable economy** | Work with partners to realise benefits of the Creative Cotswolds Action Plan | Cllr Tony Dale | Joseph Walker | Lisa Caton | Sep-25 | Mar-28 | On Target | Cabinet approved the proposal in May to recruit a specialist officer to support the cultural economy. Subsequently a post has been created and the recruitment is underway at the end of the quarter. Alongside the Leisure and Culture Support Officer has been working with the museum to enhance their use and presentation of data to inform decision-making on future economic opportunities |
| **Supporting the economy** | **Manage the opportunity and impact of the visitor economy** | Refresh the Tourism Destination Management Plan | Cllr Tony Dale | Joseph Walker<br>Chris Jackson | Chris Jackson | Sep-25 | Sep-26 | On Target | External consultant meeting with industry partners collectively and individually to gather views and intelligence to frame a new Destination Management Plan, expected in September |
| **Supporting the Economy** | **Deliver the new Local Plan** | Promote policies that maintains and protects our existing employment sites whilst supporting sustainable economic growth in the district | Cllr Juliet Layton | Geraldine LeCointe | Andrew Maxted | already commenced | Dec-26 | On Target | The draft plan (Regulation 19) will be consider by O&S on 3rd August, Cabinet on 6th August and full Council on 12th August. Subject to the Reg 19 being endorsed, the 6 week consultation starts on 24th August. |

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# CORPORATE PERFORMANCE REPORT 2026/27 Q1 – ANNEX C

COTSWOLD
District Council

## 1. EXECUTIVE SUMMARY

**1.1** This report sets out the Strategic Risk Register for Cotswold District Council which has been reviewed by the Corporate Leadership Team ("CLT") during Q1 and Q2 of the current financial year.

**1.2** The Strategic Risk Register will be considered by Audit and Governance Committee at their meeting on 05 October 2026. The committee reviewed the Q4 risk register at their meeting on 27 July 2026 and discussed the risk on Civil Contingency/Major Event (CDC_SRR_252610) with a focus on business continuity plans. Comments were also made on the definition of the Health and Safety Compliance risk (CDC_SRR_252603).

**1.3** The risks set out in Annex C-1 and provides an update of the authority's strategic risks and the risk management work being undertaken; to assist the committee in fulfilling their obligations to periodically review the authority's Corporate Risk Register and to consider the effectiveness of the council's risk management arrangements.

## 2. BACKGROUND

**2.1** Audit and Governance Committee considered the Risk and Opportunity Management Policy at their meeting on 09 April 2026. The policy outlined sets the Council's approach to risk and opportunity management including defining what is Risk and Opportunity Management, our risk appetite as a council, definitions, roles, and responsibilities, and how risk management is embedded across the organisation.

**2.2** The Council's risk appetite level is Cautious, although this can change on a risk-to-risk basis. It is willing to consider all potential options but with well evaluated risks and learning from experience. The risk appetites considered in the policy are shown below for information.

| Averse | Cautious | Creative and Aware | Eager |
|---|---|---|---|
| • Safe Business delivery options with low risks limited reward<br>• Reluctant to take action given uncertainty | • Safe delivery of options that have a medium degree of risk and potential for reward<br>• Tight corporate control over change | • Willing to consider all potential options that are most likely to result in success<br>• Well evaluated risk taking<br>• Learns from experience | • Eager to be creative and innovative<br>• Higher rewards despite inherent risk<br>• Willing to accept significant loss<br>• Actions when results are unknown |

**2.3** Accepted best practice is for risk management to be reported to members on a regular basis.

**2.4** External Audit, as part of the annual assessment of the Council's arrangements for securing economy, efficiency and effectiveness (Value for Money) have recommended that the frequency of the review of the strategic risk register should be quarterly.

**2.5** The Council's constitution sets out the role of Audit and Governance Committee includes "Monitoring the arrangements for the identification, monitoring and control of strategic and operational risk within the Council" and "consider summaries of specific risk management reports, quarterly."

**2.6** Members should view this review in response to the recommendation, and it is proposed that the strategic risk register is included in the work programme for the committee with a quarterly review frequency.

**2.7** As an additional measure, the strategic risk register is reviewed by Cabinet on a quarterly basis and is aligned to the wider service and financial performance reporting cycle.

**CORPORATE PERFORMANCE REPORT 2026/27 Q1 – ANNEX C**

COTSWOLD
District Council

## 3. MAIN POINTS

**3.1** In assessing risk, the Council utilises a 5x5 matrix (as shown below) with a score given to the Initial Risk and the Residual Risk (Current Risk)

| | | | | | | |
|---|---|---|---|---|---|---|
| Likelihood | 5 | 5 | 10 | 15 | 20 | 25 |
| | 4 | 4 | 8 | 12 | 16 | 20 |
| | 3 | 3 | 6 | 9 | 12 | 15 |
| | 2 | 2 | 4 | 6 | 8 | 10 |
| | 1 | 1 | 2 | 3 | 4 | 5 |
| | | 1 | 2 | 3 | 4 | 5 |
| | Impact | | | | | |

**3.2** The strategic risks facing the Council are set out in Annex C-1 and are considered the risks that could impact the successful achievement of the Council's long-term core objectives, priorities, reputation, and outcomes. These risks are classed as strategic as these are no able to be managed at service level.

**3.3** The risks are summarised below for the purposes of this report, but members are encouraged to review Annex C-1.

- 1 risk scored 16 (Red) – Local Plan (No Change)
- 3 risks scored 15 (Red) – Cyber Security, Health and Safety Compliance, Civil Contingency/Major Event (No Change).
- 7 risks scored 9 (Amber) – Financial Sustainability (reduction in risk score from 12), Contractor Failure, Compliance GDPR/Data breach, Staff recruitment and retention, Service Standards (LGR impact), Staff capacity (LGR workload), Fraud & Corruption.

- 3 risks scored 6 (Amber) – Corporate Plan Delivery (reduction in score of 3), Resilience – Democracy (reduction in score of 3), Procurement (no change).
- 1 risk was de-escalated – PCI/DSS compliance

**3.4** Further controls, mitigation, or contingency is detailed for each risk set out in Annex C-1 with follow-up action where appropriate.

## 4. FINANCIAL IMPLICATIONS

**4.1** There are no financial implications arising directly from this report.

## 5. LEGAL IMPLICATIONS

**5.1** There are no legal implications arising directly from this report.

## 6. RISK ASSESSMENT

**6.1** If the Council's governance arrangements are weak then Council is at risk of failing to safeguard the use of public funds. In turn this would lead to poor external assessments, damaging the reputation of the Council.

## 7. EQUALITIES IMPACT

**7.1** An equalities impact assessment is not required for this report.

## 8. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS

**8.1** There are no climate or ecological emergency implications arising directly from this report.

## 9. BACKGROUND PAPERS

**9.1** None.

(END)

## Cotswold District Council

10/08/2026

**Strategic Risk Register - August 2026**

| ID | Description of risk / opportunity | Owner | Initial Risk: Impact category | Impact score | Likelihood category | Likelihood score | Score | Residual Risk (current): Impact category | Impact score | Likelihood category | Likelihood score | Score | Change in residual risk since previous review | Date of Review | Days since last review | Control, Mitigation or Contingency | Follow on Action (if required) | Risk Acceptance Level | Impact on or from Partner Authorities | Status: Open, Hold, or Closed | Direction of Travel since previous review) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **POLITICAL** | | | | | | | | | | | | | | | | | | | | | |
| CDC_SRR_252601 | **Financial Sustainability**<br>The Council is unable to maintain a balanced budget position during 2026/27 due to unavoidable cost pressures, loss of income<br>The Council is unable to set a balanced budget for the forthcoming financial year (2027/28) | Deputy Chief Executive & Section 151 Officer | Major | 4 | Probable | 4 | 16 | Moderate | 3 | Possible | 3 | 9 | -3 | 05-Aug-2026 | 5 | 3-year funding settlement - more certainty<br>Experienced and qualified Team<br>LGR Backfill in place<br>Awareness of the Budget Gap in 2026 MTFS<br>Current Savings and Transformation Plan<br>Reserves and Balances - adequate<br>Quarterly Financial Performance reports to Cabinet & O&S<br>Financial Implications on every report<br>Engagement with Cabinet member and Informal Cabinet<br>Exposure to secondary commodities market - seek longer term fixed price deals (although market appetite is low)<br>**2025/26 Outturn positive with transfer of additional surplus to earmarked reserves** | <u>2026/27</u><br>**2026/27 Q1 Financial Performance report to Cabinet September 2026 with options on utilising any beneficial financial position to support 2026/27.**<br><br>External Auditor VfM judgement<br>Transformation Plan - ABW<br>Internal Audit to plan for audit of Budget Setting Process<br><br><u>2027/28</u><br>**Engagement with Ubico/Publica commenced June 2026 on expectations for 2027/28. Further meetings September and October.**<br><br>**2027/28 Budget options considered with Cabinet July 2026 with follow-up meetings August and September 2026.** | Risk Reduction | *Risk to Partner Authorities but under control* | Open | |
| CDC_SRR_252613 | **Procurement**<br>The Council does not undertake procurement activities in accordance with the Contract Rules and/or incurs expenditure in relation to services/works that has not been authorised in accordance with the Financial Procedure Rules. | Deputy Chief Executive & Section 151 Officer | Major | 4 | Probable | 4 | 16 | Moderate | 3 | Remote | 2 | 6 | 0 | 05-Aug-2026 | 5 | Procurement Act 2023 (effective from 24/02/2025) with updated Contract Rules adopted in the constitution.<br>Procurement Action Plan in place with additional mitigation measures.<br>Procurement Toolkit available on intranet site.<br>Procurement Training for Council staff delivered November 2025 and February 2026<br>Only authorised officers to undertake procurment<br>Senior Procurement Business Partner to escalate any procurement concerns directly to CLT<br>Commissioning and Procurement Board held monthly | <u>Mandatory</u> Member Briefing on Procurement - 18 March 2026<br>Procurement Action Plan review to Audit & Governance Committee - April 2026<br>Internal Audit Plan 2026/27 - follow-up<br>**Quarterly review at Audit & Governance Committee and Cabinet from January 2026 with next report October 2026**<br>**ABW "Purchase to Pay" enhancement for CDC live from 2026**<br>**Annual refresh of mandatory training for staff and members** | Risk Reduction | *Risk to Partner Authorities but under control* | Open | |
| CDC_SRR_252602 | **Contractor Failure - Contract Management**<br>The Council does not effectively manage contracts with major suppliers and results in a failure to deliver services<br>Major contractor unable to deliver service levels due to external pressures - Ubico expansion (Wiltshire), provision of new Waste Fleet vehicles | Deputy Chief Executive & Section 151 Officer | Major | 4 | Possible | 3 | 12 | Moderate | 3 | Possible | 3 | 9 | 0 | 05-Aug-2026 | 5 | Ubico & Publica - Teckal companies which CDC is a shareholder<br>Publica - Shareholder Forum and Operational Forum (CDC Chair for 12 months from October 2025)<br>Freedom - Leisure Contract manager (LC)<br>Ubico - Waste & Recycling contract management (PJ)<br>KPIs being developed with clear reporting framework to Cabinet & O&S on a quarterly basis<br>Freedom - quarterly performance meetings with Freedom/Cabinet Member/Officers<br>**LGR Programme - comprehensive and up-to-date contractor schedule**<br>**Protocol on procurement ahead of LGR vesting day agreed across county** | Dun & Bradsheet alerts - follow up on how this is managed/communicated<br>CDC to improve client-side management of key stakeholders<br>Fortnightly review meetings - Head of Waste, s151 on Fleet replacement | Risk Reduction | *No impact* | Open | |
| CDC_SRR_252603 | **Compliance - Health & Safety**<br>Risk of death or injury to service users/staff due to breach of H&S<br>**Consdier change to definition following A&G comments** | Chief Executive | Extreme | 5 | Possible | 3 | 15 | Extreme | 5 | Possible | 3 | 15 | 0 | 05-Aug-2026 | 5 | H&S Team, policy<br>Risk assessments in place<br>H&S Board minutes standing item on CLT (quarterly)<br><br>Risk assessment training 20/05/2026. Further dates to be confirmed<br><br>**Leader of the Council - named Cabinet member with responsibility for H&S** | Full set of H&S procedures to be developed and implemented<br>All inspections relating to assets (e.g. Legionella) are recorded on the Council's asset management system with quarterly reporting to H&S Board/CLT<br>Review of H&S Board TOR<br>**Overarching H&S Policy to be consdiered by Cabinet Oct/Nov with delegation to CEX to agree other H&S policies** | Risk Avoidance | *No impact* | Open | |

## Cotswold District Council

**Strategic Risk Register - August 2026**

10/08/2026

| ID | Description of risk / opportunity | Owner | Initial Risk | | | | | Residual Risk (current) | | | | | Change in residual risk since previous review | Date of Review | Days since last review | Control, Mitigation or Contingency | Follow on Action (if required) | Risk Acceptance Level | Impact on or from Partner Authorities | Status: Open, Hold, or Closed | Direction of Travel since previous review) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | Impact category | Impact score | Likelihood category | Likelihood score | Score | Impact category | Impact score | Likelihood category | Likelihood score | Score | | | | | | | | | |
| CDC_SRR_252604 | **Compliance - GDPR/Data Breach**<br>The Council does not have adequate internal controls around the management of its data resulting in a serious data breach | Chief Executive | Major | 4 | Probable | 4 | 16 | Moderate | 3 | Possible | 3 | 9 | 0 | 05-Aug-2026 | 5 | Data Protection Officer<br>Training (mandatory)<br>DP policies<br>ICT Acceptable use policy<br>Nominated SIRO<br>Reporting of data breaches and near misses<br>Cabinet member responsible for data governance<br>Improvements in Data Breach Reporting (more low level breaches being reported), roll-out of training to follow-up on mandatory training<br>**Annual Governance Statement (AGS) includes SIRO annual report** | Annual report to the Cabinet member on data governance<br>Internal Audit review follow and addressing the issues as raised in the IA Plan<br>Mandatory Training from March 2026 to be completed by 30/04/2026 | Risk Avoidance | *No impact* | Open | |
| CDC_SRR_252605 | **Staff**<br>Inability to recruit and retain suitably qualified and experienced staff to deliver services | Chief Executive | Major | 4 | Possible | 3 | 12 | Moderate | 3 | Possible | 3 | 9 | 0 | 05-Aug-2026 | 5 | Vacancy Management process<br>Authority to Fill process<br>Market Supplements, Flexible working, employee benefits (Medicash etc)<br>Ability to bring in Agency Staff<br>Shared agreements with other Councils<br>Trainee roles/apprenticeships<br>Approach to Learning & Development - Professional Learning<br>Positive Workplace culture - People & Culture Strategy<br>Appraisals - 2026/27 appraisals to be set no later than June 2026.<br>Retention Strategy and updated Flexibility in Pay Policy agreed in April 2026<br>**Low level of vacancies reported Q1 2026/27** | CT Developing a framework for Training & Development<br>Publica - partnership working with FODDC and WODC<br>Consideration of mutual aid policy across Gloucestershire<br>Review of secondment agreements to ensure mitigation measures are effective<br>**CLT review of recruitment and retention options - recognising difficultly in recruiting to roles and retaining interims/agency staff. Promotion of wider employee benefits (training and development) in job adverts and recruitment** | Risk Acceptance & Retention | *Publica Risk* | Open | |
| CDC_SRR_252606 | **Service Standards**<br>LGR risk inability to maintain BAU and support the Council and/or residents due to insufficient staff capacity (time spent on LGR) | Chief Executive | Moderate | 3 | Possible | 3 | 9 | Moderate | 3 | Possible | 3 | 9 | 0 | 29-Jul-2026 | 12 | Some services delivered by a partner organisation (Ubico, Publica)<br>Wellbeing strategy and other employee benefits to support staff<br>Capacity Fund to support delivery of BAU (CLT) - backfill may be an option<br>Managing members and expectations through ongoing communication and briefings on Corporate Plan and service standards<br>Retention Strategy<br>LGR Transition budget funds 50% of Programme Leads to contribute towards backfill costs. whilst maintaining a robust process<br>Where a vacancy arises - flexible approach to recruitment including backfill/act-up etc (case by case basis)<br><br>Mandatory Training to continue to build capacity, training opportunities for staff (Carmel's budget) investing in staff | s151 Ensure Capacity Fund is adequate to support Council until 31/03/2028<br>2025/26 Outturn to identify additional balance for reserve<br>Identification of single points of failure<br><br>Ongoing dialogue with Cabinet on impact of LGR on BAU<br><br>**Plan on a Page (POAP) drafted - to be published in Q2**<br>**Decisions on recruitment - maintaining service levels key consdieration**<br>**Gloucestershire-wide secondment agreement due to be launched Q2 2026/27** | Risk Acceptance & Retention | *Risk to Partner Authorities but under control* | Open | |
| CDC_SRR_252607 | **LGR Risk (staff unable to contribute/burnout)**<br>Inability to support the Council and Residents in the transition from District to Unitary Council | Chief Executive | Moderate | 3 | Possible | 3 | 9 | Moderate | 3 | Possible | 3 | 9 | 0 | 29-Jul-2026 | 12 | Some services delivered by a partner organisation (Ubico, Publica)<br>Wellbeing strategy and other employee benefits to support staff<br>Capacity Fund to support delivery of BAU (CLT) - backfill may be an option<br>Managing members and expectations through ongoing communication and briefings on Corporate Plan and service standards<br>Realistic/Deliverable CP and SP within the resources available<br><br>Impact of 2 LGR areas on staff etc<br>Aggregation and Disaggregation workstreams Oxon - asking Districts for staff/input<br>**Initial draft of Internal Audit report on staff health and wellbeing support - positive** | s151 Ensure Capacity Fund is adequate to support Council until 31/03/2028<br>2025/26 Outturn to identify additional balance for reserve<br>Identification of single points of failure<br>**CLT cognisant of LGR workload risks with weekly update on emerging issues and pressure points.** | Risk Reduction | *Risk to Partner Authorities but under control* | Open | |

## Cotswold District Council

10/08/2026

**Strategic Risk Register - August 2026**

| ID | Description of risk / opportunity | Owner | Initial Risk: Impact category | Initial Risk: Impact score | Initial Risk: Likelihood category | Initial Risk: Likelihood score | Initial Risk: Score | Residual Risk (current): Impact category | Residual Risk (current): Impact score | Residual Risk (current): Likelihood category | Residual Risk (current): Likelihood score | Residual Risk (current): Score | Change in residual risk since previous review | Date of Review | Days since last review | Control, Mitigation or Contingency | Follow on Action (if required) | Risk Acceptance Level | Impact on or from Partner Authorities | Status: Open, Hold, or Closed | Direction of Travel since previous review) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| CDC_SRR_252608 | **Local Plan**<br>The Council is not able to adopt the Local Plan in early 2028 leading to unsustainable piecemeal developments which do not provide infrastucture | Director of Communities & Place | Major | 4 | Probable | 4 | 16 | Major | 4 | Probable | 4 | 16 | 0 | 29-Jul-2026 | 12 | Local Plan Oversight Board<br>LP Project Management<br>Leader and Deputy Leader commitment to deliver<br>Review of Planning Services structures and resources<br>Earmarked Reserve (£1m) + Grant funding (£0.230m)<br>Additional £0.130m allocated to reserve February 2026 MTFS | s151 Ensure reserve funding is adequate to support Plan delivery **including examination stage**<br>**Reg 19 report to Council 13 August 2026 with public consultation to follow.**<br>Updated Project Plan lead by Interim Head of Policy Planning & Infrastructure - experienced leader<br>s151 to review total resources required to deliver updated project plan | Risk Reduction | *Risk to Partner Authorities but under control* | Open | |
| CDC_SRR_252609 | **Corporate Plan**<br>Inability to deliver the priorities as set out in the Corporate Plan leading to reputation risk to the Council | Chief Executive | Moderate | 3 | Probable | 4 | 12 | Moderate | 3 | remote | 2 | 6 | -3 | 29-Jul-2026 | 12 | Corporate Plan refresh adopted September 2025 with realistic and deliverable targets<br>Quarterly Performance reporting on CP Actions<br>Staff clear on responsibilities and accountabilities through appraisals<br>Service plans - Golden thread and embeds CP in the Council<br><br>CEX review with each Cabinet member (with Leader) on what has been done to deliver CP actions and what needs to be done for future delivery | Review of CP Actions on an annual basis to ensure actions match resources and can be delivered within timeframe of LA<br>Service Plans being reviewed/refreshed and updated for 2026/27 to ensure delivery of the CP. SP has to be signed-off by CAB member<br>**Plan on a Page (POAP) drafted - to be published in Q2** | Risk Reduction | *Risk to Partner Authorities but under control* | Open | |
| CDC_SRR_252610 | **Civil Contingency/Major Event**<br>The Council is not adequately prepared to deal with a major Civil Contingency leading to harm to life<br><br>Note - 2 different risks on BCPs vs Civil Contingencies? | Chief Executive | Extreme | 5 | Possible | 3 | 15 | Extreme | 5 | Possible | 3 | 15 | 0 | 29-Jul-2026 | 12 | BCP Plans<br>Emergency Planning<br>Training and Development of those involved in response (Gold etc)<br>Publica process on emergency planning/rota<br>Operation Pegasus/Mighty Oak etc - part of the 'live event/exercise' | **CLT to reviewing service BCPs Q1 and Q2 2026/27**<br>Member of Glos LRF Exec - all had GOLD training/refresher training<br>Involved in planning for significant/major events across Glos<br>**CDC involved in major planning exercises** | Risk Reduction | *Risk to Partner Authorities but under control* | Open | |
| CDC_SRR_252611 | **Cyber Attack**<br>The Council is inadequately prepared for a cyber attack (e.g. ransomware) leading to Council systems being unavailable and inability to deliver services | Chief Executive | Extreme | 5 | Possible | 3 | 15 | Extreme | 5 | Possible | 3 | 15 | 0 | 29-Jul-2026 | 12 | Team<br>Ability to cooperate | Regular briefings to CLT from service on state of cyber readiness, training etc | Risk Reduction | *Risk to Partner Authorities but under control* | Open | |
| CDC_SRR_252612 | **Resilience - Democracy**<br>Elected members do not agree to extending their term of office beyond May 2027 leading to an inability of the Council to make decisions (not being quorate, elections)<br>Elected members that may be a Shadow Authority member could be unable to support District Council | Director of Governance & Development | Moderate | 3 | Possible | 3 | 9 | Minor | 2 | Possible | 3 | 6 | -3 | 29-Jul-2026 | 12 | Ensure adequate staffing resource in Elections & Dem Services | Understand nature of final 11 months prior to vesting day and how member vacancies are covered<br>Keeping members updated on LGR and other issues to ensure they can manage ward-based case work etc | Risk Acceptance & Retention | *Risk to Partner Authorities but under control* | Open | |

| | Impact | | Likelihood | TOTAL |
|---|---|---|---|---|
| Total | 48.00 | | 41.00 | 142.00 |
| Average | 3.43 | | 2.93 | 10.14 |
| Previous Total | 50.00 | | 42.00 | 151.00 |
| Previous Average | 3.57 | | 3.00 | 10.79 |
| **Change in Total** | **-2.00** | | **-1.00** | **-9.00** |
| **Change in Average** | **-0.14** | | **-0.07** | **-0.64** |

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COTSWOLD
District Council

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| Council name | **COTSWOLD DISTRICT COUNCIL** |
| Name and date of Committee | **CABINET – 10 SEPTEMBER 2026**<br>**COUNCIL – 23 SEPTEMBER 2026** |
| Subject | **ESTABLISHING A JOINT/STATUTORY COMMITTEE** |
| Wards affected | All |
| Accountable member | Cllr Mike Evemy, Leader of the Council<br>Email: mike.evemy@cotswold.gov.uk |
| Accountable officer | Jane Portman, Chief Executive Officer<br>Email: jane.portman@cotswold.gov.uk |
| Report author | Angela Claridge, Director of Governance & Development (Monitoring Officer)<br>Email: angela.claridge@cotswold.gov.uk |
| Summary/Purpose | This report seeks approval for Cotswold District Council to establish and participate in a Joint Committee with the other Gloucestershire councils to oversee and co-ordinate the transition to the new single unitary Gloucestershire Council, due to become operational on 1 April 2028. The committee will provide a formal governance framework for local government reorganisation, enabling councils to work collaboratively on implementation planning, governance arrangements and key transition decisions while ensuring Cotswold District Council is actively represented and able to influence the process. |
| Annexes | Annex A – MHCLG's Letter dated 16 July 2026<br>Annex B – Joint Committee Draft Terms of Reference |
| Recommendation(s) | That Cabinet resolves to:<br>1. Approve the establishment of a Joint Committee for the area identified to form Gloucestershire Council in MHCLG's letter dated 16 July 2026 (attached at Annex A).<br>2. Approve delegated authority to the Chief Executive Officer, in consultation with Leader of the Council, to agree the terms of reference for the Joint Committee, in accordance with the |

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| | draft terms of reference as set out in Annex B, to include that:<br>(i) the Joint Committee takes the form and is authorised to undertake such functions as are expected to be required of a joint committee established under a Gloucestershire (Structural Changes) Order (SCO), as made under the Local Government and Public Involvement in Health Act 2007, together with such other functions as may be agreed with the other existing Gloucestershire Councils by the Chief Executive in consultation with the Leader of the Council and<br>(ii) the Joint Committee is in place until such time as the SCO comes into force, from which point onwards the Joint Committee shall continue and undertake responsibility for those functions as may be specified in the SCO, until the day following that on which the Gloucestershire Council holds its first meeting in shadow authority form.<br>3. Approve the nomination of one representative and one substitute as the Council's representatives to the Gloucestershire Council Joint Committee<br>4. Approve delegated authority to the Chief Executive Officer, in consultation with the Leader of Council, to agree any other matters to support the establishment, operation and decision making in support of the Gloucestershire Council Joint Committee<br>That Cabinet recommends to Council the:<br>5. the establishment of a Joint Committee with the other seven Gloucestershire Councils noting Cabinet's approval to delegate functions in accordance with Part 4 of the Local Authorities (Arrangements for the Discharge of Functions) (England) Regulations 2012"; and<br>6. Appointment of Councillor Mike Evemy as the Council's representative and Councillor Tristan Wilkinson as substitute |

COTSWOLD
District Council

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| | representative to the Gloucestershire Council Joint Committee |
| Corporate priorities | • Preparing for the Future<br>• Delivering Good Services<br>• Responding to the Climate Emergency<br>• Delivering Housing<br>• Supporting Communities<br>• Supporting the Economy |
| Key Decision | Yes |
| Exempt | No |
| Consultees/ Consultation | Leaders of the seven principal local authorities in Gloucestershire<br>Corporate Leadership Team<br>Alice McAlpine –LGR Programme Lead for Governance & Legal |

COTSWOLD
District Council

## 1. EXECUTIVE SUMMARY

**1.1** Following the Government's decision on 16 July 2026 to establish a single unitary authority for Gloucestershire, the seven existing councils are required to work together to oversee the implementation of local government reorganisation and the creation of the new Gloucestershire Council. The new authority is expected to become operational on 1 April 2028.

**1.2** Government implementation guidance expects councils to establish a Joint Committee ahead of the Structural Changes Order coming into force. Creating the committee at this stage will provide a formal governance framework to coordinate transition activity, develop implementation plans, oversee key decisions and ensure effective collaboration across all Gloucestershire councils during the first phase of reorganisation.

**1.3** The report seeks approval to establish the Joint Committee, delegate authority for finalising the Terms of Reference, and appoint a Council representative and substitute member. Participation will ensure that Cotswold District Council is fully engaged in shaping the future governance, organisational arrangements and implementation programme for the new Gloucestershire Council, helping to support a coordinated and effective transition while protecting the Council's interests throughout the reorganisation process.

## 2. BACKGROUND & MAIN POINTS

**2.1** On 16 July 2026, the then Secretary of State for Housing, Communities and Local Government, the Rt Hon Steve Reed OBE MP, wrote to the Leaders of Gloucestershire's councils confirming the Government's decision to proceed with the creation of one new unitary authority for Gloucestershire. A copy of the letter is attached at Annex A.

**2.2** The new authority will be known as Gloucestershire Council and will replace Gloucestershire County Council and the six district, borough and city councils: Cheltenham Borough Council, Cotswold District Council, Forest of Dean District Council, Gloucester City Council, Stroud District Council and Tewkesbury Borough Council. The new council is expected to become fully operational on 1 April 2028.

**2.3** Now that the Government has made its decision, the proposals for reorganisation will be implemented by way of a Structural Changes Order (SCO). The SCO will provide the legal basis for local government reorganisation in Gloucestershire, including the abolition of the existing councils, the establishment of Gloucestershire Council, transitional arrangements, elections to the shadow authority and the responsibilities of the current and successor councils in implementing local government reorganisation.

**2.4** It is currently anticipated that the SCO will be laid in Parliament in 'Winter' 2026 and will be made in March 2027. Once made it is expected that the SCO will make provision for the establishment of a formal Joint Committee, with elected-member representation from all seven existing Gloucestershire councils, to oversee preparations for the new authority until the shadow authority is elected.

**2.5** However, the MHCLG published Local Government Reorganisation: Implementation Guidance for the first transition period is clear that that councils are expected to set up a Joint Committee on a voluntary basis before the SCO comes into effect. This is to allow the Joint Committee more time to develop the implementation plan and proposals for the new authority to be considered.

**2.6** As well as the implementation plan and proposals, the Joint Committee will be expected to oversee other key implementation activity, including the transfer of functions, property, rights and liabilities from the existing councils to Gloucestershire Council; the development of proposals for governance arrangements, including a code of conduct and constitution for the shadow authority; the arrangements for interim statutory officer appointments, including the Head of Paid Service, Chief Finance Officer and Monitoring Officer; the approach to member allowances; and preparations to ensure a smooth transition for civic, ceremonial and other operational matters.

**2.7** In a further letter from MHCLG on 20 July 2026 the Government has confirmed that the Joint Committee will comprise 12 councillors: six members from Gloucestershire County Council and one member from each of Cheltenham Borough Council, Cotswold District Council, Forest of Dean District Council, Gloucester City Council, Stroud District Council and Tewkesbury Borough Council. The nominations for members from Gloucestershire County Council will be required to be politically proportionate in accordance with the Local Government Act 1989 as there will be more than three appointments to the Joint Committee.

**2.8** The implementation programme will also be supported by a dedicated officer team drawn from the existing councils led by the Chief Executive of Gloucestershire County

Council as Senior Responsible Officer (SRO) and a deputy SRO from one of the borough, city or district councils.

**2.9** Elections to the shadow authority are expected to take place in May 2027. The shadow authority will then be responsible for taking the key decisions required to establish Gloucestershire Council ahead of the new council becoming operational on 1 April 2028 and will replace the Joint Committee.

**2.10** Until vesting day, all seven existing councils will continue to deliver their services and discharge their statutory responsibilities.

**2.11** As the council operates a Leader and Cabinet/Executive model it is necessary in accordance with both Local Government Act 1972 (Section 101(5)) and the Local Government Act 2000 (Section 9E) that this decision is taken by both Cabinet and Council as both executive and non-executive functions will be delegated to the Joint Committee.

## 3. FINANCIAL IMPLICATIONS

**3.1** There are no direct financial implications arising from recommendations in the report.

**3.2** There will be some expenditure incurred by the servicing and expenses of the Joint Committee. Any agreed costs will be met from the existing resources by individual councils.

## 4. LEGAL IMPLICATIONS

**4.1** The establishment of the Joint Committee will provide a lawful governance mechanism through which the seven Gloucestershire councils can collaborate on local government reorganisation ahead of the creation of the new Gloucestershire Council. The Committee will be established under the powers available to local authorities to discharge functions jointly, pending the coming into force of the Structural Changes Order (SCO), which will provide the statutory framework for the transition arrangements and establishment of the new unitary authority.

**4.2** This cooperation will not fetter Cotswold District Council's ability to make its own autonomous decisions within the LGR context, until the coming into force of the Structural Change Order.

**4.3** As Cotswold District Council operates executive arrangements, the delegation of both executive and non-executive functions to the Joint Committee requires approval by both Cabinet and Council in accordance with Section 101(5) of the Local Government Act 1972 and Section 9E of the Local Government Act 2000. The proposed Terms of Reference and any subsequent delegations must clearly define the Joint Committee's powers and responsibilities to ensure decisions are made within the scope of the Council's legal authority. Ongoing legal advice will be provided throughout the transition programme to support compliance with statutory requirements and the implementation of the future Structural Changes Order.

**5. RISK ASSESSMENT**

**5.1** The establishment of a Joint Committee will support effective governance and decision-making during the transition to Gloucestershire Council. The principal risks associated with proceeding relate to the additional demands on member and officer capacity and the need to ensure clear governance arrangements across all participating councils. These risks will be managed through agreed terms of reference, appropriate delegations and ongoing legal and governance support.

**5.2** The risks of not establishing the Joint Committee are considered greater. Failure to participate could reduce the Council's ability to influence key decisions regarding implementation planning, governance arrangements and transitional matters associated with local government reorganisation. It could also delay preparatory work and increase the risk of an inefficient transition to the new authority.

**5.3** Overall, the proposed approach is considered to mitigate strategic, governance and operational risks by establishing a coordinated and accountable framework for joint decision-making during the first transition period, ensuring that the predecessor councils can collectively oversee and prepare for the implementation of local government reorganisation.

**6. EQUALITIES IMPACT**

**6.1** The recommendations in this report relate solely to the establishment of governance arrangements to support local government reorganisation. They do not directly affect service delivery or have any identified adverse impact on individuals or groups with protected characteristics under the Equality Act 2010.

**6.2** Any future proposals arising from the reorganisation programme that may affect residents, service users or staff will be subject to appropriate equality impact assessment and consultation.

**7. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS**

**7.1** The recommendations in this report relate to the establishment of governance arrangements to support local government reorganisation and do not, in themselves, have any direct climate or ecological impacts. No changes to service delivery, land use, buildings, transport arrangements or operational activities are proposed as part of this decision.

**7.2** The Joint Committee will oversee preparations for the establishment of the new unitary authority, and future decisions taken through the local government reorganisation programme will be subject to separate consideration of any climate and ecological implications where relevant.

**8. BACKGROUND PAPERS**

**8.1** None.

(END)

Ministry of Housing, Communities & Local Government

**Rt Hon Steve Reed OBE MP**
*Secretary of State for Housing, Communities & Local Government*
2 Marsham Street
London
SW1P 4DF

Leaders in Gloucestershire
*By email*

16 July 2026

Dear Leaders,

Thank you for your continued work to deliver local government reorganisation in Gloucestershire. This Government is delivering the most ambitious programme of local government reform in a generation, replacing the inefficient two-tier system with new unitary councils so that all parts of our country can access strong services, and are ready for devolution. We need to devolve power out of Whitehall so that we can rebalance wealth, power and opportunity across our country. But devolution must be built on strong local councils that can deliver good public services, support growth, and remain closely connected to the communities they serve.

Doing this right means recognising the unique contributions that different areas make to people's lives, as well as to the national economy. Some of our smaller cities are highly productive, but have been constrained by tight boundaries, set decades ago, which stop them from building the homes they need. Others are more rural, with significant demand for social care services and affordable housing. Local government should be set up to address the unique circumstances of each area and design public services tailored to each community.

Reorganisation provides us with a once-in-a-generation opportunity to ensure that councils genuinely represent the communities they serve today and stand the test of time. We know that people care about their own villages, home towns, high streets and communities. In many parts of the country, existing boundaries do not match local economies, public services, or local identities.

We won't achieve effective devolution or enable effective place-based public services with outdated and misaligned structures that slow down delivery, fragment public services, hamper housebuilding and slow down important decision making. We need to make sure that new councils are grounded in place and are genuinely connected to their communities.

**Decisions**

I have considered your proposals carefully against the criteria set out in the invitation letter of 5 February last year, alongside the responses to the consultation, representations made, requests for modifications made alongside the proposals and all other relevant information.

Following this assessment, I have decided to move forward with the implementation of the **one unitary proposal submitted by Cotswold District Council, Gloucestershire County Council, Stroud District Council, and Tewkesbury Borough Council** ("the one unitary proposal").

This new council will comprise the current areas of:

- Cheltenham Borough Council, Cotswold District Council, Forest of Dean District Council, Gloucester City Council, Stroud District Council and Tewkesbury Borough Council (referred to in the proposal as 'Gloucestershire')

I want to thank you for all of the work that has gone into developing options that seek to deliver new unitary councils that will help to grow the local economy and provide better public services for the people of Gloucestershire. Your ongoing collaboration will be vital to ensure that the proposal is implemented by April 2028 with the interests of residents at its heart.

Turning to the reasons for my decision, in my judgement, although the other two proposals also met the criteria for unitary local government, overall I consider the one unitary proposal to be the best option for Gloucestershire. It performed particularly well with regard to economic and housing market areas, being the only option that enables a combined functional economic and housing area of Cheltenham and Gloucester to support growth across cyber, digital, security and manufacturing industries. The one unitary proposal delivers county-wide services and partnerships through alignment of service provision and community empowerment. This is demonstrated by both feedback in the statutory consultation and support from councils in the area.

In more detail, in my view the one unitary proposal performs particularly well in the following areas:

- **Sensible geography for economic growth and housing**: In my judgment, the one unitary proposal offers the most coherent geography for Gloucestershire as a whole. Bringing the Gloucester – Cheltenham growth corridor and the Golden Valley cyber cluster into one council will enable the unitary to unlock investment and coordinate delivery most effectively. Although both of the two unitary options allow for two distinct economic areas that could plan around local need, splitting this economic zone between two unitary councils would, in my view, undermine the Cheltenham – Gloucester economic area given how physically close these urban centres are to one another. The one unitary proposal therefore better reflects the reality of a single economic and housing market area across Gloucester, Cheltenham, Tewkesbury and Stroud, where most strategic sites are located, and better enables integrated planning for housing, transport and infrastructure, which will solidify future action on these priorities.
- **Integrated services across Gloucestershire**: I am also of the view that the one unitary proposal provides the strongest basis for delivering high-quality and sustainable public services. Given Gloucestershire has established alignment of key public services and already runs a highly aligned service delivery model, including for social care, education and health, I judge that the one unitary proposal will better preserve this alignment of key public services, by allowing continued operation on the same geographic footprint. While both two unitary proposals could allow for service delivery models closer to respective communities, I do not believe that these potential benefits outweigh the risks posed by splitting service delivery across Gloucestershire – whether those risks be through creating some structural and financial imbalance in the East/West model or the creation of a small unitary in the other model. I judge that the one unitary proposal therefore offers the best opportunity for continued integrated service planning across local government and with wider public sector partners and balances its larger footprint with a strong approach to

community empowerment and engagement that will allow local communities to shape local services. A single unitary will also provide the best connections for the Forest of Dean, across service delivery, transport and economic flows.

- **Community empowerment and engagement**: I have carefully considered the consultation responses, wider representations and the proposal's evidence on community engagement and neighbourhood empowerment. As set out above, the one unitary proposal makes the strongest case for Neighbourhood Partnerships, with devolved budgets and decision-making powers to give communities a direct voice in shaping local priorities and services. While views were expressed in support of each proposal, the one unitary proposal received significant support in the consultation and provides the clearest basis for confident implementation. Taken with its performance against the statutory criteria, this gives me confidence that it is the strongest option for stable, effective and sustainable local government in Gloucestershire.

I also considered the expected costs and benefits set out in the proposals, as well as the ability of each new council to be financially resilient. Based on the information provided, and the assessment carried out against the criteria, I judge that it is most likely to deliver higher savings as well as represent an overall improvement in sustainability over current structures.

**Next steps**

In relation to next steps, as you are aware a Structural Changes Order, which will be subject to Parliamentary approval, is required to abolish existing councils, establish new structures and make transitional arrangements. I have carefully considered the information in the proposals as well as the further representations you have made on the content of this Order.

My officials will shortly write to your Chief Executives setting out the next steps and timeline for implementation, including my initial decisions on transitional arrangements that will be included in the draft legislation. This will enable you to take forward the work needed to begin preparation for implementation, in advance of Parliamentary approval of the Order. Critically, and drawing on learning from previous rounds of reorganisation, this will include an Implementation Team formed of officers from across the area, and elections to the new unitary council in May 2027. For the avoidance of doubt, these elections to the new unitary council will replace any scheduled local elections, and affected councillors will have their terms extended. I have carefully reflected on the request to use the preparing council model for implementation, but on balance have decided that the shadow council model should be used, which was also the majority view locally. While I appreciate this adds some complexity, it will help support the new council to make the most of the opportunities afforded from reorganisation.

A broad support offer is in place for councils, including support to councils through our sector advisors and through funding to the Local Government Association for an enhanced support offer. We have already announced £63m in capacity funding to support the reorganisation process, and I am pleased to provide further detail today on how this funding will be allocated.

Of the £63 million capacity funding, as well as the unprecedented £900,000 transition support to each new unitary already announced, we are also committing up to £150,000 per each new unitary as supplementary funding for Leadership Capacity and Continuity in Children's Services, Adult Social Care and Public Health. This is part of a wider package of support worth up to £10m for children's services, adult's social care and public health leadership, which will also fund targeted development, mentoring and peer support for current, new and aspiring leaders.

In addition, up to £1m of funding overall will be available to support the small number of areas with complex fire and rescue authority transitions.

Taken together, this means that areas undergoing local government reorganisation will receive more than £1 million per new unitary created. This is the first time reorganisation has been supported in this way and shows this Government is committed to supporting councils to get these reforms right. We will confirm details of these allocations in due course.

I look forward to continuing to work closely with you to deliver the vital improvements that reorganisation can facilitate.

I am copying this letter to your Chief Executives, MPs and the Police and Crime Commissioner for Gloucestershire.

Yours sincerely,

**RT HON STEVE REED OBE MP**
Secretary of State for Housing, Communities and Local Government

# ANNEX B

**GLOUCESTERSHIRE COUNCIL JOINT COMMITTEE**

**TERMS OF REFERENCE**

**1. Introduction**

**1.1.** Gloucestershire County Council, Cheltenham Borough Council, Cotswold District Council, Forest of Dean District Council, Gloucester City Council, Stroud District Council and Tewkesbury Borough Council (The "Constituent Councils" have resolved to establish a Gloucestershire Joint Committee (GCJC).

**1.2.** The GCJC is established pursuant to section s101 and 102 Local Government Act 1972 and the section 9EB Local Government Act 2000 and Part IV of the Local Authorities (Arrangements for the Discharge of Functions) (England) Regulations 2000 and 2012.

**1.3.** The GCJC will be constituted from xxxxx 2026. It shall be dissolved upon commencement of the shadow period, which is anticipated to begin four days after the 2027 elections.

**1.4.** It is constituted by resolution of each participating authority on a voluntary basis but is also intended to satisfy the requirements of any Structural Change Order when such legislation may come into force.

**1.5.** The GCJC must have regard to any information supplied to it by the Secretary of State and is set up further to the encouragement of the Secretary of State, as set out in his letter dated 16 July 2026 to all Gloucestershire authorities.

**2. Purpose**

**2.1.** The purpose of the GCJC is to bring together local authority partners expected to be succeeded by the Gloucestershire Council following local government reorganisation, in a formally constituted arrangement to facilitate the discharge of functions relating to preparatory and transition arrangements to that authority to include the functions referenced in any Structural Change Order when such legislation may come into force.

**3. Membership**

**3.1.** The GCJC consists of twelve persons:

**3.1.1.** Six persons nominated by Gloucestershire County Council, each of whom is for the time being an elected member of that council and,

**3.1.2.** Six persons nominated by the District and Borough Councils within Gloucestershire with each such Council nominating one person, each of whom is for the time being an elected member of the nominating council.

**4. Functions**

**4.1.** The GCJC will prepare, keep under review, and revise as necessary, an Implementation Plan which must include:

- Such plans and timetables as are, in the opinion of the GCJC, necessary to secure the effective, efficient and timely discharge of preparing for and facilitating the economic, effective, efficient and timely transfer to Gloucestershire Council of the Constituent Councils' functions, property, rights and liabilities; and
- Such budgets and plans as it considers necessary or desirable to facilitate the economic, effective, efficient and timely discharge, on or after 1 April 2028, of the functions that, before that date, are functions of the Constituent Councils.
- In regard to the GCJC's function of preparing, reviewing and revising an Implementation Plan, the GJC must have regard to Gloucester City Council's EFS Recovery Plan.
- The GCJC must have regard to the information supplied to the Secretary of State in support of the proposal for single tier local government in Gloucestershire.

**4.2.** Prepare, facilitate and subsequently formulate proposals for the code of conduct to be recommended for adoption by the shadow authority for Gloucestershire Council at its inaugural meeting. In formulating such proposals, the GCJC shall have regard to section 27 of the 2011 Localism Act which provides a duty to promote and maintain high standards of conduct and section 28 of that Act

**4.3.** Take all preliminary steps to enable the GCJC to be able to recommend to the first meeting of the Gloucestershire Council shadow authority designation of an interim Head of Paid Service, Chief Finance Officer and Monitoring Officer in accordance with sections 4 and 5 of the Local Government and Housing Act 1989.

**5. Scope and Role of the Joint Committee**

**5.1.** In addition to the functions set out in 4.0 above the GCJC will have the following scope and role to undertake:

**5.1.1.** Prepare, facilitate and subsequently formulate proposals for a Members' Allowance Scheme in accordance with the Local Authorities (Members' Allowances) (England) Regulations 2003 for the Gloucestershire Council shadow authority, to be recommended for adoption to the shadow authority at its inaugural meeting.

**5.1.2.** Agree the process for an independent review of a scheme of Members' Allowances for the Gloucestershire shadow authority, including preparation for the setting up of an Independent Remuneration Panel.

**5.1.3.** Establish and propose a Calendar of Meetings for the Shadow Council for adoption at its inaugural meeting.

**5.1.4.** Agree proposals for a shadow authority Constitution, to be recommended to the shadow authority, to include responsibility for executive/local choice functions, the establishment and terms of reference of various committees including a scrutiny committee and staffing committee, relevant standing orders to include council and executive procedure rules, and a scheme of delegation to be recommended for adoption at the inaugural meeting of the shadow authority.

**5.1.5.** To oversee the preparation for the smooth transition of all matters civic and ceremonial.

**5.1.6.** Take all preparatory steps to support the Returning Officer for Gloucestershire County Council in calling the first meeting of the shadow authority.

**Only from the date of the Gloucestershire (Structural Changes) Order 2027 coming into force until the fourth day after the ordinary day of election of councillors in 2027.**

**5.2.** The GCJC may, by written notice to the proper officer of each of the constituent councils, require the council referred to in the notice, to take such action relevant to the function of preparing for and facilitating the economic, effective, efficient and timely transfer to Gloucestershire Council of its functions, property, rights and liabilities, such functions to be discharged via the GCJC.

**6. Implementation Team**

**6.1.** As soon as practicable after the establishment of the GCJC it will form on a voluntary basis a single team of officers, known as the "Implementation Team" for the purpose of assisting the GCJC in the discharge of its functions, and if required the Gloucestershire Council shadow authority.

**6.2.** The members of the Implementation Team shall include officers from all Constituent Councils

**6.3.** The Leader of the Implementation Team (to be known as Senior Responsible Officer - SRO) shall be the person who is for the time being the Chief Executive of Gloucestershire County Council.

**6.4.** The deputy leader of the Implementation Team is to be the person who for the time being is the Chief Executive from one of the Constituent Councils, not including Gloucestershire County Council or as set out in the SCO.

**7. Procedures at meetings**

**7.1.** Meetings of the GCJC shall be conducted in accordance with the Terms of Procedure.

**GLOUCESTERSHIRE COUNCIL JOINT COMMITTEE**
**DRAFT TERMS OF PROCEDURE**

1. **Appointments**
   **1.1.** Appointments to the membership of the GCJC will be made by each Constituent Council in accordance with the membership criteria set out in the terms of reference for the GCJC.

   **1.2.** If any member of the GCJC ceases to be a member of the council that has nominated them, they shall, with immediate effect, cease to be a member of the GCJC, and the nominating council shall, as soon as is reasonably practicable, make a further nomination with the seat remaining vacant until such time as it is filled.

   **1.3.** Each constituent authority may remove its member(s) and appoint different member(s) as per that council's Standing Orders and by providing at least 24 hours' notice to the Leader of the Implementation Team (to be known as Senior Responsible Officer - SRO).

2. **Chair and Vice Chair**
   **2.1.** The GCJC shall appoint its own Chair and Vice Chair at its first meeting from amongst its membership.

   **2.2.** The Chair shall chair meetings of the GCJC, or in their absence, the Vice Chair shall preside at any meeting of the GCJC. In the absence of both the Chair and the Vice Chair, the GCJC will elect one of its members present to preside at the meeting.

3. **Quorum**
   **3.1.** For a meeting of the GCJC to be quorate there must be at least seven (7) members present and at least three (3) members present must be from Gloucestershire County Council and at least three (3) members present from the District and Borough Councils.

   **3.2.** No business will be transacted at a meeting unless or until a quorum exists at that meeting. If at the beginning of the meeting the person presiding declares that a quorum is not present, they shall adjourn the meeting for 15 mins and if there is still no quorum, the meeting shall stand adjourned.

4. **Voting**
   **4.1.** The GCJC's decision making will operate on the basis of mutual co-operation and consent. A question to be decided by the GCJC is to be decided by the majority of those members present and voting at the meeting at which the question is put. Each member shall have one vote.

**4.2.** In the case of an equality of votes, the person presiding at the meeting, whether or not the chair of the committee, has a casting vote, in addition to any other vote the person may have.

**4.3.** Voting at meetings shall be by show of hands or by an electronic system of voting where available.

**4.4.** Where immediately before a vote is taken, if at least two (2) members request it, there shall be a recorded vote taken and the minutes of the proceedings of that meeting shall record whether each member present cast their vote for or against the matter or whether they abstained from voting.

**5. Meetings**

**5.1.** The GCJC shall meet as required, with a schedule of meetings being agreed at its first meeting.

**5.2.** Additional meetings may be arranged with at least 5 clear working days' notice, at the request of either the Chair, any 4 members of GCJC or the SRO.

**5.3.** Meetings shall be held at such time and location as may be notified to the members of the GCJC by the SRO.

**5.4.** Agendas and reports for meetings of the GCJC shall be published and circulated at least five (5) clear working days in advance of any meeting.

**5.5.** The agenda for any meeting shall be agreed by the Chair of the GCJC and the SRO.

**5.6.** Meetings of the GCJC shall be held in public unless the public are excluded by resolution of the Committee under s100(B) Local Government Act 1972.

**5.7.** The GCJC shall, unless the person presiding at the meeting, or the GCJC determines otherwise in respect of a meeting, conduct its business in accordance with these procedure rules.

**6. Substitutes**

**6.1.** Nominated substitutes will be allowed on the GCJC and each Council when making an appointment to their seats on the GCJC may also appoint the same number of substitute member(s) as appointed member(s). In respect of Gloucestershire County Council which shall be permitted more than one substitute, any appointed substitute may act in place of any one appointed member from that Council. It is for the absent member of the GCJC to make arrangements for the substitute to attend.

**7. Public Engagement**

**7.1.** Public representations and questions are permitted at meetings of the GCJC on any matter that directly relates to any report being bought to a meeting of the Joint Committee from any person living, working or studying in Gloucestershire.

**7.2.** A representation or question may only be asked or put if notice has been given by sending it no later than 12 noon, 3 clear working days before the day of the meeting of the GCJC. Such notice must be in writing or by electronic mail to [XXX].

**7.3.** A written answer will be provided to a written question or representation and will be given to the person raising the question or representation and the members of the GCJC before the meeting. The question and answer will then be taken as read at the meeting itself and need not be read out. A copy of all written questions and written answers circulated at the meeting will be attached to the signed copy of the minutes of the meeting.

**7.4.** There shall not be provision for additional questions or representations to be made orally at the meeting.

**7.5.** Written representations and questions may be rejected when the Chair, in consultation with the Chief Executive of Gloucestershire County Council as Senior Responsible officer for the Gloucestershire LGR Programme, considers that they:

**7.5.1** Are not on any matter set out in the agenda for the GCJC.

**7.5.2** Are defamatory, frivolous or offensive.

**7.5.3** Relate to a matter which is subject to litigation or could reasonably be considered to place a Constituent Council at risk of litigation.

**7.5.4** Are substantially the same as a question that has been put to a meeting of the GCJC previously.

**7.5.5** Would require the disclosure of confidential or exempt information. In every case, the Chair will specify the reason for rejecting a representation or question.

**7.6** A person or organisation may submit a maximum of two (2) questions to each meeting.

**7.7** The total time set aside for such representations and questions and answers will be limited to 15 minutes.

**7.8** For the purposes of this paragraph any elected member from a Gloucestershire council who is not a nominated representative on the GCJC will be treated as a member of the public.

**8. Access to Information**

**8.1.** Meetings of the GCJC will be held in public except where confidential or exempt information, as defined in the Local Government Act 1972, is being discussed. Only members of the GCJC and relevant advising officers from the constituent authorities and any person so invited by the Chair, shall be permitted to be present for such items.

**8.2.** These rules do not affect any more specific rights to information contained elsewhere under the law.

**8.3.** Any information requests under the Freedom of Information Act 2000, Environmental Information Regulations 2004 or Date Protection Act 2018 received by the GCJC should be directed to the relevant Constituent Council for that council to deal with in the usual way, taking account of the relevant legislation. Where the request relates to information held by two or more Constituent Council, they will liaise with each other before replying to the request.

**9. Order of Business**

**9.1.** The order of business at each meeting of the GCJC will be as follows, unless varied by the person presiding:

**9.1.1.** Apologies for absence.

**9.1.2.** Declarations of interests and substitute members.

**9.1.3.** Approval of the minutes of the last meeting.

**9.1.4.** Matters set out in the agenda for the meeting.

**9.1.5.** Matters set out in the agenda for the meeting which, in the opinion of the SRO, are likely to be considered in the absence of the press and public.

**10. Discharge of Functions**

**10.1.** The GCJC may arrange for the discharge of their functions by the SRO (who can nominate and delegate authority to an officer of the Implementation Team) and in doing so will set out clearly any limits upon such delegation.

**11. Code of Conduct and Interests**

**11.1.** Members of GCJC are governed by the provisions of their own Council's Codes and Protocols including the code of conduct for members and the provisions regarding interests.

**12. Minutes**

**12.1.** There shall be no discussion made in respect of the minutes, except as to their accuracy. If no such question is raised or if it is raised then as soon as it has been disposed of, the Chair shall sign the minutes of the previous meeting.

**13. Role of the Chair**

**13.1.** A member wishing to speak shall address the Chair and direct their comments to the agenda item being discussed. The Chair shall decide the order in which to take representations from members wishing to speak and shall decide all questions of order. Their ruling upon all such questions or upon matters arising in debate shall be final and shall not be open to discussion.

**13.2.** The Chair shall have the discretion to regulate the behaviour of all individuals present at the meeting in the interests of the efficient conduct of the meeting, including excluding members of the press and public in the event of a disturbance.

**14. Amendment of these Procedure Rules**

**14.1.** These procedure rules may only be amended by majority resolution of the members of the GCJC present and voting, following consideration of the SRO's advice.

COTSWOLD
District Council

| | |
|---|---|
| Council name | **COTSWOLD DISTRICT COUNCIL** |
| Name and date of Committee | **CABINET – 10 SEPTEMBER 2026** |
| Subject | **PEOPLE & CULTURE STRATEGY IMPLEMENTATION PLAN YEAR 2/3** |
| Wards affected | All |
| Accountable member | Cllr Mike Evemy, Leader of the Council<br>Email: mike.evemy@cotswold.gov.uk |
| Accountable officer | Angela Claridge, Director of Governance & Development (Monitoring Officer)<br>Email: angela.claridge@cotswold.gov.uk |
| Report author | Angela Claridge, Director of Governance & Development (Monitoring Officer)<br>Email: angela.claridge@cotswold.gov.uk |
| Summary/Purpose | To approve the People & Culture Implementation Plan at Annex A |
| Annexes | Annex A – People & Culture Strategy Implementation Plan 2026-28 |
| Recommendation(s) | That Cabinet resolves to:<br>1. Approve the years 2 & 3 implementation plan as detailed in Annex A (August 2026 – March 2028).<br>2. Delegate authority to the Director of Governance & Development, in consultation with the Leader of the Council, to make minor amendments to the plan in response to emerging organisational or legislative changes. |
| Corporate priorities | • Delivering Good Services |
| Key Decision | No |
| Exempt | No |
| Consultees/ Consultation | Corporate Leadership Team, Cabinet and the workforce |

COTSWOLD
District Council

## 1. EXECUTIVE SUMMARY

**1.1** This report presents the Year 2 and 3 People & Culture Strategy Implementation Plan (August 2026 – March 2028), which builds on the strong foundations established during the first year of delivery following Cabinet approval of the strategy and initial implementation plan in September 2025.

**1.2** Over the past 12 months, the Council has made significant progress in strengthening organisational culture, modernising workforce policies and processes, and improving employee experience. Key achievements include the introduction and embedding of workforce values, implementation of a revised organisational structure, development of a more robust performance management framework, refreshed onboarding and mentoring arrangements, and the delivery of a Retention Strategy. Enhanced communication and engagement arrangements, alongside a continued focus on wellbeing, equality, diversity and inclusion, have supported workforce stability during a period of organisational change.

**1.3** This next phase of the implementation plan reflects the increasing demands of Local Government Reorganisation (LGR) and the need to maintain high-quality service delivery whilst preparing for transition to a unitary authority. It sets out a co-ordinated programme of activity focused on supporting colleagues through change, strengthening leadership capability, improving workforce resilience and building the skills and capacity required for the future organisation.

**1.4** Key priorities include delivering clear and consistent communication, supporting managers to lead through change, promoting staff wellbeing and ensuring meaningful opportunities for employee voice. The plan also places a strong emphasis on workforce development, including leadership, digital and technical capability, alongside initiatives to support retention and career progression.

**1.5** Whilst this plan focuses on the Council's internal workforce priorities, it sits alongside and is aligned with the Gloucestershire-wide People & Culture Workstream supporting LGR, recognising the interdependencies between local and system-wide activity.

**1.6** The implementation plan includes clear outcomes and success measures, with progress to be monitored through workforce metrics, staff surveys and regular reporting.

**1.7** Overall, the plan provides a comprehensive and proportionate framework to support the Council's workforce through a significant period of change, ensuring the organisation remains resilient, engaged and well-prepared for transition.

## 2. BACKGROUND

**2.1** The Council's People & Culture Strategy year 1 implementation plan and workforce values were approved by Cabinet in September 2025 and set out the ambition to build a skilled, resilient and engaged workforce capable of delivering high-quality services whilst preparing for the transition to a future unitary authority.

**2.2** Work Undertaken to Date (September 2025–August 2026)

Over the past year, significant progress has been made in implementing the People & Culture Strategy, focusing on strengthening organisational culture, improving workforce processes and preparing for LGR.

**2.3** Embedding Workforce Values & Culture

- Workforce values were developed and approved by Cabinet (September 2025), establishing a clear behavioural framework for the organisation.
- Values have been embedded through leadership communication including CEO blogs, team discussions and 1-1s.

**2.4** Organisation Design & Workforce Clarity

- A revised organisational structure was implemented (July 2025) and kept under ongoing review to ensure it remains fit for purpose.
- Work has been undertaken to ensure job descriptions are up to date and to improve visibility of training and development opportunities.

**2.5** Policy Development & Workforce Frameworks

- A programme of policy review and refresh has been progressed ensuring alignment with legislation and organisational change (including policy areas such as probation, pay and flexible working).
- Equality Impact Assessments have been embedded within policy development.
- An agile working toolkit was developed and implemented to support hybrid and flexible working arrangements.

**2.6** Recruitment, Onboarding & Early Employee Experience

COTSWOLD
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- A refreshed onboarding process has been developed to improve the experience for new starters.
- A mentoring/buddy programme has been introduced, supporting induction and integration.

**2.7** Performance Management & Workforce Development

- A stronger performance framework has been embedded including:
  - Ensuring all staff have regular 1-1s and annual performance discussions;
  - Increasing appraisal completion rates;
  - Providing support to managers to improve developmental conversations.

**2.8** Equality, Diversity & Inclusion

- The Equality, Diversity, Inclusion and Equity Policy & Procedure has been updated together with a new policy to support those employees who are also carers (Cabinet January 2026)

**2.9** Reward, Recognition & Retention

- Increased promotion of employee benefits and wellbeing support to improve awareness and uptake.
- An update to the Flexibility in Pay Policy to reflect the challenges of salaries for hard to recruit to roles.
- Development of a Retention Strategy (approved by Cabinet April 2026), forming a key element of ongoing workforce stability work.
- Continued delivery of recognition initiatives including staff “shout-outs” and awards.

**2.10** Leadership & Management Development

- Promotion of Leadership Pathways programmes including external opportunities, eg, LGA/Solace).

**2.11** Communication & Engagement

- Delivery of a targeted communication and engagement approach including:
  - Regular staff briefings;
  - Ongoing updates aligned with organisational change;
- Introduction of employee engagement surveys to gather feedback on staff experience and communication.

**2.12** Overall Position

Over the past year, the Council has successfully:

- Established strong cultural foundations through values and behaviours;
- Strengthened workforce policies and processes;
- Improved employee experience from onboarding through to development and recognition;
- Enhanced communication and engagement; and
- Put in place key building blocks to support workforce stability ahead of LGR.

This provides a solid platform for the next phase of delivery (2026–2028), which focuses on deepening this work and preparing the workforce for transition to a unitary council.

## 3. MAIN POINTS

**3.1** The implementation plan, included at annex A, represents the next phase (Years 2 – 3) of the People & Culture Strategy and reflects:

- The ongoing demands of LGR;
- The need to maintain service delivery and organisational stability during a period of uncertainty; and
- The importance of supporting colleagues through change, whilst building future capability.

The plan builds on progress made to date and consolidates activity across key themes:

- Organisation and job design
- Systems and processes
- Performing and developing with us
- Being recognised by us
- Connecting with us

Members may also recall a separate Retention Strategy was approved by Cabinet in April 2026.

**3.2** Supporting the Workforce Through Change

A central priority of the plan is to ensure colleagues feel informed, supported and engaged throughout LGR. Key actions include:

- Delivering clear, consistent and transparent communication, supported by a Gloucestershire-wide employee portal;

- Strengthening manager capability to lead through change with confidence and empathy;
- Ensuring opportunities for staff voice through surveys, engagement activities and ongoing dialogue;
- Promoting wellbeing support and implementing recommendations from the 2026 wellbeing audit.

This approach aims to maintain trust, reduce uncertainty and support resilience across the workforce.

**3.3** Building a Future-Ready Workforce

The plan includes a strong focus on workforce development to ensure readiness for a unitary council environment. This includes:

- Workforce and skills audits to identify gaps and critical roles;
- Investment in leadership, digital and technical capability;
- Expansion of early career pathways and talent pipelines;
- Development of system-wide understanding and cross-organisational working.

Together, these actions will help ensure the Council retains the capacity and capability to deliver services both now and in the future.

**3.4** Retention & Workforce Stability

Retention remains a critical risk during the transition period. Therefore, the plan continues delivery of the Retention Strategy approved by Cabinet in April 2026, with a focus on:

- Improving employee engagement and experience;
- Strengthening career development opportunities;
- Recognising and valuing staff contributions; and
- Supporting internal and cross-organisational mobility.

Additionally, a "Future Gloucestershire Workforce" approach will support co-ordinated recruitment, development and redeployment across local government partners.

**3.5** Organisational Culture & Values

Embedding workforce values remains a core element of the strategy. Key actions include:

- Aligning recruitment processes with organisational values;
- Supporting managers to address behaviours consistently and constructively;
- Strengthening staff engagement through initiatives such as the staff group "Culture Club".

This will help maintain a positive, inclusive and high-performing culture during a period of change.

**3.6** Recognition & Legacy

The plan recognises the importance of acknowledging the Council's achievements and supporting colleagues through organisational transition. Actions include:

- Celebrating organisational history and achievements;
- Recognising individual and team contributions;
- Creating meaningful milestones to mark transition.

This will support morale, maintain engagement and ensure a positive legacy.

**3.7** Outcomes & Measures of Success

The plan includes a range of measurable outcomes and targets including:

- Improved staff engagement, communication and wellbeing scores;
- Increased retention and reduced voluntary turnover;
- High levels of staff confidence in leadership and change management;
- Strong participation in engagement and development activity;
- Evidence of increased readiness for LGR and system-wide working.

Performance will be monitored through staff surveys, pulse surveys and workforce metrics, with regular reporting to the Corporate Leadership Team.

## 4. LGR PEOPLE & CULTURE WORKSTREAM

**4.1** It should be noted that this implementation plan is distinct from but complementary to, the Gloucestershire-wide People & Culture Workstream established to support LGR, with representatives from all the local government employers including Publica. Whilst CDC's plan focuses on the Council's internal workforce priorities and immediate organisational needs, the countywide workstream is developing a broader, system-wide approach to workforce transition and future operating models. There are, however, clear interdependencies between the two programmes, particularly in areas such as workforce planning, communications and employee movement across organisations. Therefore, ongoing alignment will be maintained to ensure consistency, avoid duplication and maximise collective impact across Gloucestershire.

**5. ALTERNATIVE OPTIONS**

**5.1** Cabinet may choose not to adopt the People and Culture Strategy Year 2/3 Implementation Plan; however, this is not recommended for the reasons set out in the report.

**6. CONCLUSIONS**

**6.1** The adoption of the year 2/3 People and Culture Strategy Implementation Plan will support the Council's transition in terms of embedding its key messages, supporting employee development and managing a significant period of change.

**7. FINANCIAL IMPLICATIONS**

**7.1** The Strategy can largely be delivered within existing budget and therefore has no direct financial implications. However, there may be future financial implications arising from the implementation of recommendations from the Staff Wellbeing Audit (3.2), which is due for completion in July 2026 and from the implementation of the Future Gloucestershire Workforce agreement in relation to recruitment, secondments and employee movement for development and redeployment (3.4).

**7.2** The impact of both initiatives will need to be monitored and assessed as they progress with any resulting budgetary or financial implications being considered.

**8. LEGAL IMPLICATIONS**

**8.1** The plan supports the Council in meeting its statutory employment responsibilities including ensuring policies remain compliant with employment and equality legislation and good practice.

**9. RISK ASSESSMENT**

**9.1** Key risks addressed through the plan include:

- Loss of key staff and reduced organisational capacity;

- Reduced morale and engagement during LGR;
- Insufficient capability to operate effectively whilst preparing for LGR;
- Poor communication leading to uncertainty and disengagement.

**9.2** Mitigation measures include the Retention Strategy, proactive communication and engagement, leadership development and workforce planning.

## 10. EQUALITIES IMPACT

**10.1** Equality Impact Assessments will be undertaken as part of policy reviews to ensure compliance with the Equality Act 2010.

**10.2** The plan promotes equality, diversity and inclusion through:

- Fair and consistent people policies;
- Inclusive engagement approaches;
- Monitoring of workforce data;
- Equality Impact Assessments on policy changes.

## 11. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS

**11.1** There are no direct climate implications arising from this report. However, the development of a future workforce capable of operating at scale will support the Council's wider sustainability ambitions within a unitary context.

## 12. BACKGROUND PAPERS

- People & Culture Strategy & year 1 Implementation Plan approved at Cabinet 4th September 2025.
- Retention Strategy approved at Cabinet on 16th April 2026.

(END)

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## Draft People & Culture Strategy Implementation Plan – Year 2/3 Implementation Plan (August 2026 – March 2028) V3

Legend – project status

| In Progress | Not Started |
|---|---|

Legend – owners

| | | | | |
|---|---|---|---|---|
| AC | Angela Claridge – Director of Governance | | EMT | Extended Management Team |
| CJ | Charley Jarrett – Head of Talent & Development | | Line Managers | All CDC Line Managers. |
| CLT | Corporate Leadership Team | | Publica HR | HR Team (Publica) |
| Comms | Communications Team | | HW | Helen Worledge – HR Advisor |
| CT | Carmel Togher – Head of HR | | | |

**Component - Systems & Processes**

| Ref | Aim | Action | Owners | Resource Required | Timescale | Priority | Outcome (what success looks like) | Target |
|---|---|---|---|---|---|---|---|---|
| 1 | Ensure people policies and procedures are robust, compliant, and aligned with current legislation and organisational requirements. | **CONTINUING**<br>a) Make minimal updates required to reflect legislative changes and critical organisational changes ahead of transition including references<br>b) Undertake equality impact assessments as part of any policy review. | CT/HW<br><br>CT/HW | None<br>Incorporate culture club to test/consult on policies (in addition to unions) prior to completion | Ongoing to March 2028 | Med | Policies remain legally compliant and fit for purpose during the transition period, providing clarity and assurance while avoiding unnecessary change ahead of the move to the new authority. | Agreed policies. |
| 2 | Establish a Future Gloucestershire Workforce | **NEW**<br>Implement the Future Gloucestershire Workforce agreement | Publica HR | NK | Summer 2026 | Low | Employees have increased access to a wider range of opportunities across | A higher level of vacancies filled through internal or cross-organisational |

| Ref | Aim | Action | Owners | Resource Required | Timescale | Priority | Outcome (what success looks like) | Target |
|---|---|---|---|---|---|---|---|---|
| | approach that maximises employment opportunities through coordinated recruitment, secondments, development, and redeployment across local government. | on recruitment, secondments and employee movement for development and redeployment | | | | | Gloucestershire local government, with seamless movement between organisations supporting development, redeployment, and workforce retention | candidates between implementation and vesting day. |



**Component - Performing & Developing with Us**

| Ref | Strategy Aim | Action | Owners | Resource Required | Timescale | Priority | Outcome (what success looks like) | Target |
|---|---|---|---|---|---|---|---|---|
| 3 | Managing change – a clear and shared vision of the future organisation(s) | **CONTINUE** Communicate early, regularly, and transparently in line with the Internal Communication & Engagement Strategy and check understanding through the employee survey. | Comms | No additional resources required | Ongoing | High | Colleagues feel informed, reassured, and engaged, with a clear understanding of what is happening, what to expect next, and confident that information is being shared openly and honestly. | At least 85% of respondents report (via survey) that they feel well-informed and confident in communications, with clear understanding of current status and next steps. |

| Ref | Strategy Aim | Action | Owners | Resource Required | Timescale | Priority | Outcome (what success looks like) | Target |
|---|---|---|---|---|---|---|---|---|
| | | Share what is known, what is uncertain, and next steps. Check understanding to build trust and reduce anxiety. | | | | | | |
| 4 | Managing change – a clear and shared vision of the future organisation(s) | **NEW** Implement a Gloucestershire wide employee portal as a central, accessible resource for all staff affected by local government reorganisation. | Comms | No additional resources required | July 2026 | High | Employees have easy access to clear, consistent, and up-to-date information, improving understanding of the reorganisation, reducing uncertainty, and enabling more informed engagement with the change process. | The majority of employees access the portal regularly (e.g. monthly). |
| 5 | Managing change – a clear and shared vision of the future organisation(s) - Support resilience through change. | **CONTINUE** Recognise the emotional impact of change and promote available support—such as the employee assistance programme (EAP), coaching, resilience training, wellbeing resources and flexibility. | Line managers/ HR | No additional resources required | Ongoing | Med | Colleagues feel supported and confident in managing change, with increased awareness and use of wellbeing resources, leading to improved resilience and sustained performance. | A high level of colleagues reporting through the staff survey that they feel supported during change and a positive shift in resilience or wellbeing indicators in staff surveys within 12 months. |

| Ref | Strategy Aim | Action | Owners | Resource Required | Timescale | Priority | Outcome (what success looks like) | Target |
|---|---|---|---|---|---|---|---|---|
| | | **NEW**<br>Implement any recommendations arising from the staff wellbeing audit due for completion in July 2026 | SWAP<br>AC/CT | No additional resources required | Audit report due June 2026 | Med | Staff wellbeing improves, with employees feeling better supported, resulting in increased engagement, resilience, and overall satisfaction at work | 100% of wellbeing audit recommendations implemented within timeframe with a measurable improvement in staff wellbeing scores in the subsequent staff surveys |
| 6 | Managing change – a clear and shared vision of the future organisation(s)<br>Ensure line managers have the skills, resources and confidence to lead, communicate and manage resistance with empathy. | **NEW**<br>Targeted training:<br>- Leading Change through LGR<br>- Managing Change through LGR<br>- Managing Resilience through Change<br>- Preparing People for LGR<br>**CONTINUING**<br>Regular EMT briefings.<br>Consistent comms messaging.<br>Access to senior management for | CJ/Comms/<br>CLT/CT | No additional resource required | Ongoing | High | Line managers demonstrate confident, consistent, and empathetic leadership during change, with teams feeling well-supported, clearly informed, and effectively guided through challenges and resistance. | Positive feedback from teams that they feel well-supported by their manager in staff surveys within 12 months. |

| Ref | Strategy Aim | Action | Owners | Resource Required | Timescale | Priority | Outcome (what success looks like) | Target |
|---|---|---|---|---|---|---|---|---|
| | | clarification and escalation.<br>Regular 1-1s.<br>Coaching and mentoring. | | | | | | |
| 7 | Managing change – a clear and shared vision of the future organisation(s). Engage staff at all levels, trade unions and stakeholders. | **CONTINUE.**<br>Give people a voice and draw on their insight to shape and improve the change process.<br>• Continuing engagement with trade unions.<br>• Use staff surveys, Q&As & staff briefings to gather views.<br>• Opportunities for anonymous feedback.<br>• Demonstrate how feedback has influenced decisions (you said, we did).<br>• Encourage managers to hold team discussions.<br>• Maintain regular dialogue. | CLT/Comms/CT/Line managers. | No additional resources required | Ongoing | High | A clear and widely understood vision for the future organisation, with staff, trade unions, and stakeholders engaged and invested in shaping and supporting the change. | A high level of staff report a clear understanding of the future vision and feel engaged in shaping the change, as measured through staff surveys or engagement feedback within 12 months. |

| Ref | Strategy Aim | Action | Owners | Resource Required | Timescale | Priority | Outcome (what success looks like) | Target |
|---|---|---|---|---|---|---|---|---|
| 8 | Managing change – a clear and shared vision of the future organisation(s) Demonstrate how day-to-day work remains vital, connect roles to the future, and celebrate teamwork to maintain motivation and stability. | **CONTINUE**<br>• CDC staff peer recognition & “shout-outs” on the portal.<br>• Promote Quarterly Publica partnership Recognition Awards.<br>• Use team meetings to discuss corporate and service plan progress.<br>• Comms consistently cover both LGR change progress and operational priorities. | Comms/ Publica HR/EMT | No additional resources required | Ongoing | Med | Colleagues feel valued and clear on their role in the present and future, supporting motivation, teamwork, and stability | A higher level of colleagues report feeling valued and clear about their role in both current delivery and the future organisation, with positive teamwork scores maintained or improved (e.g. +X%) in staff surveys. |
| 9 | Develop a workforce equipped with the confidence and capability to operate effectively within a unitary council environment. | **NEW**<br>Build understanding of the unitary model.<br>• Briefings on how a unitary council operates.<br>• Share clear comparison between district & unitary structure, roles & responsibilities | CLT/Comms/Glos wide Employee Experience LGR project | No additional resource required | Start June 2027 | Med | Help staff move from a district-focused perspective to a broader, system-wide mindset, building confidence and capability for operating effectively in a unitary council. | A higher level of staff demonstrate increased understanding of system-wide working and confidence operating in a unitary environment, with positive improvement in capability or readiness scores in staff surveys. |

| Ref | Strategy Aim | Action | Owners | Resource Required | Timescale | Priority | Outcome (what success looks like) | Target |
|---|---|---|---|---|---|---|---|---|
| | | Strengthen skills for scale and complexity<br>• Training in critical thinking & strategic decision making<br>Use early implementation opportunities<br>• Involve staff in LGR transformation projects/working groups. | | | Training brochure (April 26 – March 27)<br><br>June 2026 | | | |
| 10 | Build a skilled, resilient, and future-ready workforce to deliver high-quality services and support LGR. | **NEW**<br>• Build digital, AI functionality and data capability through targeted, bitesize learning. | CJ | No additional resource required. | Start July 2026 | Med | A more capable and future-ready workforce, with improved skills, enabling high-quality service delivery and readiness for organisational change and LGR. | Improved retention and engagement scores within 12–18 months. |
| 11 | Work collaboratively to break down silos, build knowledge and capability, empower | **NEW**<br>Deliver six "Leadership Lab" managers events with the objectives of<br>• Breaking down silos. | Comms/AC/CT/Publica HR | No additional resource (Budget allocated) | Sept 2026 – March 2028 | Med | A more connected and capable workforce, with managers leading confidently and collaboratively, reduced silo | Achieve at least 75% attendance at key engagement sessions, training, or collaborative events, with representation from all service areas |

| Ref | Strategy Aim | Action | Owners | Resource Required | Timescale | Priority | Outcome (what success looks like) | Target |
|---|---|---|---|---|---|---|---|---|
| | people, strengthen leadership at all levels, support managers to lead effectively, and prepare together for a smooth transition to LGR. | • Gaining knowledge.<br>• take initiative in their roles.<br>• Leadership skills.<br>• Preparing for LGR.<br>Attendees CDC & Publica managers. | | | | | working, and staff well-prepared and engaged in delivering change for LGR. | and management levels throughout the LGR transition period. |



**Component - Being Recognised by Us**

| Ref | Aim | Action | Owners | Resource Required | Timescale | Priority | Outcome (what success looks like) | Target |
|---|---|---|---|---|---|---|---|---|
| 12 | Deliver the agreed Retention Strategy (April 2026) to strengthen employee retention and maintain a stable, engaged workforce. | **CONTINUE**<br>Work together to deliver the agreed Retention Strategy, ensuring consistent implementation and shared accountability across the organisation. | CT/HW/AC | No additional resource | Cabinet agreed April 2026. Actions ongoing | High | Improved retention across the organisation, with employees feeling valued, supported, and more likely to remain, contributing to workforce stability and continuity of service delivery. | Reduce voluntary turnover with improvements in retention in key roles and a measurable increase in employee intent to stay in staff surveys within 12 months. |

| Ref | Aim | Action | Owners | Resource Required | Timescale | Priority | Outcome (what success looks like) | Target |
|---|---|---|---|---|---|---|---|---|
| 13 | Ensure staff leave CDC with a strong sense of pride, recognition, and readiness for the future, demonstrating workforce values, with their contributions valued and their legacy carried forward into the new organisation. | **NEW**<br>Capture and celebrate organisational identity<br>• Document and share the council's cultural history, achievements, and impact involving staff contributions.<br>• Hold a celebration event recognising collective achievements and milestones<br>Recognise and value people<br>• Deliver personalised recognition for long service and contributions<br>• Capture individual and team stories to showcase impact on communities<br>Create a sense of closure and pride<br>• Provide clear end-of-organisation milestones and | Comms/CLT | No additional resource | July 2026 – March 2028 | Med | Staff feel recognised and proud of their contribution, with increased confidence in their future and a positive legacy | A higher level of staff report feeling valued and proud of their contribution, with expressed confidence in their future opportunities, supported by positive feedback on legacy and transition experience in staff surveys. |

| Ref | Aim | Action | Owners | Resource Required | Timescale | Priority | Outcome (what success looks like) | Target |
|---|---|---|---|---|---|---|---|---|
| | | mark them appropriately. | | | | | | |

**Component - Connecting with Us**

| Ref | Aim | Action | Owners | Resource Required | Timescale | Priority | Outcome (what success looks like) | Target |
|---|---|---|---|---|---|---|---|---|
| 14 | Deliver a targeted communication and engagement approach that keeps all stakeholders connected, informed, and engaged throughout the change. | **CONTINUE**<br>• Deliver an employee survey as outlined already in this Implementation Plan | Comms/CT | No additional resource required. | Six monthly employee survey – Sept 2026/March 2027/Sept 2027. | High | Communication and engagement are data-led and responsive, with employees feeling informed, listened to, and increasingly engaged throughout the change process. | Six-monthly survey results show a higher level of employees feeling informed and listened to, with demonstrable improvements in key engagement measures between survey cycles. |
| 15 | Continue to actively engage with the staff group "Culture Club" ensuring staff voice shapes | **CONTINUE**<br>Use the Culture Club as an ongoing focus group, expanding membership to broaden staff input | CLT/HR/ Comms | No additional resource | Ongoing | Med | Culture Club is established as an effective and representative forum, with broader staff participation | Increase participation and impact, with membership expanded and clear evidence that Culture |

| Ref | Aim | Action | Owners | Resource Required | Timescale | Priority | Outcome (what success looks like) | Target |
|---|---|---|---|---|---|---|---|---|
| | decision-making and supports a positive organisational culture throughout LGR. | and strengthen its role in shaping our work during LGR. | | | | | actively informing and influencing decisions and shaping organisational culture throughout LGR. | Club input informs key decisions |

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COTSWOLD
District Council

| | |
|---|---|
| Council name | **COTSWOLD DISTRICT COUNCIL** |
| Name and date of Committee | **CABINET DATE 10th September 2026** |
| Subject | **Civil Penalty and Enforcement Policy** |
| Wards affected | All |
| Accountable member | Cllr Andrea Pellegram Environment and Regulatory Services<br>Email: andrea.pellegram@cotswold.gov.uk |
| Accountable officer | Mandy Fathers, Head of Environment and Revenues and Benefits<br>Email: mandy.fathers@publicagroup.uk |
| Report author | Philip Measures<br>Email: philip.measures@Cotswold.gov.uk |
| Summary/Purpose | To renew the Housing Civil Penalties Policy for Private Sector Housing Enforcement in line with current legislation. |
| Annexes | Annex A – Housing Civil Penalties Policy<br>Annex B - Offences now covered by Civil Penalties,<br>Annex C - Equality Impact Assessment. |
| Recommendation(s) | That Cabinet resolves to:<br>1. Approve the Housing Civil Penalties Policy |
| Corporate priorities | • Delivering Good Services<br>• Delivering Housing<br>• Supporting Communities |
| Key Decision | NO |
| Exempt | NO |
| Consultees/ Consultation | Business Manager Housing<br>Portfolio Holder |

COTSWOLD
District Council

## 1. EXECUTIVE SUMMARY

**1.1** This report renews the Civil Penalties and Enforcement Policy (CPP) for Private Sector Housing. This Policy was first introduced in July 2025 prior to the enactment of the Renters' Rights Act 2025. With the new Act in place, it is necessary to renew the Policy to bring the changes powers and duties within the scope of the policy.

## 2. BACKGROUND

**2.1** **The Policy for Civil Penalties.** This is a specific policy for private sector housing under the Council's Enforcement Policy. It sets out the methodology for issuing civil penalty fines for Housing offences, as an alternative to prosecution. The above-mentioned Renters' Rights Act 2025 places a greater demand and expectation to improve standards in the private rented sector through advice and regulation. The expectation of the Ministry of Housing Communities and Local Government is for enforcement through the application of Civil Penalties where necessary, and the fines received can be used to support the cost of this work. It is therefore important to have a robust Civil Penalties Policy that is up to date with current legislation and tribunal decisions on the application of penalties.

**2.2** This policy is set out in accordance with statutory guidance and the model policy developed by the Association of Chief Environmental Health Officers. If approved, it will come into effect immediately.

**2.3** The Policy is set out in Annex A. With respect to the Renters' Rights Act 2025, the scope of Civil Penalties is changed. The Renters' Rights Act 2025 significantly expands the enforcement powers of local housing authorities against landlords and letting agents:

- **Hazard and Poor Condition Fines:** Councils can impose fines of up to £7,000 for a first breach where serious (Category 1) hazards exist in a property and could reasonably have been fixed.
- **Increased General Maximum Fines:** The general maximum civil penalty for housing offences and continuing or repeated breaches under the Housing Act 2004 has increased from £30,000 to £40,000.

- **Specific Letting Process Breaches:** New civil penalties have been introduced for discriminatory practices against tenants with children (under Section 33) and for failing to specify the proposed rent in a written advertisement or offer (under Section 56).
- **Rent Repayment Orders:** Tenants can now also apply to a tribunal for Rent Repayment Orders (RROs) of up to two years' rent.

**2.4** The list of offences now covered by Civil Penalties are outlined in Appendix B.

## 3. ALTERNATIVE OPTIONS

**3.1** The Council may approve, amend, or reject the proposed policies as they see fit.

## 4. FINANCIAL IMPLICATIONS

**4.1** Separate reports have been submitted with respect to the financial implications from the Renters' Rights Act 2025. The wider scope for Civil Penalties will introduce additional fines that, when recovered, can be used for the specific purpose of private sector housing enforcement.

## 5. LEGAL IMPLICATIONS

**5.1** The legal framework for the imposition of penalties and enforcement generally is set out in the Civil Penalties Policy.

## 6. RISK ASSESSMENT

**6.1** The risk of not having a current policy is the possible challenge to the amount of civil penalty fine levied. Decisions could be modified or overturned at Tribunal if Council actions are not underpinned by current, clear and reasonable policies.

## 7. EQUALITIES IMPACT

**7.1** Please refer to Appendix C.

## 8. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS

**8.1** None.

## 9. BACKGROUND PAPERS

- None

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**ANNEX A**

COTSWOLD
District Council

# Housing Civil Penalties Policy

## Civil penalties under the Renters' Rights Act 2025 and other housing legislation

**Document Control and Overview**

| | |
|---|---|
| Organisation(s) | Cotswold District Council |
| Policy Title | Housing Civil Penalties Policy |
| Author | Principal Environmental Health Officer |
| Owner | Principal Environmental Health Officer |
| Version | 1.5 |
| Document Reference | |
| Approval Date | September 2026 |
| Policy Review Cycle | 3 years |
| Latest Review Date | September 2029 |

Version 1.5 (Aug 2026)

**Document Revision History**

| Revision Date | Reviser | Previous Version | Description of Revision |
|---|---|---|---|
| July 2026 | Paul Lankester | 1.0 | 1. Removed the words “in particular” in two locations<br>2. Adjusted the wording of the aggravating factor for “Attempting to end a tenancy by service of a notice to quit - Section 16E(1)(b) of the Housing Act 1988”<br>3. Adjusted the wording of the aggravating factor for “Attempting to end a tenancy orally or requiring that it is ended orally - Section 16E(1)(c) of the Housing Act 1988”<br>4. Adjusted the wording of the aggravating factor for “Serving a possession notice that attempts to end a tenancy outside the prescribed Section 8 process - Section 16E(1)(d) of the Housing Act 1988”<br>5. For all breaches, changed the wording from “offence-specific” to “breach-specific” mitigating and aggravating factors<br>6. Amended Housing Act 2004 section title to include breaches<br>7. Added Section 6A Housing Act 2004 to introductory overview and Housing Act 2004 breaches and offences section<br>8. Amended wording of “Failure to give an existing tenant prescribed information about changes made by the Renters’ Rights Act 2025 in the prescribed form and timeframe - paragraph 7(2) of schedule 6 to the Renters’ Rights Act 2025 (The power to impose a civil penalty for this breach is contained in Section 16I(1) of the Housing Act 1988, as amended by paragraph 7(1) of Schedule 6 to the Renters’ Rights Act 2025)” to correct a lack of clarity within the statutory guidance.<br>9. s.72(1) HA 2004 offence - changed wording of offence-specific aggravating factor to “The condition and/or facilities of the unlicensed property.” |

**Document Approvals**

This document has been approved by:

| Approval | Date |
|---|---|
| Approved by Executive | September 2026 |
| Version 1.4 approved by Service Lead Environmental Protection and Portfolio Holder for Housing | |

**Document Distribution**

| Name | Job Title |
|---|---|
| | |

# Contents

# 1.0 Civil penalties under the Renters' Rights Act 2025 and other housing legislation

1.1 This policy applies once the Council has made a decision to commence civil penalty proceedings.

1.2 In this policy, the term ‘landlord’ should be read as including letting agents, managing agents, licensors, property owners, corporate landlords, directors of corporate landlords, registered providers of social housing and any other person involved in the letting or management of accommodation.

1.3 In this policy, the term ‘corporate landlord’ should be read as referring to a body corporate that meets the definition of ‘landlord’ above.

1.4 In this policy, the terms ‘House in Multiple Occupation’ or ‘HMO’ are defined by the Housing Act 2004.

1.5 The following breaches are subject to a civil penalty with a statutory maximum of £5,000:

- Requiring a relevant person to make a prohibited payment under section 1 or section 2 of the Tenant Fees Act 2019.
- Unlawfully retaining a holding deposit under schedule 2 of the Tenant Fees Act 2019.
- Failing to comply with a remedial notice under Regulation 6 of the Smoke and Carbon Monoxide Alarm (England) Regulations 2015 (as amended).
- Letting a substandard property under Regulation 23 of the Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015.
- Registering false or misleading information on the PRS exemptions register under Regulation 36 of the Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015.
- Failing to comply with a Compliance Notice under Regulation 37 of the Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015.
- Failing to belong to a redress scheme for lettings agency work under Article 3 of the Redress Schemes for Lettings Agency Work and Property Management Work (Requirement to Belong to a Scheme etc) (England) Order 2014.
- Failing to belong to a redress scheme for property management work under Article 5 of the Redress Schemes for Lettings Agency Work and Property Management Work (Requirement to Belong to a Scheme etc) (England) Order 2014.

1.6 The following breaches are subject to a civil penalty with a statutory maximum of £7,000:

- Failure to give a written statement of terms and any other prescribed information under section 16D of the Housing Act 1988.

- Attempting to let a property for a fixed term under section 16E of the Housing Act 1988.
- Attempting to end a tenancy by service of a notice to quit under section 16E of the Housing Act 1988.
- Attempting to end a tenancy orally or requiring that it is ended orally under section 16E of the Housing Act 1988.
- Serving an eviction notice that attempts to end a tenancy outside the prescribed section 8 process under section 16E of the Housing Act 1988.
- Relying on a ground where the landlord does not reasonably believe that the landlord is/will be able to obtain possession under section 16E of the Housing Act 1988.
- Failing to provide a tenant with prior notice that a ground which requires it may be used under section 16E of the Housing Act 1988.
- Failure to give an existing tenant prescribed information about changes made by the Renters' Rights Act 2025 in the prescribed form and timeframe under paragraph 7(2) of schedule 6 to the Renters' Rights Act 2025.
- Discrimination relating to children in the lettings process under section 33 of the Renters' Rights Act 2025.
- Discrimination relating to benefits in the lettings process under section 34 of the Renters' Rights Act 2025.
- Failure to specify proposed rent within a written advertisement or offer under section 56 of the Renters' Rights Act 2025.
- Inviting, encouraging or accepting any offer of rent greater than the stated rate under section 56 of the Renters' Rights Act 2025.
- Failure by the responsible person to secure the removal of a Category 1 hazard at qualifying residential premises, other than the common parts of a building containing one or more flats, where it would have been reasonably practicable for them to do so, under Section 6A of the Housing Act 2004.

1.7 The following offences are subject to a civil penalty with a statutory maximum of £30,000:

- Conduct giving rise to liability under section 8, where within the preceding five years the landlord or letting agent has either (i) had a relevant penalty (under s8 for breach of s1 or s2 of the Tenant Fees Act 2019) imposed for a different breach of the same section and the final notice has not been withdrawn, or (ii) been convicted under s12 of an offence in respect of such a breach, under section 12 of the Tenant Fees Act 2019.

1.8 The following breaches are subject to a civil penalty with a statutory maximum of £40,000:

- Breach of duty under Regulation 3, 3B, 3C, and 3D of the Electrical Safety Standards in the Private Rented Sector and Social Rented Sector (England) Regulations 2020 (as amended).

1.9 The following offences are subject to a civil penalty with a statutory maximum of £40,000:

- Unlawful eviction and harassment of occupier under section 1 of the Protection from Eviction Act 1977.
- Continuation of conduct subject to a relevant penalty (under s.16I or s.16K Housing Act 1988) after the 28-day period (or, if appealed, after conclusion of the appeal) where the final notice has not been withdrawn under section 16J of the Housing Act 1988
- Conduct giving rise to liability under s.16I, where within the preceding five years the landlord has either (i) had a relevant penalty (under s.16I or s.16K Housing Act 1988) imposed for different conduct and the final notice has not been withdrawn, or (ii) been convicted under s.16J for different conduct under section 16(J) of the Housing Act 1988.
- Relying on a ground knowing the landlord would not be able to obtain possession or being reckless as to whether they would under section 16J of the Housing Act 1988.
- Breach of restrictions relating to reletting (s16(E)(2) Housing Act 1988) or remarketing (s16(E)(3) Housing Act 1988) a property within restricted period after using Grounds 1 or 1A of Schedule 2 Housing Act 1988 under section 16J of the Housing Act 1988.
- Breach of a banning order under section 21 of the Housing and Planning Act 2016.
- Failure to comply with an Improvement Notice under section 30 of the Housing Act 2004.
- Contravention of an overcrowding notice under section 139 of the Housing Act 2004.
- Failure to obtain a selective licence under section 95 of the Housing Act 2004.
- Failure to obtain an HMO licence under section 72 of the Housing Act 2004.
- Knowingly permitting over-occupation of an HMO under section 72 of the Housing Act 2004.
- Failure to comply with management regulations in respect of HMOs under section 234 of the Housing Act 2004.
- Failure to comply with HMO licence conditions under section 72 of the Housing Act 2004.
- Failure to comply with selective licence conditions under section 95 of the Housing Act 2004.

1.10 If a landlord has committed multiple breaches or offences, a separate civil penalty can, and usually will, be imposed for each breach and offence. In each case, the level of any civil penalty imposed will be determined in accordance with this policy.

If multiple landlords have committed the same breach or offence at the same property, a separate civil penalty can, and usually will, be imposed on each offender. In each case, the level of civil penalty imposed on each offender will be in accordance with this policy.

1.11 This policy outlines the Council's methodology and mechanism for assessing and setting the level of a civil penalty at all stages where a civil penalty is under consideration, including the preparation of a notice of intent, and where a final decision has been made to impose a civil penalty.

1.12 When applying the civil penalties matrix, interim calculations at individual stages may result in figures that exceed the statutory maximum. Where the final amount reached following application of all relevant steps exceeds the statutory maximum, the civil penalty will be reduced to the applicable statutory maximum.

1.13 The Council considers the need for transparency and consistency to be of primary importance to ensure fairness in the discharge of its functions. The general objective of this policy is, therefore, to promote both transparency and consistency in the imposition of financial penalties so that those involved in the letting or management of accommodation (a) know how the Council will generally penalise relevant breaches and offences and (b) are assured that, generally, like cases will be penalised similarly, and different cases penalised differently.

1.14 The Council recognises that, despite its best efforts, landlords may operate unlawfully for a significant period without detection, and that only a proportion of those committing relevant breaches and offences will be identified. Accordingly, the Council seeks to ensure that civil penalties are set at a level that makes it clear to the landlord concerned and to others that operating unlawfully as a landlord is financially disadvantageous when compared to operating lawfully.

1.15 The Council has a duty to act fairly, transparently and consistently when assessing civil penalties. To maintain fairness between all landlords, the Council will not give weight to claims advanced as factors that might reduce the amount of a civil penalty unless those claims are supported by evidence that the Council reasonably considers to be relevant, reliable, credible, and sufficient in scope and detail to enable proper assessment of the claim, having regard to the nature of the claim, the information ordinarily available to the landlord, and the need for consistent and fair decision-making. Allowing inadequately evidenced assertions to influence outcomes would risk rewarding those who provide incomplete or misleading information and would create an unfair advantage over landlords who provide a full and properly evidenced account. Accordingly, the Council expects landlords against whom a civil penalty is being considered to provide all documents and records that would ordinarily exist if their account were accurate. Where such evidence is not provided, and no explanation that the Council considers adequate is given, the Council may draw an adverse inference.

1.16 Where claims are advanced without sufficient supporting evidence, the Council may request specified supporting material before determining whether to issue a final notice or whether any mitigation has been sufficiently evidenced so as to justify a lower civil penalty.

The further objectives of using financial penalties as a means of enforcing the above breaches and offences are explained below.

# 2.0 Statutory Guidance

2.1 The Government has issued statutory guidance entitled “Civil penalties under the Renters' Rights Act 2025 and other housing legislation”, and “Tenant Fees Act 2019 statutory guidance for enforcement authorities” . The Council has regard to this guidance in the exercise of their functions in respect of civil penalties.

2.2 The Council has considered the following factors in developing this civil penalty policy to help ensure that the civil penalty is set at an appropriate level.

**Severity of the breach or offence.** The more serious the breach or offence, the higher the penalty should be.

**Culpability and track record of the offender.** A higher penalty will be appropriate where the offender has a history of failing to comply with their obligations and/or their actions were deliberate and/or they knew, or ought to have known, that they were in breach of their legal responsibilities.

**The harm caused to the tenant.** This is a very important factor when determining the level of penalty. The greater the actual harm or the potential for harm, principally to the tenant but also potentially the local community, the higher the penalty should be.

**Punishment of the offender.** The penalty should, in a way that is fair, both punish the offender and demonstrate the consequences of not complying with their responsibilities.

**Deter the offender from repeating breaches or offences.** The ultimate goal is to prevent any further offending and help ensure that the offender fully complies with all of their legal responsibilities in future. The level of the penalty should therefore be set at a level that it is likely to have a very significant deterrent effect.

**Deter others from committing similar breaches or offences.** While the fact that someone has received a civil penalty may not be in the public domain, the civil penalty policy itself will be and local authorities should consider how their formal enforcement activity can be effectively publicised.

An important part of deterrence is the realisation on the part of landlords that the local housing authority is proactive in levying civil penalties where the need to do so exists and the civil penalty will be set at a high enough level such that operating lawfully will be the sensible financial choice.

**Remove any financial benefit the offender may have obtained as a result of committing the breach or offence.** The principle here is that it should not be in the offender's financial interest to commit a breach or offence rather than comply, for example that the penalty for breaching licensing conditions in respect of occupancy of a property is less than the additional rent received as a result of the over-crowding. The absence of any financial benefit to the landlord does not mean though that the penalty should be reduced.

# 3.0 Civil Penalties Matrix

3.1 In determining the level of a civil penalty, officers will have regard to the matrix set out below. The matrix consists of the following sequential steps:

1. Determining the starting point based on the seriousness of the breach or offence.
2. Adjustment for factors relating to the type of landlord; size and type of portfolio controlled, owned or managed; experience of the landlord ("Landlord Type")
3. Mitigating and aggravating factors the Council deems significant including, but not limited to, factors relating to the track record and culpability of the landlord and the actual or potential harm to the occupants.
4. Financial considerations.
5. Applying the totality principle.

### 3.2 Starting point based on seriousness of the breach or offence

The Ministry of Housing, Communities & Local Government has provided statutory guidance that prescribes starting points for all breaches and offences based on the seriousness of the breach or offence. The exception to this prescription is for breaches of licensing conditions under sections 72(3) and 95(2) of the Housing Act 2004, where the Council has determined its own starting levels based on the seriousness of the specific licence condition or type of licence condition that has not been complied with.

### 3.3 Adjustment for factors relating to the type of landlord; size and type of portfolio controlled, owned or managed; experience of the landlord ("Landlord Type")

While all landlords are expected to comply fully with their legal obligations, the Council considers that a higher standard of professionalism and regulatory awareness is reasonably expected of landlords who operate at greater scale, who have greater experience, or who are involved in more complex forms of letting. Where such landlords fail to comply with their obligations, this will ordinarily justify a higher civil penalty.

A higher degree of professionalism is expected of landlords who:

- Control, own, or manage a significant portfolio of properties;
- Have significant experience in the letting or management of property;
- Are or have been involved in the letting or management of Houses in Multiple Occupation (HMOs);
- Are corporate landlords; or
- Are or have been directors of corporate landlords.

An upward adjustment of 20% of the applicable starting point will be applied where the landlord meets any one or more of the following criteria:

- The landlord has, at any point in time, controlled, owned, or managed six or more properties. These properties need not have been held concurrently or at the time civil penalty proceedings are brought.
- The landlord has, at any point in time, controlled, owned, or managed three or more properties that operated as HMOs, whether or not concurrently.
- The landlord is, or has previously been, a director of a corporate landlord.
- The landlord is a corporate landlord.
- The landlord has, in the Council's assessment and by reference to the available evidence, significant experience in the letting or management of property.

A downward adjustment of 20% of the applicable starting point will be applied only where all of the following criteria are met:

- The landlord has, at any point in time, controlled, owned, or managed no more than two properties.
- The landlord has controlled, owned, or managed no more than one property that has operated as an HMO, at any point in time.
- The landlord has, in the Council's assessment and by reference to the available evidence, very limited experience in the letting or management of property.

### 3.4 Mitigating and aggravating factors the Council deems significant including, but not limited to, factors relating to the track record and culpability of the landlord and the actual or potential harm to the occupants

To promote fairness and consistency in the administration of civil penalties, the Council will apply a structured and consistent framework when determining the extent to which mitigating and aggravating factors affect the quantum of any civil penalty.

### 3.5 General approach

Each breach or offence may have offence-specific mitigating and/or aggravating factors, which will be considered alongside the generic factors set out below.

Where multiple civil penalties are issued under this policy against the same landlord at the same time, and except where expressly stated otherwise, mitigating and aggravating factors will be considered and applied separately to each civil penalty when determining the quantum of each penalty.

### 3.6 Mitigating factors

The Council may reduce the level of a civil penalty by up to 20% of the applicable starting point to reflect the presence of mitigating factors.

Only in exceptional circumstances may the Council depart from the application of this policy in respect of mitigating factors and apply a reduction in excess of 20%. Exceptional circumstances are rare and unusual and are not established merely by the presence of multiple mitigating factors.

Within the framework of this policy, the Council has not sought to provide an exhaustive list of mitigating factors, recognising that a wide range of circumstances may potentially give rise to mitigation. However, the following generic mitigating factors will be considered in respect of each breach or offence:

### 3.7 Steps taken to remedy the basis of the breach or offence

Non-exhaustive examples include:

- Promptly remedying all elements of the breach or offence after receiving communication from the Council.
- Promptly remedying all the significant elements of the breach or offence leaving only less significant elements of the breach or offence.

**<u>A high level of cooperation</u>**

Non-exhaustive examples include:

- Proactive provision of significant information the Council reasonably considers relevant beyond that required by statutory notice.

**<u>Acceptance of liability</u>**

Non-exhaustive examples include:

- Accepting liability before or within the period for representations.

Where a landlord relies on a reasonable excuse defence or otherwise contests liability, this mitigating factor will not usually apply.

**Health circumstances**

Non-exhaustive examples include:

- A serious health condition or medical incident experienced by the landlord during, or in the period immediately preceding, the breach or offence, where there is clear and reliable evidence that the condition had a direct and material impact on the landlord's ability to comply with the relevant legal obligation. Examples may include, but are not limited to, a heart attack, stroke, cancer diagnosis, or other acute or serious medical event causing significant incapacity or impairment.

**Diminished culpability (limited responsibility)**

Non-exhaustive examples include:

- A joint landlord who has evidenced that compliance arrangements for the subject property were directed and controlled by another joint landlord, and not by them.
- A landlord who became involved only after an unforeseen change in circumstances (such as the death of the previous landlord) and who committed the breach or offence only for a limited period while putting their affairs in order.

The instruction of a managing or letting agent, or reliance on an agent's actions or omissions, will not of itself constitute diminished culpability.

### 3.8 Aggravating factors

The Council may increase the level of a civil penalty by up to 20% of the applicable starting point to reflect the presence of aggravating factors.

Only in exceptional circumstances may the Council depart from the application of this policy in respect of aggravating factors and apply an increase in excess of 20%. Exceptional circumstances are rare and unusual and are not established merely by the presence of multiple aggravating factors.

The following generic aggravating factors will be considered in respect of each breach or offence:

**Previous history of non-compliance.**

Non-exhaustive examples include:

- Previous successful prosecutions (including relevant spent convictions), previous civil penalties, previous rent repayment orders, previous works in default, previous simple cautions.

Concurrent investigations or proceedings relating to other civil penalties, prosecutions, or rent repayment orders will not be treated as previous non-compliance.

**Non-cooperation with the Council.**

Non-exhaustive examples include:

- Failure to comply with notices issued under section 16 of the Local Government (Miscellaneous Provisions) Act 1976, section 235 of the Housing Act 2004, or section 114 of the Renters' Rights Act 2025.
- Failing to provide a substantive response to a letter of alleged offence.
- Failing to attend previously agreed meetings.

Where the Council has prosecuted, or is pursuing a prosecution, in respect of the same act or omission involving failure to provide legally required information (including failure to comply with a statutory notice), that conduct will not also be treated as an aggravating factor for the purposes of setting the civil penalty, in order to avoid double counting.

Where multiple civil penalties are imposed against the same landlord at the same time, this aggravating factor will be applied only to the civil penalty with the highest starting point, unless there is a clear and reasoned basis for applying it differently.

**Deliberate intent or negligence when committing the offence.**

Non-exhaustive examples include:

- Knowledge that the breach or offence was occurring.
- Continuation of offending after communication from the Council.
- Premeditation or planning, including steps taken to prevent detection or effective investigation.
- Providing false or misleading information to the Council.
- Applying pressure to occupants to deter cooperation with the Council.

**The number of occupants affected.**

Non-exhaustive examples include:

- 3-5 occupants affected.

**Duration of non-compliance.**

Non-exhaustive examples include:

- The offence or breach occurred over a 3–6 month period.

**Vulnerability of occupants**

Non-exhaustive examples include children and young adults, persons vulnerable by reason of age, disability or sensory impairment, persons with drug or alcohol dependency, victims of domestic abuse, children in care, persons with complex health needs, persons who do not speak English as a first language, victims of trafficking or sexual exploitation, refugees, asylum seekers, and pregnant women.

**Financial considerations**

The Council will review the quantum of the civil penalty and consider whether it is sufficient to act as an effective deterrent to future non-compliance. Where the Council has evidence that it considers to be sufficiently reliable regarding rental income and/or asset value from the landlord, it may determine that an increase in the level of the penalty is appropriate in order to achieve effective deterrence.

It is essential that, as an absolute minimum, landlords do not financially benefit from their offending behaviour.

Financial circumstances will ordinarily be considered after any written representations have been received and as part of the determination of any final notice.

Where a landlord seeks to rely on a strained or limited financial position as a basis for reducing the level of a civil penalty, that position must be supported by appropriate and verifiable evidence sufficient to enable the Council to assess the landlord's financial position consistently, objectively, and transparently. Unsupported assertions, partial disclosure, or selective provision of information will not be given weight.

At a minimum, and where such information exists, the following should be provided as part of any written representations:

- The last three full tax years full self-assessment tax returns filed with HMRC, including all additional and supplemental pages;
- The last three full tax years' SA302 documents & tax year overviews;
- The last three months' payslips;
- The last three years P60 certificates;
- The last twelve months' Universal Credit payment statements;
- A list of all property assets owned or jointly owned (not limited to rental properties), together with corresponding Land Registry title documents;
- A list of all property assets owned, or held on a long lease, by any corporate entity in which the landlord has a beneficial interest, together with corresponding Land Registry documentation;
- The most recent annual mortgage statement for each property, or the last twelve months' mortgage statements where the mortgage has been in place for less than twelve months;
- Valuation statements for all ISAs held;
- Statements from any cryptoasset exchange accounts showing balances and valuations;
- A list of all shareholdings;
- Recent bank statements for any account holding a balance in excess of £5,000;

- Recent statements for all secured and unsecured loans;
- Bankruptcy orders and official notifications of bankruptcy.

Where the Council is not satisfied that it has been provided with sufficiently reliable, complete, and accurate information to assess the landlord's financial position, the Council may draw the inference that the landlord is able to pay the civil penalty as imposed.

A claimed inability to pay will not, of itself, outweigh the need to ensure effective deterrence or to remove any financial benefit obtained as a result of the breach or offence.

### 3.9 The Totality Principle

The Council will have regard to the totality principle to ensure that the overall outcome of its enforcement action is just and proportionate. In exceptional cases, and having regard to the particular circumstances of the case, the Council may take account of totality at an earlier stage by deciding not to pursue a civil penalty in respect of a specific breach or offence where doing so would render the overall outcome disproportionate.

In general, however, the application of the totality principle will form the final step in the Council's decision-making process, undertaken after any written representations have been considered and before final notices are issued, once the level of each individual civil penalty has been assessed in accordance with this policy.

As a final step before issuing final notices, the Council will consider whether multiple civil penalties being imposed under this policy against the same landlord at the same time result in an aggregate amount that is just and proportionate. Where the Council concludes that the aggregate amount would not be just and proportionate, it will consider whether a proportionate reduction of the penalties is appropriate.

The totality principle does not operate across different legal persons who are separately liable in law, nor does it operate across civil penalties imposed at different times. In general, it applies only to multiple civil penalties imposed under this policy on the same person at the same time. Where, however, legislation provides that an officer of a body corporate, or a person concerned in its management, may be separately liable in relation to the same conduct as the body corporate, and that officer also holds a shareholding interest in the body corporate, the Council will, where civil penalties are imposed at the same time on both the body corporate and the officer arising from that same conduct, consider whether the combined outcome results in punitive duplication and is therefore not just and proportionate.

Where a reduction is applied under the totality principle, the Council will ordinarily do so by applying a uniform percentage reduction across all relevant civil penalties being issued at the same time, being those civil penalties that form part of the same totality assessment. Where, however, the application of the totality principle is required to address punitive duplication arising from a shared economic interest between a body corporate and an officer, the Council may apply a differential adjustment to ensure that the overall outcome is just and proportionate.

This approach reflects the statutory guidance on the application of the totality principle and is intended to promote consistency, transparency, and proportionality, while avoiding arbitrary or selective adjustment of individual penalties.

In accordance with the statutory guidance, any rent repayment orders made in respect of the same breach or offence will be disregarded for the purposes of assessing the totality of civil penalties under this policy.

# 4.0 Offences and breaches where a civil penalty may be levied and relevant considerations as to the level of that penalty

### 4.1 Protection from Eviction Act 1977 offences

#### 4.1.1 Unlawful eviction and harassment of occupier - section 1 of the Protection from Eviction Act 1977

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £35,000 | £40,000 | £28,000 | £35,000 | £42,000 |

Offence-specific mitigating factors:

- None.

Offence-specific aggravating factors:

- Violence or threats of violence.
- Disposal of possessions or threats to dispose of possessions.
- Breach or evasion of an injunction or undertaking.
- Loss of home.

## 4.2 Housing Act 1988 breaches and offences

### 4.2.1 Failure to give a written statement of terms and any other prescribed information - section 16D of the Housing Act 1988

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £4,000 | £7,000 | £3,200 | £4,000 | £4,800 |

Breach-specific mitigating factors:
- Provision of some of the required terms and prescribed information within the required period.

Breach-specific aggravating factors:
- None.

### 4.2.2 Attempting to let a property for a fixed term - section 16E(1)(a) of the Housing Act 1988

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £4,000 | £7,000 | £3,200 | £4,000 | £4,800 |

Breach-specific mitigating factors:
- None.

Breach-specific aggravating factors:
- None.

### 4.2.3 Attempting to end a tenancy by service of a notice to quit - section 16E(1)(b) of the Housing Act 1988

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £6,000 | £7,000 | £4,800 | £6,000 | £7,200 |

Breach-specific mitigating factors:
- None.

Breach-specific aggravating factors:
- Tenant vacates property within four months of the attempt to end a tenancy by service of a notice to quit..

#### 4.2.4 Attempting to end a tenancy orally or requiring that it is ended orally - section 16E(1)(c) of the Housing Act 1988

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £6,000 | £7,000 | £4,800 | £6,000 | £7,200 |

Breach-specific mitigating factors:
- None.

Breach-specific aggravating factors:
- Tenant vacates property within four months of the attempt to end a tenancy orally.

#### 4.2.5 Serving a possession notice that attempts to end a tenancy outside the prescribed section 8 process - section 16E(1)(d) of the Housing Act 1988

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £6,000 | £7,000 | £4,800 | £6,000 | £7,200 |

Breach-specific mitigating factors:
- None.

Breach-specific aggravating factors:
- Tenant vacates property within four months of the attempt to end a tenancy outside the prescribed Section 8 process.

#### 4.2.6 Relying on a ground where the person does not reasonably believe that the landlord is, will, or may be able to obtain possession on that ground and the tenant(s) surrendered the tenancy within the period of four months beginning with the date of the contravention, without an order for possession of the dwelling-house being made - section 16E(1)(e) of the Housing Act 1988

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £6,000 | £7,000 | £4,800 | £6,000 | £7,200 |

Breach-specific mitigating factors:
- None.

Breach-specific aggravating factors:
- None.

### 4.2.7 Failing to provide a tenant with prior notice that a ground which requires it may be used - section 16E(1)(f) of the Housing Act 1988

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £3,000 | £7,000 | £2,400 | £3,000 | £3,600 |

Breach-specific mitigating factors:
- None.

Breach-specific aggravating factors:
- None.

### 4.2.8 Failure to give an existing tenant prescribed information about changes made by the Renters' Rights Act 2025 in the prescribed form and timeframe - paragraph 7(2) of schedule 6 to the Renters' Rights Act 2025 (The power to impose a civil penalty for this breach is contained in Section 16I(1) of the Housing Act 1988, as amended by paragraph 7(1) of Schedule 6 to the Renters' Rights Act 2025)

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £4,000 | £7,000 | £3,200 | £4,000 | £4,800 |

Breach-specific mitigating factors:
- Provision of some of the required prescribed information within the required period.
- Provision of prescribed information but not in the prescribed form.

Breach-specific aggravating factors:
- None.

**4.2.9 Continuation of conduct subject to a relevant penalty (under s.16I or s.16K Housing Act 1988) after the 28-day period (or, if appealed, after conclusion of the appeal) where the final notice has not been withdrawn — section 16J(3) of the Housing Act 1988**

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| Double the starting level for the two constituent breaches added together | £40,000 | Dependent on the constituent breaches | Dependent on the constituent breaches | Dependent on the constituent breaches |

Offence-specific mitigating factors:

- None.

Offence-specific aggravating factors:

- None.

**4.2.10 Conduct giving rise to liability under s.16I, where within the preceding five years the person has either (i) had a relevant penalty (under s.16I or s.16K Housing Act 1988) imposed for different conduct and the final notice has not been withdrawn, or (ii) been convicted under s.16J for different conduct – section 16(J)(4) of the Housing Act 1988**

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| Double the starting level for the two constituent breaches added together | £40,000 | Dependent on the constituent breaches | Dependent on the constituent breaches | Dependent on the constituent breaches |

Offence-specific mitigating factors:

- Dependent on the most recent conduct giving rise to liability to a civil penalty under section 16I of the Housing Act 1988.

Offence-specific aggravating factors:

- Dependent on the most recent conduct giving rise to liability to a civil penalty under section 16I of the Housing Act 1988.

**4.2.11 Relying on a ground where the person knows that the landlord would not be able to obtain an order for possession on that ground, or being reckless as to whether the landlord would be able to do so and the tenant(s) surrendered the tenancy within the period of four months beginning with the date the ground was relied on, without an order for possession of the dwelling-house being made – section 16J(1) of the Housing Act 1988**

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £30,000 | £40,000 | £24,000 | £30,000 | £36,000 |

Offence-specific mitigating factors:

- None.

Offence-specific aggravating factors:

- None.

**4.2.12 Breach of restrictions relating to reletting (s16(E)(2) Housing Act 1988) or remarketing (s16(E)(3) Housing Act 1988) a property within restricted period after using Grounds 1 or 1A of Schedule 2 Housing Act 1988 - section 16J(2) of the Housing Act 1988**

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £25,000 | £40,000 | £20,000 | £25,000 | £30,000 |

Offence-specific mitigating factors:

- None.

Offence-specific aggravating factors:

- None.

## 4.3 Housing and Planning Act 2016 offences

### 4.3.1 Breach of a banning order - section 21(1) of the Housing and Planning Act 2016

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £35,000 | £40,000 | £28,000 | £35,000 | £42,000 |

Offence-specific mitigating factors:
- A single, isolated incident.

Offence-specific aggravating factors:
- Concealment or evasion.

## 4.4 Renters Rights Act 2025 breaches

### 4.4.1 Discrimination relating to children in the lettings process – section 33(1) of the Renters' Rights Act 2025

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £6,000 | £7,000 | £4,800 | £6,000 | £7,200 |

Breach-specific mitigating factors:
- None.

Breach-specific aggravating factors:
- None.

### 4.4.2 Discrimination relating to benefits in the lettings process – section 34(1) of the Renters' Rights Act 2025

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £6,000 | £7,000 | £4,800 | £6,000 | £7,200 |

Breach-specific mitigating factors:
- None.

Breach-specific aggravating factors:
- None.

#### 4.4.3 Failure to specify proposed rent within a written advertisement or offer – section 56(2) of the Renters' Rights Act 2025

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £3,000 | £7,000 | £2,400 | £3,000 | £3,600 |

Breach-specific mitigating factors:
- None.

Breach-specific aggravating factors:
- None.

#### 4.4.4 Inviting, encouraging or accepting any offer of rent greater than the stated rate – section 56(3) of the Renters' Rights Act 2025

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £4,000 | £7,000 | £3,200 | £4,000 | £4,800 |

Breach-specific mitigating factors:
- None.

Breach-specific aggravating factors:
- None.

### 4.5 The Electrical Safety Standards in the Private Rented Sector and Social Rented Sector (England) Regulations 2020 breach of duties

#### 4.5.1 Failure to comply with The Electrical Safety Standards in the Private Rented Sector and Social Rented Sector (England) Regulations 2020 Regulation 3: (3)(b), (3)(d), (3)(e). Regulation 3D: (a), (b), (c), (f)

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £5,000 | £40,000 | £4,000 | £5,000 | £6,000 |

Breach-specific mitigating factors:
- The report or record evidences that the electrical installations were compliant at all points.

Breach-specific aggravating factors:

- The number or nature or severity of the issues observed on the report or record.

**4.5.2 Failure to comply with The Electrical Safety Standards in the Private Rented Sector and Social Rented Sector (England) Regulations 2020 Regulation 3: (1)(a), (1)(b), (1)(c), (3)(a), (3)(c), (3)(ca), (5)(b), (5)(c). Regulation 3B: (1)(a), (1)(b), (1)(c). Regulation 3C: (1), (2)(a). Regulation 3D: (d), (e).**

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £12,500 | £40,000 | £10,000 | £12,500 | £15,000 |

Breach-specific mitigating factors:

- The report or record evidences that the electrical installations were compliant at all points.

Breach-specific aggravating factors:

- The number or nature or severity of the issues observed on the report or record.

**4.5.3 Failure to comply with The Electrical Safety Standards in the Private Rented Sector and Social Rented Sector (England) Regulations 2020 Regulation 3: (4), (5a), (6). Regulation 3C: (2)(b), (4).**

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £20,000 | £40,000 | £16,000 | £20,000 | £24,000 |

Breach-specific mitigating factors:

- None.

Breach-specific aggravating factors:

- The number or nature or severity of the issues observed on the report or record.

**4.6 Housing Act 2004 breaches and offences**

**4.6.1 Failure by the responsible person to secure the removal of a Category 1 hazard at qualifying residential premises, other than the common parts of a building containing one or more flats, where it would have been reasonably practicable for them to do so - Section 6A of the Housing Act 2004.**

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £6,000 | £7,000 | £4,800 | £6,000 | £7,200 |

Breach-specific mitigating factors:

- Access prevented by occupant(s) despite appropriate landlord steps

Breach-specific aggravating factors:

- None.

### 4.6.2 Failure to comply with an improvement notice - section 30(1) of the Housing Act 2004

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £25,000 | £40,000 | £20,000 | £25,000 | £30,000 |

Offence-specific mitigating factors:

- The nature and extent of hazard(s) that are present once the deadline for compliance has passed.
- Whether the property is unoccupied once the deadline for compliance has passed.
- Access to the property was prevented by the actions or refusal of the occupant(s) and a landlord can evidence that they took steps to obtain access to the property for the purpose of carrying out the required works, but those steps fell short of establishing a reasonable excuse for non-compliance.

Offence-specific aggravating factors:

- The nature and extent of hazard(s) that are present once the deadline for compliance has passed.

### 4.6.3 Failure to comply with an overcrowding notice - section 139(7) of the Housing Act 2004

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £20,000 | £40,000 | £16,000 | £20,000 | £24,000 |

Offence-specific mitigating factors:

- None.

Offence-specific aggravating factors:

- The level of overcrowding present.

### 4.6.4 Failure to obtain an HMO licence - section 72(1) of the Housing Act 2004

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £17,000 | £40,000 | £13,600 | £17,000 | £20,400 |

Offence-specific mitigating factors:
- None.

Offence-specific aggravating factors:
- The landlord has knowledge or experience of licensing requirements.
- The condition and/or facilities of the unlicensed property.

### 4.6.5 Knowingly permitting over-occupation of an HMO - section 72(2) of the Housing Act 2004

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £20,000 | £40,000 | £16,000 | £20,000 | £24,000 |

Offence-specific mitigating factors:
- There are suitable amenity and space provisions in the HMO.

Offence-specific aggravating factors:
- The level of over-occupation present.

### 4.6.6 Failure to Comply with The Management of Houses in Multiple Occupation [England] Regulations 2006 and The Licensing and Management of Houses in Multiple Occupation (Additional Provisions) (England) Regulations 2007 – section 234(3) of the Housing Act 2004

The Management of Houses in Multiple Occupation (England) Regulations 2006 impose duties on the persons managing HMOs in respect of:
- Providing information to occupiers [Regulation 3]
- Taking safety measures, including fire safety measures [Regulation 4]
- Maintaining the water supply and drainage [Regulation 5]
- Supplying and maintaining gas and electricity, including having these services/appliances regularly inspected [Regulation 6]
- Maintaining common parts [Regulation 7]
- Maintaining living accommodation [Regulation 8]
- Providing sufficient waste disposal facilities [Regulation 9]

The Licensing and Management of Houses in Multiple Occupation (Additional Provisions) (England) Regulations 2007 impose duties on the persons managing HMOs as defined by Section 257 Housing Act 2004 in respect of:

- Providing information to occupiers [regulation 4]
- Taking safety measures, including fire safety measures [regulation 5]
- Maintaining the water supply and drainage [regulation 6]
- Supplying and maintaining gas and electricity, including having these services/appliances regularly inspected [regulation 7]
- Maintaining common parts [regulation 8]
- Maintaining living accommodation [regulation 9]
- Providing sufficient waste disposal facilities [regulation 10]

Where there are multiple breaches of a single Management Regulation at a single HMO, a single civil penalty will be imposed which will cover all the breaches of that Management Regulation.

Where multiple Management Regulations have been breached at a single HMO, a separate civil penalty will be imposed for each Management Regulation that has been breached.

| Name of Management Regulation | Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|---|
| Duty of manager to provide information to occupier | £3,000 | £40,000 | £2,400 | £3,000 | £3,600 |

Offence-specific mitigating factors:

- The nature and extent of offences within the specific regulation

Offence-specific aggravating factors:

- The nature and extent of offences within the specific regulation
- The landlord has refused to provide any outstanding contact information more than 48 hours after it has been requested by an occupant or on behalf of an occupant.

| Name of Management Regulation | Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|---|
| Duty of manager to take safety measures | £20,000 | £40,000 | £16,000 | £20,000 | £24,000 |

Offence-specific mitigating factors:

- The number, nature and extent of offences within the specific regulation

Offence-specific aggravating factors:

- The number, nature and extent of offences within the specific regulation

| Name of Management Regulation | Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|---|
| Duty of manager to maintain water supply and drainage | £10,000 | £40,000 | £8,000 | £10,000 | £12,000 |

Offence-specific mitigating factors:

- The number, nature and extent of offences within the specific regulation

Offence-specific aggravating factors:

- The number, nature and extent of offences within the specific regulation

| Name of Management Regulation | Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|---|
| Duty of manager to supply and maintain gas and electricity | £12,000 | £40,000 | £9,600 | £12,000 | £14,400 |

Offence-specific mitigating factors:

- The number, nature and extent of offences within the specific regulation

Offence-specific aggravating factors:

- The number, nature and extent of offences within the specific regulation

| Name of Management Regulation | Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|---|
| Duty of manager to maintain common parts, fixtures, fittings and appliances | £7,000 | £40,000 | £5,600 | £7,000 | £8,400 |

Offence-specific mitigating factors:

- The number, nature and extent of offences within the specific regulation

Offence-specific aggravating factors:

- The number, nature and extent of offences within the specific regulation

| Name of Management Regulation | Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|---|
| Duty of manager to maintain living accommodation | £7,000 | £40,000 | £5,600 | £7,000 | £8,400 |

Offence-specific mitigating factors:

- The number, nature and extent of offences within the specific regulation

Offence-specific aggravating factors:

- The number, nature and extent of offences within the specific regulation

| Name of Management Regulation | Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|---|
| Duty to provide waste disposal facilities | £7,000 | £40,000 | £5,600 | £7,000 | £8,400 |

Offence-specific mitigating factors:

- The nature and extent of offences within the specific regulation

Offence-specific aggravating factors:

- The nature and extent of offences within the specific regulation
- The lack of sufficient refuse and/or litter containers either inside and/or outside the property has been previously reported
- The refuse and/or litter that requires disposal includes hazardous materials

### 4.7 Breach of licence conditions – Section 72(3) Housing Act 2004

4.7.1 All granted HMO licences impose a set of conditions on the licence holder. It is important that the licence holder of a licensed property complies with all imposed conditions, but the Council recognises that a failure to comply with certain licence conditions is likely to have a much bigger impact on the safety and comfort of residents than others.

4.7.2 The starting levels for each different type of licence condition breach is set out below based on the seriousness of the offence. Where a licence condition could be interpreted to fall within two different potential starting levels, the higher starting level will be chosen.

4.7.3 Where multiple licence conditions have been breached at a single property, a separate civil penalty will be imposed for each licence condition that has been breached.

**4.7.4 Failure to comply with licence conditions related to:**

- Signage or the provision of information for tenants
- Provision of written terms of occupancy for tenants
- Procedures regarding complaints
- Procedures regarding vetting of incoming tenants
- Compliance with deposit protection legislation
- The recording and provision of information regarding rent payments
- Procedures relating to rent collection
- The provision of information regarding occupancy of the property
- The provision of information regarding change of managers or licence holder details
- The provision of information related to changes in the property
- Requirements relating to the sale of the property
- Attending training courses
- Requirements to hold insurance
- The provision of insurance documentation
- The provision of or obtaining of suitable references
- The provision of keys and alarm codes
- Security provisions for access to the property
- The provision of suitable means for occupiers to regulate temperature
- Carrying out items on a schedule of works not otherwise mentioned in the HMO licence conditions section of this policy, relating to non-compliance with items on a schedule of works

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £4,000 | £40,000 | £3,200 | £4,000 | £4,800 |

Offence-specific mitigating factors:

- The nature and extent of the licence condition breach

Offence-specific aggravating factors:

- The nature and extent of the licence condition breach

### 4.7.5 Failure to comply with licence conditions related to:

- Procedures and actions regarding Inspections
- Procedures regarding Repair issues
- Maintenance and use of common parts (including gardens, outbuildings and property exterior) and living areas
- Safeguarding occupiers and minimising disruption during works
- The provision of information regarding alterations and construction works
- Procedures regarding emergency issues
- Waste and waste receptacles, pests, minor repairs, alterations or decoration.
- Giving written notice prior to entry
- Allowing access for inspections
- Minimising risk of water contamination
- The compliance of furnishings or furniture with fire safety regulations
- Carrying out items on a schedule of works in relation to provision of mechanical extraction or electrical sockets

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £7,000 | £40,000 | £5,600 | £7,000 | £8,400 |

Offence-specific mitigating factors:
- The nature and extent of the licence condition breach

Offence-specific aggravating factors:
- The nature and extent of the licence condition breach

### 4.7.6 Failure to comply with licence conditions related to:

- The provision of documentation regarding energy performance certificates, fire detection and prevention, emergency lighting, carbon monoxide detection, fire risk assessments, gas installations, electric installations and appliances
- Notification of legal proceedings, contraventions and other relevant information that may affect a fit and proper person status
- Procedures and actions regarding ASB
- Carrying out items on a schedule of works in relation to the provision of personal hygiene facilities, kitchen facilities or heating

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £12,500 | £40,000 | £10,000 | £12,500 | £15,000 |

Offence-specific mitigating factors:
- The nature and extent of the licence condition breach

Offence-specific aggravating factors:
- The nature and extent of the licence condition breach

### 4.7.7 Failure to comply with licence conditions related to:

- Minimum floor areas
- Occupancy rates
- Occupancy of rooms or areas that are not to be used as sleeping accommodation
- Limits on number of households allowed to occupy the property or part of the property

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £20,000 | £40,000 | £16,000 | £20,000 | £24,000 |

Offence-specific mitigating factors:
- The nature and extent of the licence condition breach

Offence-specific aggravating factors:
- The nature and extent of the licence condition breach

### 4.7.8 Failure to comply with licence conditions related to:

- The condition or existence of smoke alarms, carbon monoxide alarms, emergency lighting, gas installations, electric installations and appliances, fire detection or other fire safety features or requirements
- The provision and maintenance of safe means of escape, including requirements to keep escape routes and exits free from obstruction
- Carrying out items on a schedule of works in relation to fire safety or the provision of a carbon monoxide detector

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £25,000 | £40,000 | £20,000 | £25,000 | £30,000 |

Offence-specific mitigating factors:
- The nature and extent of the licence condition breach

Offence-specific aggravating factors:
- The nature and extent of the licence condition breach

## 4.8 Tenant Fees Act 2019 breaches and offences

### 4.8.1 Requiring a relevant person to make a prohibited payment under section 1 or section 2 of the Tenant Fees Act 2019

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £3,000 | £5,000 | £2,400 | £3,000 | £3,600 |

Breach-specific mitigating factors:

- None.

Breach -specific aggravating factors:

- Failure to pay tenant back or the amount paid of the excess fees charged.

### 4.8.2 Unlawfully retaining a holding deposit under schedule 2 of the Tenant Fees Act 2019

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £3,000 | £5,000 | £2,400 | £3,000 | £3,600 |

Breach -specific mitigating factors:

- None.

Breach -specific aggravating factors:

- Failure to pay tenant back or the amount paid of the excess fees charged.

### 4.8.3 Conduct giving rise to liability under section 8, where within the preceding five years the landlord or letting agent has either (i) had a relevant penalty (under s8 for breach of s1 or s2 of the Tenant Fees Act 2019) imposed for a different breach of the same section and the final notice has not been withdrawn, or (ii) been convicted under s12 of an offence in respect of such a breach, under section 12 of the Tenant Fees Act 2019

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £12,500 | £30,000 | £10,000 | £12,500 | £15,000 |

Offence-specific mitigating factors:

- None.

Offence-specific aggravating factors:

- Failure to pay tenant back or the amount paid of the excess fees charged.

### 4.9 Smoke and Carbon Monoxide Alarm (England) Regulations 2015 (as amended) breaches

#### 4.9.1 Failing to comply with a remedial notice under Regulation 6 of the Smoke and Carbon Monoxide Alarm (England) Regulations 2015 (as amended)

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £4,000 | £5,000 | £3,000 | £4,000 | £5,000 |

Breach -specific mitigating factors:

- Access to the property was prevented by the actions or refusal of the occupant(s) and a landlord can evidence that they took steps to obtain access to the property for the purpose of carrying out the required works, but those steps fell short of establishing a reasonable excuse for non-compliance.

Breach -specific aggravating factors:

- The number of alarms not working or missing.

### 4.10 Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015 breaches

4.10.1 Privately rented properties must meet minimum energy efficiency standards as determined by the Energy Performance Certificate (EPC). These regulations allow the Council to issue civil penalties and/or impose a “publication penalty” which means publishing details of the breach on the PRS exemption register for a minimum period of 12 months. Where the Council imposes civil penalties on a landlord in relation to multiple regulation breaches at the same time, the total penalty must not exceed £5,000.

### 4.10.2 Letting a substandard property under Regulation 23 of the Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015 for less than three months

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £2,000 | £2,000 | £1,600 | £2,000 | £2,000 plus 2-year Publication Penalty |

Breach -specific mitigating factors:

- How far below the minimum energy efficiency standard the property fell.

Breach -specific aggravating factors:

- How far below the minimum energy efficiency standard the property fell.

### 4.10.3 Letting a substandard property under Regulation 23 of the Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015 for three months or more

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £4,000 | £4,000 | £3,200 | £4,000 | £4,000 plus 4-year Publication Penalty |

Breach -specific mitigating factors:

- How far below the minimum energy efficiency standard the property fell.

Breach -specific aggravating factors:

- How far below the minimum energy efficiency standard the property fell.

### 4.10.4 Registering false or misleading information on the PRS exemptions register under Regulation 36(2) of the Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £1,000 | £1,000 | £800 plus 1-year Publication Penalty | £1,000 plus 2-year Publication Penalty | £1,000 plus 4-year Publication Penalty |

Breach -specific mitigating factors:

- None.

Breach -specific aggravating factors:

- None.

#### 4.10.5 Failing to comply with a Compliance Notice under Regulation 37(4)(a) of the Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £2,000 | £2,000 | £1,600 | £2,000 | £2,000 plus 2-year Publication Penalty |

Breach -specific mitigating factors:

- None.

Breach -specific aggravating factors:

- None.

### 4.11 Redress Schemes for Lettings Agency Work and Property Management Work (Requirement to Belong to a Scheme etc) (England) Order 2014 breaches

#### 4.11.1 Failing to belong to a redress scheme for lettings agency work under Article 3 of the Redress Schemes for Lettings Agency Work and Property Management Work (Requirement to Belong to a Scheme etc) (England) Order 2014

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £5,000 | £5,000 | £4,000 | £5,000 | £6,000 |

Breach -specific mitigating factors:

- None.

Breach -specific aggravating factors:

- None.

**4.11.2 Failing to belong to a redress scheme for property management work under Article 5 of the Redress Schemes for Lettings Agency Work and Property Management Work (Requirement to Belong to a Scheme etc) (England) Order 2014**

| Starting point | Statutory maximum civil penalty amount | Landlord Type downward adjustment | No Landlord Type adjustment | Landlord Type upward adjustment |
|---|---|---|---|---|
| £5,000 | £5,000 | £4,000 | £5,000 | £6,000 |

Breach -specific mitigating factors:

- None.

Breach -specific aggravating factors:

- None.

**4.12 Process for imposing a civil penalty and the right to make written representations**

**4.12.1 Notice of intent**

Before imposing a civil penalty on a landlord, the Council will give the landlord a notice of intent. The notice of intent will set out:

- The amount of the proposed civil penalty
- The reasons for proposing to impose the civil penalty
- Information about their right to make written representations

**4.12.2 Right to make written representations**

A landlord who is given a notice of intent may make written representations to the Council about the proposal to impose a civil penalty. Any representations must be made within a period of 28 days beginning with the day after the date on which the notice of intent was given.

**4.12.3 Decision after the representations period**

After the end of the period for representations the Council will:

- Decide whether to impose a civil penalty on the landlord; and
- If it decides to impose a civil penalty, decide the amount of the penalty. This amount can be higher or lower than the amount stated in the notice of intent.

A landlord's rectification of the identified breach or offence during the representations period will rarely, of itself, lead the Council to conclude that the imposition of a civil penalty is inappropriate. However, compliance at that stage will usually be relevant to the assessment of mitigating factors that may reduce the level of any civil penalty imposed.

Similarly, an admission of liability will rarely, of itself, lead the Council to conclude that the imposition of a civil penalty is inappropriate. An admission of liability will, however, usually be relevant to the assessment of mitigating factors that may reduce the level of any civil penalty imposed.

### 4.12.4 Final notice

If, following the receipt of written representations and/or the expiry of the time period to make written representations, the Council decides to impose a civil penalty on the landlord, it will give the landlord a final notice imposing that penalty.

The final notice will set out:

- The amount of the civil penalty
- The reasons for imposing the penalty
- Information about how to pay the penalty
- The period for payment of the penalty
- Information about rights of appeal
- The consequences of failure to comply with the notice

## 4.13 Discount for prompt payment

4.13.1 Where a civil penalty imposed by a final notice is paid in full within the period specified in that notice (normally 28 days beginning with the day after the final notice is given), the Council will apply a discount of 15% to the amount of the civil penalty.

The availability of the discount is conditional upon full payment being received within the specified period. The discount period will not be extended or suspended by the bringing of an appeal. A landlord who chooses to appeal may still benefit from the discount by paying the civil penalty in full within the specified period; however, where payment is not made within that period, the discount will not apply.

*Illustrative example of the application of the discount*
The landlord of an HMO property fails to obtain a licence. They only operate two HMO properties and there are no other relevant factors or aggravating features. The starting point for the offence under the Council's civil penalties matrix is £17,000.

Following the issue of a notice of intent proposing a civil penalty of £17,000, the landlord makes written representations. Having considered those representations, the Council determines to impose a civil penalty of £16,000, as set out in the final notice.

If the landlord pays the civil penalty in full within the payment period specified in the final notice, a 15% prompt payment discount is applied, resulting in a discounted payment of £13,600.

## 4.14 Appeals

4.14.1 A landlord who is given a final notice may appeal to the First-tier Tribunal (Property Chamber) against the decision to impose a civil penalty and/or the amount of the civil penalty. Any appeal must be made within 28 days beginning with the day after the date on which the final notice was given.

Where an appeal is brought, the final notice is suspended until the appeal is finally determined or withdrawn.

An appeal to the First-tier Tribunal is by way of a re-hearing of the Council's decision. In determining an appeal, the Tribunal may have regard to matters of which the Council was unaware at the time the decision to impose the civil penalty was made.

The Tribunal may dismiss an appeal if it is satisfied that the appeal is frivolous, vexatious, an abuse of process, or has no reasonable prospect of success.

The First-tier Tribunal may invite the parties to consider mediation or another form of alternative dispute resolution. The Council will not generally agree to mediation in relation to the level of a civil penalty, as civil penalties are determined by reference to this Policy to promote fair, consistent, and proportionate outcomes. Agreeing reductions outside the Policy framework would risk undermining consistency and the Council's enforcement objectives.

On determination of an appeal, the Tribunal may:

- Confirm the civil penalty
- Vary the amount of the civil penalty (whether by increase or reduction)
- Cancel the civil penalty

Where the Tribunal varies a civil penalty by increasing its amount, it may do so only up to the applicable statutory maximum for the relevant breach or offence.

A party to the appeal may apply for permission to appeal the decision of the First-tier Tribunal to the Upper Tribunal (Lands Chamber).

## 4.15 Policy review and updates

To ensure this policy stays up to date with changes in legislation and relevant caselaw, this policy authorises the Service Leader Environmental Protection, in consultation with the Portfolio Holder for Housing to approve updates to this policy where such changes are consistent with the overall policy approach.

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## Offences Covered by Civil Penalties

- unlawful eviction and harassment of occupier as defined under the Protection from Eviction Act 1977
- failure to give a written statement of terms under section 16D of the Housing Act 1988
- failure to give an existing tenant information about changes made by the Renters' Rights Act under paragraph 7(2) of schedule 6 to the Renters' Rights Act 2025
- attempting to let a property for a fixed term under section 16E of the Housing Act 1988
- attempting to end a tenancy orally or by service of a notice to quit under section 16E of the Housing Act 1988
- serving an eviction notice that attempts to end a tenancy outside the prescribed section 8 process under section 16E of the Housing Act 1988
- relying on a ground where the person does not reasonably believe that the landlord is/will be able to obtain possession under section 16E of the Housing Act 1988
- relying on a ground knowing the landlord would not be able to obtain possession or being reckless as to whether they would under section 16J of the Housing Act 1988
- failing to provide a tenant with prior notice that a ground which requires it may be used under section 16E of the Housing Act 1988
- reletting or remarketing a property before expiry of the 12 month no-let period after using the moving and selling grounds under sections 16E and 16J of the Housing Act 1988
- failure to comply with an Improvement Notice under section 30 of the Housing Act 2004
- offences in relation to licensing of houses in multiple occupation (HMOs) under section 72 of the Housing Act 2004
- offences in relation to licensing of other houses under section 95 of the Housing Act 2004
- contravention of an overcrowding notice under section 139 of the Housing Act 2004

- failure to comply with management regulations in respect of houses in multiple occupation under [section 234 of the Housing Act 2004]
- breach of a banning order under [section 21 of the Housing and Planning Act 2016]
- discriminating against prospective tenants during the letting process on the grounds that those tenants are in receipt of benefits or have children under sections 33 and 34 of the Renters’ Rights Act 2025
- marketing a letting without stating the proposed rent under section 56 of the Renters’ Rights Act 2025

- inviting or encouraging any person to offer to pay an amount of rent under the proposed letting that exceeds the stated rent under section 56 of the Renters’ Rights Act 2025
- accepting an offer from any person to pay an amount of rent under the proposed letting that exceeds the stated rent under section 56 of the Renters’ Rights Act 2025

Statutory guidance, Civil penalties under the Renters' Rights Act 2025 and other housing legislation MHCLG November 2025.

**Equality and Rurality Impact Assessment Form**

When completing this form you will need to provide evidence that you have considered how the 'protected characteristics' may be impacted upon by this decision. In line with the General Equality Duty the Council must, in the exercise of its functions, have due regard for the need to:

a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

This form should be completed in conjunction with the guidance document available on the Intranet
Once completed a copy should be emailed to cheryl.sloan@publicagroup.uk to be signed off by an equalities officer before being published.



1. Persons responsible for this assessment:

| | |
|---|---|
| Names:<br>Philip Measures | |
| Date of assessment:<br>13/07/26 | Telephone:<br>Email:philip.measures@publicagroup.uk |

2. Name of the policy, service, strategy, procedure or function:

| |
|---|
| The Civil Penalties Enforcement Policy, Environmental Protection Service. |

3. Briefly describe it aims and objectives

| |
|---|
| This report renews the private sector housing policy for Civil Penalties. The renewal is required to take account of legislative changes and to take into account new guidance and the provisions of the Renters' Rights Act 2026. |

4. Are there any external considerations? (e.g. Legislation/government directives)

| |
|---|
| The Housing Act 2004<br>The Housing and Planning Act 2016<br>LACORS guidance<br>The Renters' Rights Act 2026. |

5. What evidence has helped to inform this assessment?

| Source | ✓ | If ticked please explain what |
|---|---|---|
| Demographic data and other statistics, including census findings | ✓ | Private Sector Housing Stock Conditions Survey. |
| Recent research findings including studies of deprivation | ☐ | |
| Results of recent consultations and surveys | ☐ | |
| Results of ethnic monitoring data and any equalities data | ☐ | |
| Anecdotal information from groups and agencies within Gloucestershire | ☐ | |
| Comparisons between similar functions / policies elsewhere | ☐ | |
| Analysis of audit reports and reviews | ☐ | |
| Other: | ✓ | Ist Tier Property Tribunal decisions, meaning the current Private Sector Housing policies are out of date. |



6. Please specify how intend to gather evidence to fill any gaps identified above:

| |
|---|
| At West Oxfordshire, a business case is proposed to carry out a new PSH Stock Conditions Survey because the existing one is over 10 years old. At Cotswold and Forest of Dean District Council this work has been completed. |

7. Has any consultation been carried out?

| |
|---|
| No, this is not required. |

If NO please outline any planned activities

| |
|---|
| |

8. What level of impact either directly or indirectly will the proposal have upon the general public / staff? (Please quantify where possible)

| Level of impact | Response |
|---|---|
| NO IMPACT – The proposal has no impact upon the general public/staff | ✓ |
| LOW – Few members of the general public/staff will be affected by this proposal | ☐ |
| MEDIUM – A large group of the general public/staff will be affected by this proposal | ☐ |
| HIGH – The proposal will have an impact upon the whole community/all staff | ☐ |
| The policy renews an existing, so the impact should be positive. Landlords who are non-complaint, may face additional sanctions as a result of this policy being in place. | |



9. Considering the available evidence, what type of impact could this function have on any of the protected characteristics?

*Negative – it could disadvantage and therefore potentially not meet the General Equality duty;*

*Positive – it could benefit and help meet the General Equality duty;*

*Neutral – neither positive nor negative impact / Not sure*

| | Potential Negative | Potential Positive | Neutral | Reasons | Options for mitigating adverse impacts |
|---|---|---|---|---|---|
| Age – Young People | | | ✓ | The policy is concerned with the regulation of conditions in private sector housing, for the benefit of all residents. It does not introduce anything new that would have either a positive or negative impact on individuals with protected characteristics. | |
| Age – Old People | | | ✓ | | |
| Disability | | | ✓ | | |
| Sex – Male | | | ✓ | | |
| Sex – Female | | | ✓ | | |

| | | | | | |
|---|---|---|---|---|---|
| Race including Gypsy and Travellers | | | ✓ | | |
| Religion or Belief | | | ✓ | | |
| Sexual Orientation | | | ✓ | | |
| Gender Reassignment | | | ✓ | | |
| Pregnancy and maternity | | | ✓ | | |
| Geographical impacts on one area | | | ✓ | | |
| Other Groups | | | ✓ | | |
| **Rural considerations:** i.e. Access to services; leisure facilities, transport; education; employment; broadband. | | | ✓ | | |



10. Action plan (add additional lines if necessary)

| Action(s) | Lead Officer | Resource | Timescale |
|---|---|---|---|
| n/a | | | |

11. Is there is anything else that you wish to add?

| |
|---|
| |

**Declaration**

**Annex C**

I/We are satisfied that an equality impact assessment has been carried out on this policy, service, strategy, procedure or function and where an negative impact has been identified actions have been developed to lessen or negate this impact. We understand that the Equality Impact Assessment is required by the District Council and that we take responsibility for the completion and quality of this assessment.

| | | | |
|---|---|---|---|
| Completed By: | Philip Measures | Date: | 13/07/26 |
| Line Manager: | Mandy Fathers | Date: | |
| Reviewed by Corporate Equality Officer: | | Date: | |

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Annex D

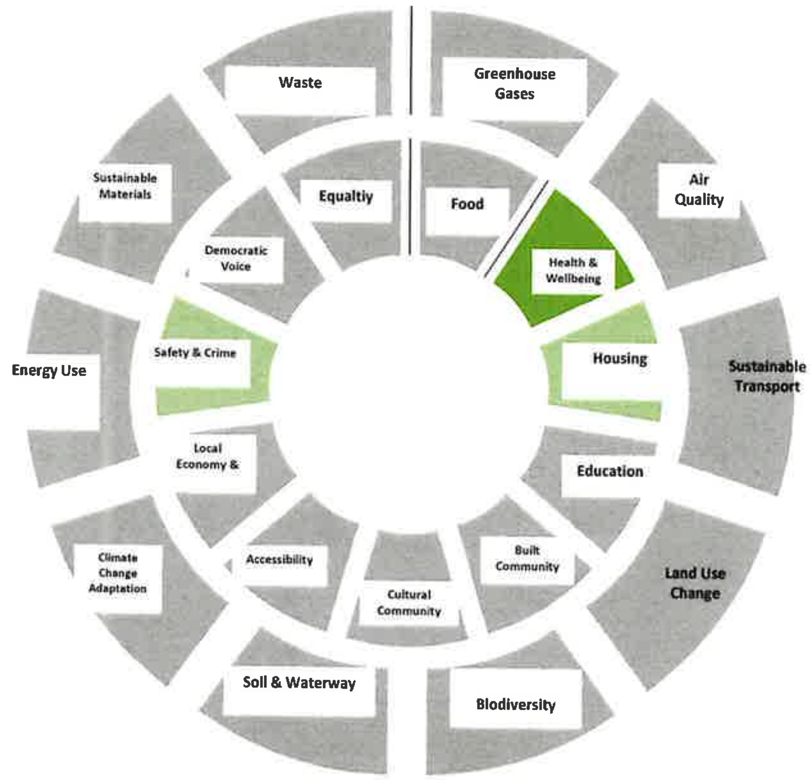
**Project Brief**

Approval of a new Civil Penalty Policy for Private Sector Housing

| Criteria | Score | Justification |
|---|---|---|
| Energy Use | 0 | The policy could encourage landlords to make their homes more energy efficient, rather than risk a fine for letting their property without a valid EPC. This adjustment |
| GHGs | 0 | It's an enforcement policy for the application of civil penalties. The policy will not have a positive or negative impact. |
| Air quality | 0 | The policy does not deliver improvements or otherwise to air quality. |
| Land use change | 0 | The policy does not change land use. |
| Soil and waterway health | 0 | The policy has no relevance to soil and waterway health. |
| Waste | 0 | The policy itself is not relevant to waste production or use. |
| Sustainable Transport | 0 | The policy has no relevance to sustainable travel. |
| Biodiversity | 0 | The policy has no relevance to biodiversity. |
| Climate Change Adaptation | 0 | The policy has no relevance to climate change adaptation. |
| Sustainable Materials | 0 | The policy has no relevance to sustainable materials. |
| Food | 0 | The policy is not concerned with access to food. |
| Health | 4 | The deterrant effect of the Policy and Civil Penalties will drive up standards in the private rented sector, improving tenant wellbeing. |
| Housing | 2 | The delivery location is the Council District. Better regulation aims to drive up standards, thus improving the quality of homes. |
| Education | 0 | This policy is not related to education. |
| Built Community | 0 | This policy does not change the criteria for built communities. |
| Cultural Community | 0 | This policy does not impact on community culture. |
| Accessibility | 0 | The policy does not affect accessibility. |
| Local Economy and Jobs | 0 | The policy has no impact on the ecomy or jobs. |
| Safety | 2 | Better regulation of housing standards improves the health and safety of occupants. |
| Democratic Voice | 0 | There is no public engagement with respect to this policy. It is concerned with the application of national legislaltion which has already gone through a consultation |
| Equity | 0 | No impacts on groups with protected characteristics. |

NB: You can filter the justifications by colour using the filter option on the 'score' column.

For example, you can choose to only print red scores so that you can review them.



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| | |
|---|---|
| Council name | **COTSWOLD DISTRICT COUNCIL** |
| Name and date of Committee | **CABINET – 10 SEPTEMBER 2026** |
| Subject | **HEALTH AND SAFETY DELEGATED RESPONSIBILITY FRAMEWORK** |
| Wards affected | None |
| Accountable member | Cllr Mike Evemy, Leader of the Council<br>Email: mike.evemy@cotswold.gov.uk |
| Accountable officer | Claire Locke, Executive Director for Corporate Services<br>Email: Claire.locke@publicagroup.uk |
| Report author | Amy Kemmett, Health and Safety Business Partner<br>Email: amy.kemmett@publicagroup.uk |
| Summary/Purpose | Submit the Health and Safety Delegated Responsibility Framework to the Cabinet for approval. |
| Annexes | Annex A – C-HSP-001-01 Policy Implementation Framework<br>Annex B – Health & Safety Policy Approval Process<br>Annex C – Sustainability Impact Assessment |
| Recommendation(s) | That Cabinet resolves to:<br>• Approve the implementation of the attached Health and Safety Delegated Responsibility Framework.<br>• Delegate authority to the Chief Executive Officer to approve health and safety policies in line with the Framework attached. |
| Corporate priorities | N/A |
| Key Decision | NO |
| Exempt | NO |

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| | |
|---|---|
| Consultees/ Consultation | Consultation has been undertaken with Publica Executives, the Corporate Health and Safety Team, and senior officers across the partnership. The framework also sets out future consultation arrangements for health and safety policy development, including proportionate engagement with Executive Leadership Teams, Health and Safety Committees, Trade Union representatives, Legal, Data Protection and Equality Leads where relevant. |

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## 1. EXECUTIVE SUMMARY

**1.1** To support effective health and safety governance across services delivered through Publica on behalf of Cotswold District Council, a review has identified the need for a consistent and proportionate framework for the development, approval and implementation of health and safety policies.

**1.2** The Health and Safety Delegated Responsibility Framework establishes a clear governance route for health and safety policies, enabling the Chief Executive Officer to approve policies under delegated authority where appropriate, while ensuring that matters are escalated to Cabinet where required by legislation, constitutional requirements, financial significance, legal implications, political sensitivity or public interest.

**1.3** The framework supports a more efficient and timely policy approval process, ensuring that health and safety policies remain current, legally compliant and responsive to changes in legislation, operational practice and best practice guidance. It also provides assurance that Cabinet retains strategic oversight through exception reporting and by-exception decision-making where escalation criteria are met.

**1.4** Approval of this framework will provide clarity for officers, elected members and services by defining policy categories, approval routes, consultation requirements, publication arrangements, monitoring, review and audit expectations. This will strengthen accountability and support consistent health and safety standards across Cotswold District Council.

## 2. BACKGROUND

**2.1** The current process for developing and approving health and safety policies would benefit from greater clarity and consistency. Health and safety policies are required to set out mandatory standards, responsibilities and arrangements to ensure that Cotswold District Council complies with their statutory duties as an employer, service provider and, where applicable, landlord.

**2.2** The health and safety management system is being developed to provide a structured suite of documents, including policies, procedures, guidance, templates and management arrangements. This will support compliance with health and safety legislation and ensure that employees, councillors, contractors, tenants, visitors and members of the public remain safe when on council premises, working on council business or engaging with council services.

**2.3** Historically, health and safety policies have often required Cabinet approval. While this remains appropriate for matters with significant strategic, legal, financial or political implications, not all health and safety policies require this level of approval. In many cases, policies are technical documents designed to implement statutory duties and operational controls. Requiring Cabinet approval for all such documents can delay implementation and increase the risk that policies do not remain current in response to changes in legislation, regulatory expectations, audit findings or incident learning.

**2.4** The Delegated Responsibility Framework has therefore been developed to establish a transparent and accountable approach to health and safety policy approval. It enables policies to be approved at Corporate Leadership Team or senior officer level where constitutionally appropriate, while ensuring escalation to Cabinet where specific criteria are met.

**2.5** The framework operates within the Council's Constitution and Scheme of Delegation. Where the Constitution requires Cabinet or Executive approval, that route will take precedence. The Constitution can be found at [The Council's Constitution - Cotswold District Council].

## 3. HEALTH AND SAFETY DELEGATED RESPONSIBILITY FRAMEWORK

**3.1** The framework introduces three levels of health and safety documentation:

**Level 1 – Corporate Health and Safety Policies:** organisation-wide principles and mandatory requirements, approved by relevant Council Corporate Leadership Teams under delegated authority.

**Level 2 – Topic Procedures:** operational methods for implementing policy requirements for specific risks, approved by CLT or a delegated Director/Head of Service as defined locally.

**Level 3 – Guidance and Toolkits:** good practice advice and templates that support implementation and do not change mandatory controls, approved by the Document Owner's Head of Service.

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**3.2** It includes a Health and Safety Management System diagram as Appendix 1 to Annex A, which supports the overall structure of the framework and demonstrates how the delegated responsibility arrangements fit within the broader health and safety governance system. A process diagram of the practical approval process can be found at Annex B.

## 4. ALTERNATIVE OPTIONS

**4.1** An alternative option would be to continue requiring all health and safety policies to be approved through Cabinet approval routes. However, this approach would not provide a proportionate approval process for technical or operational health and safety documents and may delay the implementation of policies required to support statutory compliance.

## 5. CONCLUSIONS

**5.1** The recommended approach is therefore to adopt the Delegated Responsibility Framework. This provides a balanced governance model that supports timely decision-making, maintains Cabinet oversight where required, and ensures that health and safety policies remain legally compliant, proportionate and consistently managed

## 6. FINANCIAL IMPLICATIONS

**6.1** There are no direct financial implications arising from the approval of this framework.

**6.2** The framework is designed to support more efficient governance and approval arrangements for health and safety policies. It does not, in itself, introduce new operational controls or require additional expenditure. Where individual health and safety policies developed under this framework have financial implications, these will be identified and considered as part of the relevant policy development and approval process.

**6.3** The framework also provides that the Monitoring Officer and Section 151 Officer will provide advice on legal, constitutional and financial implications where relevant.

## 7. LEGAL IMPLICATIONS

**7.1** Cotswold District Council and Publica have statutory duties under health and safety legislation, including the Health and Safety at Work etc. Act 1974 and the Management of Health and Safety at Work Regulations 1999. Additional duties may also apply under legislation relating to premises, work equipment, manual handling, substances hazardous to health, accident reporting, fire safety and landlord responsibilities.

**7.2** This framework supports compliance with these duties by ensuring that health and safety policies are developed, approved, implemented and reviewed through a clear, consistent and auditable governance process.

**7.3** Failure to maintain suitable health and safety policies and governance arrangements could result in inconsistent standards, delayed implementation of necessary controls and increased risk of non-compliance with statutory duties. This may expose the Council to enforcement action, civil claims, reputational damage and increased risk to employees, contractors, visitors, tenants and members of the public.

## 8. RISK ASSESSMENT

**8.1** Without a clear delegated responsibility framework, there is a risk that health and safety policies may be subject to inconsistent approval routes, delayed implementation or insufficient oversight. This could affect the Council's ability to respond promptly to legislative change, incident learning, audit findings or changes in operational practice.

**8.2** The framework reduces this risk by establishing a documented approach for policy development, consultation, approval, publication, communication, implementation, review and audit. It also ensures that escalation to Cabinet is required where the policy has significant financial, legal or political implications, where legislation or the Constitution requires Cabinet approval, or where the Corporate Leadership Team or Monitoring Officer considers Cabinet approval appropriate.

**8.3** The framework further strengthens assurance by requiring a central register of health and safety policies, exception reporting of overdue reviews and high-priority actions, and the potential use of internal audit or peer review to assess compliance with the framework.

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**9. EQUALITIES IMPACT**

**9.1** The framework requires equality considerations to be applied proportionately to Level 1 and Level 2 health and safety documents, as described above in 3.3, with any required mitigations identified as part of policy development and implementation.

**10. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS**

**10.1** The implementation of this framework is not expected to have any direct climate, biodiversity or ecological emergency implications.

**10.2** The framework relates to the governance, approval and implementation of health and safety policies. Where individual health and safety policies developed under this framework have sustainability, environmental or ecological implications, these will be considered as part of the relevant policy development and approval process.

**10.3** A Sustainability Impact Assessment is to be found at Annex C.

**11. BACKGROUND PAPERS**

**11.1** There are no background papers.

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## Annex A

COTSWOLD District Council

FOR INTERNAL USE ONLY

**Title: C-HSP-001-01 Health & Safety Delegated Responsibility Framework**
**Author:** Publica Corporate Health & Safety Team
**Date:** August 2026
**Approved By:**
**Review Date:** September 2027

| Version | Status | Date | Reviewer | Purpose/outcome |
|---|---|---|---|---|
| 1.0 | Draft | 05/08/2026 | Corporate Health & Safety Team | Draft Specific to Cotswold District Council for Cabinet Approval |

# 1. Purpose

The framework establishes a consistent approach to the development, approval and implementation of health and safety policies across services delivered through Publica on behalf of partner councils. It enables the Corporate Leadership Team to approve policies under delegated authority, with escalation to Elected Members where required by legislation, constitutional requirements or defined criteria.

The framework supports effective governance by streamlining approval processes, ensuring compliance with statutory duties, and enabling timely adoption of policies in response to legislative, operational and best practice changes. It also clarifies roles and responsibilities for policy development and approval, ensuring appropriate oversight, accountability and assurance.

In doing so, it supports the provision of safe and healthy environments for employees, contractors and others affected by service delivery, while allowing councils to retain flexibility to reflect local priorities within an aligned health and safety framework.

# 2. Statement of Intent

Publica and Cotswold District Council are committed to maintaining high standards of health and safety governance. This framework ensures that policies are developed, approved and implemented in a consistent, efficient and compliant manner, supporting operational needs while protecting the health, safety and wellbeing of employees, contractors, visitors and others affected by service delivery.

The framework is intended to enable delegated decision-making at Corporate Leadership Team level, supported by clear escalation arrangements, proportionate consultation, and robust assurance processes. It ensures compliance with legal and constitutional requirements, while allowing policies to remain current, practical and responsive to change.

### Accountability and Governance

The Corporate Leadership Team will exercise delegated authority in accordance with this framework, recording decisions through established governance arrangements. Cabinet retain strategic oversight through assurance reporting and by-exception decision-making where escalation criteria are met.

The Monitoring Officer and Section 151 Officer will provide advice on legal, constitutional and financial implications as required. All approved policies will be recorded in a central register, including version control and review arrangements.

This framework operates within Cotswold District Council's Constitution and Scheme of Delegation. Where these require Cabinet approval, that route will take precedence.

## 3. Scope

This framework applies to the development, review and approval of health and safety policies across all services delivered by Publica and Cotswold District Council. It includes corporate policies that define principles, standards and arrangements for managing risk and complying with statutory duties.

**Included within scope:**

- Corporate health and safety policies applicable across Cotswold District Council's operations
- Policies addressing specific operational risks (e.g. statutory compliance, lone working, workplace safety)
- Revisions and updates to existing health and safety policies

**Excluded from scope:**

- Statutory plans or strategies that require full Council approval under legislation.
- Policies outside the remit of health and safety (e.g., HR, finance, or environmental policies unless they directly impact health and safety).

## 4. Definitions

To ensure clarity and consistency, the following terms are defined for the purpose of this framework:

**Framework -** A governance document setting out the principles, processes and accountability arrangements for the development, approval and implementation of health and safety policies.

**Policy -** A formal statement establishing the principles, standards and mandatory requirements for managing health and safety risks and ensuring compliance with legislation.

**Corporate Leadership Team -** Senior officers with delegated authority to approve health and safety policies, including responsibility for ensuring policies are appropriate, compliant and aligned with operational needs.

**Cabinet -** Elected members responsible for strategic oversight. Cabinet retains accountability through assurance arrangements and by-exception decision-making where escalation criteria are met.

**Delegated Authority -** The formal transfer of decision-making powers enabling policies to be approved without requiring full Council approval, in accordance with each council's constitution.

**Partnership Councils -** The councils receiving services through Publica. Each retains autonomy and may adapt policies to reflect local operational requirements.

**Health and Safety Policy -** A document setting out the organisation's approach to managing health and safety risks, including responsibilities, arrangements and compliance requirements. Policies may be corporate or council specific.

**Governance Framework -** The systems and processes ensuring policies are developed, approved and implemented in a transparent, accountable and compliant manner.

# 5. Legislative & Governance Context

This Framework is underpinned by statutory requirements and governance arrangements that ensure health and safety policies are legally compliant, transparent and subject to appropriate oversight.

### Legislative Context

Cotswold District Council and Publica have duties arising from their roles as employers and, where applicable, landlords. Key legislation includes:

- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999
  Workplace (Health, Safety and Welfare) Regulations 1992
- Provision and Use of Work Equipment Regulations 1998 (PUWER)
- Manual Handling Operations Regulations 1992
- Control of Substances Hazardous to Health Regulations 2002 (COSHH)
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- Fire Safety (Regulatory Reform) Order 2005

Where landlord responsibilities apply, additional duties include:

- Landlord and Tenant Act 1985 and Homes (Fitness for Human Habitation) Act 2018
- Gas Safety (Installation and Use) Regulations
- Electrical Safety Standards in the Private Rented Sector Regulations 2020
- Fire Safety (England) Regulations 2022

These requirements ensure risks are managed to protect employees, tenants, contractors and others affected by service delivery.

### Governance Context

Health and safety policy approval operates within established local government governance arrangements, including:

- Local Government Act 1972 and 2000
- Council Constitutions
- Publica Governance Framework

This framework operates within these legislative and governance parameters to ensure that health and safety policies are:

- Legally compliant.
- Approved through a transparent and accountable process.
- Consistent in approach while allowing for local operational requirements

# 6. Roles and Responsibilities

This framework defines clear ownership to ensure accountability and timely decision-making

**Corporate Leadership Team** – exercise delegated authority to approve health and safety policies, ensure legal compliance, record decisions through established governance routes and commission implementation.

**Document Owner** – Ownership and overall responsibility for all health and safety policies within this framework sits with the Corporate Health and Safety Team.

**Corporate Health and Safety Team** – provides technical advice, quality assurance, consistency across policy development, and maintains the central register of policies.

**Monitoring Officer and Section 151 Officer** – Statutory Council roles which advise on legality, constitution and financial implications where relevant.

**Trade Union and staff representatives** – consulted proportionately through the Health and Safety Committee and routine engagement channels.

**Managers** – implement approved policies in their services, brief teams and confirm any local procedures needed to comply.

**All employees and contractors** – follow approved policies and report any issues or improvement opportunities.

## 7. Document Categories and Approved Routes

To promote consistency and proportionality, documents are grouped and approved as follows.

**Level 1 – Corporate Health and Safety Policies**: set organisation wide principles and mandatory requirements.

Approver: Council Corporate Leadership Teams under delegated authority.

**Level 2 – Topic Procedures**: operational methods that implement policy requirements for specific risks (for example, lone working, manual handling).

Approver: CLT or delegated Director/Head of Service as defined locally.

**Level 3 – Guidance and Toolkits:** good practice advice and templates that support implementation and do not change mandatory controls.

Approver: Document Owner's Head of Service.

## 8. Development, Consultation and Assurance

Policies and procedures will be developed through a proportionate and auditable process.

**Drafting** – the Document Owner prepares the draft using the agreed template, aligning with legal duties and current best practice.

**Consultation** – proportionate engagement with the Health and Safety Committee, Trade Union representatives, Legal, Data Protection and Equality Leads where relevant.

**Technical assurance** – To support quality and technical assurance, all documentation will be independently reviewed and cross-checked by other members of the Health and Safety Team. Finalisation – consultation feedback and assurance comments are recorded, with rationale for acceptance or nonacceptance, before submission for approval.

## 9. Escalation to Cabinet

Most health and safety policies are approved under delegated authority.  Escalation to Cabinet is required where:

- Legislation or Council constitution explicitly requires Cabinet approval.
- The policy has significant financial, legal or political implications that exceed CLT delegations.
- The CLT or Monitoring Officer considers Cabinet approval appropriate due to the sensitivity or public interest.
- Escalation decisions will be documented with reasons and, where time-critical, may follow an urgent decision route in line with each Council's Constitution.

## 10. Publications, Communication and Implementation

Approved documents will be accessible, communicated and embedded effectively.

### Publication & Access

Approved policies will be published in a single, read-only location on the staff intranet as the definitive source, with consistent naming, version control and defined ownership. Superseded versions will be archived, and documents will meet accessibility requirements.

### Go-Live Criteria

Policies may go live once approval has been recorded, publication arrangements are in place, key messages and audiences identified, and any supporting materials or dependencies updated. An appropriate effective date will be set to allow for communication and implementation.

### Communication

Communication will be proportionate to the impact of the policy and will ensure that relevant stakeholders are informed of key changes, responsibilities and actions required. Appropriate channels will be used, supported by clear messaging and, where necessary, briefing materials.

### Manager Briefing and Local Implementation

Managers will ensure policies are communicated within their services and that any required local arrangements, including updates to risk assessments or procedures, are implemented. Issues affecting implementation will be escalated as required.

### Implementation Responsibilities

- Document Owner – coordinates implementation, communication and readiness for go-live
- Corporate Health and Safety Team – provides guidance, assurance and maintains the central register
- Communications – supports delivery of proportionate communications
- Managers – implement and confirm completion of required actions
- Contractors/Partners – receive and comply with relevant policies as required

### Document Control and Retention

Superseded materials will be withdrawn from use, and relevant records relating to approval, communication and implementation will be retained in accordance with organisational requirements.

## 11. Review and Continuous Improvement

Policies will be maintained to ensure they remain current, practical and effective.

**Review cycle** – maximum review periods will apply based on policy level:

- Level 1 – every two years
- Level 2 – every two to three years
- Level 3 – up to three years

Reviews may be brought forward following legislative change, incident learning, audit findings or organisational change.

**Continuous improvement** – feedback from services, audits, incidents and user queries will be captured and considered as part of scheduled reviews or, where necessary, through interim updates.

**Version control** – each policy will include document ownership, approval, effective date, next review date and a summary of changes.

## 12. Monitoring, Reporting and Audit

Assurance is maintained through routine monitoring and transparent reporting arrangements.

- **Central register** – the Corporate Health and Safety Team maintains a register of all health and safety policies, including ownership, approval and review status.
- **Exception reporting** – overdue reviews and high-priority actions are reported to Executive Leadership Teams on a quarterly basis and, by exception, to Cabinets through existing governance arrangements.
- **Audit** – internal audit or peer review may be used to assess compliance with this framework, including the accuracy of the register, publication status and evidence of implementation.

## 13. Records and Retention

Governance records will be retained in line with organisational information management requirements.

Drafting materials, consultation feedback, assurance records, approval records and publication logs will be stored in the designated repository.

Superseded policy versions will be retained with version history and withdrawal rationale.

Retention of records will comply with each council's retention schedule, ensuring documents remain accessible for audit and legal purposes.

## 14. Urgent Updates and Exceptions

Where necessary, expedited arrangements may be used to address legal changes or immediate risks.

**Urgent updates** – the CLT Chair or a nominated Director may approve urgent changes under existing delegated authority. Decisions will be recorded and reported to the Executive Leadership Team and, where required, to Cabinet at the next available meeting.

**Temporary exceptions** – where full compliance is temporarily impracticable, a Director may authorise a time-limited exception, supported by a documented risk assessment and appropriate control measures. This will be undertaken in consultation with the Corporate Health and Safety Team and, where appropriate, the Monitoring Officer.

## 15. Equality, Privacy and Accessibility

Policy development and implementation will consider equality, data protection and accessibility requirements.

**Equality** – proportionate equality impact considerations will be applied to Level 1 and Level 2 documents, identifying any required mitigations.

**Privacy** – where policies involve the processing of personal data, the Document Owner will ensure compliance with data protection requirements and confirm any necessary privacy notices.

**Accessibility** – policies will be written in clear language and made available in accessible formats.

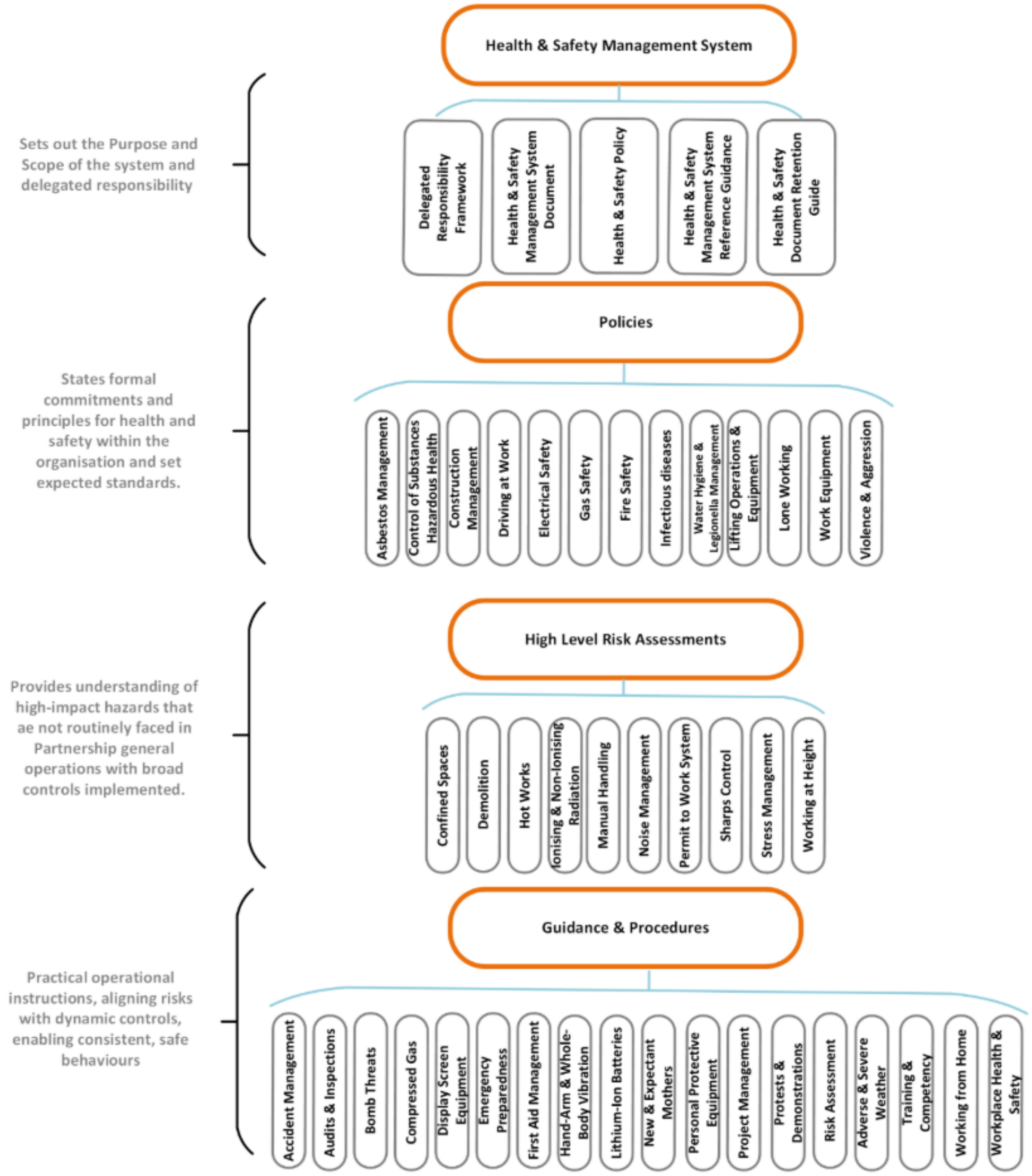
## 16. Consistency and Local Adaption

This framework supports local flexibility while maintaining consistency in the application of health and safety policies.

Where local operational needs require, councils may implement local procedures or appendices, provided these do not weaken or conflict with mandatory controls.

The Corporate Health and Safety Team will identify opportunities to align policies across councils to reduce duplication and improve clarity.

# Appendix One – Health and Safety Management System Diagram



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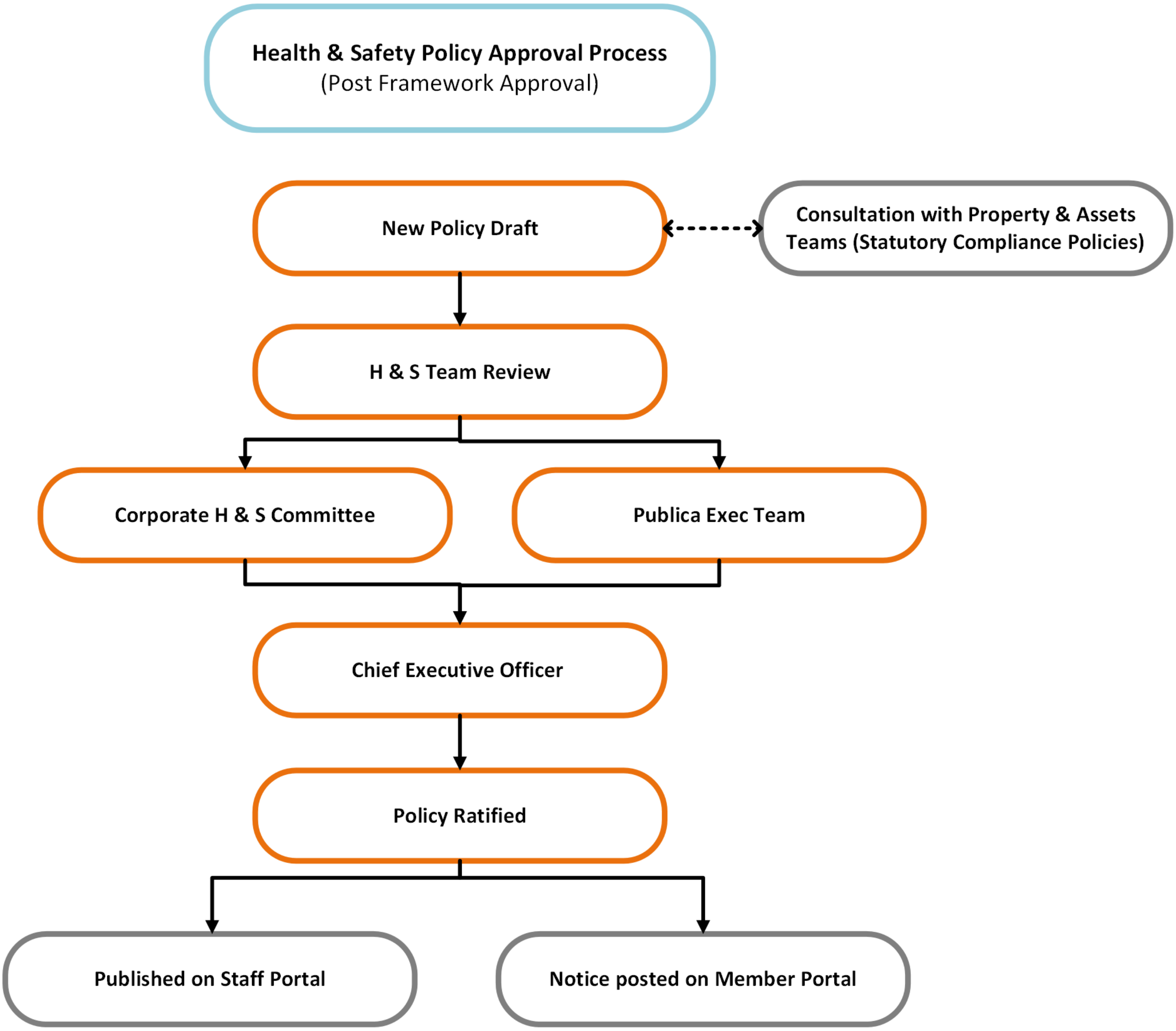
## Health and Safety Policy Approval Process



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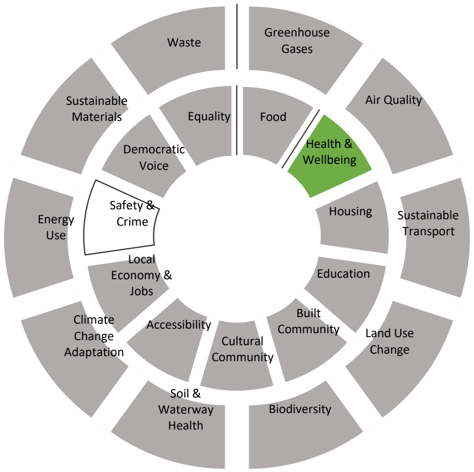
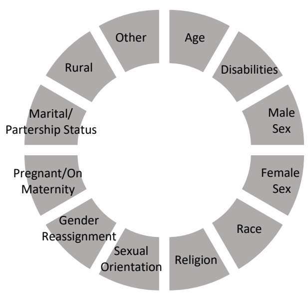
**Report:** Health and Safety Delegated Responsibility Framework




**CHECKS**

| ENVIRONMENTAL | Scores | Action | Justification | Reviewed | Recommendation |
|---|---|---|---|---|---|
| GHGs | 0 | No action required. | The framework itself willnot have any impact. | | |
| Air quality | 0 | No action required. | The framework itself will not have any impact. | | |
| Sustainable Transport | 0 | No action required. | The fraemwork will not have any impact. | | |
| Land use change | 0 | No action required. | The Framework will not have any impact | | |
| Biodiversity | 0 | No action required. | The framework will not have any impact. | | |
| Soil and waterway health | 0 | No action required. | The Framework will not have any impact | | |
| Climate Change Adaptation | 0 | No action required. | The Framework will not have any impact | | |
| Energy Use | 0 | No action required. | The Framework will not have any impact | | |
| Sustainable Materials | 0 | No action required. | The framework will not have any impact | | |
| Waste | 0 | No action required. | The Framework will not have any impact | | |

| SOCIAL | Scores | Action | Justification | Reviewed | Recommendation |
|---|---|---|---|---|---|
| Food | 0 | No action required. | The framework will not have any impact. | | |
| Health | 4 | No action required | Employee health may be improved as the work environment becomes safer. | | |
| Housing | 0 | No action required. | The framework will not have an impact | | |
| Education | 0 | No action required. | The framework will not have an impact. | | |
| Built Community | 0 | No action required. | The framework will not have an impact. | | |
| Cultural Community | 0 | No action required. | The framework will not have an impact | | |
| Accessibility | 0 | No action required. | The framework will not have an impact | | |
| Local Economy and Jobs | 0 | No action required. | The Framework will not have an impact | | |
| Safety | 0 | No action required. | The framework will reduce risks related to Council activities. | | |
| Democratic Voice | 0 | No action required. | 0 | | |
| Equality | 0 | No action required. | No impacts on groups with protected characteristics.<br>Evidence: Other, as referenced below.<br>0 | | |

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COTSWOLD
District Council

| | |
|---|---|
| Cotswold District Council name | **COTSWOLD DISTRICT COUNCIL** |
| Name and date of Committee | **CABINET – 10 SEPTEMBER 2026** |
| Subject | **GRANT MANAGEMENT POLICY** |
| Wards affected | All |
| Accountable member | Councillor Patrick Coleman, Cabinet Member for Finance<br>Email: patrick.coleman@cotswold.gov.uk |
| Accountable officer | David Stanley, Deputy Chief Executive and Chief Finance Officer<br>Email: david.stanley@cotswold.gov.uk |
| Report author | Emma Cathcart, Assistant Director Counter Fraud and Enforcement Unit<br>Email: emma.cathcart@cotswold.gov.uk |
| Summary/Purpose | To present Cabinet with a new Grant Management Policy for approval and adoption.<br>To provide an over-arching Policy that provides guidance to employees on the Council's governance and approach for administration and management of grant income, in order to ensure that we are maximising outcomes, minimising risk and delivering the greatest benefit to our communities. |
| Annexes | Annex A – Grant Management Policy<br>Annex B – Equalities Impact Assessment |
| Recommendation(s) | That Cabinet resolves to:<br>1. Approve and adopt the Grant Management Policy attached to this report.<br>2. Delegate authority to the Deputy Chief Executive and Chief Finance Officer to approve future minor amendments to the Policy, in consultation with the Cabinet Member for Finance, Assistant Director Counter Fraud and Legal Services. |

COTSWOLD
District Council

| | |
|---|---|
| Corporate priorities | • Delivering Good Services |
| Key Decision | NO |
| Exempt | NO |
| Consultees/ Consultation | Any policies drafted or revised by the Counter Fraud and Enforcement Unit are provided to Legal Services for review and are issued to the relevant Senior Officers, Management and Governance Officers for comment. |

COTSWOLD
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## 1. EXECUTIVE SUMMARY

**1.1** Cotswold District Council supports the voluntary and community sector, and businesses within the district through the operation of community grants schemes and via the distribution of grants received from third parties or Central Government.

**1.2** As a Local Authority, the Council is entrusted with public funds and has a duty to ensure that funding is distributed properly and spent lawfully and that processes used to determine grants are fair and transparent.

**1.3** The Grant Management Policy, attached at Annex A, has been developed to set out the processes to be followed when managing grants, including applying for external funding, developing and launching a new grant scheme and the distribution of funds.

**1.4** It lays out aims and principles in awarding grants and sets out verification checks that we need to undertake, whilst at the same time ensuring that we are maximising outcomes, minimising risk and delivering the greatest benefit to our communities.

**1.5** The Counter Fraud and Enforcement Unit has developed this Policy with Governance Officers and consulted with the Economic Development and Communities Team.

## 2. BACKGROUND

**2.1** The Council manages various grant schemes but to date, does not have an overarching Policy or Procedure that provides guidance to employees on the governance and approach for administration and management of grant income.

**2.2** The attached Policy includes details relating to:

- Roles and responsibilities;
- Funding agreements;
- Outcomes;
- Eligibility criteria;
- Assessment and awarding process;
- Conflicts of interest;
- Segregation of duties, and
- Due diligence checks.

**2.3** The Policy sets out the processes to be followed when managing grants, including applying for external funding, developing and launching a new grant scheme and the distribution of funds.

**2.4** It lays out the aims and principles in awarding grants and sets out verification checks that we need to undertake, whilst at the same time ensuring that we are maximising outcomes, minimising risk and delivering the greatest benefit to our communities.

**2.5** The Council may also be tasked by Central Government with providing emergency funding or grants on an ad hoc basis and at short notice following national emergencies such as flooding, pandemics, welfare issues and humanitarian crises etc and this Policy will also apply to the distribution of those funds.

**2.6** Different types of grant funding schemes will have very different eligibility criteria, but all require an application process, due diligence, verification checks and decisions regarding eligibility that should be transparent, consistent, fair and auditable.

**2.7** The Council may also have to agree to a mandated Government application, verification or audit process before commencing payments, so it is important the scheme is legally and meticulously implemented.

**2.8** All grant schemes require a named lead officer with defined responsibilities for the lifetime of the grant. They will be responsible for the key stages of the grant giving process outlined in the Policy, ensuring consultation and approval as appropriate.

**2.9** The Policy includes guidance on developing a community grant scheme including application guidelines, timescales, promotion, and assessment of applications. It also includes guidance about funding agreements with grant recipients and performance monitoring and reporting.

**2.10** To mitigate fraud and error, the CFEU developed a grants toolkit to be used in conjunction with this Policy. It provides guidance on the minimum verification and due diligence checks which must be undertaken. These checks should be determined at the start of the grant process and relevant documentation should be provided with every new grant application request, regardless of whether an organisation has received funding before.

**2.11** Due regard should also be given to the internal processes and systems required to administer a grant scheme

COTSWOLD
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**2.12** The Policy and toolkit will be communicated to managers and employees involved in the administration and management of the Council's grant income following approval.

**3. ALTERNATIVE OPTIONS**

**3.1** None

**4. FINANCIAL IMPLICATIONS**

**4.1** This Policy will ensure that the Council has robust systems of financial control in place for the management of grants.

**4.2** Whilst there are no direct financial implications arising from the implementation of the Policy, relevant financial implications must be taken into consideration as part of the application for any grant funding and the development of any grant schemes.

**4.3** The adoption and approval of this Policy will help to support the prevention and detection of misuse of public funds and will support the Council's objectives in reducing crime and financial loss to the Council.

**5. LEGAL IMPLICATIONS**

**5.1** There are a number of powers given to Councils to provide grant funding. The most appropriate power for grants to small voluntary and community sector grants is the general power of competence under Section 1 of the Localism Act 2011.

**5.2** The subsidy control position for all grants, regardless of value must be considered before setting up a grant scheme and Legal Services can provide support with this.

**5.3** Legal Services can assist with prepared template grant agreements for use by the Communities and Sustainable Economies Team for smaller grants.

**5.4** Legal Services should review funding agreements from Central Government and draft bespoke agreements to pass on this funding to local groups.

**6. RISK ASSESSMENT**

**6.1** Deliverability of grants schemes will be monitored via the relevant performance and monitoring arrangements as set out in individual grant agreements. .

**7. EQUALITIES IMPACT**

**7.1** An Equality's Impact Assessment has been completed and is attached at Annex B.

**7.2** The impact for this policy is neutral however; individual grant schemes should consider their equalities impact when being developed.

**8. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS**

**8.1** The Policy has a neutral impact however, individual grant schemes should consider their environmental and climate change implications when being developed.

**9. BACKGROUND PAPERS**

**9.1** None.

(END)

# Grant Management Policy

**Version Control:**

| | |
|---|---|
| **Document Name:** | Grant Management Policy |
| **Version:** | 1 |
| **Responsible Officer:** | Deputy Chief Executive and s151 Officer |
| **Approved by:** | Cabinet |
| **Next Review Date** | February 2029 |

**Revision History**

| Revision date | Version | Description |
|---|---|---|
| | | |

**Consultees**

| Internal | External |
|---|---|
| Legal Services<br>Corporate Leadership Team<br>Economic Development and Communities Team | |

**Distribution**

| Name | |
|---|---|
| | |
| | |

**CONTENTS**

## 1 INTRODUCTION AND PURPOSE OF THE POLICY

1.1 Cotswold District Council is proud to be able to support the voluntary and community sector and businesses within its district through the operation of Crowd Fund Cotswold, our community grant schemes and via the distribution of CIL (community infrastructure levy) funding and grants that we receive from third parties such as the NHS. We acknowledge that as a Local Authority we are entrusted with public funds and that we have a duty to ensure that funding is distributed properly and spent lawfully and that processes used to determine grants are fair and transparent.

1.2 This policy sets out the processes to be followed when managing all grants, whether capital or revenue, including applying for external funding, developing and launching a new grant scheme and the distribution of funds. It lays out our aims and principles in awarding grants and sets out the specific checks that we need to undertake, whilst at the same time ensuring that we are maximising outcomes, minimising risk and delivering the greatest benefit to our communities.

1.3 The Council may also be tasked by Central Government with providing emergency funding or grants on an ad hoc basis at short notice following national emergencies such as flooding, pandemics, welfare issues and humanitarian crises etc.

1.4 Different types of grant funding schemes will have very different eligibility criteria, but all require an application process, due diligence, verification checks, monitoring and decisions regarding eligibility that should be transparent, consistent, fair and auditable. The Council may also have to agree to a mandated Government application, verification or audit process before commencing payments, so it is important the scheme is legally and meticulously implemented.

1.5 Information on the conditions that will apply to a grant will be made available to applicants before they apply together with key dates for submission and future spending of funds.

## 2 MANAGING EXTERNAL FUNDING

2.1 External funding can be an important source of income to the Council, but funding conditions need to be carefully considered to ensure that they are compatible with the aims and objectives of the Council.

2.2 Authority from Corporate Leadership Team must be received before bidding for grants and funding so that financial impact to the Council and compliance with the Constitution is considered. Additionally, where any funding could be utilised by the Council this must be highlighted to Corporate Leadership Team for consideration.

2.3 The Council shall seek to maximise its resources by attracting external funding where appropriate. However, in some instances, available funding may be linked to tight specifications and may not be sufficiently flexible to link to the council's strategies therefore due consideration must be given to applying for or accepting any external funding.

2.4 All applications for, or acceptance of funding must be in line with the rules sets out in the constitution and the financial rules. For the avoidance of doubt:

- Bids for external funding or accepting grant funding where the amount of funding exceeds £2 million and to accept the terms and conditions of that funding, if awarded must be approved by Cabinet;
- Bids for external funding or accepting grant funding where the amount of funding exceeds £500,000 but does not exceed £2 million and to accept the terms and conditions of that funding, if awarded must be approved by the relevant Cabinet Member
- Bids for external funding or accepting grant funding where the amount of funding is less than £500,000 and to accept the terms and conditions of that funding, if awarded must be approved by the relevant Director.

2.5 Where the funding has match funding requirements then in accordance with the financial rules the Section 151 Officer is responsible for:

- Ensuring that any match funding requirements are considered prior to entering into an external agreement and that adequate future revenue budgets are in place to meet these requirements.
- Ensuring that all funding notified by external bodies is received and properly recorded in the council's accounts.
- Ensuring that all audit requirements are met.

2.6 Directors and Heads of Service are responsible for ensuring that:

- Funds are acquired only to meet the priorities approved in the policy framework by the council.
- Any match funding requirements are considered prior to entering into an external agreement and consulting with the Section 151 Officer to ensure that adequate future revenue budgets are in place to meet these requirements.
- Key conditions of funding and any statutory requirements are complied with and that the responsibilities of the Accountable body are clearly understood.
- All claims for funds are made by the due date and income received in accordance with the agreement.
- The project progresses in accordance with the agreed project outline and that all expenditure is properly incurred and recorded in the council's accounts
- Advice is sought from the legal team on the terms of the funding agreement and subsidy control implications as early as possible, particularly where there is an intention to pass the funds onto third parties.

2.7 Where external funding is received by the Council for onward distribution that distribution must be carried out in accordance with this policy, including via the development of an appropriate grant scheme.

## 3 EMERGENCY FUNDING STREAMS

3.1 National and local emergencies such as pandemics, floods, the cost-of-living crisis, international conflicts etc may result in Central Government asking Councils to administer grants and funding schemes to businesses and individuals.

3.2 These schemes are implemented quickly and with little prior warning to the Council and often with guidance provided after the funding has been announced. The Council should be prepared for the possibility of being tasked with this and have guidance and checklists available to assist.

3.3 The nature of the emergency will determine the application information required and criteria will be mandated by Central Government. The Council must ensure it follows this guidance to enable recovery of payments from Central Government

3.4 A core emergency funding group should be set up to include a representative from Finance to ensure management of delivery of payments, a representative from the legal team to ensure compliance with legal requirements and terms and conditions of funding, Revenues and Benefits Officer to provide customer/business data, a representative from Internal Audit and the Counter Fraud and Enforcement Unit (CFEU) to advise on risk and mitigation, and a representative from the relevant service area(s) (e.g Public Protection for floods/health emergencies, or Housing etc).

3.5 Businesses, voluntary or non-profit organisations, Town and Parish Councils, and individuals and individuals will have to complete an application form (online or paper) and sign a declaration which will include agreeing to any clauses required by Central Government and the following statement:

*Please be advised that the Council will not accept deliberate manipulation and fraud and any applicant caught falsifying their statements or evidence to gain grant money will face prosecution and any funding issued will be subject to claw back, as may any grants paid in error.*

3.6 Businesses and individuals will be required to provide proof of identity and eligibility, and proof of the bank account they wish payment to be made to. See the grants toolkit for examples of the type of documentation/proof that may be required.

3.7 Where grant funding is allocated to selected voluntary and community sector organisations, based on existing partnerships and known ability to deliver with impact, a grant agreement will be entered into clearly specifying the expected outcomes.

3.8 Returns will be made to Central Government, or the relevant body and minimum audit requirements will be detailed on all documentation. Decision-making documents must be kept in line with the scheme guidance and data retention policies.

## 4 CONFLICTS OF INTEREST

4.1 A conflict of interest is any activity that is inconsistent with the Council's best interests or that which could give the appearance of impropriety or corruption. Officers, contractors and Members must not place themselves in a position within which a personal benefit could be derived or be perceived to be derived from actions or decisions made in their official capacity as an employee.

4.2 Conflicts of interest should be declared at the start of the process so that they may be recorded and considered at the first opportunity. As these will be specific to each grant scheme, they should be held with the associated documentation. Where a conflict of interest is present, the officer, contractor or Member will not form part of any assessment panel or take part in any decision making for that grant scheme.

## 5. ROLES AND RESPONSIBILITIES

5.1 All grant schemes require a named lead officer with defined responsibilities for the lifetime of the grant. They will be responsible for the key stages of the grant scheme outlined below ensuring consultation and approval as appropriate.

| Stage | Who should be involved | Notes |
|---|---|---|
| Development of grant scheme – including priorities, criteria, assessment, risk assessment and decision making<br><br>Drafting of grant scheme<br><br>Development of application form and process | • Lead officer<br>• Corporate Leadership Team<br>• Lead Cabinet Member<br>• Representative of funding body where applicable (e.g. NHS for Health & Wellbeing Grants)<br>• Finance<br>• One Legal/Legal Services<br>• SWAP (internal audit)<br>• Counter Fraud and Enforcement Unit (CFEU)<br>• Partnership organisation (where applicable) | Proposals must be discussed with the appropriate colleagues to ensure authority to bid for funding and any match funding is available.<br><br>Seek legal advice on the proposed grant scheme and instruct Legal Services to draft a grant agreement template.<br><br>Timescales should be agreed in relation to availability and the time frame within which they should be spent.<br><br>Consider risk and mitigations accordingly.<br><br>Refer to supporting CFEU recommendations grants toolkit to cover application supporting information required, |

| Stage | Who should be involved | Notes |
|---|---|---|
| | | declarations, and verification checks |
| Launch of grant scheme and promotion | • Lead officer<br>• Communications team | Details of all current grant schemes should be available on the Council website |
| Due diligence checks on the application / applicant | • Lead officer<br>• Finance (if required)<br>• SWAP (if required)<br>• CFEU (if required) | As per Grants toolkit recommendations |
| Assessment Panel where applicable and/or required | • Lead Cabinet Member<br>• Member of Corporate Leadership Team<br>• Representative of funding body (e.g. NHS for Health & Wellbeing Grants) where applicable<br>• Representative of impartial voluntary sector organisation with knowledge of the subject area where applicable | Lead officer is there to facilitate the panel, providing information, liaising with applicants if more information is needed and recording decisions<br><br>For the avoidance of doubt the Lead officer is not part of the decision making |
| Decision making – as per scope of scheme, policy requirements or level of funding | • Formal decision by either the Lead Cabinet Member (via a delegated member decision), or Cabinet or Delegated Officer decision | Decisions must be recorded on appropriate decision-making forms and sent to democratic services to ensure publication on the decision-making register |
| Communication with applicants | • Lead officer | |
| Issue of grant agreements for signature to recipient and return to overseeing body | • Lead officer<br>• Legal Services | No grants should be paid without a signed grant agreement being in place.<br>All grant agreements over £10K should be drafted by Legal Services.<br>Grant agreements should be signed by the recipient in accordance with the stipulated timescales to ensure funding is not withdrawn<br>Legal advice should be sought to ensure all contractual arrangements are met |
| Processing of grant payments | • Grant budget holder<br>• Finance | This part of the process should include a clear segregation of duties to ensure transparency |

| Stage | Who should be involved | Notes |
|---|---|---|
| | | and probity. The Lead officer should not be responsible for approving payments. |
| Collation of monitoring information | • Lead officer | Where appropriate, assurance checks need to be conducted to ensure funding has been spent in accordance with the funding terms and conditions or within any requisite time period. |
| End of grant scheme summary report | • Lead officer | Details of all grants made should be published to the Councils website or reported |

## 6 DEVELOPING A COMMUNITY GRANT SCHEME

6.1 In developing a community grant scheme, the Council will have greater flexibility in the design and aims of the scheme. Consideration should be given to which organisations are eligible to apply (for example not for profit organisations, voluntary sector organisations, charities) as well as bodies which are not eligible to apply (for example individuals or groups that are not constituted). This information must be clearly detailed in the application guidance.

6.2 Grants should only be made to a legal person. Only a legal person(s) should enter into a grant agreement. This would normally be a limited company; however, where the recipient is an unincorporated association, the grant agreement should be signed by at least two individual trustees.

6.3 The criteria that applicants should meet must be pre-determined, considering the purpose of the grant scheme. These should be clearly defined and detail outcome priorities.

6.4 When developing a grant scheme, approval must be sought from the Corporate Leadership Team, and the appropriate people must be consulted to ensure any legal and financial implications are considered.

6.5 Applicants must be allowed a reasonable window in which to apply following notification of the grant scheme that is clearly publicised. The application process should also advise how long the verification and decision period will take before they are notified of any successful application.

6.6 Standard application form templates are available and should be used and adapted using online tools such as MS Forms.

6.7 The grant scheme should be promoted widely, using the Council's website and social media channels as well as via elected members, stakeholders and the Council's partners. Accessibility requirements should also be considered and alternative formats made available as required.

6.8 Details of funded projects should be publicised to ensure previous recipients can be considered during the assessment phase. This should be balanced against considerations relating to effective and efficient outcomes. This avoids accusations of bias and helps to ensure funding is spread fairly.

6.9 The grant agreement with successful applicants should include the requirement to acknowledge the support of the Council in all publicity material associated with the project as well as to follow the publicity guidelines from other funders who have contributed to the fund. The agreement should also stipulate that the Council reserves the right to use such material and any photographs of the project in its own publicity material.

6.10 Adequate time must be allowed for the assessment and awarding process to ensure applications can be sufficiently considered before payments deadlines are set.

6.11 An assessment panel should be formed to assess applications and the recommendations from the panel, once finalised, will need to be approved through the relevant decision-making process.

6.12 The grant scheme should advise the applicant whether they can challenge a decision and how to make a complaint or raise a dispute. If there is no right of appeal or challenge this should be stated in the guidelines.

## 7 FUNDING AGREEMENTS

7.1 When the formal decision about which projects will be funded has been made, the lead officer issues a grant funding agreement to successful applicants. Standard templates must be used, receive legal approval and must be signed by an appropriate member of Corporate Leadership Team, or if agreed, Senior Officer within the Council. The applicant should sign the grant agreement first and return it to the Council, which will then sign and date the agreement.

7.2 The grant recipient should be advised of a clear deadline for returning the signed copy, otherwise the grant agreement could be deemed invalid.

7.3 Where the grant is administered on behalf of Central Government then the recipient must agree to the terms and conditions stipulated in the scheme guidance.

7.4 All funding agreements should normally include as a minimum:

- Agreed aims of the project and any conditions
- The level of funding
- Funding term
- Terms and conditions including:

- Appropriate Legislation such as Data Protection, Equalities, Human Rights etc
- Arrangements and conditions for the payment of grant
- Reporting and monitoring arrangements
- Health and safety
- Indemnity and insurance
- Child and vulnerable adult protection and safeguarding
- Publicity and promotion expectations
- Subsidy control rules

## 8 PERFORMANCE OUTCOMES

8.1 Outcomes are taken from the grant application and are included in the project funding agreement.

8.2 The monitoring arrangements should be stipulated in the application process and where money is provided at the commencement of the project or in stages then regular reporting is required (minimum quarterly).

8.3 These should demonstrate how the project is achieving aims and objectives and how the organisation is ensuring the money is distributed fairly and correctly.

8.4 Final monitoring reports should be received within one year of the grant being awarded (unless by prior agreement), but any grant claim request during the grant period must be accompanied by a progress report to date.

8.5 Detail must be provided at the outset on how long the Council expects documentation and project delivery paperwork to be kept for monitoring and audit purposes.

8.6 The council reserves the right to withhold payment of funding where the monitoring requirements are not met.

## 9 GRANT SCHEME MONITORING

9.1 Payments may be made in arrears upon completion of the project and submission of a grant claim and monitoring report.

9.2 Where staged payments are made on delivery of outcomes timescales should be agreed at the outset and be dependent on receipt of interim reports. A small amount may need to be withheld pending receipt of the final monitoring report.

9.3 The standard grant monitoring template should be used, and must include as a minimum:

- A description of how the grant was used and how it met the aims of the grant scheme.
- A breakdown of spend

- A breakdown of other support that the project was able to use
- What checks and monitoring of spend were completed
- How the project impacted its beneficiaries
- How many people were involved
- Volunteer effort given to the project
- Feedback received by the project
- Future plans

9.4 All grant monitoring templates should be sent to WHERE so that they can be centrally collated for periodic review by the Corporate Leadership Team.

9.5 Payment must not be made until a signed grant agreement has been received.

9.6 If an organisation is not set up on the Council's payment system, they will be required to complete the appropriate documentation to enable the Council to make payment.

9.7 To ensure appropriate segregation of duties, payments of grants must be authorised by someone other than the Lead Officer and be in line with authorisation limits.

## 10 DUE DILIGENCE CHECKS AND VERIFICATION

10.1 The required due diligence and verification checks should be determined at the start of the grant process. These should be built into the application form and communicated so that all applicants are aware of the documentation they will be required to provide when making the application.

10.2 This documentation should be provided with every new grant application request for all organisations, regardless of whether they have received funding before. Applications which do not include the required documentation must not be accepted.

10.3 The grants toolkit provides guidance on the minimum verification and due diligence checks which must be undertaken but further advice and guidance can be provided by the Counter Fraud and Enforcement Unit.

## 11 DATA PROTECTION AND TRANSPARENCY

11.1 Data must be handled in line with the Council's Data Privacy Policy.

11.2 Due regard should be given to the internal processes and systems required to administer a grant scheme. It is likely that the lead officer will receive a significant amount of organisational data that contains sensitive information such as bank account details, names and addresses etc. This data must be handled appropriately and in line with regulations around data protection principles.

11.3 Lead officers must consider whether completing a Data Protection impact assessment is required and consult with the Data Protection officer if applicable

11.4 Data must not be kept longer than necessary, and the lead officer must consider timeframes for deleting information related to applications that were unsuccessful in their funding application in accordance with the Council's data retention procedures.

11.5 It is advised that files for successful applications should be kept for 7 years.

11.6 Appropriate systems should be set up to record necessary information, ensuring that only authorised staff have access to any sensitive information. Records should be kept in relation to:

- A spreadsheet to record details of all applications received such as date received, details of supporting documents submitted, when the application was acknowledged etc.
- Applications should be given unique ID numbers that will help to easily identify them.
- A separate folder should be created for each applicant to hold all relevant information about each organisation in one place such as application, constitution and accounts.
- If an applicant is successful then the grant funding agreement, details of payments and monitoring submissions with copies of any correspondence.
- Details of recommendations for all applications and scoring matrixes for an appropriate amount of time after the assessment, for example if an applicant requests feedback on why their application was not successful.
- Decisions relating to grant funding should be kept.
- A copy of all the grant paperwork such as guidance notes, regulations, legal agreements and Policies.

11.7 Details of all current grant schemes are available on the Council's website.

11.8 Decisions relating to grant funding should be made accessible to the public.

11.9 All grants made to voluntary and community sector organisations should be published on the council's website at the end of each financial year.

## 12 GRANT CERTIFICATION

12.1 Some grants received by the Council, especially Government Grants, require either the Chief Finance Officer or Head of Internal Audit to certify the appropriateness of grant spend.

12.2 All grants that require sign off, should be advised to the Head of Internal Audit, at the earliest convenience, so that they can be planned into their programme of work.

12.3 Once certification is required, the completed template and all information needed to certify the grant, should be forwarded to the internal auditors.

# ANNEX B

**Equality and Rurality Impact Assessment Form**

When completing this form you will need to provide evidence that you have considered how the 'protected characteristics' may be impacted upon by this decision. In line with the General Equality Duty the Council must, in the exercise of its functions, have due regard for the need to:

a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

This form should be completed in conjunction with the guidance document available on the Intranet
Once completed a copy should be emailed to cheryl.sloan@publicagroup.uk to be signed off by an equalities officer before being published.



1. Persons responsible for this assessment:

| | |
|---|---|
| Names: Emma Cathcart | |
| Date of assessment: 11.6.2026 | Telephone: 01285 623000<br>Email: Emma.Cathcart@cotswold.gov.uk |

2. Name of the policy, service, strategy, procedure or function:

| |
|---|
| Grant Management Policy<br><br>Is this a new or existing one? New |

3. Briefly describe it aims and objectives

| |
|---|
| Although the Council manages various grant schemes currently, it does not have an over-arching policy or procedure that provides guidance to staff on its governance and approach for administration and management of its grant income.<br>To ensure there is clear guidance on the processes to be followed when managing grants, including applying for external funding, developing and launching a new grant scheme and the distribution of funds, the grant management policy sets out the specific checks that we need to undertake, whilst at the same time ensuring that we are maximising outcomes, minimising risk and delivering the greatest benefit to our communities.<br>To have a robust process in place and to provide clear guidance to staff involved in the management of grants, to minimise the risks associated with not having a clear and transparent policy in place around the distribution of funds |

| |
|---|
| To have clear roles and responsibilities at each stage of the grant making process. Communities will benefit as the policy seeks to ensure that funding is fairly and lawfully spent and distributed so that the outcomes are maximised. |

4. Are there any external considerations? (e.g. Legislation/government directives)

| |
|---|
| Yes – legislation / government schemes |

5. What evidence has helped to inform this assessment?

| Source | ✓ | If ticked please explain what |
|---|---|---|
| Demographic data and other statistics, including census findings | ☐ | |
| Recent research findings including studies of deprivation | ☐ | |
| Results of recent consultations and surveys | ☐ | |
| Results of ethnic monitoring data and any equalities data | ☐ | |
| Anecdotal information from groups and agencies within Gloucestershire | ☐ | |
| Comparisons between similar functions / policies elsewhere | X | Comparison and inclusion of existing Policy across partner Council's. Departmental Policies. |
| Analysis of audit reports and reviews | ☐ | |
| Other: | X | Consultation with legal representatives, service leads and corporate management. |

6. Please specify how intend to gather evidence to fill any gaps identified above:

| |
|---|
| N/A |

| |
|---|
| |

7. Has any consultation been carried out?

| |
|---|
| Yes<br><br>Details of Consultation<br>Consultation with Legal Representatives across the Partnership<br>Consultation with Community / Economic Development Teams across the Partnership<br>Consultation with Strategic / Corporate Leadership Teams |

If NO please outline any planned activities

| |
|---|
| |



8. What level of impact either directly or indirectly will the proposal have upon the general public / staff? (Please quantify where possible)

| Level of impact | Response |
|---|---|
| NO IMPACT – The proposal has no impact upon the general public/staff | X |
| LOW – Few members of the general public/staff will be affected by this proposal | ☐ |
| MEDIUM – A large group of the general public/staff will be affected by this proposal | ☐ |
| HIGH – The proposal will have an impact upon the whole community/all staff | ☐ |
| Comments: e.g. Who will this specifically impact?<br>Individuals who are subject to enforcement action. | |

9. Considering the available evidence, what type of impact could this function have on any of the protected characteristics?
**No impact from the policy however individual grant schemes should consider relevant equality impacts**

*Negative – it could disadvantage and therefore potentially not meet the General Equality duty;*
*Positive – it could benefit and help meet the General Equality duty;*
*Neutral – neither positive nor negative impact / Not sure*

| | Potential Negative | Potential Positive | Neutral | Reasons | Options for mitigating adverse impacts |
|---|---|---|---|---|---|
| Age – Young People | | | | | |
| Age – Old People | | | | | |
| Disability | | | | | |
| Sex – Male | | | | | |
| Sex – Female | | | | | |
| Race including Gypsy and Travellers | | | | | |
| Religion or Belief | | | | | |
| Sexual Orientation | | | | | |
| Gender Reassignment | | | | | |
| Pregnancy and maternity | | | | | |
| Geographical impacts on one area | | | | | |
| Other Groups | | | | | |
| **Rural considerations:** ie Access to services; leisure facilities, transport; education; employment; broadband. | | | | | |

10. Action plan (add additional lines if necessary)

| Action(s) | Lead Officer | Resource | Timescale |
|---|---|---|---|
| | | | |

11. Is there is anything else that you wish to add?

| |
|---|
| No |

**Declaration**

I/We are satisfied that an equality impact assessment has been carried out on this policy, service, strategy, procedure or function and where an negative impact has been identified actions have been developed to lessen or negate this impact. We understand that the Equality Impact Assessment is required by the District Council and that we take responsibility for the completion and quality of this assessment.

| | | | |
|---|---|---|---|
| Completed By: | Emma Cathcart | Date: | 11.6.2026 |
| Line Manager: | David Stanley | Date: | 11.6.2026 |
| Reviewed by Corporate Equality Officer: | | Date: | |

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COTSWOLD
District Council

| | |
|---|---|
| Cotswold District Council name | **COTSWOLD DISTRICT COUNCIL** |
| Name and date of Committee | **CABINET – 10 SEPTEMBER 2026** |
| Subject | **COUNTER FRAUD AND ANTI-CORRUPTION POLICY** |
| Wards affected | All |
| Accountable member | Councillor Patrick Coleman, Cabinet Member for Finance<br>Email: patrick.coleman@cotswold.gov.uk |
| Accountable officer | David Stanley, Deputy Chief Executive and Chief Finance Officer<br>Email: david.stanley@cotswold.gov.uk |
| Report author | Emma Cathcart, Assistant Director Counter Fraud and Enforcement Unit<br>Email: emma.cathcart@cotswold.gov.uk |
| Summary/Purpose | To present Cabinet with a revised Counter Fraud and Anti-Corruption Policy for approval and adoption.<br><br>The Policy has been reviewed to ensure the content reflects current legislation and the Council's Policies and Procedures. |
| Annexes | Annex A – Counter Fraud and Anti-Corruption Policy |
| Recommendation(s) | That Cabinet resolves to:<br>1. Approve and adopt the Counter Fraud and Anti-Corruption Policy attached to this report.<br>2. Delegate authority to the Deputy Chief Executive and Chief Finance Officer to approve future minor amendments to the Policy, in consultation with the Cabinet Member for Finance, Assistant Director Counter Fraud and Legal Services**.** |
| Corporate priorities | • Delivering Good Services |
| Key Decision | NO |

COTSWOLD
District Council

| | |
|---|---|
| Exempt | NO |
| Consultees/ Consultation | Any policies drafted or revised by the Counter Fraud and Enforcement Unit are provided to Legal Services for review and are issued to the relevant Senior Officers, Management and Governance Officers for comment. |

## 1. EXECUTIVE SUMMARY

**1.1** The Counter Fraud and Enforcement Unit is tasked with reviewing the Council's Counter Fraud and Anti-Corruption Policy.

**1.2** It is recommended good practice that the Policy is updated and reviewed at least every three years in line with any legislative changes.

**1.3** In administering its responsibilities, this Council has a duty to prevent fraud and corruption, whether it is attempted by someone outside or within the Council such as another organisation, a resident, an employee or Councillor.

## 2. BACKGROUND

**2.1** The Council's existing Counter Fraud and Anti-Corruption Policy was developed to reflect (i) latest legislation, (ii) the creation of the Counter Fraud and Enforcement Unit and (iii) the changes from the creation of the Single Fraud Investigation Services (operated by the Department for Work and Pensions) which subsumed the Council's responsibilities for investigating Housing Benefit Fraud.

**2.2** The Policy highlights the key legislation and roles and responsibilities of Members, Officers and other parties.

**2.3** The Policy was last reviewed following the changes brought about by data protection legislation / regulations. A section was inserted relating to Money Laundering and Proceeds of Crime and relating to Modern Slavery, detailing the Council's responsibilities.

**2.4** Attached at Annex A is the updated Counter Fraud and Anti-Corruption Policy.

**2.5** A section has been added in relation to the Economic Crime and Corporate Transparency Act 2023 to confirm the introduction of a 'failing to prevent fraud' offence which the Council could be found guilty of should it not be able to demonstrate effective fraud prevention procedures.

**2.6** In addition, a section detailing ICT responsibilities relating to cyber-crime, and reference to compliance activities relating to tax evasion have been added.

**2.7** The majority of the other amendments are minor and reflect any service-related documents that the Counter Fraud and Enforcement Unit has introduced.

**2.8** For ease of reference, new text is shown in red and text to be removed is shown as struck through.

**2.9** Cabinet last considered the Policy in November 2022.

**2.10** Awareness will be raised with all employees following the approval of the Policy through internal communication channels and through briefings and management meetings.

**2.11** Additionally, fraud awareness and whistleblowing training is being delivered across the CFEU Partnership Councils during 2026/27, and the Policy will be highlighted.

**2.12** Counter Fraud Risk Management and enforcement activity is monitored across the Council and is subject to legal approval.

## 3. ALTERNATIVE OPTIONS

**3.1.** This is a review and update of the Policy therefore there are no specific alternative options. Cabinet is asked to endorse the Policy making observations or recommendations, as necessary.

## 4. FINANCIAL IMPLICATIONS

**4.1** There are no direct financial implications arising from this report.

**4.2** The adoption and approval of this Policy will help to support the prevention and detection of misuse of public funds and will support the Council's objectives in reducing crime and financial loss to the Council.

## 5. LEGAL IMPLICATIONS

**5.1** There are no significant legal implications associated with this report.

**5.2** In general terms, the existence and application of an effective fraud risk management regime will assist the Council in effective financial governance which is less susceptible to legal challenge.

**5.3** The legislation utilised by the Counter Fraud and Enforcement Unit and other service areas within the Council is identified within the Policy, and the Council must comply with all legislative requirements. The additions to the Policy are essential to protect the Council from criminal liability and other sanctions.

**5.4** The Council must also ensure that authorisations obtained under the Regulation of Investigatory Powers Act 2000 or the Investigatory Powers Act 2016 are appropriately logged, maintained and updated on the central register.

**5.5** Approval of this Policy supports compliance with the Economic Crime and Corporate Transparency Act 2023 and should reduce the Council's exposure to the failure to prevent fraud offence.

## 6. RISK ASSESSMENT

**6.1** The Council is required to proactively tackle fraudulent activity in relation to the abuse of public funds.

**6.2** Failure to undertake such activity would accordingly not be compliant and expose the authority to greater risk of fraud and/or corruption. If the Council does not have effective counter fraud and corruption controls it risks both assets and reputation.

## 7. EQUALITIES IMPACT

**7.1** Prosecutions will only be considered where the evidential and public interest tests are met with due consideration to the welfare of individuals.

**7.2** Where any safeguarding concerns are identified during the course of any investigation, appropriate referrals will be made.

**7.3** The Council will only take enforcement action where appropriate to do so with due consideration to older offenders, offenders with disabilities, and where the offender lacks mental capacity.

**7.4** The application of the Policy and the promotion of effective counter fraud controls and a zero-tolerance approach to internal misconduct promotes a positive work environment.

**7.5** The Council seeks to ensure that public authorities' actions are consistent with the Human Rights Act 1998. It balances safeguarding the rights of the individual against the needs of society as a whole to be protected from crime and other public safety risks.

## 8. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS

**8.1** There are no significant implications within this category.

## 9. BACKGROUND PAPERS

**9.1** None.

(END)

# Counter Fraud and Anti-Corruption Policy

Forest of Dean District Council · Cotswold District Council · West Oxfordshire District Council · Tewkesbury Borough Council · Cheltenham Borough Council · Stroud District Council · PUBLICA

| Version Control: | |
|---|---|
| **Document Name:** | Counter Fraud and Anti-Corruption Policy |
| **Version:** | 2.~~1~~2 |
| **Responsible Officer:** | Emma Cathcart, Counter Fraud and Enforcement Unit |
| **Approved by:** | Executive / Cabinet / Audit & Standards Committee / Audit and Risk Assurance Committee |
| **Next Review Date** | January 2029 ~~May 2025~~ |
| ~~**Retention Period:**~~ | ~~N/A~~ |

## Revision History

| Revision date | Version | Description |
|---|---|---|
| August 2019 | 1.1 | Update following changes to data protection legislation |
| May 2022 | 2 | Review and Update |
| December 2023 | 2.1 | Inclusion of Stroud DC |
| January 2026 | 2.2 | General review and inclusion of Economic Crime and Corporate Transparency Act 2023 |

## Consultees

| Internal | External |
|---|---|
| CFEU Partnership Board | |
| Service Lead Officers | |
| One Legal / Legal Services | |

## Distribution

| Name | |
|---|---|
| All Staff | |

**CONTENTS**

## CONTENTS – To be updated

## 1. INTRODUCTION AND PURPOSE OF THE POLICY

1.1. In administering its responsibilities; this Council has a duty to prevent fraud and corruption, whether it is attempted by someone outside or within the Council such as another organisation, a resident, an employee or Member. The Council is committed to an effective Counter Fraud and Anti-Corruption culture, by promoting high ethical standards and encouraging the prevention, detection and investigation of fraudulent activities.

1.2. The Section 151 Officer has a statutory responsibility under Section 151 of the Local Government Act 1972 to ensure the proper arrangements for the Council's financial affairs to include the development of financial codes of practice and accounting instructions. Through delegation of duties, the Officer ensures appropriate controls are in place.

1.3. The Monitoring Officer has a statutory responsibility to advise the Council on the legality of its decisions and to ensure that the Council's actions do not give rise to illegality or maladministration. It is therefore essential for employees to follow the Council's policies and procedures to demonstrate that the Council is acting in an open and transparent manner.

1.4. The Council has a statutory duty to undertake an adequate and effective internal audit of its accounting records and its system of internal controls. The Council's Financial Rules outline that any suspected irregularity or fraud should be reported promptly to the Section 151 Officer, Monitoring Officer and Chief Internal Audit Officer who will notify the Counter Fraud and Enforcement Unit. ~~'whenever a matter arises which involves, or is thought to involve irregularities concerning cash, stores or other property of the Council, or any suspected irregularity in the exercise of the functions of the Council, there is a duty to immediately notify the Section 151 Officer and the Monitoring Officer, who shall take steps as they consider necessary by way of investigation and report. Furthermore the Financial Rules also detail that each Director, Head of Service or equivalent Senior Officer is responsible for 'notifying the Section 151 Officer and the Chief Internal Audit Officer immediately of any suspected fraud, theft, irregularity, improper use or misappropriation of the Council's property or resources.~~

1.5. The Council has a zero-tolerance approach to fraud committed or attempted by any person against the organisation or any of its partner agencies. The Council will thoroughly investigate all suggestions of fraud, corruption or theft, from within the Council and from external sources which it recognises can:

- Undermine the standards of public service that the Council is attempting to achieve by diverting resources from legitimate activities.
- Reduce the level of resources and services available for the residents of the borough, district or county as a whole.
- Result in consequences which damage public confidence in the Council and / or adversely affect staff morale.

1.6. Any proven fraud will be dealt with in a consistent and proportionate manner. Appropriate sanctions and redress for losses will be pursued, to include criminal proceedings against anyone perpetrating, or seeking to perpetrate, fraud, corruption or theft against the Council.

1.7. The Council is committed to the highest possible standards of openness, probity, honesty, integrity and accountability. The Council expects all Officers, Members and partner organisations to observe these standards and values, which are defined within the Code of Conduct for Employees and the Members Code of Conduct, or equivalent, to help achieve the Council's over-arching priority for the continued delivery of outcomes and value for money for local tax-payers.

**2. SCOPE**

2.1. ~~In relation to any of the above mentioned~~ The offences detailed within this policy ~~applies~~ apply to**:**

- All employees, including shared service employees, casual workers and agency staff.
- Members.
- Committee Members of Council funded voluntary organisations.
- Partner organisations, where the Council has a financial or statutory responsibility.
- Council Suppliers, Contractors and Consultants.
- The general public.

**3. AIMS AND OBJECTIVES**

3.1. The aims and objectives of the Counter Fraud and Anti-Corruption Policy are to:

- Ensure that the Council has measures in place to guard against fraud and loss and that the Council maximises revenue recovery.
- Safeguard the Council's valuable resources by ensuring they are not lost through fraud but are used for providing services to the community as a whole.
- Create a 'counter fraud' culture which highlights the Council's zero tolerance to fraud, corruption, bribery and theft, which defines roles and responsibilities and actively engages everyone (the public, Members, Officers, managers and policy makers).

3.2. The Council aims to:

- Proactively deter, prevent and detect fraud, corruption, bribery and theft.
- Investigate any suspicions of, or detected instances of fraud, corruption, bribery and theft.
- Enable the Council to apply appropriate sanctions, to include prosecution, and recovery of losses.
- Provide recommendations to inform policy, system and control improvements, thereby reducing the Council's exposure to fraudulent activity.

**4. AREAS OF FOCUS ~~DEFINITIONS~~**

4.1. **FRAUD**

The term "fraud" is usually used to describe depriving someone of something by deceit, which might either be misuse of funds or other resources, or more complicated crimes like false accounting or the supply of false information. ~~In legal terms~~ All of these activities are the same crime, theft, examples of which include deception, bribery, forgery, extortion, corruption, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts and collusion.

4.2. Fraud was introduced as a general offence and is defined within The Fraud Act 2006. The Act details that a person is guilty of fraud if he commits any of the following:

- Fraud by false representation; that is if a person:

(a) dishonestly makes a false representation, and

(b) intends, by making the representation:

 (i) to make a gain for himself or another, or

 (ii) to cause loss to another or to expose another to a risk of loss.

- Fraud by failing to disclose information; that is if a person:

(a) dishonestly fails to disclose to another person information which he is under a legal duty to disclose, and

(b) intends, by failing to disclose the information:

 (i) to make a gain for himself or another, or

 (ii) to cause loss to another or to expose another to a risk of loss.

- Fraud by abuse of position; that is if a person:

(a) occupies a position in which he is expected to safeguard, or not to act against, the financial interests of another person,

(b) dishonestly abuses that position, and

(c) intends, by means of the abuse of that position:

 (i) to make a gain for himself or another, or

 (ii) to cause loss to another or to expose another to a risk of loss.

4.3. In addition the Act introduced new offences in relation to obtaining services dishonestly, possessing, making, and supplying articles for the use in frauds and fraudulent trading applicable to non-corporate traders.

4.4. **ECONOMIC CRIME AND CORPORATE TRANSPARENCY ACT 2023 (ECCTA)**

ECCTA created a failure to prevent fraud offence. Guidance makes clear that under the offence, an organisation may be "criminally liable where an employee, agent, subsidiary, or other 'associated person', commits a fraud intending to benefit the organisation and the organisation did not have reasonable fraud prevention procedures in place."

4.5. If liable, penalties could include unlimited fines and other severe commercial and operational consequences.

4.6. Organisations impacted by the new offence in both the public and private sector must meet two out of three criteria below:

- A turnover over £36 million
- A balance sheet of more than £18 million
- Have over 250 employees

4.7. The Council would therefore be considered an organisation which ECCTA applies to. The Council will be able to avoid criminal liability for failing to prevent fraud where it can prove that it had "reasonable" fraud prevention procedures in place at the time of the alleged fraud (or that it was reasonable not to have such procedures in place). It is therefore everyone's responsibility to ensure probity and transparency in any of the Council's areas of work.

4.8. More information relating to this legislation can be found on the Counter Fraud and Enforcement Unit intranet page.

4.9. **THEFT**

Is the physical misappropriation of cash or other tangible assets. A person is guilty of "theft" if he or she dishonestly appropriates property belonging to another with the intention of permanently depriving the other of it.

4.10. **MONEY LAUNDERING**

Money laundering is the process by which criminals attempt to 'recycle' the proceeds of their criminal activities in order to conceal its origins and ownership whilst retaining use of the funds.

4.11. The burden of identifying and reporting acts of money laundering rests within the organisation. Any service that receives money from an external person or body is potentially vulnerable to a money laundering operation. The need for vigilance is vital and any suspicion concerning the appropriateness of a transaction should be reported and advice sought from the Monitoring Officer, Section 151 Officer or Chief Internal Audit Officer. A failure to report a suspicion could compromise an individual and they could be caught by the money laundering provisions. All employees are therefore instructed to be aware of the increasing possibility of receiving requests that are not genuine and are in fact for the purpose of money laundering.

4.12. The Council recognises its responsibilities under Money Laundering and Proceeds of Crime Legislation. These responsibilities are adhered to in line with the Council's Proceeds of Crime and Anti-Money Laundering Policy and the related Procedures. The Council is required to have a designated Officer for money laundering reporting purposes. The officer nominated to receive disclosures about money laundering activity is the Officer appointed under section 151 of the Local Government Act 1972.

4.13. Both Financial and Legal Officers working for the Council also have their own professional guidance in relation to money laundering which places a duty on them to report any suspicions. These suspicions may override their legal professional privilege and confidentiality.

4.14. **BRIBERY AND CORRUPTION**

4.15. "Corruption" is the deliberate use of one's position for direct or indirect personal gain. Corruption covers the offering, giving, soliciting or acceptance of an inducement or reward, which may influence the action of any person to act inappropriately and against the interests of the organisation.

4.16. The Bribery Act 2010 introduced four main offences, simplified below. Please note, a 'financial' or 'other advantage' may include money, assets, gifts or services within the following:

- Bribing another person: a person is guilty of an offence if he offers, promises or gives a financial or other advantage to another person. Further if he intends the advantage to induce a person to perform improperly a function or activity or if he knows or believes the acceptance of the advantage offered constitutes improper activity.

- Offences relating to being bribed: a person is guilty of an offence if he requests, agrees to receive, or accepts a financial or other advantage intending that as a consequence an improper activity or function will be performed improperly or if he knows or believes the acceptance of the advantage offered constitutes improper activity. Where a person agrees to receive or accepts an advantage as a reward for improper activity or function that has been performed. It does not matter whether the recipient of the bribe receives it directly or through a third party, or whether it is for the recipient's ultimate advantage or not.

- Bribery of a foreign public official: a person who bribes a foreign public official is guilty of an offence if the person's intention is to influence the foreign public official in their capacity, duty or role as a foreign public official. A person must also intend to obtain or retain business or an advantage in the conduct of business and must offer, promise or give any financial or other advantage.
- Failure of commercial organisations to prevent bribery: organisations, which include the Council, must have adequate procedures in place to prevent bribery in relation to the obtaining or retaining of business associated with the business itself.

4.17. The Council is committed to ensuring the prevention of corruption and bribery and sets out its policy in relation to the acceptance of gifts and hospitality by Officers and Members within the Codes of Conduct for Employees / Members (or equivalent) and the Constitution. Offers of or the receipt of any gifts or hospitality should be recorded by Officers and Members in the appropriate register whether accepted or refused. Officers and Members are also required to declare any outside interests that they have which may result in a conflict of interest in respect of transactions and dealings with the Council. Again, any such interests will be recorded in an appropriate register.

4.18. Prior to entering into any business arrangements, all Council Officers and/or business units should ensure that they have taken all reasonable steps to identify any potential areas of risk relating to bribery or corruption. If an Officer has any concerns they must raise them with The Chief Internal Audit Officer.

4.19. **TAX EVASION**

4.20. The Criminal Finance Act 2017 creates the corporate offence of failing to prevent the facilitation of UK tax evasion.

4.21. The Council ensures compliance by ensuring any contractors or employees that are not PAYE comply with their responsibilities under IR35.

4.22. **MODERN SLAVERY**

Modern Slavery takes a number of forms but all relate to the illegal exploitation of people for personal or commercial gain. The Council recognises its responsibilities as outlined within the legislation and is committed to promoting transparency in supply chains to prevent modern slavery and to take appropriate action to identify and address those risks.

## 5. PRINCIPLES

5.1. The Council will not tolerate abuse of its services or resources and has high expectations of propriety, integrity and accountability from all parties identified within this policy. Maintaining this policy supports this vision.

5.2. The Council has a documented Constitution, Scheme of Delegated Powers and Financial Regulations to give Members and Officers clear instructions or guidance for carrying out the Council's functions and responsibilities. Responsibility for ensuring compliance with these documents rests with management with adherence being periodically monitored by Internal Audit Services. Where breaches are identified these will be investigated in accordance with this policy and the Council's Financial Rules.

5.3. The Council expects that Members and Officers will lead by example in ensuring adherence to rules, procedures and recommended practices. A culture will be maintained that is conducive to ensuring probity. Members and Officers should adopt the standards in public life as set out by the Nolan Committee, known as the Nolan Principles which are summarised below:

- Selflessness – to take decisions solely in terms of the public interest and not in order to gain for themselves.
- Integrity – not to place themselves under any obligation to outside individuals or organisations that may influence the undertaking of their official duties.
- Objectivity – when carrying out any aspect of their public duties, to make decisions and choices on merit.
- Accountability – to be accountable, to the public, for their decisions and actions and must submit themselves to the appropriate scrutiny.
- Openness – to be as open as possible about the decisions and actions they take and the reasons for those decisions and actions. The dissemination of information should only be restricted when the wider public interest clearly demands it.
- Honesty – to declare any private interests which relate to their public duties and take steps to resolve any conflicts arising in a manner which protects the public interest.
- Leadership – to promote and support these principles by leadership and example.

5.4. The Council will ensure that the resources dedicated to counter fraud activity are appropriate and any officers involved in delivering these services are trained to deliver a professional counter fraud service to the correct standards ensuring consistency, fairness and objectivity.

5.5. All fraudulent activity is unacceptable, and may result in consideration of legal action being taken against the individual(s) concerned. In addition, the Council has in place disciplinary procedures which must be followed whenever Officers are suspected of committing a fraudulent or corrupt act. These procedures are monitored and managed by the Human Resources Team and may be utilised where the outcome of an investigation indicates fraudulent or corrupt acts have occurred.

5.6. The Council may pursue the repayment of any financial gain from individuals involved in fraud, malpractice and wrongdoing. The Council may also pursue compensation for any costs it has incurred when investigating fraudulent or corrupt acts.

5.7. This policy encourages those detailed within this document to report any genuine suspicions of fraudulent activity. However, malicious allegations or those motivated by personal gain will not be tolerated and, if proven, disciplinary or legal action may be taken. Reporting arrangements in relation to incidents of fraud or irregularity are detailed below.

5.8. The Council will work both internally across different departments and with external organisations and groups such as the Police, HM Revenue and Customs and other Councils to strengthen and continuously improve its arrangements to prevent fraud and corruption.

5.9. The Council is committed to assisting the Police in fighting Serious and Organised crime and will implement measures and share data to ensure the Council is not engaging with organised crime gangs when procuring goods and services.

5.10. The Council collects and stores data within multiple departments to enable data cleansing, data sharing and data matching. This process can be utilised for the prevention and detection of fraud and the Council will pursue this where appropriate. The Council applies fair processing practices and these are reflected within data collection documents, stationery and other data collection processes such as those required for the National Fraud Initiative.

5.11. The Council will ensure Members and Officers receive the appropriate training relating to the areas covered within this Policy.

## 6. RESPONSIBILITIES

| OFFICER / DEPARTMENT | SPECIFIC RESPONSIBILITIES |
|---|---|
| **Head of Paid Service / Chief Executive** | Ultimately accountable for the effectiveness of the Council's arrangements for countering fraud and corruption. |
| **Chief Finance Officer**<br><br>**(Section 151 Officer)** | To ensure the Council has adopted an appropriate Counter Fraud and Anti-Corruption Policy. That there is an effective internal control environment in place and resources to investigate allegations of fraud and corruption. |
| **Monitoring Officer** | To advise Members and Officers on ethical issues, conduct and powers to ensure that the Council operates within the law and statutory Codes of Practice. |
| **Audit Committee/ ~~Audit and General Purposes Committee~~ / Audit and Governance Committee / Audit and Standards Committee / Audit, Compliance and Governance Committee** | To receive formal assurance from an appropriate representative at meetings and an annual opinion report in relation to the Council's control measures and counter fraud activity.<br><br>The Audit Committee also receives assurance from external audit on the Council's Annual Accounts and Annual Governance Statement. |
| **Councillors / Members** | To comply with the Members Code of Conduct and related Council policies and procedures.<br><br>To be aware of the possibility of fraud, corruption, bribery and theft and to report any genuine concerns to the Chief Internal Audit Officer. |
| **External Audit / Internal Audit** | Has a duty to ensure that the Council has adequate arrangements in place for the prevention and detection of fraud, corruption, bribery and theft.<br><br>Has powers to investigate fraud and the Council may invoke this service. |

| OFFICER / DEPARTMENT | SPECIFIC RESPONSIBILITIES |
|---|---|
| **Counter Fraud and Enforcement Unit** | Responsible for assisting the development and implementation of the Counter Fraud and Anti-Corruption Policy. The Counter Fraud and Enforcement Unit have a duty to monitor the investigation of any reported issues of irregularity and/or fraud.<br><br>To ensure that all suspected or reported irregularities are dealt with promptly and in accordance with this policy and legislation.<br><br>That action is identified to improve controls and reduce means, opportunity and the risk of recurrence.<br><br>Reporting to the appropriate Senior Officer(s) (Chief Executive, Section 151 Officer, Monitoring Officer, Chief Internal Audit Officer) regarding the progress and results of investigations.<br><br>Reporting annually to the Audit Committee on proven frauds. |
| **Counter Fraud Provision / Services** | To proactively deter, prevent and detect fraud, corruption, bribery and theft within or against the Council.<br><br>To work on behalf of Councils, Charities, Social Housing Providers and other organisations to proactively deter, prevent and detect fraud, bribery, corruption and theft for the benefit of local residents and the public purse.<br><br>To investigate all suspicions of fraud, corruption, bribery or theft, within or against the Council, in accordance with the Criminal Procedures and Investigations Act 1996 (CPIA).<br><br>To consider reputational damage and the public interest test when investigating any instances of fraud, corruption, bribery or theft.<br><br>To conduct interviews under caution when appropriate in accordance with the Police and Criminal Evidence Act 1984 (PACE).<br><br>To undertake any surveillance operation or obtaining any communications data, adhering to the Regulation of Investigatory Powers Act 2000 (RIPA) and the Investigatory Powers Act 2016 – this is applicable when undertaking criminal investigations only. |

| OFFICER / DEPARTMENT | SPECIFIC RESPONSIBILITIES |
|---|---|
| | To comply with Data Protection Legislation ~~(and the General Data Protection Regulations)~~ when obtaining or processing personal data.<br><br>To report to the appropriate Senior Officer(s) for decisions in relation to further action.<br><br>To enable the Council to apply appropriate sanctions, prosecute cases ~~to include criminal proceedings,~~ and to assist in the recovery of losses in accordance with the Council's Corporate Enforcement Policy. To include prosecutions on behalf of Social Housing Providers, Charities, and other organisations where it is in the public interest and for the benefit of the local residents.<br><br>To prepare Witness Statements and prosecution paperwork for the Council's Legal Department.<br><br>To attend and give ~~present~~ evidence at Courts and Tribunals ~~in the Magistrates Court, the Crown Court and Employment Tribunals~~.<br><br>To provide recommendations to inform policy, system and control improvements.<br><br>To provide fraud awareness training and updates for Members and Officers.<br><br>To publicise successes where appropriate. |
| **ICT** | To be responsible for reducing the risk of technology fraud including cybercrime which may impact the Council.<br><br>Cybercrime fraud encompasses many illegal activities that is executed using devices that either:<br><br>- Connect with the systems the Council uses via it networks and/or the internet<br>- Are owned by the Council.<br><br>These offences are wide ranging and include external threats such as Phishing, online scams, and ransomware attacks.<br><br>Other offences may originate from officers, members and/or affiliates using Council devices to commit fraud on systems not used by the Council. |
| **Human Resources** | To report any suspicions of fraud, corruption, bribery or theft to the Section 151 Officer, Monitoring Officer or |

| OFFICER / DEPARTMENT | SPECIFIC RESPONSIBILITIES |
|---|---|
| | Counter Fraud representative if reported directly to HR or if identified during any disciplinary or internal procedures.<br><br>To ensure recruitment procedures provide for the obtainment and verification of significant information supplied by applicants in accordance with the HR Fraud Risk Register ~~Vetting and Recruitment Fraud Risk Report~~. |
| **Strategic Directors, Heads of Service, Service Managers or equivalent Senior Officers** | The primary responsibility for maintaining sound arrangements to prevent and detect fraud and corruption rests with management.<br><br>To promote awareness and ensure that all suspected or reported irregularities are immediately referred to the appropriate Senior Officer.<br><br>To ensure that there are mechanisms in place within their service areas to assess the risk of fraud, corruption, bribery and theft. To reduce these risks by implementing internal controls, monitoring of these controls by spot checks and to rectify weaknesses if they occur. |
| **Staff / Employees / Officers** | To comply with Council policies and procedures when conducting their public duties.<br><br>To be aware of the possibility of fraud, corruption, bribery and theft and to report any genuine concerns. Officers may report suspicions as detailed below.<br><br>Referrals can also be made in confidence in accordance with the Council's Whistleblowing Policy. |
| **Public, Partners, Suppliers, Contractors and Consultants** | To be aware of the possibility of fraud and corruption within or against the Council and to report any genuine concerns or suspicions as detailed below. |

## 7. APPROACH TO COUNTERING FRAUD

7.1. The Council has a responsibility to reduce fraud and protect its resources by enabling counter fraud services to complete work in each of the following key areas:

7.2. **DETERRENCE**

The best deterrent is the existence of clear procedures and responsibilities making fraud and corruption difficult to perpetrate and easy to detect. As detailed already within this policy, the Council has a number of measures in place to minimise risk:

- Clear codes of conduct for Officers and Members.
- Register for declarations of interest / gifts and hospitality for Members and Officers.
- Clear roles and responsibilities for the prevention and detection of fraud, corruption, bribery and theft including an Audit Committee, an appointed Monitoring Officer, Section 151 Officer and trained Counter Fraud Officers.
- Effective ICT security standards and usage policies.
- The application of appropriate sanctions and fines as detailed below.

7.3. The existence of an effective Counter Fraud Team is a prime deterrent for fraud and corruption. Counter Fraud Officers and the Internal Audit Team analyse and identify potential areas at risk of fraudulent abuse with the assistance of the Council's Corporate Management, efficient and effective audits of principal risk areas can then be conducted.

7.4. The Council will promote and develop a strong counter fraud culture, raise awareness and provide information on all aspects of its counter fraud work. This may include advice on the intranet, fraud e-learning tools, publicising the results of proactive work, investigating fraud referrals and seeking the recovery of any losses.

**7.5. PREVENTION**

7.6. The Council will strengthen measures to prevent fraud ensuring consideration of the Fraud Risk Strategy, associated documents and service area fraud risk registers. Counter Fraud Officers will work with management and policy makers to ensure new and existing systems, procedures and policy initiatives consider any possible fraud risks. Any internal audit conducted will also consider fraud risks as part of each review and ensure that internal controls are in place and maintained to combat this.

7.7. Important preventative measures include effective recruitment to establish the propriety and integrity of all potential employees.~~as set out within the HR Vetting and Recruitment Fraud Risk Report~~. Recruitment is carried out in accordance with the Council's Recruitment Policies and Procedures ~~and Selection Policy~~ and provides for the obtainment and verification of significant information supplied by applicants.

7.8. The Council will undertake any internal remedial measures identified by any investigation to prevent future recurrence at the first opportunity.

7.9. The Counter Fraud and Enforcement Unit will support workstreams and initiatives providing awareness and advice to maximise prevention and disrupt large scale widespread fraud threats.

7.10. **DETECTION**

A record of fraud referrals received will be maintained by Counter Fraud Officers (and other departments as applicable). This record helps to establish those areas within the Council most vulnerable to the risk of fraud. In addition, a consistent treatment of information and independent investigation is ensured. A Council wide fraud profile is created which then informs any detailed proactive work.

7.11. The Council is legislatively required to participate in a national data matching exercise; the National Fraud Initiative (NFI). Particular sets of data are provided and matched against other records held by the Council or external organisations. Where a 'match' is found it may indicate an irregularity which requires further investigation to establish whether fraud has been committed or an error made. An officer within the authority is designated as the 'Key Contact' for this process. The initiative also assists in highlighting areas which require more proactive investigation. The Council may engage in other data matching/sharing for the purposes of fraud prevention and detection, and for the recovery of monies owed.

7.12. Safeguarding and deterrent internal controls and monitoring procedures are established for financial and other systems within the Council, for example those set out within the Council's Financial Rules / Contract Rules.

7.13. The Council relies on employees, Members and the public to be alert and to report any suspicions of fraud and corruption which may have been committed or that are allegedly in progress. Managers should be vigilant and refer any matters which may require additional monitoring to a senior representative within the Human Resources Department for guidance and further action.

**7.14. INVESTIGATION**

7.15. The Council will investigate all reported incidents of fraud or irregularity using its counter fraud resources. The Council will ensure the correct gathering and presentation of evidence in accordance with the Criminal Procedures and Investigations Act 1996.

7.16. Investigations will make due reference to Employment Law as necessary and be conducted within a reasonable time in accordance with the Human Rights Act 1998. Investigations will also adhere to and comply with other applicable legislation such as the Police and Criminal Evidence Act 1984, Data Protection Legislation and the Freedom of Information Act 2000 as appropriate.

7.17. Officers may utilise investigative tools and gain intelligence utilising a number of legal gateways and data sharing agreements. This may include membership to third party organisations such as the National Anti-Fraud Network (NAFN).

7.18. When investigating allegations of fraud and corruption, the Council may be required to conduct surveillance. The Council must comply with the Regulation of Investigatory Powers Act 2000 which ensures that investigatory powers are used in accordance with human rights. To ensure compliance the Council has a written procedure detailing who may authorise covert surveillance and the use of covert human intelligence sources. Standard documentation has been adopted which must be used by an Officer when seeking such authorisation.

7.19. Officers may also need to acquire communications data when conducting an investigation. This is permissible however; the Council must adhere to the Investigatory Powers Act 2016 when applying for this information and the correct nominated single point of contact must be used. As above, specific details are set out within the written procedures.

7.20. The Counter Fraud and Enforcement Unit Officers adhere to the appropriate legislation when investigating irregularities and allegations of fraud. This includes the need to:

- Deal promptly with the matter.
- Record all evidence received.
- Ensure that evidence is sound and adequately supported.
- Conduct interviews under caution when necessary.
- Ensure security of all evidence collected.
- Contact other agencies if necessary e.g. Police, Trading Standards, HM Revenue and Customs.

- Notify the Council's insurers.
- Implement Council disciplinary procedures where appropriate.
- Attend court and present evidence.

7.21. **SANCTIONS**

7.22. The Council will apply considered sanctions to individuals or organisations where an investigation reveals fraudulent activity. This may include:

- Appropriate disciplinary action in line with the Disciplinary Policy.
- Fines and penalties.
- Criminal proceedings – the Court can impose sanctions following conviction of any offence.
- Civil proceedings to recover loss.

7.23. **REDRESS**

A crucial element of the Council's response to tackling fraud is seeking financial redress. The recovery of defrauded monies is an important part of the Council's strategy and will be pursued in line with internal debt recovery processes and legal redress i.e. Confiscation Orders and the application of the Proceeds of Crime Act 2002.

7.24. **CONTROL FAILURE RESOLUTION**

In addition to the above, Internal Audit also prepares a risk based annual Audit Plan that details the key objectives and areas of work for the year. Within these work areas indicators for fraud are considered. Internal Audit will also respond to requests from management and Counter Fraud Officers where there may be concerns over the effectiveness of internal controls. The work plan is agreed and monitored by the Audit Committee and Section 151 Officer.

8. **REPORTING, ADVICE AND SUPPORT**

8.1. The Council's expectation is that Members and managers will lead by example and that employees at all levels will comply with the Constitution, Council Policies, Financial Regulations, Procurement Regulations, Financial and Contract Procedure Rules, codes of conduct and directorate procedures.

8.2. The Council recognises that the primary responsibility for the prevention and detection of fraud rests with management. It is essential that employees of the Council report any irregularities, or suspected irregularities to their Line Manager and if this is not appropriate then to a Counter Fraud representative.

8.3. The Council has a Fraud Response Plan, which provides guidance on how to report and what to do when fraud is suspected. This can be found on the Counter Fraud and Enforcement Unit intranet page.

8.4. The Council must create the right environment so that anyone can raise concerns in respect of irregularities with the knowledge that they will be treated seriously and confidentially. If employees raise concerns confidentially as a whistle-blower, the Council will provide all reasonable protection for those who raise genuine concerns ~~in good faith,~~ as confirmed in the Council's Whistle-Blowing Policy.

8.5. If the informant is a member of the public or external contractor, they can contact a Counter Fraud Officer at the Council to report the suspicion. This can be done anonymously. A hotline number for reporting suspicions may also be established and if so, can be found on the Council's website. The Council's complaint procedure may also be utilised but may not be the most appropriate channel.

8.6. The above process does not relate to reporting Housing Benefit Fraud allegations (which are now dealt with by the Department for Work and Pensions) or to Council Tax Reduction Scheme offences. The informant should contact the Officer nominated to deal with this; details can be found on the Council's website within the Revenues and Benefit Section information.

8.7. The Officer who receives the allegation (whether from a Member or a Council employee) must refer the matter to the Counter Fraud and Enforcement Unit ~~Counter Fraud representative within the Council~~, to determine how the potential irregularity will be investigated and to whom the allegation should be discussed with ~~within the Council~~. This is to ensure correct investigative procedures are adhered to and that any potential fraud enquiry is not compromised.

8.8. As appropriate, reports will be issued to the Monitoring Officer, Head of Paid Service, Section 151 Officer, Senior Officers, and ~~Cabinet~~ Members etc. where the irregularity is material and/or could affect the reputation of the Council. Decisions will then be made with regard to the most appropriate course of action. Communications and publicity will also be managed if the matter is likely to be communicated externally.

8.9. If the investigation relates to an employee, then Human Resources will be engaged and the Council's Disciplinary Procedure will also be considered however this will be managed carefully to ensure any criminal investigation is not compromised.

8.10. The Council will also work in co-operation with the following bodies (and others as appropriate) that will assist in scrutinising our systems and defences against fraud, bribery and corruption:

- Local Government and Social Care Ombudsman.
- External Audit.
- The National Fraud Initiative.
- Central Government Departments.
- HM Revenue and Customs.
- The Police.
- Trading Standards.
- The Department for Work and Pensions.
- Immigration Services.
- The Chartered Institute of Public Finance and Accountancy (CIPFA).
- The Institute of Revenues Rating and Valuation (IRRV).
- Social Housing Providers and Charitable Bodies

8.11. As detailed within this document and the Council's Whistle Blowing Policy, any concerns or suspicions reported will be treated with discretion and in confidence. Referrals can be made in confidence to the Counter Fraud and Enforcement Unit at fraud.referrals@cotswold.gov.uk who work on behalf of Cheltenham and Tewkesbury Borough Councils and Cotswold, Forest of Dean, Stroud and West Oxfordshire District Councils. Concerns can also be raised via Internal Audit.

9. **FURTHER INFORMATION**

9.1. Further information on Council policy can be found in the following documents (or equivalent documentation / codes):

- The Constitution.
- Code of Conduct for Employees (or equivalent) and the Members Code of Conduct which include information in relation to gifts and hospitality and declaring and registering interests.
- Whistleblowing Policy.
- Corporate Enforcement (Prosecution) Policy.
- Proceeds of Crime and Anti-Money Laundering Policy.
- Recruitment and Selection Processes.
- Regulation of Investigatory Powers Act 2000 / Investigatory Powers Act 2016 Policies, Procedures and Guidance.
- Financial Rules.
- Contract Rules or equivalent.
- Fair Processing Statement.
- Disciplinary Procedure.

10. **POLICY REVIEW**

~~The appropriate department will review and amend this policy as necessary to ensure that it continues to remain compliant and meets legislative requirements and the vision of the Council in consultation with the Council's Chief Finance Officer, the Legal Department and Members.~~

10.1. Review frequency as required by legislative changes / every three years.

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COTSWOLD
District Council

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|---|---|
| Cotswold District Council name | **COTSWOLD DISTRICT COUNCIL** |
| Name and date of Committee | **CABINET – 10 SEPTEMBER 2026** |
| Subject | **PROCEEDS OF CRIME AND ANTI-MONEY LAUNDERING POLICY** |
| Wards affected | All |
| Accountable member | Councillor Patrick Coleman, Cabinet Member for Finance<br>Email: patrick.coleman@cotswold.gov.uk |
| Accountable officer | David Stanley, Deputy Chief Executive and Chief Finance Officer<br>Email: david.stanley@cotswold.gov.uk |
| Report author | Emma Cathcart, Assistant Director Counter Fraud and Enforcement Unit<br>Email: emma.cathcart@cotswold.gov.uk |
| Summary/Purpose | To present Cabinet with a revised Proceeds of Crime and Anti-Money Laundering Policy for approval and adoption.<br><br>The Policy has been reviewed to ensure the content reflects current legislation and the Council's Policies and Procedures. |
| Annexes | Annex A – Proceeds of Crime and Anti-Money Laundering Policy<br>Annex B – Employee Flowchart (Proceeds of Crime and Anti-Money Laundering) |
| Recommendation(s) | That Cabinet resolves to:<br>1. Approve and adopt the Proceeds of Crime and Anti-Money Laundering Policy attached to this report.<br>2. Delegate authority to the Deputy Chief Executive and Chief Finance Officer to approve future minor amendments to the Policy, in consultation with the Cabinet Member for Finance, Assistant Director Counter Fraud and Legal Services**.** |

COTSWOLD
District Council

| | |
|---|---|
| Corporate priorities | • Delivering Good Services |
| Key Decision | NO |
| Exempt | NO |
| Consultees/ Consultation | Any policies drafted or revised by the Counter Fraud and Enforcement Unit are provided to Legal Services for review and are issued to the relevant Senior Officers, Management and Governance Officers for comment. |

COTSWOLD
District Council

## 1. EXECUTIVE SUMMARY

**1.1** The Counter Fraud and Enforcement Unit is tasked with reviewing the Council's Proceeds of Crime and Anti-Money Laundering Policy.

**1.2** It is recommended good practice that the Policy is updated and reviewed at least every three years in line with any legislative changes.

**1.3** In administering its responsibilities, this Council has a duty to prevent fraud and corruption, whether it is attempted by someone outside or within the Council such as another organisation, a resident, an employee or Councillor.

## 2. BACKGROUND

**2.1** Money laundering is the process by which funds derived from criminal activity are given the appearance of being legitimate by being exchanged for 'clean' money so that it appears to come from a legitimate source.

**2.2** The proceeds of any acquisitive crime are 'cleaned up' by various means and then fed back into the financial system after a transaction or series of transactions designed to disguise the original source of the funds.

**2.3** Money that funds terrorism is also covered by money laundering legislation whether the funds originated from a legitimate source or not.

**2.4** Proceeds of Crime and Money Laundering legislation govern the responsibilities of individuals and organisations.

**2.5** The Policy, at Annex A, defines a best practice approach for dealing with the Council's anti-money laundering obligations and suspicious activity reports.

**2.6** The Policy, and the related internal guidance procedure addresses the way in which the Council, its employees and its Members can formally discharge these obligations.

**2.7** The nominated Money Laundering Reporting Officer is the Officer appointed under section 151 of the Local Government Act 1972. In the case of the Council, this is the Deputy Chief Executive and Chief Finance Officer.

**2.8** The Policy has been refined with revisions or significantly new sections shown as red text. Any operational or procedural elements relating to the disclosure procedure, the reporting Officer's considerations or client/supplier identification process are now detailed within the supporting internal procedure document.

**2.9** The majority of the other amendments are minor and are shown as insertions in red.

**2.10** Attached for information at Annex B is the supporting flowchart which will be provided to employees as a supporting quick reference guide.

**2.11** Members last considered the Policy in April 2021.

**2.12** Awareness will be raised with employees following the approval of the Policy. General communications will be issued through internal communication channels and more direct training, and awareness will be delivered with those employees more likely to identify suspicious activity.

## 3. ALTERNATIVE OPTIONS

**3.1** None

## 4. FINANCIAL IMPLICATIONS

**4.1** There are no direct financial implications arising from this report.

**4.2** The adoption and approval of this policy will help to support the prevention and detection of misuse of public funds and will support the Council's objectives in reducing crime and financial loss to the Council.

## 5. LEGAL IMPLICATIONS

**5.1** There are no significant legal implications associated with this report.

**5.2** The Policy sets out the statutory requirements that the Council must consider and adhere to when undertaking relevant activities.

## 6. RISK ASSESSMENT

**6.1** The Council is required to mitigate the risk of money laundering and report any suspicious activity.

**6.2** The Policy reduces the risk that the Council will fail to fulfil its legal obligations.

## 7. EQUALITIES IMPACT

**7.1** None directly.

## 8. CLIMATE AND ECOLOGICAL EMERGENCIES IMPLICATIONS

**8.1** There are no significant implications within this category.

COTSWOLD
District Council

## 9. BACKGROUND PAPERS

**9.1** None.

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# Proceeds of Crime and Anti-Money Laundering Policy

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| **Version Control:** | |
| **Document Name:** | Proceeds of Crime and Anti-Money Laundering Policy |
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| **Responsible Officer(s):** | Officer appointed under section 151 of the Local Government Act 1972<br>Assistant Director, Counter Fraud and Enforcement Unit |
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**Revision History**

| Revision date | Version | Description |
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| April 2026 | 2 | Review and update |

**Consultees**

| Internal | External |
|---|---|
| s151 Officer / Finance | |
| One Legal / Legal Services | |

**Distribution**

| Name | |
|---|---|
| | |

## Contents

## 1. WHAT IS MONEY LAUNDERING?

1.1 Money laundering is the process by which funds derived from criminal activity are given the appearance of being legitimate by being exchanged for 'clean' money so that it appears to come from a legitimate source.

1.2 The proceeds of any acquisitive crime are 'cleaned up' by various means and then fed back into the financial system after a transaction or series of transactions designed to disguise the original source of the funds.

1.3 Money that funds terrorism is also covered by money laundering legislation whether the funds originated from a legitimate source or not.

1.4 Money laundering can take many forms:

- Handling the proceeds of crime
- Being directly involved with criminal or terrorist property
- Entering into arrangements to facilitate laundering of criminal or terrorist property
- Investing the proceeds of crime into other financial products, property purchase of other assets

1.5 Criminals launder money in order to enjoy the fruits of their criminality. Most crime is acquisitive in nature, and it is necessary to give the proceeds of crime the appearance of being legitimate in order that the source of the funds can be disguised.

1.6 The money generated by these crimes needs to be laundered before the criminals can gain full benefit of it, and law enforcement agencies around the world are keen to make it hard for criminals to benefit in this way.

1.7 The UK terrorism legislation also addresses the issue of the funding of terrorism, much of which is directly related to criminal activity.

## 2. LEGISLATION

2.1 The legislation in respect of Money Laundering is set out in the following:

- Proceeds of Crime Act 2002 as amended by the Crime and Courts Act 2013 and the Serious Crime Act 2015.
- The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 and The Money Laundering and Terrorist Financing (Amendment) Regulations 2019.
- The Terrorism Act 2000 as amended by the Anti-Terrorism, Crime and Security Act 2001, the Terrorism Act 2006 and the Terrorism Act 2000 and Proceeds of Crime Act 2002 (Amendment) Regulations 2007.

2.2 The combined legislation is referred to in this Policy as 'the money laundering legislation'.

2.3 Significant changes were made to the money laundering legislation which broadened the definition of money laundering and increased the range of activities caught by the statutory framework. As a result, the obligations impact on certain areas of Council business and require Councils to establish internal procedures to prevent the use of their services for money laundering. The Council undertakes many due diligence activities across its services to prevent money laundering, and the specific internal supporting procedure also forms part of this activity.

## 3. MONEY LAUNDERING OFFENCES

3.1 The Money Laundering Regulations apply to firms in the regulated sector (businesses which provide access to financial services).

3.2 There are three primary offences as set out in the Proceeds of Crime Act 2002:

- Concealing, disguising, converting, transferring criminal property or removing it from the UK (section 327 of the Proceeds of Crime Act 2002);
- Entering into or becoming concerned in an arrangement which you know, or suspect facilitates the acquisition, retention, use or control of criminal property by or on behalf of another person (section 328); or
- Acquiring, using or possessing criminal property (section 329).

3.3 These are the primary money laundering offences and are thus prohibited acts under the legislation. There are also secondary offences, which apply to the Council and its employees as detailed below:

- Failure to disclose: other nominated officers (section 332). A nominated officer in the non-regulated sector commits an offence if, as a result of a disclosure, he or she knows or suspects that another person is engaged in money laundering and fails to make a disclosure as soon as practicable to the Serious Organised Crime Agency (SOCA).
- 'Tipping off' offence: whereby a person knows or suspects that an investigation in connection with alleged money laundering has or is about to be commenced in respect of another person but nonetheless makes a disclosure to any other person which is likely to prejudice any such investigation; this is a secondary offence known as prejudicing an investigation (section 342).

3.4 These are serious offences: The primary offences carry a maximum penalty of 14 years imprisonment, the secondary offences carry a maximum penalty of 5 years imprisonment

## 4. POLICY STATEMENT

4.1 The Council will do all it can to:

- Prevent, wherever possible, the organisation, its employees and Members being exposed to money laundering.
- Identify the potential areas where money laundering may occur and take appropriate action to minimise the risk; and
- Comply with all legal and regulatory requirements, especially with regard to the reporting of actual or suspected cases.

4.2 Every employee and elected Member has a personal responsibility to be vigilant.

**5. SCOPE OF THE POLICY**

5.1 This Policy applies to all Officers and elected Members of the Council. The Policy sets out the procedures that must be followed to enable the Council to comply with its legal obligations.

5.2 Officers are considered to be employees of the Council whether directly employed, seconded, or working via an agency, and other public authorities delivering a service on behalf of the Council, for example Ubico or Publica.

5.3 Failure to comply with the procedures set out in this Policy may lead to disciplinary action being taken in accordance with existing Council policies in addition to any criminal prosecution which may ensue.

5.4 This Policy should be read in conjunction with the Whistle-Blowing Policy and the Counter Fraud and Anti-Corruption Policy.

**6. PURPOSE**

6.1 The Council has a duty to ensure it complies with its obligations under the legislation, but it is acknowledged that it is low risk due to the limited number of areas to which it applies. Criminal sanctions may be imposed for breaches of the legislation.

6.2 The purpose of this Policy is to make Officers and Members aware of the money laundering legislation; their responsibilities regarding the legislation; and the consequences of non-compliance with this Policy.

6.3 Any Officer or Member of the Council could be subject to the provisions of the money laundering legislation if they suspect money laundering and either fail to report their concerns or become involved in any actions to process the suspicious transaction. This Policy sets out how any concerns should be raised.

**7. THE COUNCIL'S OBLIGATIONS**

7.1 Not all of the Council's business is "relevant" for the purposes of the legislation. It is mainly accountancy and audit services and financial, company and property transactions. The safest way to ensure compliance with the law is to apply the regulations to all areas of the Councils work. Therefore, all employees are required to adhere to the process set out in the supporting internal procedure.

7.2 Organisations conducting "relevant business" under the legislation must:

- Appoint a Money Laundering Reporting Officer (MLRO) to receive disclosures from employees of money laundering activity (their own or anyone else's);
- Implement a procedure to enable the reporting of suspicions of money laundering;
- Maintain client identification procedures in certain circumstances; and
- Maintain records.

## 8. AREAS AT RISK OF MONEY LAUNDERING

- Property sales, shared ownership, staircasing (the gradual purchasing of additional shares in a shared ownership property), other sales
- Cash payments in excess of £10,000 or cash payments that have totalled £10,000 in four or less transactions
- Refunds of overpayments to accounts
- Fraud, internal or external
- Suspiciously low tenders

## 9. IDENTIFYING SUSPICIOUS ACTIVITY

9.1 Employees dealing with transactions that involve income for goods and services (or other income) are most likely to identify suspicious activity, particularly where:

- Large amounts of cash are received
- Overpayment is received by cash and a refund is requested
- Overpayment is received by credit or debit card, and a cheque refund is requested
- Property sales:
    - Checking the seller's/buyer's identity is difficult
    - Buyer reluctant to provide details of their identity
    - Financial circumstance of buyer has changed significantly
    - Money is paid by a third party who has no obvious link to the transaction
- Misuse of Council properties:
    - Cannabis farm

o Human trafficking, modern slavery and exploitation

o Tenancy fraud and sub-letting

9.2 These employees will receive training and will be referred to the supporting flowchart and internal procedure document to ensure they are confident about identifying activity and how to report it.

**10. PROCEDURE**

10.1 The Officer nominated to receive disclosures about money laundering activity is the Officer appointed under section 151 of the Local Government Act 1972 and is known as the Money Laundering Reporting Officer or MLRO.

10.2 Where it becomes known or is suspected, that money laundering is taking/has taken place or there is concern by an Officer that involvement in a matter may amount to a prohibited act under the legislation (see definition above), it must be disclosed immediately to the MLRO. Disclosure must be within hours of the information becoming known. Failure to disclose may lead to prosecution.

10.3 A template Disclosure Report and guidance on how and what to refer to can be found within the supporting internal procedure.

10.4 On receiving a disclosure report, the MLRO must note the date of receipt on his/her section of the report and acknowledge receipt of it. He/she should also advise the Officer, who made the report, of the timescale within which he/she expects to respond. The MLRO will consider the report and any other available internal information they think relevant. The steps to follow can be found within the supporting internal procedure.

**11. CLIENT IDENTIFICATION PROCEDURE**

11.1 Where the Council is carrying out relevant business (examples of relevant business may be defined for this Council as, legal services, investments, cash handling and accountancy services) and:

a) Forms an ongoing business relationship with a client; or

b) Undertakes a one-off transaction involving payment by or to the client of €10,000 (or equivalent) or more; or

c) Undertakes a series of linked one-off transactions involving a total payment by or to the client(s) of €10,000 (or equivalent) or more; or

d) It is known or suspected that a one-off transaction or a number of them involves money laundering; then this Client Identification Procedure must be followed before any business is undertaken.

11.2 In the above circumstances employees in the applicable department must obtain satisfactory evidence of the identity of the prospective client as soon as practicable after instructions are received. This applies to existing clients, where such information has not been obtained, as well as new clients (see Customer Due Diligence process outlined in the supporting internal procedure.

11.3 The evidence should be retained for at least five years from the end of the business relationship or one-off transaction.

11.4 If satisfactory evidence is not obtained at the outset, then the business relationship or one-off transaction cannot proceed. If there is an unjustifiable delay in obtaining evidence of identity or the where the client is deliberately not providing evidence a disclosure will have to be made.

## 12. RECORD KEEPING

12.1 Employees within the areas of the Council conducting relevant business must maintain records of:

- Client identification evidence obtained and;
- Details of all relevant business transactions carried out for clients.

12.2 As a minimum the records must provide an audit trail to aid any subsequent investigation, for example, distinguishing the client and the relevant transaction and recording in what form any funds were received or paid.

12.3 In all cases evidence should be retained for at least five years from the end of the business relationship or transaction(s). This is so that they may be used as evidence in any subsequent investigation.

## 13. GUIDANCE & TRAINING

13.1 In support of this Policy the Council will make employees aware of the requirements and obligations placed on the Council and on themselves as individuals by the legislation and give training to those most likely to encounter money laundering.

13.2 As a minimum they should be made aware of the relevant legislation, and their responsibilities as set out in the supporting internal procedure.

# A Short Guide to Money Laundering - Counter Fraud and Enforcement Unit

## What is Money Laundering?

- Where criminals use the funds obtained from their crimes to pay for goods and services / conduct financial transactions in order to 'clean' the money and hide its source

## Why do criminals launder money?

- They do this so that they can enjoy the benefit of their crimes, finance other criminal activity or terrorism, and avoid detection by law enforcement agencies

## Money Laundering Legislation

- There are several acts relating to Money Laundering, Proceeds of Crime and Terrorism that combine to create offences relating to money laundering and to impose rules on organisations about what they must do if they suspect money laundering

## The Council's Policy

- The Council has adopted a Money Laundering policy as they recognise the importance of preventing and identifying any potential suspicious transactions

## Who is affected?

- It is the responsibility of **all** employees, and Members, to be vigilant
- In certain circumstances, an individual may commit an offence if they fail to report a suspicion

## Areas at risk and what to look for

- Large cash payments
- Payment of lower cash sums where cash is not the normal means of payment.
- A transaction without obvious legitimate purpose or which appears uneconomic
- Transactions at substantially above or below fair market values / suspiciously low tenders
- Overpayment is received by cash / card and a refund is requested by another means
- Involvement of an unconnected third party without logical reason or explanation
- Concerns about the honesty, integrity, identity or location of a customer/donor

## Procedures

- Any cash transaction of £3,000 or more, or linked transactions that have totalled £10,000, or more, in four or less cash payments must be reported immediately to the Chief Finance Officer
- Any large cash payments must be treated with caution. No payment in cash in excess of £3,000 will be accepted without the prior approval of the CFO

## Your Responsibilities

- Anyone who suspects that a transaction could be linked to money laundering or the proceeds of crime should report the matter to the Chief Finance Officer

## Further Information and Guidance

- The Proceeds of Crime and Anti-Money Laundering Policy is available and advice and guidance can be obtained from the Chief Finance Officer or from the Counter Fraud and Enforcement Unit

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