

LUDLOW TOWN COUNCIL A G E N D A

To: All Members of the Council, Unitary Councillors, Press

Contact: Gina Wilding

Ludlow Town Council, The Guildhall,

Mill Street, Ludlow, SY8 1AZ

01584 871970

townclerk@ludlow.gov.uk

Despatch date: 9th April 2025

COUNCIL

You are summoned to attend the meeting of Ludlow Town Council to be held
at The Guildhall, Mill Street, Ludlow, on
Monday 14th April 2025 at 7.00pm

Gina Wilding

Gina Wilding
Town Clerk

Key Agenda Items:

- Local Policing Community Charter
- Community Banking Hub

The public may speak at this meeting

Public Open Session (15 minutes) – Members of the public are invited to make representations to the Council on any matters relating to the work of the Council or to raise any issues of concern.

1. **WELCOME FROM THE MAYOR AND HEALTH & SAFETY INFORMATION**

Councillors and members of the public are to note that the fire exits can be found to the rear of the building and via the front door. The fire assembly point is on the pavement opposite the Guildhall. For fire safety purposes all Councillors should sign the attendance book and members of the public should sign the attendance sheet.

2. **RECORDING OF MEETINGS** – Under the Openness of Local Government Regulations 2014, recording and broadcast including blogging, tweeting and other social media is permitted during public session of Council meetings.

The act of recording and broadcasting must not interfere with the meeting.

The Council understands that some members of the public may not wish to be recorded and asks that they make this known immediately.

3. **APOLOGIES**

To receive Councillor's apologies.

4. **DECLARATIONS OF INTEREST**

To receive declarations of interests for:

- a) Disclosable Pecuniary Interest
- b) Declaration of Conflicts of Interest
- c) Declarations of Personal Interest

Members are reminded that they must not participate in the discussion or voting on any matter in which they have a Disclosable Pecuniary Interest and should leave the room prior to the commencement of the debate. (Disclosable Pecuniary Interests) Regulations 2012 (SI 2012/1464)

5. **PUBLIC OPEN SESSION (15 MINUTES)** – Members of the public are invited to make representations to the Council on any matters relating to the work of the Council or to raise any issues of concern. Public Bodies (admissions to meetings) Act 1960 s 1 extended by the LG Act 972 s 100.

6. **LUDLOW POLICE UPDATE**

To receive an update from Police Inspector Damien Kelly.

7. **LUDLOW'S UNITARY COUNCILLORS SESSION**

Ludlow's Unitary Councillors are invited to provide updates on Unitary Council matters related to Ludlow.

8. **MINUTES**

To approve the open and closed minutes of **Council on Monday 3rd March 2025** as a correct record of the meetings. LGA 1972 Sch 12 para 41(1).

9. **ITEMS TO ACTION**

To note the items to action from **Monday 3rd March 2025**.

ITEM	Attachment
10. <u>TOWN WALLS</u> To note the communication received from Ludlow Town Walls Trust.	10
11. <u>LOCAL POLICING COMMUNITY CHARTER</u> a) To agree priorities for April – September 2025. b) To respond to Ludlow Safer Neighbourhood Team with an update on LTC actions.	11
12. <u>COMMUNITY BANKING HUB</u> To consider applying for an assessment by the Community Cash Advisory Panel via Link to obtain new shared cash services.	12
13. <u>SPRING STATEMENT IMPACT ON HIGH STREET BUSINESSES AND TOWNS</u> To note the the update on the impact of the government's Spring Statement on the High Street, and to approach Shropshire Council for the re-instatement of the Ludlow Future Partnership.	13
14. <u>DEVOLUTION UPDATE</u> To note the report.	14
15. <u>MODEL STANDING ORDERS</u> To note the updates to Model Standing Orders.	15
16. <u>FINANCIAL REGULATIONS</u> To adopt the changes by NALC.	16
17. <u>PROJECT UPDATE</u> To note the project updates.	17
18. <u>PROJECT SUPPORT GRANTS</u> a) To consider the grant application from Ludlow French Twinning Association. b) To review the criteria for Project Support Grants in relation to Core Grant Awards and the maximum award to an organisation.	18a
19. <u>LUDLOW CONCERT BAND</u> To consider the request from the Ludlow Concert Band.	19
20. <u>CYCLE TO WORK SCHEME</u> To approve further research into organisational procedures identified in 4.4 through 4.13 by Staffing Committee.	20

21.	<u>CIVIC AWARDS</u> To consider a new award in recognition of supporting biodiversity, energy reduction and environmental sustainability.	21
22.	<u>CLIMATE ACTION PLAN</u> a) To note the minutes of the Climate Action Task and Finish Group.	22a
	b) To approve the updates to the Council's Climate Actions plan (in green) and the new actions (in pink).	22b
23.	<u>INTERNATIONAL DAY OF PEACE</u> To consider a request from Ludlow Quakers.	23
24.	<u>TOWN CRIER</u> To consider a report.	24
25.	<u>RECOGNISING AND RESPONDING TO EARLY WARNING SIGNS IN PUBLIC SECTOR BODIES</u> To note the report from the Committee on Standards in Public Life.	25
26.	<u>COMMITTEE RECOMMENDATIONS</u> To consider the recommendations from: a) Policy & Finance Committee on 7 th April 2025.	26a
27.	<u>COMMITTEE MINUTES</u> To receive the minutes of: a) Policy & Finance Committee on 7 th April 2025. b) Representational Committee on 11 th March 2025. c) Staffing Committee on 13 th March 2025.	27a 27b 27c

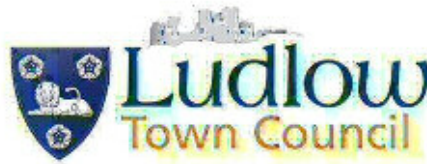
M e m b e r s h i p

Councillors B Waite (Town Mayor); Childs; Garner; Gill (Deputy Mayor); Ginger; Hall; Harris; Jones; Miller; Parry; Tapley; Thompson and S. Waite.

The date of the next Council meeting is 14th May 2025

Item 8.

MINUTES



MINUTES

Minutes of a meeting of the **COUNCIL** held at The Guildhall, Mill Street, Ludlow on **MONDAY 3rd MARCH 2025** at **7.00 PM**.

FC/311 PRESENT

Chairman: Councillor B. Waite

Councillors: Childs; Garner; Gill; Ginger; Harris; Parry; Tapley; Thompson and S. Waite.

Officers: Gina Wilding, Town Clerk
Helen Jones, Senior Admin Assistant

ABSENT

Councillors: De Gersigny, Hall, Jones and Miller.

FC/312 HEALTH & SAFETY

The Mayor, Councillor B. Waite, welcomed everyone to the Full Council meeting and made some health and safety announcements.

FC/313 RECORDING OF MEETINGS

The Mayor notified those present that under the Openness of Local Government Regulations 2014, recording and broadcasting is permitted during public session of Council Meetings. The act of recording and broadcasting must not interfere with the meeting.

FC/314 APOLOGIES

Apologies were received from Councillors De Gersigny (family commitment), Hall (holiday), Jones (ill health) and Miller (ill health).

FC/315 DECLARATIONS OF INTEREST

Disclosable Pecuniary Interests
None

Conflicts of Interest

None

Personal Interests

None

FC/316 PUBLIC OPEN SESSION (15 minutes)

There were four members of the public in attendance.

A resident of Whitcliffe spoke on the topic of the town walls at St. Laurence Churchyard. He referred to an exchange of letters in 2015 between Shropshire Council and Ludlow Town Council. He enquired if LTC had been maintaining the stabilisation measures put in place by SC in 2013, and if LTC was intending to discuss this matter at the forthcoming meeting.

A resident of Ludford also spoke on the topic of the town walls at St. Laurence Churchyard. He asked if LTC is prepared to accept responsibility for the Town Walls. He understood that LTC signed a declaration to say they accept responsibility. He stated that only by working together with other bodies equally keen to restore the town walls can they be returned to their proper and safe state, and surely LTC must be keen for any help it can get. He accused LTC of hiding the state of the section of walls towards The Compasses.

FC/317 LUDLOW POLICE UPDATE

Ludlow Safer Neighbourhood Team provided a copy of their monthly newsletter.

FC/318 LUDLOW'S UNITARY COUNCILLORS SESSION

Councillor Parry (Ludlow South) confirmed that Shropshire Council has now moved into the Guildhall building.

FC/319 MINUTES

RESOLVED BW/SH (unanimous)

That the minutes of the Council meetings held on Monday 20th January 2025 and Monday 3rd February 2025 be approved as a correct record and signed by the Chair.

FC/320 ITEMS TO ACTION

RESOLVED BW/SW (unanimous)

That the Items to Action of the Council meetings held on 20th January 2025 be noted.

FC/321 TRANSPORT FOR WALES

The Council received a presentation from Nichole Sarra, Stakeholder Manager for the Borders, Transport for Wales (TfW) on the improvements of the rolling stock, improvements to the timetable to reduce interdependent services and the resultant knock-on delays, and expansion of services. She explained it would be difficult to reinstate some stops to Craven Arms because of timetabling complications.

Questions and responses:

Q: Where do the CCTV cameras feed into, who monitors them?

A: British Transport Police do have access to the cameras so they are able to monitor the platforms for anti-social behaviour, for example. I will find out exactly and come back to you.

Q: Do you think the target for deploying all Class 197 trains by Easter is achievable?

A: Possibly not, there have been delays getting them all into service because of the time this class of train requires in maintenance, but we are heading in the right direction.

Q: Can you give us the figures for the Visit Shropshire campaign last year?

A: I can certainly request these and forward them on, but what I will say is that the campaign wouldn't be renewed for this year if it hadn't been a success last year.

Q: Are there risk assessments for the impact of overcrowded carriages for example, the 'two-carriage' service provided at very busy times?

A: We do try to take account of the very busy times and to put on the bigger trains where possible, for example, in the last few weeks we have introduced the Class 197's on the Birmingham to Shrewsbury line to increase capacity. The conductors have responsibility for the trains on the line, but they cannot physically prevent people getting on the service, hence why some trains may be crowded at times.

FC/322 STEPHEN HOUSE

The Council also received a presentation from Paul Kemp, Lay Pastoral Support at St Laurence's Church, to explain how Stephen House provides a vital support service for individuals facing homelessness, loneliness, financial difficulties, or other challenges. The facility offers emergency day services including hot drinks, meals, showers, a safe place to rest, and emotional support. It also guides individuals towards further help from local charities and agencies. Named in memory of Stephen Treasure, who had a vision for such a space, Stephen House is funded through community donations to help those in crisis. The facility is open to all, offering a welcoming environment where individuals can find support and a way forward.

Questions and responses:

Q: How do you advertise your services?

A: Word of mouth mostly, I do a lot of networking and collaboration with other agencies. I work closely with Shropshire Council, Connexus and Star Housing.

Q: Could you clarify what you mean by the service “not being a drop-in centre, but all are welcome”?

A: Our approach is that everybody is welcome, but there must be a purpose for the visit.

FC/323 TOWN CRIER

RESOLVED BW/TG (unanimous)

To approve subscription membership of the Ancient & Honourable Guild of Town Criers.

FC/324 RESOLVED BW/SW (9:0:1)

To approve the voluntary position of Ludlow Town Crier with the duties described in the report plus a list of key annual events and a clause to state that the Town Crier will only perform duties within the parish of Ludlow, and there will be no expenses payable for the role.

FC/325 RESOLVED BW/EG (unanimous)

To approve the draft application form.

FC/326 RESOLVED BW/SW (9:0:1)

That subject to a satisfactory completion of the application form, to approve the appointment of a Town Crier.

FC/327 ELECTION UPDATE

RESOLVED BW/TG (unanimous)

To note the procedural updates.

FC/328 RESOLVED BW/TG (unanimous)

To approve the change of date of the Annual Town Residents Meeting (ATRM) to 19th May 2025.

FC/329 STANDING ORDERS

RESOLVED BW/TG (unanimous)

To insert the following words into Standing Orders:

‘Councillors are not permitted to speak in public open session at Council or committee meetings on any agenda items.’

FC/330 CLIMATE ACTION PLAN

RESOLVED BW/EG (unanimous)

To note the minutes of the Climate Action Task and Finish Group.

FC/331 RESOLVED BW/EG (unanimous)

To approve the updates to the Council’s Climate Action Plan.

FC/332 CHRISTMAS LIGHTS

RESOLVED BW/TG (unanimous)

To approve the new configuration of lights in Corve Street.

FC/333 RESOLVED SH/DT (5:4:1)

To approve the installation of white curtain lights in Corve Street.

FC/334 SAFETY OF LITHIUM-ION BATTERIES CAMPAIGN

RESOLVED BW/EG (unanimous)

To approve support for the campaign and to write to Lord Foster.

FC/335 CIVIC AWARDS AND ANNUAL PLAQUE AWARD SCHEME

RESOLVED BW/EG (unanimous)

To approve the criteria including the new plaque award.

FC/336 RESOLVED BW/EG (unanimous)

To approve release of civic award nomination forms.

FC/337 PROJECT SUPPORT GRANT - LAR**RESOLVED BW/EG (8:0:2)**

To approve a grant of £480 to cover the free tickets for local children and to reject the £250 for marketing expenses.

FC/338 RESOLVED GG/SW (9:0:1)

To review the criteria for Project Support Grants in relation to Core Grant Awards / maximum award to an organisation at the next Council meeting.

FC/339 COMMITTEE RECOMMENDATIONS**RESOLVED SW/SH (9:0:1)**

To approve the recommendations from Policy and Finance Committee on 24th February 2025:

- **Policy Review**

That the Investment Policy, as amended, be adopted.

That the Policy for Handling of Fundraising Bucket Collection and Static Fundraising Tins for the Mayor's Charity, subject to the inclusion of the following paragraph at 4.1.4 "The amount is to be verified by a separate member of staff to the collector prior to banking", be adopted.

- **Task and Finish Group Recommendations:**

That the recommendations from the Climate Action Task and Finish Group meeting held on the 13th of February 2025, be approved as follows: -

- a) £168 is spent from budget 101/4062 on purchasing two medium (90L) blister recycling boxes to be purchased from ReFactory and donated to Ludlow Cancer Support Group for their community initiative. That the remaining budget in 101/4062 be carried forward into the next financial year.
- b) Ludlow Town Council apply for a stall (free of charge) at the 2025 Green Festival.

- **Allstar Chargepass**

That the Council apply for an Allstar Chargepass fuel account (Electric, Diesel and Petrol) with two cards.

- **Combining of Budgets**

That the Subscriptions and Publications (101/4023), and Licence Fees (101/4054) budgets be amalgamated into budget 101/4023 – Subscription and Licence Fees.

- **Transaction Fees Cost Centre**

That a new cost centre (104) Transaction Fees be created and the following codes be moved from their current cost centre to:-

Old Code	New Code
101/4058 – Bank Charges	104/4058
119/4523 – Buttercross Card Payment Fees	104/4523
201/4327 – PayPal Commission Charge	104/4327
201/4524 – Market Card Payment Fees	104/4524
411/4075 – Linney Parking Meter Fees	104/4075
New code – Guildhall Card Payment Fees	New code

FC/340 RESOLVED BW/EG (9:0:1)

To approve the recommendation from Services Committee on 19th February 2025 to create a working group to include Councillors, and members of the Gorilla Gardeners, Ludlow Chamber of Trade, and Wigley Field Allotments to manage the planting and watering of the tubs, and to defer the appointment of the Task and Finish Group membership until the first meeting of the new council in May 2025.

FC/341 COMMITTEE MINUTES

RESOLVED DT/SH (unanimous)

To receive the minutes of the Policy and Finance Committee meeting held on 13th January 2025 and 24th February 2025.

FC/342 RESOLVED BW/SH (9:0:1)

To receive the minutes of the Services Committee meeting held on 19th February 2025.

FC/343 RESOLVED GG/DT (unanimous)

To receive the minutes of the Representational Committee meeting held on 14th January 2025 and 11th February 2025.

FC/344 RESOLVED EG/DT (9:0:1)

To receive the minutes of the Staffing Committee held on 20th February 2025.

The meeting closed at 8:40PM.

Town Mayor

Date

Closed session minutes will NOT be issued for this meeting.

Item 9.

ITEMS TO ACTION

Council 14th April 2025

Items to Action

Min No.	Resolution	Action	Staff	Status / Update	Date
FC/323 03/03/2025	<u>TOWN CRIER</u> To approve subscription membership of the Ancient & Honourable Guild of Town Criers.	To join the Guild.	GW	Complete	March 2025
FC/324 03/03/2025	To approve the voluntary position of Ludlow Town Crier with the duties described in the report plus a list of key annual events and a clause to state that the Town Crier will only perform duties within the parish of Ludlow, and there will be no expenses payable for the role.	To add agreed clauses into the job description and duties of the Town Crier.	GW	Complete	March 2025
FC/326 03/03/2025	That subject to a satisfactory completion of the application form, to approve the appointment of a Town Crier.	To progress the appointment.	GW	Complete	March 2025
FC/328 03/03/2025	<u>ELECTION UPDATE</u> To approve the change of date of the Annual Town Residents Meeting (ATRM) to 19 th May 2025.	To update the calendar and circulate to staff.	HJ	Complete	10/03/2025
FC/329 03/03/2025	<u>STANDING ORDERS</u> To insert the following words into Standing Orders:	To insert into Standing Orders.	GW	Complete	April 2025

Council 14th April 2025

Items to Action

	'Councillors are not permitted to speak in public open session at Council or committee meetings on any agenda items.'				
FC/334 03/03/2025	<u>SAFETY OF LITHIUM-ION BATTERIES CAMPAIGN</u> To approve support for the campaign and to write to Lord Foster.	To draft a letter.	GW	Complete	13/03/2025
FC/335 03/03/2025	<u>CIVIC AWARDS AND ANNUAL PLAQUE AWARD SCHEME</u> To approve release of civic award nomination forms.	To publish nomination forms on LTC website.	HJ	Complete	10/03/2025
FC/337 03/03/2025	<u>PROJECT SUPPORT GRANT – LAR</u> To approve a grant of £480 to cover the free tickets for local children and to reject the £250 for marketing expenses.	To process the grant payment.	LJ	Complete	10/03/2025
FC/338 03/03/2025	To review the criteria for Project Support Grants in relation to Core Grant Awards / maximum award to an organisation at the next Council meeting.	To review the criteria.	GW	Complete	April 2025
FC/339 03/03/2025	<u>COMMITTEE RECOMMENDATIONS</u>			Complete	10/03/2025

Council 14th April 2025

Items to Action

	<p>To approve the recommendations from Policy and Finance Committee on 24th February 2025:</p> <ul style="list-style-type: none">• <u>Policy Review</u> <p>That the Investment Policy, as amended, be adopted.</p> <p>That the Policy for Handling of Fundraising Bucket Collection and Static Fundraising Tins for the Mayor's Charity, subject to the inclusion of the following paragraph at 4.1.4 "The amount is to be verified by a separate member of staff to the collector prior to banking", be adopted.</p> <ul style="list-style-type: none">• <u>Task and Finish Group Recommendations</u> <p>That the recommendations from the Climate Action Task and Finish Group meeting held on the 13th of February 2025, be approved as follows: -</p> <p>a) £168 is spent from budget 101/4062 on purchasing two medium (90L) blister recycling boxes to be purchased from ReFactory and donated to Ludlow Cancer Support Group for</p>			
			LJ	
			LJ	
			LJ	

Council 14th April 2025

Items to Action

	<p>their community initiative. That the remaining budget in 101/4062 be carried forward into the next financial year.</p> <p>b) Ludlow Town Council apply for a stall (free of charge) at the 2025 Green Festival.</p> <ul style="list-style-type: none">• <u>Allstar Chargepass</u> <p>That the Council apply for an Allstar Chargepass fuel account (Electric, Diesel and Petrol) with two cards.</p> <ul style="list-style-type: none">• <u>Combining of Budgets</u> <p>That the Subscriptions and Publications (101/4023), and Licence Fees (101/4054) budgets be amalgamated into budget 101/4023 – Subscription and Licence Fees.</p> <ul style="list-style-type: none">• <u>Transaction Fees Cost Centre</u> <p>That a new cost centre (104) Transaction Fees be created and the following codes be moved from their current cost centre to:-</p>		KA		
			LJ		
			LJ		
			LJ		

Council 14th April 2025

Items to Action

	Old Code 101/4058 – Bank Charges 119/4523 – Buttercross Card Payment Fees 201/4327 – PayPal Commission Charge 201/4524 – Market Card Payment Fees 411/4075 – Linney Parking Meter Fees New code – Guildhall Card Payment Fees	New Code 104/4058 104/4523 104/4327 104/4524 104/4075 New code				
FC/340 03/03/2025	To defer the appointment of the Task and Finish Group membership until the first meeting of the new council in May 2025.	To bring back to Full Council in May 2025.	GW			
FC/284 20/01/25	<u>BUDGET 2025/26</u> To approve the £946,000.00 precept for 2025/26.	To notify Shropshire Council of the precept.	GW	Complete		

Council 14th April 2025

Items to Action

FC/285 20/01/25	<u>REPRESENTATIONAL COMMITTEE MEETING DATES</u> To approve the dates for Representational Committee up until June 2025 as listed below: 14 th January 2025 11 th February 2025 11 th March 2025 8 th April 2025 20 th May 2025 17 th June 2025	To circulate calendar to Cllrs and ensure website updated.	HJ	Complete 21/01/2025
FC/287 20/01/25	<u>THE CLIMATE AND NATURE BILL</u> To write to Ludlow's MP to ask for his support of the Bill.	Draft a letter.	GW	Complete 28/01/2025
FC/288 20/01/25	<u>MENTOR SUPPORT FOR LUDLOW MUSUM AT THE BUTTERCROSS</u> To approve a letter to Shropshire Council in support of retention of their current employees.	Send letter to SC.	GW	Complete 22/01/2025
FC/291 20/01/25	<u>LUDLOW YOUTH CLUB</u>			

Council 14th April 2025

Items to Action

	To inform SYA of the decision.	Email CEO of SYA.	GW	Complete	21/01/2025
	To create a Ludlow Youth Club cost centre and put the three-year's funds into a new earmarked reserve.	New cost centre and reserve.	GW/LJ	Complete	
FC/292 20/01/25	<u>WALKERS ARE WELCOME</u> To approve Council support for the Walkers Are Welcome initiative in Ludlow.	Draft a letter to Ludlow Parish Path Partnership	GW	Complete	22/01/2025
FC/294 20/01/25	<u>FESTIVAL FEES FOR EVENTS SQUARE</u> Three-tier charging structure for festivals and events on Events Square to be introduced. Festival fees are to be added to the fees table for annual review.	Add to fees table.	GW	Complete	28/01/2025
FC/295 20/01/25	<u>LUDLOW BATHING WATER STATUS</u> To approve the installation of temporary water quality sampling equipment at The Linney Riverside Park.	To inform the Environment Agency.	GW	Complete	22/01/2025
FC/297 20/01/25	<u>STANDARDS CONSULTATION</u>				

Council 14th April 2025

Items to Action

	To approve all proposals being consulted upon.	To respond to the consultation by 12 th February 2025.	GW	Complete 22/01/2025	
FC/298 20/01/25	<u>WHEELER ROAD RECREATION AREA</u> To support in principle the request from Ludlow Rugby Club to use Wheeler Road Recreation Area as a temporary training ground, subject to approval from a successor of the original grantee.	To locate and write to original grantee.	GW	Ongoing	
FC/299 20/01/25	<u>LORD LIEUTENANT'S GARDEN PARTY</u> To nominate Councillor Garner to attend the party in recognition of her leadership, commitment, and hard work as a town councillor in Ludlow, and most recently and independent of the council, setting up Ludlow and Area Community Partnership Charity.	To return nomination form by 31/1/25	GW	Complete 22/01/2025	
FC/300 20/01/25	<u>COMMITTEE RECOMMENDATIONS</u> To approve the recommendations from Policy and Finance Committee on 2 nd December 2024: - That the amended Financial Regulations be adopted.	Financial Regulations into	GW / LJ	Complete	26/02/2025

Council 14th April 2025

Items to Action

	<ul style="list-style-type: none"> - That the MPS (NW) Ltd debt, in the sum of £4,249.15, be written off. - That the Health and Safety Policy, as amended, be adopted. 	<p>Policies folder and circulated.</p> <p>Senior Finance Officer to action.</p> <p>Updated version into Policies folder and circulated.</p>	<p>LJ</p> <p>GW / LJ</p>	<p>Complete</p> <p>Complete</p>	<p>26/02/2025</p> <p>30/01/2025</p>
FC/302 20/01/25	<p><u>COMMITTEE RECOMMENDATIONS</u></p> <p>To approve the recommendations from Services Committee on Wednesday 8th January 2025:</p> <ul style="list-style-type: none"> - That an annual plaque award scheme is devised to run alongside the Civic Awards. The details of the criteria, including that the plaque would be installed on a bench owned by Ludlow Town Council, are to be approved by Full Council, and that the first recipient of a plaque should be Ludlow Hospital League of Friends. 	<p>To create the criteria and bring to Full Council in March 2025.</p>	<p>GW</p>	<p>Complete</p>	<p>25/02/2025</p>
FC/303 20/01/25	<p><u>COMMITTEE RECOMMENDATIONS</u></p>				

Council 14th April 2025

Items to Action

	<p>To approve the recommendations from Representational Committee on 17th December 2024:</p> <ul style="list-style-type: none"> - That a Place Plan project is created to lower the kerb outside Station Drive Surgery as an urgent H&S requirement to reduce the risk of a fatality due to slips and falls into the carriageway. - That the unallocated CIL of £1,665.00 is committed to this project. 	Complete Place Plan submission form and notify SC that CIL funds are available.	GW	Complete	25/02/2025
FC/310 20/01/2025	<p><u>LUDLOW TOWN WALLS</u></p> <p>To approve attendance of the Town Clerk, Mayor and Councillor Ginger at the meeting on 24th January 2025.</p>	To confirm attendance with chair of LTWT.	GW	Complete	21/01/2025
FC/267 16/12/24	<p><u>TOWN WALL AT ST LAURENCE'S CHURCHYARD, LUDLOW</u></p> <p>To approve the release of the printed full structural report to Shropshire Council, the PCC of St Laurence, The Town Walls Trust, and Historic England.</p>	To print and distribute structural report to recipients	GW	Complete	
FC/241 9/12/24	<u>EXTERNAL AUDIT</u>	For internal audit	GW	Complete	

Council 14th April 2025

Items to Action

	To adopt the external auditors report for the financial year 2023/24.				
FC/243 9/12/24	<u>ICO MODEL PUBLICATION SCHEME</u> To approve the Council's updated model publication scheme.	Insert onto website	GW/EG	Complete	
FC/244 9/12/24	<u>PROJECT SUPPORT GRANT APPLICATION</u> To approve a £750 grant for Ludlow Assembly Rooms in support of a British Sign Language translator for a Pantomime performance.	Inform LAR Arrange payment	GW GW/LJ	Complete	
FC/245 9/12/24	<u>COMMITTEE RECOMMENDATIONS</u> To approve the recommendations from Policy & Finance Committee on 2 nd December 2024. INTERNAL AUDIT That Full Council adopt the internal auditor's observations and proposed actions from November 2024 and note the status of actions on prior observations from Year End internal review 2024. INVESTMENTS	For internal audit	GW GW	Complete	

Council 14th April 2025

Items to Action

	<p>That Full Council increase the investment in the Public Sector Deposit Fund (PSDF) by £500,000.00.</p> <p>RESERVES</p> <p>Annual Review of Reserves To continue monitor income trends, asset conditions, and expenditure to adjust reserves as necessary.</p> <p>Income Diversification To reduce reliance on precept by exploring grants, and sponsorships.</p> <p>Proactive Asset Management To conduct regular inspections of listed buildings, play areas, and other high-risk assets to prevent unexpected costs.</p> <p>Cost Monitoring To continue continuously monitor operating expenses to ensure reserves remain adequate and proportionate to risks through Policy and Finance Committee.</p> <p>Reserve Levels To approve a General Reserve of £300,000 or equivalent to 3 months of operating expenditure, providing a balance between flexibility and prudent risk management.</p> <p>Earmarked Reserves:</p>	<p>To arrange for money to be moved</p> <p>To enact in budget setting</p>	GW		
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Council 14th April 2025

Items to Action

	<p>To approve total earmarked reserves of £600,000 - £800,000.</p> <p>Breakdown:</p> <ul style="list-style-type: none"> • Listed buildings maintenance: £200,000 • Play areas and public toilets: £75,000. • Market infrastructure: £50,000. • Staffing contingencies: £50,000. • Legal and regulatory compliance: £30,000. • Other projects / devolution costs: £350,000 <p>To approve building total reserves of £900,000 to £1.1 million to ensure the council can handle both short-term operational risks and long-term capital obligations.</p>				
FC/246 9/12/24	<p><u>BUDGET TASK AND FINISH GROUP PRELIMINARY REPORT</u></p> <p>To approve the preliminary draft budget for 2025/26.</p> <p>To note that the final budget including fees for grave digging and benches, and adjustments for the council tax base will be presented to Full Council for approval in January 2025.</p>	To bring final budget to Full Council in January 2025	GW	Complete	
FC/248 9/12/24	<p><u>REMOTE MEETINGS</u></p> <p>To respond to the Government's consultation questions as follows:</p>	To respond to the consultation	GW	Complete	

Council 14th April 2025

Items to Action

	<ul style="list-style-type: none"> • To agree with the broad principle of granting local authorities' powers to allow remote attendance at formal meetings. • To agree that there should be no limitations placed upon councils with regard to setting arrangements for remote attendance of council meetings, up to and including full remote attendance. 				
FC/250 9/12/24	<u>LORD LIEUTENANT'S SHROPSHIRE GARDEN PARTY 2025</u> To submit a nomination for Councillor Parry to attend the garden party in recognition of her work for Ludlow in Bloom.	To respond to the invitation to nominate	GW	Complete	
FC/251 9/12/24	<u>SHROPSHIRE FIRE AND RESCUE CONSULTATION</u> To respond in general support of priorities.	To respond to the consultation	GW	Complete	
FC/252 9/12/24	<u>NATIONAL CREMATION AND BURIAL CONSULTATION</u> Ludlow Town Council would be against removing burials and reusing graves and to maintain compliance with current regulations that graves are sold once and due to double depth and could include up to five single depth cremated remains interments.	To respond to the consultation	GW	Complete	

Council 14th April 2025

Items to Action

FC/256	<u>STAFFING MATTER</u> That the solicitors advice is followed, and a cease-and-desist letter is sent to Councillor Childs.	To send a letter to Cllr Childs	GW	Complete	
FC/257 9/12/24	<u>LUDLOW TOWN WALLS</u> A response from the Council's solicitors will come back to a Full Council meeting to be considered by the whole council.	To bring back to Full Council	GW	Complete	
FC/258 9/12/24	That following receipt of legal advice, a single-issue extraordinary council meeting relating to this issue will be called.	To call a meeting		Complete	16/12/24
FC/125 29/07/19	<u>1ST FLOOR GUILDHALL</u> That: - i) the remaining funds of £1,500 from the Mayor's Allowance from 2018-19 be used towards the refurbishment of the first floor of the Guildhall. ii) the listed building consent for the Chamber is renewed. iii) Quotations for works to the Chamber, and works to the first floor of the Guildhall, as described in the report, are sought and brought back to Council for approval.	Building consent application sent. Quotations sought.	GW GW	Complete Pending	09/12/19

Council 14th April 2025

Items to Action

FC/336 26/04/21	<u>STAFFING STRUCTURE REVIEW</u> To approve: - i) Creation of workspaces upstairs at the Guildhall to facilitate the above appointments. ii) Further exploration of a Projects and Assets role by a Staffing Task & Finish Group. iii) Further exploration of an additional admin apprentice role by a Staffing Task & Finish Group	Not being progressed. Staffing T&F to discuss.	GW	Complete Pending Pending	01/07/22
FC/50 11/05/22	<u>MARKET PARKING</u> To escalate the item to action for prompt consideration in six months.	To follow up with SC monthly.		Feb 24 – update: draft consultation with legal department. April 24 – email and images sent to SC to inform of cars left on market.	
FC/122 01/08/22	<u>MARKET PARKING</u> That once the parking order is enacted, its effect will be monitored by market traders and the Town Council.	To be monitored.	GW	Pending	
FC/123 01/08/22	<u>MARKET PARKING</u>				

Council 14th April 2025

Items to Action

	That if after a period of six months, if the Town Council deems the parking order to have been ineffective at its next meeting, Ludlow Town Council will approve consultation with the Conservation Officer for approval of the design of the bollards to be installed on the Market Square.	To be diarised when parking order in force.	GW	Pending	
FC/89 19/06/23	<u>HISTORICAL SEALS</u> i) To arrange with Shropshire Council Museum Service that the seals become part of their collection and permanent exhibits at the Ludlow Museum at the Buttercross. ii) That images of the seals and any information discovered by the Museum Service is available for use on the Town Council's website.	Arrangements made with the Museum Service. Information passed to the Communications Officer.	KA	Done	May 2024
FC/133 31/07/23	<u>INSURANCE</u> That: i) the renewal questionnaire for the Town Council's insurance is approved. ii) the civic regalia is revalued.	Questionnaire to be returned to insurance company. Civic regalia to revalued.	GW GW	Complete Pending	August 2023

Council 14th April 2025

Items to Action

		Specification delegated			
FC/205 30/10/23	<u>CHANGES TO FIRE SAFETY LEGISLATION</u> To note the changes and that a review of Fire Risk assessments will be undertaken to ensure compliance.	To review for compliance	GW	Ongoing	
FC/206 30/10/23	<u>ASSET DISPOSAL - WORK VANS</u> To approve sale of the L200 Mitsubishi pick up in line with the Council's Asset Disposal Policy.	Asset disposal when appropriate	GW	Complete	August 2024
FC/226 30/10/23	<u>PHOTOCOPIER AGREEMENT</u> In the first instance, to pursue repayment via Barclaycard, and if not successful, to pursue the debt in the small claims court. Giving the Town Clerk authority for expenditure to make the claim. No further action shall be taken after this and the matter will come back to Full Council for further evaluation.		GW	Pending.	
17/6/24					
FC/104 17/6/24	<u>BATHING WATERS UPDATE</u> To receive the update that suggest that the on-site signage would display warning of unsuitable bathing	Ongoing communications with EA	GW	COMPLETE regular meetings arranged and	September 2024

Council 14th April 2025

Items to Action

	conditions as notified by the Environment Agency, and that there should be a prominent link to the bathing waters profile page for Ludlow on the Town Council website.	Notice board and website link to be progressed.	GW/EG	information signage ordered
FC/172 18/09/23	<u>CLIMATE ACTION PLAN</u> That the Climate Action Sub-Committee recommendations within the Terms of Reference of the Group are brought back to Full Council.	Plan to be referred to CASC for revision.	KA	Complete
FC/113 17/6/24	<u>LUDLOW CASTLE CONCERTS</u> To note the decisions taken under delegated authority that, at this meeting it was agreed that: <ul style="list-style-type: none"> • Futuresound would ensure that Castle Gardens remained open to the public at all times and that no charge would therefore be made by the Town Council. • There would be a £60 per day charge for the use of Events Square from 18th July to 2nd August inclusive, and reasonable staff and 'out of pocket' costs including moving and storing the benches (see below) would also be charged to Futuresound by the Town Council. 	To continue liaising with Futuresound and invoice costs.	GW	COMPLETE

Council 14th April 2025

Items to Action

	<ul style="list-style-type: none"> • Futuresound would move, safely store, and return the large and smaller planters at no cost to the Council. • The Town Council would remove the middle section of benches, and the roadside benches would remain. • Futuresound would block off access to the roadside benches with Heras fencing when they were working during the designated times, and the benches would be available for public use at all times. 				
29.7.2024					
FC/134 29/7/24	<u>VISIT SHROPSHIRE MEMBERSHIP</u> To approve silver membership at a cost of £1,500.00 and to ask Visit Shropshire to improve the destination page content to more closely align with Ludlow's offer, and for assistance in exploring Coach Friendly Status for Ludlow.	To liaise with Visit Shropshire	GW	Complete	
FC/136 29/7/24	<u>CASTLE STREET CAR PARK</u>	To contact SC	GW	Complete	

Council 14th April 2025

Items to Action

	<p>To ask SC to answer the following questions as a matter of urgency with monthly follow up until there is a response/action:</p> <ul style="list-style-type: none"> • Do the shops have permission to use areas of the car park for their refuse bins? • Can the bins be stored tidily or screened from sight? • Who is responsible for making sure this is happening? 				
FC/138 29/7/24	<u>LUDLOW IN BLOOM</u>			Complete	
FC/139	To approve the grant final settlement figure of £1,537.20	To pay grant to LIB	GW		
	That Services Committee consider options for the way forward Ludlow's 'in Blooms' competition entry and floral arrangements in 2025/26.	To return to Services Committee	GW/KA		
FC/143 29/7/24	<u>CO-OPTION</u>			COMPLETE	
	To approve the co-option advert, timetable and application forms for Corve Ward and Gallows Bank ward, and an outdoor co-option awareness event by Councillors on Event Square during the advertising period.	To being the Co-option process	GW		
FC/144 29/7/24	<u>COACHES</u>			BIDs and Visit Shropshire	
			GW/EG		

Council 14th April 2025

Items to Action

FC/145	<p>To secure coach friendly status and liaise with the Chamber about the coach driver welcome pack.</p> <p>To follow up with Visit Shropshire to promote Ludlow as a coach destination at tourism shows and through other communication channels.</p>	To liaise with BIDs and make the application.		<p>approached for information.</p> <p>Made contact with Coach Friendly Status organisation.</p> <p>Application needs to be completed.</p>	
FC/147 29/7/24	<p><u>COMMITTEE RECOMMENDATIONS</u></p> <p>To adopt the Buildings, Equipment and Facilities Inspection and Maintenance Policy.</p>	To adopt the policy and update staff.	GW	COMPLETE	
FC/154 29/7/24	<p><u>NEXT STEPS FOLLOWING SUGGESTIONS FROM HISTORIC ENGLAND</u></p> <p>To note that Historic England are not willing to fund the setting up of a working group.</p>	To communicate this information to all relevant parties.	GW		
FC/155	To respond to Historic England without accepting any liability, that a Building Preservation Trust are not a suitable legal frame works.				

Items to Action

FC/156	That at a future meeting of the three parties, to discuss Shropshire Council becoming the lead organising in a no liability working group. SC would be the organisation to commission works when adequate grant funding had been amassed.				
16.9.2024					
FC/163	<u>LUDLOW POLICE UPDATE</u> That in relation to the recent request for an update to the Council's Local Policing Charter priorities the Council confirmed that they remained: 1) Drugs 2) Thefts from both commercial and domestic properties 3) All anti-social behaviours, including antisocial driving and drinking in public places The Council also stated that the charter contained an undertaking from the local police to attend monthly/ six weekly meetings with the Town Council, specifically at Full Council meetings, but this undertaking had not been met for a number of months. The Council felt that their relationship with the local police, which has been good, was suffering as a consequence and the local police	To respond to Ludlow Police	GW	Complete	

Council 14th April 2025

Items to Action

	should do everything, they could attend future Full Council meetings.				
FC/167	<u>CO-OPTION</u> To approve the co-option of Elizabeth Miller as a Councillor for Corve Ward.	Induction process and mentoring to be arranged	GW	Complete	
FC/168	<u>CO-OPTION</u> To approve continuation of advertising of the Gallows Bank Ward vacancy for the next meeting on 28 th October 2024.	Continue with advertising on website and social media	GW/ EG	Complete	
FC/169	<u>ANNUAL CORE GRANTS IN 2025-26</u> <u>LUDLOW TOWN CONCERT BAND</u> To approve the award of a grant of £1,050.00 to Ludlow Town Concert Band in 2025/26.	Write letter to inform Ludlow Town Concert Band	GW	Complete	
FC/170	<u>RICHARDS CASTLE SOAP BOX CIC</u> To refuse a grant to Richards Castle Soap Box CIC in 2025/26. The council decided that the application did	Write letter to inform Richards			

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Items to Action

	not satisfy criteria 1 because the event and the organisation are not based in Ludlow.	Castle Soap Box CIC			
FC/171	<u>LUDLOW PIANO FESTIVAL CIC</u> To approve the grant of £750.00 to Ludlow Piano Festival CIC in 2025/26.	Write letter to inform Ludlow Piano Festival CIC	GW	Complete	
FC/172	<u>LUDLOW SWIMMING CLUB</u> To refuse a grant to Ludlow Swimming Club in 2025/26. The application did not sufficiently demonstrate financial need, or clearly explain how the funds would be spent.	Write letter to inform Ludlow Swimming Club	GW	Complete	
FC/173	<u>LUDLOW IN BLOOM</u> To defer consideration of the grant application from Ludlow In Bloom until the October Full Council meeting	Include on agenda of next meeting.	GW	Complete	
FC/174	<u>LUDLOW CASTLE CROQUET CLUB</u> To refuse a grant to Ludlow Castle Croquet Club in 2025/26. The Council decided that the application does not demonstrate a financial need.	Write letter to inform Ludlow Castle Croquet Club	GW	Complete	
FC/175	<u>LUDLOW HOCKEY CLUB</u> To approve the grant of £1,000.00 to Ludlow Hockey Club in 2025/26.	Write letter to inform Ludlow Hockey Club	GW	Complete	

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Items to Action

FC/176	<u>SOUTH SHROPSHIRE YOUTH FORUM</u> To approve the grant of £1,000.00 to South Shropshire Youth Forum in 2025/26. The Council decided that whilst it was not able to supply the full funding requested, the support and guidance of young people is an important investment in the town.	Write letter to inform South Shropshire Youth Forum	GW	Complete
FC/177	<u>LUDLOW ASSEMBLY ROOMS</u> To approve the grant of £5,000.00 to Ludlow Assembly Rooms in 2025/26. The Council decided that the criteria were met and Ludlow Assembly Room's developing support of young people is very important for the town.	Write letter to inform Ludlow Assembly Rooms	GW	Complete
FC/179	<u>LUDLOW VISITOR INFORMATION CENTRE</u> To approve the grant of £5,000.00 to Ludlow Visitor Information Centre in 2025/26. The Council decided that whilst the Ludlow Visitor Information Centre is part of the Ludlow Assembly Rooms offer, and not a separate organisation, the Visitor Information Centre is an important resource for the town that needs to be supported.	Write letter to inform Ludlow Visitor Information Centre	GW	Complete
FC/180	<u>PROJECT SUPPORT GRANTS</u>		GW	Complete

Council 14th April 2025

Items to Action

	<u>LUDLOW LOCAL AGENDA 21</u> To refuse the application. The Council decided that the application does not demonstrate any financial need.	Contact Ludlow Local Agenda 21			
FC/181	<u>PROJECT SUPPORT GRANTS</u> <u>LUDLOW ASSEMBLY ROOMS</u> To defer the application until the next meeting as full accounts information is required so that the application can be considered.	Contact Ludlow Assembly Rooms	GW	Complete	
FC/182	<u>INSURANCE</u> To approve the renewal of the Council's insurance with Hiscox at a cost of £21,971.05	Renew insurance	GW	Complete	
FC/183	<u>FUTURE OPTIONS WITH TOWN AND PARISH COUNCILS SURVEY</u> To approve the Council's response to Shropshire Council that the Town Council is willing to help, but their ability to help depends on resources required. The Town Council would like to know which services are most at risk and to begin a conversation regarding Shropshire Councils 11/12 play areas in Ludlow.	Respond to Shropshire Council	GW	Complete	
FC/185	<u>CHRISTMAS LIGHTS – PARKWAY</u> To approve the quotation to put up lights in Parkway.		GW	Complete	

Council 14th April 2025

Items to Action

		Update office staff to organise works with contractor.			
FC/188	<u>SAVE OUR SHROPSHIRE CLIMATE ACTION AWARD SCHEME</u> To approve the submission of an application to the award scheme.	To submit an application	KA	In process	
FC/189	<u>COMMITTEE STRUCTURE</u> To approve disbanding the Climate Action Sub Committee because successive meetings have been inquorate, and no business has been transacted for many months.	To update Committee membership matrix	KA	Complete	
FC/190	<u>CLIMATE ACTION TASK AND FINISH GROUP</u> To create a Climate Action Task and Finish Group and approve the terms to reference. To approve membership of the Climate Action Task and Finish Group as Councillors Garner, Miller, Parry and Tapley.	To update Committee membership matrix and follow existing agreed dates for meetings.	KA	Complete	

Council 14th April 2025

Items to Action

FC/191	<u>COMMITTEE RECOMMENDATIONS - REP</u> To approve the recommendations from Representational Committee on 27 th August 2024: <ul style="list-style-type: none"> That a task and finish group is set up to explore the stages of creating a Neighbourhood Plan and design codes, and that all Councillors are eligible to join. 	Committee membership matrix to be updated		KA	Pending	
	<ul style="list-style-type: none"> To approve the refurbishing of the Mill Street bus shelter in the next financial year, and quotes are obtained to enable an appropriate budget to be set. 	Organise in Spring 2025		KA	Pending	
FC/192	To approve membership of the Neighbourhood Plan Task and Finish Group as Councillors Ginger, Harris, Miller, Parry, Tapley and S Waite.	Initial meeting to be called			Pending	
FC/194	<u>COMMITTEE RECOMMENDATIONS – P & F</u> To approve the recommendations from Policy and Finance Committee on 9 th Sept 2024: <ul style="list-style-type: none"> That the Planning for the Future statement be adopted That the Staff Code of Conduct be adopted 	Policies to be added to the T drive folder and communicated to staff.		GW	Complete	

Council 14th April 2025

Items to Action

	<ul style="list-style-type: none"> That the amended Social Media Policy and Disciplinary Policy be adopted 				
FC/195	<u>COMMITTEE MINUTES</u> That the receipt of the minutes of Policy & Finance Committee on 9 th Sept 2024; Services Committee on 4 th Sept 2024; Representational Committee on 30 th July and 27 th August 2024; and Staffing Committee on 2 nd Sept 2024 be deferred to next meeting.	Copies of mins to be included within the papers for the FC October 2024 meeting	KA	Complete	
FC/197	<u>TOWN WALLS TRUST</u> To note the information provided regarding the Town Walls Trust, and to approve attendance of the meeting by Councillors B Waite and Ginger, alongside the Town Clerk.			Completed	
28th October 2024					
FC/209	<u>CO-OPTION</u> To continue advertising the co-option vacancy for Gallows Bank ward until the next meeting.			Complete	
FC/210	<u>ANNUAL CORE GRANT – LUDLOW IN BLOOM</u> To decline awarding a grant to Ludlow in Bloom in 2025/26.			Complete	

Council 14th April 2025

Items to Action

FC/211	<u>PROJECT SUPPORT GRANT – LAR</u> To approve the award of a £900 Project Support Grant to Ludlow Assembly Rooms for the Lit Fest project.			Complete
FC/212	<u>BUDGET TIMETABLE AND CONSULTATION</u> To approve the budget timetable and the release of the budget consultation.	Release publicly		Complete
FC/213	<u>LUDLOW MUSEUM AT THE BUTTERCROSS FORWARD PLAN</u> To approve Ludlow Museum at the Buttercross Forward Plan 2024/26.	Inform Arts Council		Complete
FC/218	<u>COMMITTEE MEMBERSHIP</u> To approve the following amendments to Committee membership: a) That Councillor Miller joins Services and Policy & Finance Committees.	Update member matrix		Complete

Council 14th April 2025

Items to Action

	<p>b) That Councillor De Gersigny is removed from Representational Committee.</p> <p>c) That Councillor Hall is removed from the Budget Task & Finish Group, and the Grants Task & Finish Group. That Councillor Hall joins the Climate Action Task & Finish Group.</p> <p>d) The Councillor Thompson is removed from Policy & Finance Committee and joins the Climate Action Task & Finish Group.</p>				
FC/219	<p><u>COMMITTEE RECOMMENDATIONS</u></p> <p>As recommended by Policy & Finance Committee on 21st October 2024, to approve the Sexual Harassment Policy, the Sexual Harassment Action Plan and Risk Assessment, and the amendments to the Disciplinary and Grievance Policy.</p>	Update policy folder / share with staff		Complete	
FC/226	<p><u>LUDLOW TOWN WALLS</u></p> <p>To approve the release of the Structural Options Report to a named person from The Town Walls Trust, St Laurence's Church, Shropshire Council and Historic England under a non-disclosure agreement.</p>	Contact solicitor to progress		Complete	

Council 14th April 2025

Items to Action

FC/227	<u>LIVE AT LUDLOW CASTLE – FUTURE SOUND</u> To approve the request for use of Events Square from 10 th July to the morning of 1 st August inclusive. To reinforce the importance of the organiser providing adequate banksmen to guide large vehicles egress along Bell Lane.	Communicate decision to FutureSound		Complete	
Completed					
FC/98 17/6/24	<u>CO-OPTION</u> To co-opt Councillor Harris for Rockspring Ward.	Induction process and mentoring to be arranged	GW	Completed	June 2024
FC/100 17/6/24	<u>INTERNAL AUDIT</u> To adopt the Internal Audit Report 2023/24; and to action the year end audit observations.	Report sent to external auditor and actions undertaken.	GW	Completed	June 2024
FC/101 17/6/24	<u>ANNUAL GOVERNANCE AND ACCOUNTING RETURN (AGAR) 2023/24</u>	AGAR to be sent to external auditor	GW	Completed	June 2024

Council 14th April 2025

Items to Action

	To approve the Annual Return Governance Statement 2023/24 in accordance with the Accounts and Audit Regulations.				
FC/103 17/6/24	<u>ANNUAL GOVERNANCE AND ACCOUNTING RETURN (AGAR) 2023/24</u> To approve the dates for the period for the exercise of public rights as 1 st July to 9 th August 2024.	Notice to be posted on website and notice board by end of June 2024.	GW	Completed	June 2024
FC/111 17/6/24	<u>LUDLOW IN BLOOM REPRESENTATIVE FOR 2024/25</u> Councillor Parry is appointed the Town Council representative.	To update the matrix and website. To inform the relevant body.	KA/EG LC	Completed	June 2024
FC/106 17/6/24	<u>ANNUAL TOWN RESIDENTS MEETING UPDATE</u> To approve the resident's concerns as stated below being submitted to Connexus and Shropshire Council for their response as requested. <ul style="list-style-type: none"> • Empty properties are being left and not being let to families that need them, and tenants are being left in overcrowded and unsuitable homes. • Connexus are selling housing stock on without replacing them, thus reducing the housing stock. 	To send the concerns on to Connexus and Shropshire Council.	GW	Complete	18.6.2024

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Items to Action

	<ul style="list-style-type: none"> • Connexus will not meet any of the tenants personally to provide clarity on what exactly is going on. 				
FC/108 17/6/24	<p><u>COMMITTEE MEMBERSHIP</u></p> <p>To approve Committee membership matrix submitted to the meeting and changes proposed at the meeting as follows:</p> <ul style="list-style-type: none"> • Councillor Parry to join Services Committee, Representational Committee, Policy & Finance Committee, Climate Action Sub-Committee, and Budget Task & Finish Group. • Councillor Tapley to join Climate Action Sub-Committee • Councillor Harris to join Representational. • Councillor de Gersigny to leave Climate Action Sub-Committee. 	<p>To update matrix and website accordingly.</p> <p>Inform all relevant staff.</p>	KA/EG	Completed	June 2024
FC/109 17/6/24	<p><u>REPRESENTATIVES ON OUTSIDE BODIES</u></p> <p><u>SALC (SOUTH SHROPSHIRE AREA COMMITTEE) REPRESENTATIVE FOR 2024/25</u></p> <p>Councillor Parry is appointed the Town Council representative.</p>	<p>To update the matrix and website.</p> <p>To inform the relevant body.</p>	<p>KA/EG</p> <p>LC</p>	Completed	June 2024

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Items to Action

FC/110 17/6/24	<u>PARISH PATHS PARTNERSHIP REPRESENTATIVE FOR 2024/25</u> Councillor S Waite is appointed the Town Council representative.	To update the matrix and website. To inform the relevant body.	KA/EG LC	Completed	June 2024
FC/112 17/6/24	<u>FAIRTRADE STEERING GROUP REPRESENTATIVE FOR 2024/25</u> Councillor Garner is appointed the Town Council representative.	To update the matrix and website. To inform the relevant body.	KA/EG LC	Completed	June 2024
FC/116 17/06/24	<u>GRANT FUNDING TASK & FINISH GROUP</u> To approve the Terms of Reference of a Grant Funding Task & Finish Group.	To file in TOR folder	GW	Complete	June 2024
FC/119 17/06/24	<u>MEMBERSHIP OF GRANT FUNDING TASK & FINISH GROUP</u> Councillors Garner, Hall, Harris, Parry and S Waite.	To add to the committee list	KA	Complete	June 2024
FC/121 17/06/24	<u>COMMITTEE RECOMMENDATIONS</u>		KA	Complete	19.6.2024

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Items to Action

	<p>The following recommendations from Policy and Finance Committee were approved:</p> <ul style="list-style-type: none"> • That the new NALC Model Financial Regulations be adopted. • That the Biodiversity Policy, subject to the addition of 'noticeboards' in the Reporting section of the Action Plan, be adopted. • That the Statement on Duties Related to Biodiversity be adopted. • That the Statement on Duties Related to Crime and Disorder be adopted. • That the Appraisal Policy and Appraisal Form be adopted. • That the Staff Induction Policy and Induction Checklist be adopted. • That the Councillor Induction Policy and Induction Checklist, subject to the amendment of "May" to "July" in paragraph 4.5, be adopted. • That the Council engage the services of Goodman Nash to challenge the rateable value of Ludlow Museum at the Buttercross. 	<p>To update Policy & Finance Committee Officer.</p> <p>P&F Committee Officer to update policies folder and liaise with Town Clerk.</p> <p>To communicate the agreed policies to staff in writing and update at staff meeting.</p>	<p>LJ</p> <p>LJ/GW</p>	<p>Complete</p> <p>Complete</p>	<p>11/07/24</p> <p>12/07/24</p>
<p>FC/29 08/05/24</p>	<p><u>AUTHORISED SIGNATORIES</u></p>	<p>Mandate</p>	<p>LJ / GW</p> <p>LJ/GW</p>	<p>Completed</p>	

Council 14th April 2025

Items to Action

	That Councillors Gill, Ginger, Parry and B. Waite and S. Waite be approved as Authorised Signatories.	Barclays.net to be updated.		Complete
FC/144 31/07/23	<u>TOWN WALLS</u> To agree the proposed research and pass the information to the barrister for assessment.	To be passed on.	GW	Complete

Item 10.

TOWN WALLS



REPORT

Ludlow Town Council TOWN WALL AT ST. LAURENCE'S CHURCHYARD. Report No. FC/25/10 Full Council 14th April 2025

1. INTRODUCTION

- 1.1 This report provides an update on communications between Ludlow and Town Council and Ludlow Town Walls Trust.

2. RECOMMENDATION

- 2.1 To note the communication between Ludlow Town Council and Ludlow Town Walls Trust.

3. CURRENT SITUATION BACKGROUND

- 3.1 Ludlow Town Council has recently become communicated with Ludlow Town Walls Trust.
- 3.2 communication from Ludlow Town Council:

Thank you for your email of 26 March, and for providing an update on your discussions with the HLF.

The principal reason for inviting you to the next meeting of the Town Council on 14 April, was to give you an opportunity (on behalf of LTWT) to share the detail of your discussions with the Heritage Lottery Fund (HLF)

with members. We do not consider that you providing information in this way would be in anyway controversial.

Although you have now outlined some of the detail of your discussions with the HLF, there are a number of matters we would be interested in exploring further with you, such as the extent of the necessary feasibility study, what it might involve, (in very broad terms) the likely cost and what might be involved in any grant application process. We would also be interested in your thoughts on potential sources of grant funding other than the HLF.

There are though a few issues we do not follow and on which we would welcome your further comment. First, it is not apparent why you asked the HLF whether a group could secure funding on a “no liability basis.” You appear to be confusing LTC resolving to take a full and active part in joining the partnership seeking external funding on a “no liability basis”, with an application for funding being made on a “no liability basis.” These are two entirely separate activities and it seems unsurprising that you received the response you say you have.

Second, you raise concerns regarding the 2012 application for funding to stabilise the churchyard wall, in that it is likely to form part of the case history of any new application, with any material differences between the two applications likely to be queried. Having checked our records in relation to the 2012 application, it is our recollection that the application was made by the Ludlow Heritage Partnership Consortium and that whilst LTC was identified as a lead organisation, Shropshire Council was named as the “accountable body”. Further, LTC did not identify itself as being responsible for maintenance of the section of wall covered by the application but confirmed (the factual position) that it had for many years maintained part of the North Face of the Ludlow Town Walls. Indeed, the section of wall which was the subject of the 2012 application is separate from and was (and is) in different ownership to the section of wall now in need of renovation. We therefore do not follow why HLF would query any material differences between the two applications, when the circumstances of the sections of wall in question are entirely distinct .

We had hoped that any issues arising in taking forward the essential feasibility study could have been discussed by stakeholders at the meeting scheduled for 28 February, in the spirit of co-operation which was discussed at the meeting on 24 January. It is disappointing that some other stakeholders are rumoured to now be pursuing a different strategy. This information would particularly assist the Council in considering the matter further in the best interests of Ludlow ratepayers.

We would though like to renew the invitation to you to attend our next meeting on 14 April, so that we can hear your views on the above matters and the funding opportunities available with HLF and others.

In the meantime, I will be in touch separately regarding the ongoing stabilisation work.

3.3 The response from Ludlow Town Walls Trust:

Thank you for your response.

There is clearly some confusion on this matter but as your record notes may reveal, the section of Ludlow Town Wall subject to the 2012 application was in fact the same section fronting the Garden of Rest as is now the focus of attention. I accompanied HLF officials to view this section on at least three occasions and also with Hereford College officials when we were putting together the partnership proposal. Similarly at the Ludlow Conservation Weekend Stone Carving Festival in May 2012 we demonstrated at the Garden of Rest the crafts and skills which would be incorporated in the Town Wall repair below the site.

To avoid any misunderstanding, at the relevant juncture, once any disputes have been resolved, the Ludlow Town Walls Trust are happy to facilitate a visit by the HLF case officer allocated for this project to directly address your members and other stakeholders. This way we can all, with clarity, understand the opportunities and challenges we face in creating a potentially fundable proposal. Similarly, if you or any nominated colleagues/members wish to join the LTWT in attending some of the funding fairs which occur across our region this will again provide access to the primary information relevant to the project.

The LTWT therefore maintain that at this point it will decline the invitation but will work towards creating an opportunity for direct interface between potential funders and the various stakeholders in the section of Town Wall fronting the Garden of Rest.

Town Clerk
April 2025

Implications

Wards Affected (All)

Financial (unknown)

Health & Safety (as stated)

Law & Order (none)

Environmental Implications (undetermined)

Item 11.

LOCAL POLICING COMMUNITY CHARTER

LUDLOW LOCAL POLICING COMMUNITY CHARTER

Good Morning Gina,

Please find the attached Local Policing Community Charter and your latest parish priorities contact contract. We are now looking for your priorities for the April – September 2025 period. If you could please take the time to discuss this with your councillors and fill in the blank contract and return it to myself.

Please update me if any of your priorities have changed from the attached so we can discuss and direct the team accordingly?

Here is an update regarding your current priorities:

PRIORITY 1 – DRUGS

PRIORITY 2 – THEFTS (COMMERCIAL)

PRIORITY 3 – ASB DRIVING

Please can you also inform me of what, if any action the parish council has taken in relation to the above priorities so that we can update our priorities tracker? We are keen to promote a joint effort in reducing harm in our communities.

As your local Safer Neighbourhood Team, we are committed to maintain contact with you so that you can update your residents. An easy tool for you and your residents to be updated by the SNT is by using www.neighbourhoodmatters.co.uk – please sign up and encourage your residents to sign up using your various methods of communication (Face-to-face, Social Media, Newsletters, Email, Letter etc.).

We look forward to working with you during the next period.

Kind regards,

Beth

Beth Francis

PCSO 40287 | Ludlow SNT | West Mercia Police

Ludlow Police Station, Lower Galdeford, Ludlow, Shropshire, SY8 1SA

Mobile: 07773054449 **Ext.** 7704431

Team email: ludlow.snt@westmercia.police.uk



West Mercia Police Community Charter

Parish Contact Contract

- ☐ INITIAL CONTRACT
☒ RENEWED CONTRACT

Parish Council:			
Contract Date: 01/04/2025		3 Month Review Date: 30/09/2025	
Council Chair	Beverley Waite	Tel:	Email: councillor.waite@ludlow.gov.uk
Council Clerk	Gina Wilding	Tel: 07971798131	Email: townclerk@ludlow.gov.uk
PC / PCSO	Beth Francis	Tel:	Email: ludlow.snt@westmercia.pnn.police.uk
Top 3 community issues			
1	2	3	
Choose an item.	Choose an item.	Choose an item.	
Other Comments			
Agreed contact	Contact type Meeting	Contact Frequency MONTHLY	

PLEASE SEND A COPY OF THE COMPLETED FORM TO YOUR PARISH COUNCIL CHAIR & CLERK, YOUR Local SNT AND TO THE PREVENTION HUB TEAM EMAIL BOX

Item 12.

COMMUNITY BANKING HUB



REPORT

Ludlow Town Council COMMUNITY BANKING HUB Report No. FC/25/11

**Full Council
14th April 2025**

1. INTRODUCTION

- 1.1 This report provides information to assist the council to understand the processes and parameters for setting up a Community Banking Hub.

2. RECOMMENDATION

- 2.1 To complete and submit the access to cash form.

3. BACKGROUND

- 3.1 Link are responsible for assessing if a town requires / or meets the criteria for a Community Banking Hub. The initial assessment is in relation to the community being able to access cash. More information is available via this link: <https://www.link.co.uk/media/nwqly3h4/access-to-cash-assessment-process-infographic.pdf>
- 3.2 There is an option to request a review: <https://www.link.co.uk/helping-you-access-cash/request-access-to-cash>.

4. CURRENT SITUATION

- 4.1 Reasons for a review to be considered in Ludlow:

- Population demographic – Shropshire Council's 2022 Market Town Profile records that Ludlow has an aging population, and a higher age profile when compared with Shropshire and nationally.
- There is an area of deprivation within Ludlow that is in the most deprived 10% nationally, which is likely to affect community mobility in terms of travelling outside Ludlow to access banking facilities.
- Barclays bank has closed.
- Lloyds Bank will close in May 2025.
- The only cash point that was wheelchair accessible is due to be removed when Lloyds Bank closes in May 2025.
- Supermarkets are less likely to offer cash back facilities instore.
- Ludlow's former main post office has been degraded from a four position counter services to an instore partnership concession in a Onestop shop with one counter position, and inadequate security arrangements.
- The nearest secure post office counter is located in Orleton, which is over 6 miles away. There is a direct bus (490) departing from Assembly Rooms and arriving at Boot Inn. Services depart five times a day, and operate Monday to Saturday. The journey takes approximately 21 min.

Town Clerk
April 2025

Implications

Wards Affected (All)

Financial (as described in the report)

Health & Safety (none)

Law & Order (none)

Environmental Implications (undetermined)



WORRIED ABOUT GETTING CASH IN YOUR AREA?

WE CAN HELP.

Who can ask for a review?

If you're concerned about getting cash or paying cash into your account where you live, you can ask us to check things out. This is called a "cash access request". Anyone can make a cash access request if they think it's hard to get cash in their local area. You can ask if you're an individual, a group, or an organisation. You need to ask in writing, but we can help you with this — you can use this form and post it to us at:

Link Scheme Ltd (Cash Access Request), Central House, Otley Road, Harrogate, HG3 1UF

When won't we do a review?

When we receive a cash access request we might not do a review if:

- We're already doing a review or we've done a review in the past year that covers the area and the same cash access services that you have asked us to look at.
- You don't have a good reason to ask for a review of cash access services in the local area you mention in your cash access request.
- You might not know about all the cash services near you. If we tell you about them and you decide there's no problem, then we won't do a review.

Before you ask for a review

You might want to check if there is a bank branch, Post Office or ATM (cash machine) in the local area you mention in your cash access request, and think about whether you could use it to deposit or withdraw cash or make a balance enquiry. Every Post Office offers Everyday Banking which allows customers of lots of the banks and some building societies to pay in cash and cheques, withdraw cash, and check balances over the counter.

We know how important it is for people to be able to deposit and withdraw cash. We want to make sure everyone can access and manage their money easily. Try using our Cash Locator tool on our website to find the nearest place to you, to get cash — to find out more visit www.link.co.uk.

Let's get started

If you think your community needs better access to cash, this form will guide you through some questions and gather information that will help us to look carefully at what you and your community need.

Please spend a few minutes to provide us with as much information as possible. The information you provide will only be used to help us to undertake our review in support of your cash access request.



Section 1: Tell us about you

Name

Contact number

Email address

Postal address

I am a:

- ☐ Local Resident
- ☐ Local Business Owner or Manager
- ☐ Community Representative
- ☐ Elected Representative (state below)

We need your contact details to let you know the outcome of your cash access request. We have to send this to you in writing so please let us have either an **e-mail address** or a **postal address** in the box above. We'll be in touch if we need to ask you for any more information. Please let us know your contact preference.

- ☐ Telephone Preferred time of day: ☐ Morning ☐ Afternoon
- ☐ Email
- ☐ By post (you must provide a postal address above if you select this option)

Section 2: Tell us about your community

We need to know a bit more about where you live and where your local high street with shops is. This will help us to pinpoint the location and see what cash facilities are available nearby.

Location

Post code of request location (if known)

Town or village name

Landmark (e.g. a retailer or coffee shop in the high street)

Roughly how many shops are there in the community?

- ☐ Less than 5
- ☐ Less than 40
- ☐ 40 to 69
- ☐ 70 or more

Developments

Are you aware of any proposed housing developments locally or any other planned changes in the community?



Section 3: Tell us about the services you need

What best describes what you and your community need? (Tick all that apply)

- ☐ Free to use cash withdrawal services for personal current accounts
- ☐ Free to use cash deposit services for personal current accounts
- ☐ Cash deposit services for business accounts
- ☐ Cash withdrawal services for business accounts
- ☐ Unsure

What extra features (if any) do you think would be helpful?

- ☐ The ability to deposit and withdraw a variety of notes and coins
- ☐ Having a trained person available to help you with cash access services

Are there premises where services could be located? (Please provide details)

Section 4: Tell us about cash facilities near to you

About local bank branches

- | | |
|---|---|
| <input type="checkbox"/> I have one or more bank branches | <input type="checkbox"/> I don't have a bank branch |
| <input type="checkbox"/> I have a bank branch, but it is closing soon | <input type="checkbox"/> Unsure |

Where do you currently go to do your Banking?

How easy is it to get to this location by public transport?

Where is your nearest Post Office?

Tell us why this does not meet your cash access needs?



Section 4: Tell us about cash facilities near to you (...continued)

Changes in access to cash

Have there been recent changes in the community, or other challenges making it difficult to access cash in your local area?

Is there anything else we need to know?

Please use the text box below to provide any additional information to support your request.

Consent

By submitting your details, you are consenting to LINK storing them. LINK will record your request, its decision and rationale. LINK will not keep your personal details for longer than required in accordance with its Privacy Notice which is available on our website, or can be posted on request.

Signature:

Date:

Please send this completed form to :

**Link Scheme Ltd (Cash Access Request),
Central House,
Otley Road,
Harrogate,
HG3 1UF**

We will aim to respond to all requests within 28 days of receiving your form.

Item 13.

**SPRING STATEMENT IMPACT ON HIGH
STREET BUSINESSES AND TOWNS**



REPORT

Ludlow Town Council SPRING STATEMENT IMPACT ON LOCAL BUSINESSES Report No. FC/25/12

**Full Council
14th April 2025**

1. INTRODUCTION

- 1.1 This report provides an update on recent changes for local businesses.

2. RECOMMENDATION

- 2.1 To note the update on the impact of the government's Spring Statement on the High Street, and to approach Shropshire Council for the re-instatement of the Ludlow Future Partnership.

3. BACKGROUND

- 3.1 Ludlow Future Partnership began meeting in 2024, to bring SC, LTC, and local orgs together in support of achieving common aims to improve Ludlow, specifically,
- To improve decide on short, mid and long terms projects to improve Ludlow.
 - To meet quarterly to progress short, mid and long terms projects for Ludlow.
- 3.2 A Priorities Workshop to take place in October 2024, and the inaugural meeting of Ludlow Future Partnership took place in November 2024.

A series of quarterly meetings are now due to take place in 2024 / 25 and beyond. In March 2025, the group suspended until after 1 May 2025 Elections.

4. CURRENT SITUATION

4.1 Good2Great recent reported on the impact of the government's Spring Statement on the High Street:

The dawn of the new tax year sees some key measures that will significantly impact high-street businesses and towns.

While some policies present financial challenges, others offer relief designed to support the long-term sustainability of retail, hospitality, and leisure enterprises. However, there will be an inevitable 'shaking down' while the dust settles.

As the economic landscape changes, we must stay at the forefront of these discussions, advocating for business owners and supporting our local towns.

High streets are the backbone of our economy, driving local employment, fostering entrepreneurship, and creating vibrant communities. Their success is integral not just to individual businesses but to the wider economic health of our regions and the country as a whole.

Challenges Facing High Streets

Several policy changes announced in the Autumn Budget will inevitably place increased financial strain on high street businesses:

- **Reduced Business Rate Relief** – The Retail, Hospitality, and Leisure Relief scheme will see a reduction in its discount from 75% to 40% for the 2025/26 period. This shift could lead to higher operational costs for eligible businesses, making it more difficult for independent traders to thrive.
- **Increased Employer National Insurance Contributions** – From April 6, 2025, higher employer NIC rates will take effect. This increase is likely to raise employment costs, forcing businesses to reassess their staffing levels and wage structures.
- **Minimum Wage Increase** – Adjustments to the National Living Wage and National Minimum Wage will further contribute to increased payroll expenses, adding financial pressure to local businesses. Taken together, these changes will necessitate a careful review of financial and operational strategies for high-street businesses. Higher

business rates, employment costs, and wage expenses could lead to reduced hiring, potential price increases, and a shift in how businesses manage their resources.

Opportunities and Support for Businesses

Despite these challenges, the Spring Statement also introduces measures aimed at alleviating financial pressure and fostering high-street growth:

- **Permanent Reduction in Business Rates** – Starting in 2026, a new legislative change will allow for a permanent reduction in business rates for retail, hospitality, and leisure properties. This initiative will be funded by increasing contributions from the top 1% of high-value commercial properties, such as large warehouses used by online retailers.
- **Interim Business Rate Relief** – Until the permanent reduction takes effect, approximately 250,000 retail, hospitality, and leisure properties will receive a 40% relief on their business rates, capped at £110,000 per business. This immediate financial aid will help many small and medium-sized enterprises (SMEs) manage costs in the short term.
- **Employment Allowance Increase** – From April 2025, the Employment Allowance will increase from £5,000 to £10,500, meaning that 865,000 employers will not pay any employer National Insurance contributions next year. This move enables businesses to employ up to four full-time workers on the National Living Wage without incurring additional employer NIC costs.

The Road Ahead for High Streets

While the financial relief measures introduced in the Spring Statement provide some respite, opinions remain divided on their long-term impact.

The reduction in business rate relief and rising employment costs may outweigh the benefits of increased allowances and rate reductions for many businesses.

High streets in towns will need to adapt, reassess financial strategies, and consider innovative approaches to sustain footfall and profitability. If we want to see thriving town centres that benefit both businesses and communities alike, then local businesses, policymakers, and stakeholders must engage in active discussions on how to mitigate risks while leveraging new opportunities.

By fostering collaboration and advocating for policies that truly support our high streets, we can ensure their long-term success and resilience.

The conversation doesn't end here. Business owners and stakeholders must continue to stay informed, adapt to policy changes, and take advantage of available support.

- 4.2 Ludlow Town Council needs to work with other organisations, including Shropshire Council, to help Ludlow continue to prosper.
- 4.3 Good2Great, also suggest that if we want to build resilient high streets and support a thriving local economy, we need to take action, and invite us to join them for the Meeting of Minds Seminar on Thursday, 24 April, where we'll explore how to unlock empty high street properties and breathe new life into our town centres.

Join here: <https://go.good-2-great.co.uk/meeting-of-minds-seminar123661>

Town Clerk
April 2025

Implications

Wards Affected (All)

Financial (as described in the report)

Health & Safety (none)

Law & Order (none)

Environmental Implications (undetermined)

Item 14.

DEVOLUTION UPDATE



REPORT

Ludlow Town Council DEVOLUTION UPDATE Report No. FC/25/13

**Full Council
14th April 2025**

1. INTRODUCTION

- 1.1 This report provides an update from Shropshire Council.

2. RECOMMENDATION

- 2.1 To note the devolution information and Marches Forward Partnership information from Shropshire Council.
- 2.2 To note that Ludlow Town Council has to date taken on devolved services including Street Trading in 2011, Public Conveniences in 2011, and Ludlow Museum at the Buttercross, in partnership with Shropshire Council Museum Services, in 2016.

3. BACKGROUND

- 3.1 SALC have supplied the following via email:

As part of the devolution debate, a number of areas have been invited to submit proposals to the Government for future reorganisation by 21st March.

Shropshire was not one of those areas asked to make a submission but obviously the issue of Shropshire's future is attracting attention.

This afternoon, we have been asked by Shropshire Council to circulate the attached briefing update it has prepared for your information.

4. CURRENT SITUATION

4.1 The information supplied by SC is as follows:

Devolution

The English Devolution White Paper of 16th December 2024 signals a change to local government in England. The first stage of this is local government re-organisation which will see the abolition of two-tier authorities in favour of unitary authorities, ideally each with a population of 500,000 or more.

The Government has invited proposals for both a single tier of local government and established a Devolution Priority Programme (DPP) for areas that are ready to achieve mayoral devolution at pace.

As an existing unitary authority, Shropshire Council has not received an invitation for local government reorganisation. It has also not been identified within the priority programme for devolution.

Following on from the first phase of the Government's re-organisation, it is anticipated there will be a need for the new unitary authorities and existing ones such as Shropshire, to collaborate voluntarily to form either a mayoral authority or a strategic authority, covering "areas that people recognise and work in".

It is anticipated that Shropshire would collaborate with neighbouring authorities to form part of a strategic authority, but the Government will in time also legislate for a ministerial directive which will allow the creation of strategic authorities where local leaders have not been able to make progress.

Government states that the following list should be considered as areas where strategic authorities should have a mandate to act strategically to drive growth:

- Transport and local infrastructure.
- Skills and employment support
- Housing and strategic planning
- Economic development and regeneration
- Environment and climate change
- Health, wellbeing, and public service reform
- Public safety

While the government is clearly taking a phased approach to implementing these changes, Shropshire Council is committed to advancing the principles of devolution and recognises the importance of local governance and the empowerment of our communities. As a unitary council authority, we will be considering all options with our neighbours to forming a strategic authority under the English devolution framework.

Shropshire will continue those important discussions with potential partners as and when they emerge, and as soon as we have a vision for how a strategic regional authority that works for population and geography, we will submit these plans to Government.

The White Paper only considers devolution for England, but Shropshire has already accelerated the establishment of the Marches Forward Partnership. This enables strategic joint working along our border, recognising the 'functional geography' Shropshire has as a gateway between England and Wales.

The Marches Forward Partnership has progressed under existing local authority powers to unlock new investment and drive sustainable growth into the Marches region ahead of the Government's principles for local government transformation.

4.2 Information on Marches Forward Partnership

Executive Summary (from SC report)

The Shropshire Plan's healthy organisation priority recognises the importance of putting the Council's resources in the right place to deliver the organisation's priorities and meet the needs of our residents. This includes maximising external funding opportunities and collaborating with neighbouring authorities to share best practice and support financial resilience of services through joint working initiatives.

Shropshire Council has been working collaboratively with Herefordshire Council and both Monmouthshire and Powys County Councils to develop a common understanding of each other's organisations. The aim has been to establish areas where there is mutual benefit and added value in working together, supporting each other's strategic aims and leveraging combined knowledge, resources and activities.

Geographically, the neighbouring local authorities cover a contiguous area which straddles over 80% of the English and Welsh border. Commuting patterns and access to retail, education, business support and healthcare services all reflect the functional profile of the area.

The local authorities are bound together by common purpose based on a high quality rural environment, but with consequent more expensive access to services, changing service demands from an ageing population and low levels of productivity and employment growth. Given this profile, the local authorities are keen to explore a shared ambition for rural based growth, identifying opportunities for strategic collaboration on agreed projects and initiatives. This approach is aimed at ensuring effective local joint working and provides a basis, using the power of the collective area, to develop investment propositions for Government and partners.

Whilst the local authorities have interacted with one another as neighbouring areas on many levels for a long time, these activities have not previously been fully coordinated. There is now an opportunity and willingness to align respective strategic visions, plans and resources for the maximum benefit on the Marches and cross border area.

This emphasis on greater cross border understanding has intensified for many local authorities over recent years, with a shared focus on partnership working. This is supported by greater flexibility and an emphasis on strategic collaboration from Government, recently illustrated by the Wales and Cornwall Celtic-Heritage Collaboration Agreement.

Covering the gateway between England and Wales, the Marches Forward Partnership could provide opportunity for the border local authorities to coordinate future joint working under a flexible umbrella framework. It is aimed at supporting a shared understanding of 'life on the borders' as a focus for strategic joint working and as a means to unlock additional investment into the area.

The Partnership will focus its collaboration only where it adds the greatest value. All participating councils will maintain independent decision making and local delivery within each local authority area, where this continues to be most appropriate, including involvement in other beneficial partnership arrangements.

Town Clerk
April 2025

Implications

Wards Affected (All)

Financial (unknown)

Health & Safety (unknown)

Law & Order (unknown)

Environmental Implications (unknown)



Committee and Date

Item

Public



Marches Forward Partnership Memorandum of Understanding

Responsible Officer:		Mark Barrow, Executive Director of Place	
email:	mark.barrow@shropshire.gov.uk	Tel:	01743 258919
Cabinet Member (Portfolio Holder):		Lezley Picton	

1. Synopsis

This report seeks approval for the Council to sign a Memorandum of Understanding (MOU) between Shropshire Council, Herefordshire Council and Monmouthshire and Powys County Council's for collaboration as a Marches Forward Partnership.

2. Executive Summary

- 2.1 The Shropshire Plan's healthy organisation priority recognises the importance of putting the Council's resources in the right place to deliver the organisation's priorities and meet the needs of our residents. This includes maximising external funding opportunities and collaborating with neighbouring authorities to share best practice and support financial resilience of services through joint working initiatives.
- 2.2 Shropshire Council has been working collaboratively with Herefordshire Council and both Monmouthshire and Powys County Councils to develop a common understanding of each other's organisations. The aim has been to establish areas where there is mutual benefit and added value in working together, supporting each other's strategic aims and leveraging combined knowledge, resources and activities.
- 2.3 Geographically, the neighbouring local authorities cover a contiguous area which straddles over 80% of the English and Welsh border. Commuting patterns and access to retail, education, business support and healthcare services all reflect the functional profile of the area.

- 2.4 The local authorities are bound together by common purpose based on a high quality rural environment, but with consequent more expensive access to services, changing service demands from an ageing population and low levels of productivity and employment growth. Given this profile, the local authorities are keen to explore a shared ambition for rural based growth, identifying opportunities for strategic collaboration on agreed projects and initiatives. This approach is aimed at ensuring effective local joint working and provides a basis, using the power of the collective area, to develop investment propositions for Government and partners.
- 2.5 Whilst the local authorities have interacted with one another as neighbouring areas on many levels for a long time, these activities have not previously been fully coordinated. There is now an opportunity and willingness to align respective strategic visions, plans and resources for the maximum benefit on the Marches and cross border area.
- 2.6 This emphasis on greater cross border understanding has intensified for many local authorities over recent years, with a shared focus on partnership working. This is supported by greater flexibility and an emphasis on strategic collaboration from Government, recently illustrated by the Wales and Cornwall Celtic-Heritage Collaboration Agreement.
- 2.7 Covering the gateway between England and Wales, the Marches Forward Partnership could provide opportunity for the border local authorities to coordinate future joint working under a flexible umbrella framework. It is aimed at supporting a shared understanding of 'life on the borders' as a focus for strategic joint working and as a means to unlock additional investment into the area.
- 2.8 The Partnership will focus its collaboration only where it adds the greatest value. All participating councils will maintain independent decision making and local delivery within each local authority area, where this continues to be most appropriate, including involvement in other beneficial partnership arrangements.

3. Recommendations

Cabinet agree to:

- 3.1. The establishment of a Marches Forward Partnership with neighbouring local authorities.
- 3.2. The signing of a Memorandum of Understanding between the local authorities to reflect the spirit of cooperation and joint working between them.
- 3.3. Support the development of the Marches Forward Partnership through representation on a joint local authority Leaders Group.
- 3.4. Delegate to the Chief Executive and Executive Director of Place to proceed with development of a work programme to meet the objectives within the Memorandum of Understanding, in consultation with relevant Portfolio Holders (depending on the service under consideration).

Report

4. Risk Assessment and Opportunities Appraisal

- 4.1. Significant opportunity is provided by the development of the Marches Forward Partnership. The Partnership provides a flexible umbrella framework for joint working which supports local service delivery based around how people and places function rather than being confined within organisational or geographical boundaries. It also enables the Council to harness the unique value of Shropshire's cross border location.
- 4.2. The Partnership is not intended to be a legal entity. There will be no formal governing structure and no elements of the MOU will be legally binding. As a result, there are no currently identified legal risks to the Council since the Partnership will operate on an informal basis, based around joint working on areas of common purpose.
- 4.3. Mapping has been undertaken to understand existing strategic partnership arrangements across the area. As a result, the development of the Partnership and its intended work programme do not pose a risk in terms of duplicating existing arrangements. Instead, the Partnership will only focus on areas of added value, addressing an existing gap in strategic cross border working between England and Wales.
- 4.4. As a flexible arrangement, each local authority within the Partnership has the freedom to either not undertake a particular activity or not participate further in the Partnership at any point in time. The Partnership does not therefore pose a risk in terms of prejudicing or constraining any of the constituent partners or groupings of partners in being involved in alternative partnership arrangements. The MOU does not restrict, in any way, other arrangements that a partner local authority may wish to develop independently.
- 4.5. The risks and opportunities relating to this report are predominately focused on Shropshire Council's role in developing an informal partnership and the associated working arrangements. Whilst this poses resource implications, the proposed management structure for the Partnership is focused on joint resourcing. Each local authority will share skills, data and learning as well as the provision of a portfolio lead for thematic working groups. There are significant opportunities for greater efficiency and effectiveness through joint working initiatives as well as the potential to use the Marches Forward Partnership as a platform to secure wider investment support.

5. Financial Implications

- 5.1. The MOU makes clear that nothing in the agreement involves a commitment of funds from the partner local authorities. Work to date has used existing local authority resources, focused on shared staff time and skills. It has not involved any other financial implications.
- 5.2. The Partnership provides opportunity for continued sharing of staff resources to support development of cross border joint working. Through the development of the Partnership work programme, partners may decide to commission work on particular topics to progress key areas of activity. Future work by the Partnership

may therefore involve an ask for partner investment. However, the Partnership framework provides a basis to prioritise, agree and divide such costs across the collective partners, thereby providing benefit and reducing the financial implications to each individual organisation.

- 5.3. Given the informal working relationship under the strategic collaboration, the MOU does make clear that each local authority will have individual responsibility for relevant Cabinet and Council briefings. This will include ensuring all the necessary financial agreements are in place within each partner local authority for any future key areas of work associated with the Partnership. Political leadership and oversight through a Leaders Group will ensure regular updates on progress and future work programmes.
- 5.4. As a strategic collaboration, the Partnership provides opportunity as a means of unlocking new funding into the area. Using the additional value of the unique cross border location and collective approach, the Partnership provides a platform to attract investment for effective service delivery and critical infrastructure across the area.

6. Climate Change Appraisal

- 6.1 The Partnership provides a significant opportunity for the partner local authorities to support one another on climate and net zero plans and local delivery.
- 6.2 Early scoping work for the Partnership identified key areas of service alignment and priority across the neighbouring authorities. As a grouping with a shared, high quality, rural environment, a key thematic focus has already emerged around nature, energy and climate adaptation. This is reflected in the MOU which highlights opportunity to work together on strategic scale projects to address current and future resilience challenges in relation to climate change and nature recovery. The Partnership could also support rural resilience through work around land management and exploring common local authority aspirations around net zero and renewable energy solutions.

7. Background

- 7.1 The Marches Forward Partnership brings together strategic joint working between Shropshire, Herefordshire, Powys and Monmouthshire local authorities. It covers a population of approximately 737,000 residents and covers an area of approximately 1,140,000 hectares.
- 7.2 For many people, the border between England and Wales is somewhat of an artificial boundary and can limit potential for collaboration. A strategic cross border partnership provides opportunity to support government ambitions around Union Connectivity, improving join up between England and Wales and helping to increase investment and accelerate delivery of key infrastructure projects.
- 7.3 Early scoping work by the neighbouring local authorities has highlighted the potential to innovate and look at creative solutions which are not bound by statutory delivery timescales or regulatory frameworks. The Partnership offers a flexible framework to explore how local services and corporate priorities can be

delivered differently using shared skill sets and an unusual level of freedom. It provides a unique opportunity to focus on the added value of working as a collective whole whilst not seeking to duplicate or impact on individual partner relationships or partnerships explored in the future by constituent partners.

- 7.4 Whilst initially focused on short term opportunities for more efficient and effective service delivery, the Partnership also provides opportunity for constituent partners to seek and gain greater recognition of the need for joint working across borders with respective Governments. As such, it provides a platform to raise the profile of the area and seek greater investment for delivery.
- 7.5 Functionally the area is already united, with significant flows of people between the Mid Wales-English border in all areas including healthcare, education, skill development, jobs and service provision. This cross border movement is attributable to a number of interrelated factors including geographic convenience, specialities in sector and service provision and infrastructure availability.
- 7.6 Cross border partnership working has been a focal point for some time. Shropshire, Telford and Wrekin and Herefordshire already operate as a collective economic geography under the Marches Local Enterprise Partnership and whilst there is not a similar LEP structure for Wales, cross border joint working is a focus of activity between Shropshire, Herefordshire, Powys and Monmouthshire on a local service delivery basis. The Marches has also been progressing conversations, for some time, on the potential for a cross border Growth Deal with Powys. This is based on recognition of the importance of the cross border relationship between Mid Wales and the Marches.
- 7.7 Between Summer 2022 and January 2023, Local Authority Leaders within the Marches discussed, with the Marches LEP, options for securing more freedoms to make decisions at a local level. Such discussions were also driven by consideration of the types of means available in the future to unlock greater investment into the area as an enabler of growth.
- 7.8 At the same time, local authority Leaders across Shropshire, Herefordshire, Powys and Monmouthshire started to explore areas of collective interest and ambitions to bring together both Welsh and English Governments to support, in principle, joint working across borders. It was agreed that joint scoping should take place across the local authorities to understand shared priorities and opportunities that are worthy of further investigation. This was aimed at identifying those key focal points where strategic thinking and joint work at the collective scale provides the most benefit.
- 7.9 Alongside this early scoping work, ongoing conversations are taking place with both Wrexham Council and Telford and Wrekin Council as the two other local authorities with a shared interest in this functional geography. An open invitation has been established for these partners to join the Partnership, as the development work progresses and more information is known and shared on priority areas and joint working opportunities.
- 7.10 From the early scoping work, key areas of shared interest have been identified around nature and climate adaptation, energy, transport and connectivity, housing, digital, economic regeneration, skills and innovation. In June 2023, a draft MOU

was developed to reflect some of the outputs from the early scoping work. This is summarised within the following six objectives:

- **Objective 1: Data, Evidence and Research:** Leveraging joint intelligence and research expertise to improve the quality of life for our rural, cross border communities through sharing information and carrying out research.
- **Objective 2: Nature, Energy and Climate Adaptation:** Working together to identify and collaborate on strategic scale opportunities based around our high quality natural environment, addressing current and future resilience challenges in relation to climate change and nature recovery.
- **Objective 3: Transport and Digital Transformation:** Working together to improve rural connectivity, to level up access to jobs, education and opportunity and bring mutual benefits for our neighbouring areas.
- **Objective 4: Sustainable Communities:** Working together on the development of sustainable communities, creating a social infrastructure offer which realises the growth and sustainability of the rural economy and supports our residents, employers and users of our geography.
- **Objective 5: Food, Rural Development and Visitor Economy:** Working together to identify opportunities for closer collaboration which encourages the economic growth of our rural economy, developing and promoting our unique offer.
- **Objective 6: Government and Strategic Relations:** Working together on strategic communications to raise the regional, national and international profile of our area.

7.11 These objectives now provide a starting point, to be built on through the Marches Forward Partnership.

8. Additional Information

8.1. In supporting the MOU, Shropshire Council is asked to agree that:

- Appropriate support is prioritised to respond and progress work within the MoU, with each partner Local Authority in the Partnership taking individual responsibility for relevant Cabinet and Council briefings, as needed, to update on progress and ensure widespread support for this work.
- the MoU will run for an 18-month term before review;
- the broader activity of the Partnership may evolve and expand during implementation and will be reflected in subsequent reviews;
- nothing in the MoU will be interpreted as a commitment of funds from each local authority; and
- the MoU does not restrict, in any way, other arrangements that a local authority may wish to develop independently.

9. Conclusions

9.1. The Marches Forward Partnership offers opportunity to establish a collaboration framework for neighbouring local authority areas with shared needs and interests. It provides a flexible basis for joint working without the need for formal governing structures and without impacting existing strategic partnerships or individual local authority working arrangements.

- 9.2. It offers the ability to consider where strategic joint working across borders between England and Wales provides the most significant value and can bring together shared resources and skill sets to maximise delivery and opportunity for the area.
- 9.3. Across the partner local authorities, the Marches Forward Partnership is seen as an opportunity to:
- Focus on the shared geography and maximising the potential of the area.
 - Provide the right tools for effective service delivery within each local authority.
 - Understand and work together to attract the right investment, for example for critical infrastructure.
 - Understand and innovate to address the needs of rural communities.
 - Harness the value of shared rural assets.
 - Align policy and investment drivers to obtain the best from cross border political ambitions.
 - Understand future trends and service demands across a functional area.
 - Focus on where collaboration adds the greatest value.
 - Share learning and best practice.

List of Background Papers (This MUST be completed for all reports, but does not include items containing exempt or confidential information)

Local Member: *All Members*

Appendices [Please list the titles of Appendices]

Draft MOU Marches Forward Partnership- August 2023

Item 15.

MODEL STANDING ORDERS



Standing Orders

A NALC PUBLICATION by **Meera Tharmarajah**

PART TWO –

Electronic Standing Orders

Adopted by Full Council 8th May 2019

Reviewed and re-adopted Full Council 22nd March 2021

Reviewed and re-adopted Full Council 11th May 2022

Reviewed and re-adopted Full Council 10th May 2023

Reviewed and Re-adopted Full Council 8th May 2024

Reviewed, Amended, and Re-adopted Full Council 29th July 2024

Amendment approved at Full Council on 3rd March 2025, and Re-adopted Full Council 14th April 2025.

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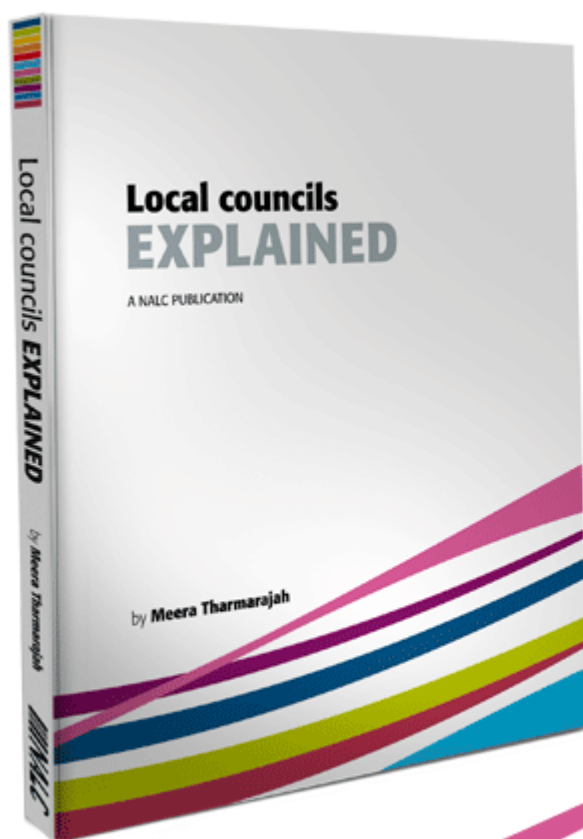
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by **Meera Tharmarajah**



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NALC

PART TWO

Part two

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How to use model standing orders

Standing orders are the written rules of a local council. They are used to confirm a council's internal organisational, administrative and procurement procedures and procedural matters for meetings. They are not the same as the policies of a council but they may refer to them. A local council must have standing orders for the procurement of contracts.

Meetings of full council, councillors, the Responsible Financial Officer and Proper Officer are subject to many statutory requirements. A council should have standing orders to confirm those statutory requirements. A council should have standing orders to control the number, place, quorum, notices and other procedures for committee and sub-committee meetings because these are subject to fewer statutory requirements. If it does not, committees and sub-committees may adopt their own standing orders.

Model standing orders that are in bold type contain statutory requirements. It is recommended that councils adopt them without changing them. Other model standing orders not in bold are designed to help councils operate effectively but do not contain statutory requirements so they may be adopted as drafted or amended to suit a council's needs. For convenience, the word "councillor" is used in model standing orders and includes a non-councillor with or without voting rights unless otherwise stated.

A model standing order that includes brackets like this '()' requires information to be inserted by a council. A model standing order that includes the term 'OR' provides alternative options for a council to choose from when determining standing orders.

The model standing orders do not include model financial regulations. Financial regulations are standing orders to regulate and control the financial affairs and accounting procedures of a local council. The financial regulations, as opposed to the standing orders of a council, include most of the requirements relevant to the Responsible Financial Officer.

Model financial regulations are available to councils in membership of the National Association of Local Councils (NALC) or One Voice Wales (OVW).

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Model standing orders

Adopted by Full Council

9th May 2018

9th May 2019

Amended and adopted 11th May 2022

Reviewed and Re-adopted Full Council 10th May 2023

Reviewed and Re-adopted Full Council 8th May 2024

Reviewed, amended and adopted Full Council 29th July 2024

Review Annually

1. Rules of debate at meetings

- a Motions on the agenda shall be considered in the order that they appear unless the order is changed at the discretion of the Chair of the meeting.
- b A motion (including an amendment) shall not be progressed unless it has been moved and seconded.
- c A motion on the agenda that is not moved by its proposer may be treated by the Chair of the meeting as withdrawn.
- d If a motion (including an amendment) has been seconded, it may be withdrawn by the proposer only with the consent of the seconder and the meeting.
- e An amendment is a proposal to remove or add words to a motion. It shall not negate the motion.
- f If an amendment to the original motion is carried, the original motion becomes the substantive motion upon which further amendment(s) may be moved.

- g An amendment shall not be considered unless early verbal notice of it is given at the meeting and, if requested by the Chair of the meeting, is expressed in writing to the Chair.
- h A councillor may move an amendment to his own motion if agreed by the meeting. If a motion has already been seconded, the amendment shall be with the consent of the seconder and the meeting.
- i If there is more than one amendment to an original or substantive motion, the amendments shall be moved in the order directed by the Chair.
- j Subject to standing order 1(k) below, only one amendment shall be moved and debated at a time, the order of which shall be directed by the Chair of the meeting.
- k One or more amendments may be discussed together if the Chair of the meeting considers this expedient but each amendment shall be voted upon separately.
- l A councillor may not move more than one amendment to an original or substantive motion.
- m The mover of an amendment has no right of reply at the end of debate on it.
- n Where a series of amendments to an original motion are carried, the mover of the original motion shall have a right of reply either at the end of debate of the first amendment or at the very end of debate on the final substantive motion immediately before it is put to the vote.
- o Unless permitted by the Chair of the meeting, a councillor may speak once in the debate on a motion except:
 - i. to speak on an amendment moved by another councillor;
 - ii. to move or speak on another amendment if the motion has been amended since he last spoke;
 - iii. to make a point of order;
 - iv. to give a personal explanation; or
 - v. in exercise of a right of reply.
- p During the debate of a motion, a councillor may interrupt only on a point of order or a personal explanation and the councillor who was interrupted shall stop speaking. A councillor raising a point of order shall identify the standing order which he considers has been breached or specify the other irregularity in the proceedings of the meeting he is concerned by.
- q A point of order shall be decided by the Chair of the meeting and his decision shall be

final.

- r When a motion is under debate, no other motion shall be moved except:
- i. to amend the motion;
 - ii. to proceed to the next business;
 - iii. to adjourn the debate;
 - iv. to put the motion to a vote;
 - v. to ask a person to be no longer heard or to leave the meeting;
 - vi. to refer a motion to a committee or sub-committee for consideration;
 - vii. to exclude the public and press;
 - viii. to adjourn the meeting; or
 - ix. to suspend particular standing order(s) excepting those which reflect mandatory statutory requirements.
- s Before an original or substantive motion is put to the vote, the Chair of the meeting shall be satisfied that the motion has been sufficiently debated and that the mover of the motion under debate has exercised or waived his right of reply.
- t Excluding motions moved understanding order 1(r) above, the contributions or speeches by a councillor shall relate only to the motion under discussion and shall not exceed 1 minutes without the consent of the Chair of the meeting.

2. Disorderly conduct at meetings

- a No person shall obstruct the transaction of business at a meeting or behave offensively or improperly. If this standing order is ignored, the Chair of the meeting shall request such person(s) to moderate or improve their conduct.
- b If person(s) disregard the request of the Chair of the meeting to moderate or improve their conduct, any councillor or the Chair of the meeting may move that the person be no longer heard or excluded from the meeting. The motion, if seconded, shall be put to the vote without discussion.
- c If a resolution made under standing order 2(b) above is ignored, the Chair of the meeting may take further reasonable steps to restore order or to progress the meeting. This may include temporarily suspending or closing the meeting.

3. Meetings generally



- Full Council meetings
- Committee meetings
- Sub-committee meetings



- a **Meetings shall not take place in premises which at the time of the meeting are used for the supply of alcohol, unless no other premises are available free of charge or at a reasonable cost.**
- b **The minimum three clear days for notice of a meeting does not include the day on which notice was issued, the day of the meeting, a Sunday, a day of the Christmas break, a day of the Easter break or of a bank holiday or a day appointed for public thanksgiving or mourning.**
- c **The minimum three clear days' public notice for a meeting does not include the day on which the notice was issued or the day of the meeting unless the meeting is convened at shorter notice.**
- ■ d **Meetings shall be open to the public unless their presence is prejudicial to the public interest by reason of the confidential nature of the business to be transacted or for other special reasons. The public's exclusion from part or all of a meeting shall be by a resolution which shall give reasons for the public's exclusion.**
- e Members of the public may make representations, answer questions and give evidence at a meeting which they are entitled to attend in respect of the business on the agenda.
- f The period of time designated for public participation at a meeting in accordance with standing order 3(e) above shall not exceed 15 minutes unless directed by the Chair of the meeting.
- g Subject to standing order 3(f) above, a member of the public shall not speak for more than 3 minutes.
- h In accordance with standing order 3(e) above, a question shall not require a response at the meeting nor start a debate on the question. The Chair of the meeting may direct that a written or oral response be given.
- i A person shall stand when requesting to speak and when speaking (except when a person has a disability or is likely to suffer discomfort). The Chair of the meeting may at any time permit a person to be seated when speaking.


j A person who speaks at a meeting shall direct his comments to the Chair of the meeting.


k Only one person is permitted to speak at a time. If more than one person wants to speak, the Chair of the meeting shall direct the order of speaking.




l **Councillors are not permitted to speak in public open session at Council or committee meetings.**




  m **Photographing, recording, broadcasting or transmitting the proceedings of a meeting by any means is not permitted without the Council's prior written consent.**

  n **The press shall be provided with reasonable facilities for the taking of their report of all or part of a meeting at which they are entitled to be present.**

 o **Subject to standing orders which indicate otherwise, anything authorised or required to be done by, to or before the Chair of the Council may in his absence be done by, to or before the Vice-Chair of the Council (if any).**

 p **The Chair, if present, shall preside at a meeting. If the Chair is absent from a meeting, the Vice-Chair, if present, shall preside. If both the Chair and the Vice-Chair are absent from a meeting, a councillor as chosen by the councillors present at the meeting shall preside at the meeting.**

   q **Subject to a meeting being quorate, all questions at a meeting shall be decided by a majority of the councillors or councillors with voting rights present and voting.**

   r **The Chair of a meeting may give an original vote on any matter put to the vote, and in the case of an equality of votes may exercise his casting vote whether or not he gave an original vote.**

See standing orders 5(i) and (j) below for the different rules that apply in the election of the Chair of the Council at the annual meeting of the council.

s **Unless standing orders provide otherwise, voting on a question shall be by a show of hands. At the request of a councillor, the voting on any question shall be recorded so as to show whether each councillor present and voting gave his vote for or against that question.** Such a request shall be made before moving on to the next item of business on the agenda.

Voting on the appointment of the Mayor and Deputy Mayor and Co-options shall take place in open session and the vote shall be by a paper ballot, which is counted and reported at the meeting. The ballot papers will be retained for scrutiny for a period of one week after the meeting.

- t The minutes of a meeting shall include an accurate record of the following:
- i. the time and place of the meeting;
 - ii. the names of councillors present and absent;
 - iii. interests that have been declared by councillors and non-councillors with voting rights;
 - iv. whether a councillor or non-councillor with voting rights left the meeting when matters that they held interests in were being considered;
 - v. if there was a public participation session; and
 - vi. the resolutions made.



- u *(England)* **A councillor or a non-councillor with voting rights who has a disclosable pecuniary interest or another interest as set out in the council's code of conduct in a matter being considered at a meeting is subject to statutory limitations or restrictions under the code on his right to participate and vote on that matter.**



- v **No business may be transacted at a meeting unless at least one-third of the whole number of members of the council are present and in no case shall the quorum of a meeting be less than three.**

See standing order 4d(viii) below for the quorum of a committee or sub-committee meeting.



- w **If a meeting is or becomes inquorate no business shall be transacted** and the meeting shall be closed. The business on the agenda for the meeting shall be adjourned to another meeting.

- x A meeting shall not exceed a period of 2 hours.

4. Committees and sub-committees

- a **Unless the council determines otherwise, a committee may appoint a sub-committee whose terms of reference and members shall be determined by the committee.**
- b **The members of a committee may include non-councillors unless it is a committee which regulates and controls the finances of the council.**
- c **Unless the council determines otherwise, all the members of an advisory committee and a sub-committee of the advisory committee may be non-councillors.**
- d The council may appoint standing committees or other committees as may be necessary, and:
 - i. shall determine their terms of reference;
 - ii. shall determine the number and time of the ordinary meetings of a standing committee up until the date of the next annual meeting of full council;
 - iii. shall permit a committee, other than in respect of the ordinary meetings of a committee, to determine the number and time of its meetings;
 - iv. shall, subject to standing orders 4(b) and (c) above, appoint and determine the terms of office of members of such a committee;
 - v. may, subject to standing orders 4(b) and (c) above, appoint and determine the terms of office of the substitute members to a committee whose role is to replace the ordinary members at a meeting of a committee if the ordinary members of the committee confirm to the Proper Officer 3 days before the meeting that they are unable to attend;
 - vi. shall, after it has appointed the members of a standing committee, appoint the Chair of the standing committee;
 - vii. shall permit a committee other than a standing committee, to appoint its own Chair at the first meeting of the committee;
 - viii. shall determine the place, notice requirements and quorum for a meeting of a committee and a sub-committee which shall be no less than three;
 - ix. shall determine if the public may participate at a meeting of a committee;
 - x. shall determine if the public and press are permitted to attend the meetings of a sub-committee and also the advance public notice requirements, if any, required for the meetings of a sub-committee;

- xi. shall determine if the public may participate at a meeting of a sub-committee that they are permitted to attend; and
 - xii. may dissolve a committee.
- e The Mayor may not become the Chair or Vice-Chair of the Staffing & Appeals Committee.

5. Ordinary council meetings

- a In an election year, the annual meeting of the council shall be held on or within 14 days following the day on which the new councillors elected take office.
- b In a year which is not an election year, the annual meeting of a council shall be held on such day in May as the council may direct.
- c If no other time is fixed, the annual meeting of the council shall take place at 6pm.
- d (*England*) In addition to the annual meeting of the council, at least three other ordinary meetings shall be held in each year on such dates and times as the council directs.
- e The first business conducted at the annual meeting of the council shall be the election of the Chair and Vice-Chair (if any) of the Council. Election of the Mayor and Deputy Mayor will be by paper ballot.
- f The Chair of the Council, unless he has resigned or becomes disqualified, shall continue in office and preside at the annual meeting until his successor is elected at the next annual meeting of the council.
- g The Vice-Chair of the Council, if any, unless he resigns or becomes disqualified, shall hold office until immediately after the election of the Chair of the Council at the next annual meeting of the council.
- h In an election year, if the current Chair of the Council has not been re-elected as a member of the council, he shall preside at the meeting until a successor Chair of the Council has been elected. The current Chair of the Council

shall not have an original vote in respect of the election of the new Chair of the Council but must give a casting vote in the case of an equality of votes.

- i In an election year, if the current Chair of the Council has been re-elected as a member of the council, he shall preside at the meeting until a new Chair of the Council has been elected. He may exercise an original vote in respect of the election of the new Chair of the Council and must give a casting vote in the case of an equality of votes.**
- j Following the election of the Chair of the Council and Vice-Chair (if any) of the Council at the annual meeting of the council, the business of the annual meeting shall include:**

 - i. In an election year, delivery by the Chair of the Council and councillors of their acceptance of office forms unless the council resolves for this to be done at a later date. In a year which is not an election year, delivery by the Chair of the Council of his acceptance of office form unless the council resolves for this to be done at a later date;**
 - ii. Confirmation of the accuracy of the minutes of the last meeting of the council;
 - iii. Receipt of the minutes of the last meeting of a committee;
 - iv. Consideration of the recommendations made by a committee;
 - v. Review of delegation arrangements to committees, sub-committees, staff and other local authorities;
 - vi. Review of the terms of reference for committees;
 - vii. Appointment of members to existing committees;
 - viii. Appointment of any new committees in accordance with standing order 4 above;
 - ix. Review and adoption of appropriate standing orders and financial regulations;
 - x. Review of arrangements, including any charters and agency agreements, with other local authorities and review of contributions made to expenditure incurred by other local authorities;
 - xi. Review of representation on or work with external bodies and arrangements for reporting back;
 - xii. (*England*) In an election year, to make arrangements with a view to the council becoming eligible to exercise the general power of competence in the future;
 - xiii. Review of inventory of land and assets including buildings and office equipment;
 - xiv. Confirmation of arrangements for insurance cover in respect of all insured risks;
 - xv. Review of the council's and/or staff subscriptions to other bodies;
 - xvi. Review of the council's complaints procedure;

- xvii. Review of the council's procedures for handling requests made under the Freedom of Information Act 2000 and the Data Protection Act 1998;
- xviii. Review of the council's policy for dealing with the press/media; and
- xix. Determining the time and place of ordinary meetings of the full council up to and including the next annual meeting of full council.

6. Extraordinary meetings of the council and committees and sub-committees

- a The Chair of the Council may convene an extraordinary meeting of the council at any time.**
- b If the Chair of the Council does not or refuses to call an extraordinary meeting of the council within seven days of having been requested in writing to do so by two councillors, any two councillors may convene an extraordinary meeting of the council. The public notice giving the time, place and agenda for such a meeting must be signed by the two councillors.**
- c The Chair of a committee or a sub-committee may convene an extraordinary meeting of the committee or the sub-committee at any time.
- d If the Chair of a committee or a sub-committee does not or refuses to call an extraordinary meeting within 7 days of having been requested by to do so by 4 members of the committee or the sub-committee, any 4 members of the committee and the sub-committee may convene an extraordinary meeting of a committee and a sub-committee.

7. Previous resolutions

- a A resolution shall not be reversed within six months except either by a special motion, which requires written notice by at least 4 councillors to be given to the Proper Officer in accordance with standing order 9, or by a motion moved in pursuance of the recommendation of a committee or a sub-committee.
- b When a motion moved pursuant to standing order 7(a) has been disposed of, no similar motion may be moved for a further six months.

8. Voting on appointments

- a Where more than two persons have been nominated for a position to be filled by the council and none of those persons has received an absolute majority of votes in their favour, the name of the person having the least number of votes shall be struck off the list and a fresh vote taken. This process shall continue until a majority of votes is given in favour of one person. A tie in votes may be settled by the casting vote exerciseable by the Chair of the meeting.
- b Canvassing councillors or the members of a committee or sub-committee, directly or indirectly, for appointment to or by the Council shall disqualify the candidate from appointment.

9. Motions for a meeting that require written notice to be given to the Proper Officer

- a A motion shall relate to the responsibilities of the meeting which it is tabled for and in any event shall relate to the performance of the council's statutory functions, powers and obligations or an issue which specifically affects the council's area or its residents.
- b No motion may be moved at a meeting unless it is on the agenda and the mover has given written notice of its wording to the Proper Officer at least 7 clear days before the meeting. Clear days do not include the day of the notice or the day of the meeting.
- c The Proper Officer may, before including a motion on the agenda received in accordance with standing order 9(b) above, correct obvious grammatical or typographical errors in the wording of the motion.
- d If the Proper Officer considers the wording of a motion received in accordance with standing order 9(b) above is not clear in meaning, the motion shall be rejected until the mover of the motion resubmits it in writing to the Proper Officer so that it can be understood at least 3 clear days before the meeting.
- e If the wording or subject of a proposed motion is considered improper, the Proper Officer shall consult with the Chair of the forthcoming meeting or, as the case may be, the councillors who have convened the meeting, to consider whether the motion shall be included in the agenda or rejected.

- f Subject to standing order 9(e) above, the decision of the Proper Officer as to whether or not to include the motion on the agenda shall be final.
- g Motions received shall be recorded in a book for that purpose and numbered in the order that they are received.
- h Motions rejected shall be recorded in a book for that purpose with an explanation by the Proper Officer for their rejection.

10. Motions at a meeting that do not require written notice

- a The following motions may be moved at a meeting without written notice to the Proper Officer;
 - i. to correct an inaccuracy in the draft minutes of a meeting;
 - ii. to move to a vote;
 - iii. to defer consideration of a motion;
 - iv. to refer a motion to a particular committee or sub-committee;
 - v. to appoint a person to preside at a meeting;
 - vi. to change the order of business on the agenda;
 - vii. to proceed to the next business on the agenda;
 - viii. to require a written report;
 - ix. to appoint a committee or sub-committee and their members;
 - x. to extend the time limits for speaking;
 - xi. to exclude the press and public from a meeting in respect of confidential or sensitive information which is prejudicial to the public interest;
 - xii. to not hear further from a councillor or a member of the public;
 - xiii. to exclude a councillor or member of the public for disorderly conduct;
 - xiv. to temporarily suspend the meeting;
 - xv. to suspend a particular standing order (unless it reflects mandatory statutory requirements);
 - xvi. to adjourn the meeting; or
 - xvii. to close a meeting.

11. Handling confidential or sensitive information

See also standing order 20.

- a **The Council shall have in place and keep under review, technical and organisational measures to keep secure information (including personal data) which it holds in paper and electronic form. Such arrangements shall include deciding who has access to personal data and encryption of personal data.**
- b **The Council shall have in place, and keep under review, policies for the retention and safe destruction of all information (including personal data) which it holds in paper and electronic form. The Council's retention policy shall confirm the period for which information (including personal data) shall be retained or if this is not possible the criteria used to determine that period (e.g. the Limitation Act 1980).**
- c **The agenda, papers that support the agenda and the minutes of a meeting shall not disclose or otherwise undermine confidential information or personal data without legal justification.**
- d **Councillors, staff, the Council's contractors and agents shall not disclose confidential information or personal data without legal justification.**

12. Draft minutes

- a If the draft minutes of a preceding meeting have been served on councillors with the agenda to attend the meeting at which they are due to be approved for accuracy, they shall be taken as read.
- b There shall be no discussion about the draft minutes of a preceding meeting except in relation to their accuracy. A motion to correct an inaccuracy in the draft minutes shall be moved in accordance with standing order 10(a)(i) above.
- c The accuracy of draft minutes, including any amendment(s) made to them, shall be confirmed by resolution and shall be signed by the Chair of the meeting and stand as an accurate record of the meeting to which the minutes relate.
- d If the Chair of the meeting does not consider the minutes to be an accurate record of the meeting to which they relate, he shall sign the minutes and include a paragraph in

the following terms or to the same effect:

“The Chair of this meeting does not believe that the minutes of the meeting of the () held on [date] in respect of () were a correct record but his view was not upheld by the meeting and the minutes are confirmed as an accurate record of the proceedings.”

- e Upon a resolution which confirms the accuracy of the minutes of a meeting, the draft minutes or recordings of the meeting for which approved minutes exist shall be destroyed.

13. Code of conduct and dispensations

See also standing order 3(t) above.

England

- a All councillors and non-councillors with voting rights shall observe the code of conduct adopted by the council.
- b Unless he has been granted a dispensation, a councillor or non-councillor with voting rights shall withdraw from a meeting when it is considering a matter in which he has a disclosable pecuniary interest. He may return to the meeting after it has considered the matter in which he had the interest.
- c Unless he has been granted a dispensation, a councillor or non-councillor with voting rights shall withdraw from a meeting when it is considering a matter in which he has another interest if so required by the council's code of conduct. He may return to the meeting after it has considered the matter in which he had the interest.
- d **Dispensation requests shall be in writing and submitted to the Proper Officer** as soon as possible before the meeting, or failing that, at the start of the meeting for which the dispensation is required.
- e A decision as to whether to grant a dispensation shall be made [by the Proper Officer] OR [by a meeting of the council, or committee or sub-committee for which the dispensation is required] and that decision is final.
- f A dispensation request shall confirm:
 - i. the description and the nature of the disclosable pecuniary interest or other interest to which the request for the dispensation relates;
 - ii. whether the dispensation is required to participate at a meeting in a discussion only or a discussion and a vote;

- iii. the date of the meeting or the period (not exceeding four years) for which the dispensation is sought; and
 - iv. an explanation as to why the dispensation is sought.
- g Subject to standing orders 13(d) and (f) above, dispensations requests shall be considered [by the Proper Officer before the meeting or, if this is not possible, at the start of the meeting for which the dispensation is required] OR [at the beginning of the meeting of the council, or committee or a sub-committee for which the dispensation is required].
- h **A dispensation may be granted in accordance with standing order 13(e) above if having regard to all relevant circumstances the following applies:**
 - i. **without the dispensation the number of persons prohibited from participating in the particular business would be so great a proportion of the meeting transacting the business as to impede the transaction of the business or**
 - ii. **granting the dispensation is in the interests of persons living in the council's area or**
 - iii. **it is otherwise appropriate to grant a dispensation.**

14. Code of conduct complaints

- a Upon notification by the District or Unitary Council [(Wales) [County Borough] OR [County Council]] that it is dealing with a complaint that a councillor or non-councillor with voting rights has breached the council's code of conduct, the Proper Officer shall, subject to standing order 11 above, report this to the council.
- b Where the notification in standing order 14(a) above relates to a complaint made by the Proper Officer, the Proper Officer shall notify the Chair of Council of this fact, and the Chair shall nominate another staff member to assume the duties of the Proper Officer in relation to the complaint until it has been determined and the council has agreed what action, if any, to take in accordance with standing order 14(d) below.
- c The council may:
 - i. provide information or evidence where such disclosure is necessary to progress an investigation of the complaint or is required by law;
 - ii. seek information relevant to the complaint from the person or body with statutory responsibility for investigation of the matter;
- d **Upon notification by the District or Unitary Council that a councillor or non-councillor with voting rights has breached the council's code of conduct, the council shall consider what, if any, action to take against him. Such action excludes disqualification or suspension from office.**

15. Proper Officer

- a The Proper Officer shall be either (i) the clerk or (ii) other staff member(s) nominated by the council to undertake the work of the Proper Officer when the Proper Officer is absent.
- b The Proper Officer shall:
- i. **at least three clear days before a meeting of the council, a committee and a sub-committee serve on councillors, by delivery or post at their residences, a signed summons confirming the time, place and the agenda. or** by email.
See standing order 3(b) above for the meaning of clear days for a meeting of a full council and standing order 3 (c) above for a meeting of a committee.
 - ii. **give public notice of the time, place and agenda at least three clear days before a meeting of the council or a meeting of a committee or a sub-committee (provided that the public notice with agenda of an extraordinary meeting of the council convened by councillors is signed by them);**
See standing order 3(b) above for the meaning of clear days for a meeting of a full council and standing order 3(c) above for a meeting of a committee.
 - iii. subject to standing order 9 above, include on the agenda all motions in the order received unless a councillor has given written notice at least 3 days before the meeting confirming his withdrawal of it;
 - iv. **convene a meeting of full council for the election of a new Chair of the Council, occasioned by a casual vacancy in his office;**
 - v. facilitate inspection of the minute book by local government electors;
 - vi. **receive and retain copies of byelaws made by other local authorities;**
 - vii. retain acceptance of office forms from councillors;
 - viii. retain a copy of every councillor's register of interests;
 - ix. assist with responding to requests made under the Freedom of Information Act 2000 and Data Protection Act 1998, in accordance with and subject to the council's policies and procedures relating to the same;
 - x. receive and send general correspondence and notices on behalf of the council except where there is a resolution to the contrary;
 - xi. manage the organisation, storage of, access to and destruction of information held by the council in paper and electronic form;
 - xii. arrange for legal deeds to be executed;
See also standing order 22 below.
 - xiii. arrange or manage the prompt authorisation, approval, and instruction regarding any payments to be made by the council in accordance with the council's financial regulations;
 - xiv. record every planning application notified to the council and the council's response to the local planning authority in a book for such purpose;
 - xv. refer a planning application received by the council to the [Chair or in his absence

the Vice-Chair of the Council] OR [Chair or in his absence Vice-Chair of the Representational Committee within two working days of receipt to facilitate an extraordinary meeting if the nature of a planning application requires consideration before the next ordinary meeting of the Representational committee;

- xvi. manage access to information about the council via the publication scheme; and
- xvii. retain custody of the seal of the council (if any) which shall not be used without a resolution to that effect.

See also standing order 22 below.

16. Responsible Financial Officer

- a The council shall appoint appropriate staff member(s) to undertake the work of the Responsible Financial Officer when the Responsible Financial Officer is absent.

17. Accounts and accounting statements

- a “Proper practices” in standing orders refer to the most recent version of Governance and Accountability for Local Councils – a Practitioners’ Guide.
- b All payments by the council shall be authorised, approved and paid in accordance with the law, proper practices and the council’s financial regulations.
- c The Responsible Financial Officer shall supply to each councillor as soon as practicable after 30 June, 30 September and 31 December in each year a statement to summarise:
 - i. the council’s receipts and payments for each quarter;
 - ii. the council’s aggregate receipts and payments for the year to date;
 - iii. the balances held at the end of the quarter being reported

and which includes a comparison with the budget for the financial year and highlights any actual or potential overspends.

- d As soon as possible after the financial year end at 31 March, the Responsible Financial Officer shall provide:
 - i. each councillor with a statement summarising the council’s receipts and payments for the last quarter and the year to date for information; and
 - ii. to the full council the accounting statements for the year in the form of Section 1 of the annual return, as required by proper practices, for consideration and

approval.

- e The year end accounting statements shall be prepared in accordance with proper practices and applying the form of accounts determined by the council (receipts and payments, or income and expenditure) for a year to 31 March. A completed draft annual return shall be presented to each councillor before the end of the following month of May. The annual return of the council, which is subject to external audit, including the annual governance statement, shall be presented to council for consideration and formal approval before 30 June.

18. Financial controls and procurement

- a. The Council shall consider and approve financial regulations drawn up by the Responsible Financial Officer, which shall include detailed arrangements in respect of the following:
 - i. the keeping of accounting records and systems of internal controls;
 - ii. the assessment and management of financial risks faced by the Council;
 - iii. the work of the independent internal auditor in accordance with proper practices and the receipt of regular reports from the internal auditor, which shall be required at least annually;
 - iv. the inspection and copying by councillors and local electors of the Council's accounts and/or orders of payments; and
 - v. whether contracts with an estimated value below **£25,000** due to special circumstances are exempt from a tendering process or procurement exercise.
- b. Financial regulations shall be reviewed regularly and at least annually for fitness of purpose.
- c. **A public contract regulated by the Public Contracts Regulations 2015 with an estimated value in excess of £25,000 but less than the relevant thresholds referred to in standing order 18(f) is subject to the "light touch" arrangements under Regulations 109-114 of the Public Contracts Regulations 2015 unless it proposes to use an existing list of approved suppliers (framework agreement).**
- d. Subject to additional requirements in the financial regulations of the Council, the tender process for contracts for the supply of goods, materials, services or the execution of works shall include, as a minimum, the following steps:
 - i. a specification for the goods, materials, services or the execution of works shall be drawn up;

- ii. an invitation to tender shall be drawn up to confirm (i) the Council's specification (ii) the time, date and address for the submission of tenders (iii) the date of the Council's written response to the tender and (iv) the prohibition on prospective contractors contacting councillors or staff to encourage or support their tender outside the prescribed process;
 - iii. the invitation to tender shall be advertised in a local newspaper and in any other manner that is appropriate;
 - iv. tenders are to be submitted in writing in a sealed marked envelope addressed to the Proper Officer;
 - v. tenders shall be opened by the Proper Officer in the presence of at least one councillor after the deadline for submission of tenders has passed;
 - vi. tenders are to be reported to and considered by the appropriate meeting of the Council or a committee or sub-committee with delegated responsibility.
- e. Neither the Council, nor a committee or a sub-committee with delegated responsibility for considering tenders, is bound to accept the lowest value tender.
- f. **Where the value of a contract is likely to exceed the threshold specified by the Office of Government Commerce from time to time, the Council must consider whether the Public Contracts Regulations 2015 or the Utilities Contracts Regulations 2016 apply to the contract and, if either of those Regulations apply, the Council must comply with procurement rules. NALC's procurement guidance contains further details.**

19. Handling staff matters

- a. A matter personal to a member of staff that is being considered by a meeting of council OR the Staffing & Appeals Committee is subject to standing order 11 above.
- b. Subject to the council's policy regarding absences from work, the council's most senior member of staff shall notify the Chair of the Staffing & Appeals Committee or, if he is not available, the vice-Chair of the Staffing & Appeals Committee of absence occasioned by illness or other reason and that person shall report such absence to the Staffing & Appeals Committee at its next meeting.
- c. The Chair of the Staffing & Appeals Committee or in his absence, the vice-Chair shall upon a resolution conduct a review of the performance and annual appraisal of the work of Town Clerk. The reviews and appraisal shall be reported in writing and is subject to approval by resolution by Staffing & Appeals Committee.
- d. Subject to the council's policy regarding the handling of grievance matters, the council's most senior employee (or other employees) shall contact the Chair of [Staffing

& Appeals Committee or in his absence, the vice-Chair of Staffing & Appeals Committee in respect of an informal or formal grievance matter, and this matter shall be reported back and progressed by resolution of the Staffing & Appeals Committee.

- e Subject to the council's policy regarding the handling of grievance matters, if an informal or formal grievance matter raised by the Town Clerk relates to the Chair or vice-Chair of Staffing & Appeals Committee, this shall be communicated to another member of Staffing & Appeals Committee, which shall be reported back and progressed by resolution of Policy & Finance Committee.
- f Any persons responsible for all or part of the management of staff shall treat the written records of all meetings relating to their performance, capabilities, grievance or disciplinary matters as confidential and secure.
- g The council shall keep all written records relating to employees secure. All paper records shall be secured and locked and electronic records shall be password protected and encrypted.
- h Only persons with line management responsibilities shall have access to staff records referred to in standing orders 19(f) and (g) above if so justified.
- i Access and means of access by keys and/or computer passwords to records of employment referred to in standing orders 19(f) and (g) above shall be provided only to the Town Clerk.

20. Requests for information

See also standing order 21.

- a **In accordance with freedom of information legislation, the Council shall publish information in accordance with its publication scheme and respond to requests for information held by the Council.**
- i. **[If gross annual income or expenditure (whichever is the higher) exceeds £200,000] The Council, shall publish information in accordance with the requirements of the Local Government (Transparency Requirements) (England) Regulations 2015.**

21. RESPONSIBILITIES UNDER DATA PROTECTION LEGISLATION

(Below is not an exclusive list).

See also standing order 11.

- a The Council may appoint a Data Protection Officer.
- b **The Council shall have policies and procedures in place to respond to an individual exercising statutory rights concerning his/her/their personal data.**
- c **The Council shall have a written policy in place for responding to and managing a personal data breach.**
- d **The Council shall keep a record of all personal data breaches comprising the facts relating to the personal data breach, its effects and the remedial action taken.**
- e **The Council shall ensure that information communicated in its privacy notice(s) is in an easily accessible and available form and kept up to date.**
- f **The Council shall maintain a written record of its processing activities.**

22. Relations with the press/media

- a Requests from the press or other media for an oral or written comment or statement from the Council, its councillors or staff shall be handled in accordance with the Council's policy in respect of dealing with the press and/or other media.

23. Execution and sealing of legal deeds

See also standing orders 15(b)(xii) and (xvii) above.

- a A legal deed shall not be executed on behalf of the council unless authorised by a resolution.
- b **Subject to standing order 22(a) above, any two councillors may sign, on behalf of the council, any deed required by law and the Proper Officer shall witness their signatures.**

24. Communicating with District and County or Unitary councillors

- a An invitation to attend a meeting of the council shall be sent, together with the agenda, to the ward councillor(s) of the Unitary Council representing the area of the council.

- b Unless the council determines otherwise, a copy of each letter sent to the Unitary Council shall be sent to the ward councillor(s) representing the area of the council.

25. Restrictions on councillor activities

- a Unless authorised by a resolution, no councillor shall:
 - i. inspect any land and/or premises which the council has a right or duty to inspect; or
 - ii. issue orders, instructions or directions.

26. Standing orders generally

- a All or part of a standing order, except one that incorporates mandatory statutory requirements, may be suspended by resolution in relation to the consideration of an item on the agenda for a meeting.
- b A motion to add to or vary or revoke one or more of the council's standing orders, except one that incorporates mandatory statutory requirements, shall be proposed by a special motion, the written notice by at least 4 councillors to be given to the Proper Officer in accordance with standing order 9 above.
- c The Proper Officer shall provide a copy of the council's standing orders to a councillor as soon as possible after he has delivered his acceptance of office form.
- d The decision of the Chair of a meeting as to the application of standing orders at the meeting shall be final.



Item 16.

FINANCIAL REGULATIONS



REPORT

Ludlow Town Council FINANCIAL REGULATIONS Report No. FC/25/14

**Full Council
14th April 2025**

1. INTRODUCTION

- 1.1 This report explains NALC updates made in line with new procurement legislation to the Model Financial Regulations (England).

2. RECOMMENDATION

- 2.1 To adopt the NALC changes.

3. BACKGROUND

- 3.1 Model financial regulations for parish and town councils are standardised guidelines designed to ensure the proper management and oversight of financial activities within these councils. These regulations provide a framework for financial governance, helping councils maintain transparency, accountability, and efficiency in their financial operations. They are crucial for safeguarding public funds and promoting good governance practices.
- 3.2 The NALC template was last updated on 5 March 2025 and was issued by NALC finance advisor, Parkinson Partnership LLP.

4. CURRENT SITUATION

- 4.1 The changes are made to points 5.4, 5.7, and 5.11.

- 4.2 The changes reflect changes to Procurement legislation. The Council's Financial regulations show the text that is to be omitted struck through and highlighted in red, and this is followed by the new text, also highlighted in red.

Town Clerk
April 2025

Implications

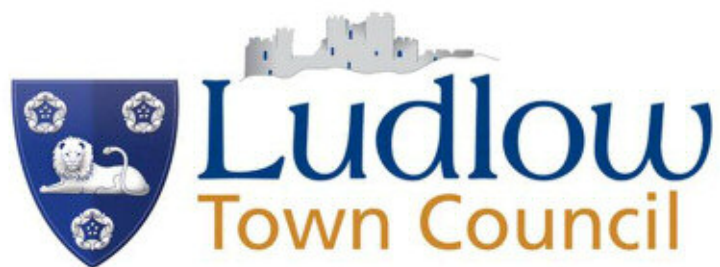
Wards Affected (All)

Financial (as described in the report)

Health & Safety (Effective management of risk)

Law & Order (none)

Environmental Implications (undetermined)



NALC

MODEL FINANCIAL REGULATIONS FOR LOCAL COUNCILS

Approved by FC - May 2024.

Amended and approved by FC – 20th January 2025

**Amended in line with NALC template changes and re-adopted by
FC on 14 April 2025**

LUDLOW TOWN COUNCIL FINANCIAL REGULATIONS

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These Financial Regulations were adopted by the Council at its meeting held on the **20TH January 2025.**

1. General

- 1.1. These Financial Regulations govern the financial management of the Council and may only be amended or varied by resolution of the Council. They are one of the Council's governing documents and shall be observed in conjunction with the Council's Standing Orders.
- 1.2. Councillors are expected to follow these regulations and not to entice employees to breach them. Failure to follow these regulations brings the office of Councillor into disrepute.
- 1.3. Wilful breach of these regulations by an employee may result in disciplinary proceedings.
- 1.4. In these Financial Regulations:
 - 'Accounts and Audit Regulations' means the regulations issued under Sections 32, 43(2) and 46 of the Local Audit and Accountability Act 2014, or any superseding legislation, and then in force, unless otherwise specified.
 - "Approve" refers to an online action, allowing an electronic transaction to take place.
 - "Authorise" refers to a decision by the Council, or a Committee or an officer, to allow something to happen.
 - 'Proper practices' means those set out in *The Practitioners' Guide*
 - *Practitioners' Guide* refers to the guide issued by the Joint Panel on Accountability and Governance (JPAG) and published by NALC in England or Governance and Accountability for Local Councils in Wales – A Practitioners Guide jointly published by One Voice Wales and the Society of Local Council Clerks in Wales.
 - 'Must' and **bold text** refer to a statutory obligation the Council cannot change.
 - 'Shall' refers to a non-statutory instruction by the Council to its Members and staff.
- 1.5. The Responsible Financial Officer (RFO) holds a statutory office, appointed by the Council. The Clerk has been appointed as RFO and these regulations apply accordingly.

The RFO:

 - acts under the policy direction of the Council;
 - administers the Council's financial affairs in accordance with all Acts, Regulations and proper practices;
 - determines on behalf of the Council its accounting records and control systems;
 - ensures the accounting control systems are observed;
 - ensures the accounting records are kept up to date;
 - seeks economy, efficiency and effectiveness in the use of Council resources; and
 - produces financial management information as required by the Council.

- 1.6. **The Council must not delegate any decision regarding:**
- **setting the final budget or the precept (Council tax requirement);**
 - **the outcome of a review of the effectiveness of its internal controls**
 - **approving accounting statements;**
 - **approving an annual governance statement;**
 - **borrowing;**
 - **declaring eligibility for the General Power of Competence; and**
 - **addressing recommendations from the internal or external auditors**
- 1.7. In addition, the Council shall:
- determine and regularly review the bank mandate for all Council bank accounts;
 - authorise any grant or single commitment in excess of £5,000; and
- 2. Risk management and internal control**
- 2.1. **The Council must ensure that it has a sound system of internal control, which delivers effective financial, operational and risk management.**
- 2.2. The Clerk shall prepare, for approval by the Council, a risk management policy covering all activities of the Council. This policy and consequential risk management arrangements shall be reviewed by the Council at least annually.
- 2.3. When considering any new activity, the Clerk shall prepare a draft risk assessment including risk management proposals for consideration by the Council.
- 2.4. **At least once a year, the Council must review the effectiveness of its system of internal control, before approving the Annual Governance Statement.**
- 2.5. **The accounting control systems determined by the RFO must include measures to:**
- **ensure that risk is appropriately managed;**
 - **ensure the prompt, accurate recording of financial transactions;**
 - **prevent and detect inaccuracy or fraud; and**
 - **allow the reconstitution of any lost records;**
 - **identify the duties of officers dealing with transactions and**
 - **ensure division of responsibilities.**
- 2.6. At least once in each quarter, and at each financial year end, a Member other than the Chair or a signatory shall be appointed to verify bank reconciliations for all accounts produced by the RFO. The Member shall sign and date the reconciliations and the original bank statements as evidence of this. This activity, including any exceptions, shall be reported to and noted by Policy & Finance Committee.

- 2.7. Regular back-up copies shall be made of the records on any Council computer and stored either online or in a separate location from the computer. The Council shall put measures in place to ensure that the ability to access any Council computer is not lost if an employee leaves or is incapacitated for any reason.

3. Accounts and audit

- 3.1. All accounting procedures and financial records of the Council shall be determined by the RFO in accordance with the Accounts and Audit Regulations.
- 3.2. **The accounting records determined by the RFO must be sufficient to explain the Council's transactions and to disclose its financial position with reasonably accuracy at any time. In particular, they must contain:**
- **day-to-day entries of all sums of money received and expended by the Council and the matters to which they relate;**
 - **a record of the assets and liabilities of the Council;**
- 3.3. The accounting records shall be designed to facilitate the efficient preparation of the accounting statements in the Annual Governance and Accountability Return.
- 3.4. The RFO shall complete and certify the annual Accounting Statements of the Council contained in the Annual Governance and Accountability Return in accordance with proper practices, as soon as practicable after the end of the financial year. Having certified the Accounting Statements, the RFO shall submit them to the Council, within the timescales required by the Accounts and Audit Regulations.
- 3.5. **The Council must ensure that there is an adequate and effective system of internal audit of its accounting records and internal control system in accordance with proper practices.**
- 3.6. **Any officer or Member of the Council must make available such documents and records as the internal or external auditor consider necessary for the purpose of the audit** and shall, as directed by the Council, supply the RFO, internal auditor, or external auditor with such information and explanation as the Council considers necessary.
- 3.7. The internal auditor shall be appointed by the Council and shall carry out their work to evaluate the effectiveness of the Council's risk management, control and governance processes in accordance with proper practices specified in the Practitioners' Guide.
- 3.8. The Council shall ensure that the internal auditor:
- is competent and independent of the financial operations of the Council;
 - reports to Council in writing, or in person, on a regular basis with a minimum of one written report during each financial year;

- can demonstrate competence, objectivity and independence, free from any actual or perceived conflicts of interest, including those arising from family relationships; and
 - has no involvement in the management or control of the Council
- 3.9. Internal or external auditors may not under any circumstances:
- perform any operational duties for the Council;
 - initiate or approve accounting transactions;
 - provide financial, legal or other advice including in relation to any future transactions; or
 - direct the activities of any Council employee, except to the extent that such employees have been appropriately assigned to assist the internal auditor.
- 3.10. For the avoidance of doubt, in relation to internal audit the terms 'independent' and 'independence' shall have the same meaning as described in The Practitioners Guide.
- 3.11. The RFO shall make arrangements for the exercise of electors' rights in relation to the accounts, including the opportunity to inspect the accounts, books, and vouchers and display or publish any notices and documents required by the Local Audit and Accountability Act 2014, or any superseding legislation, and the Accounts and Audit Regulations.
- 3.12. The RFO shall, without undue delay, bring to the attention of all Councillors any correspondence or report from internal or external auditors.

4. Budget and precept

- 4.1. **Before setting a precept, the Council must calculate its Council tax requirement for each financial year by preparing and approving a budget, in accordance with The Local Government Finance Act 1992 or succeeding legislation.**
- 4.2. Budgets for salaries and wages, including employer contributions shall be reviewed by the Council at least annually in January for the following financial year and the final version shall be evidenced by a hard copy schedule signed by the Clerk and the Chair of the Council.
- 4.3. No later than December each year, the RFO shall prepare a draft budget with detailed estimates of all income and expenditure for the following financial year, taking account of the lifespan of assets and cost implications of repair or replacement.
- 4.4. Unspent budgets for completed projects shall not be carried forward to a subsequent year. Unspent funds for partially completed projects may only be carried forward (by placing them in an earmarked reserve) with the formal approval of the full Council.
- 4.5. Each Committee shall review its draft budget and submit any proposed amendments to the Council not later than the end of November each year.

- 4.6. The draft budget with any Committee proposals and forecast, including any recommendations for the use or accumulation of reserves, shall be considered by the Budget Taks & Finish Group and a recommendation made to the Council.
- 4.7. Having considered the proposed budget and forecast, the Council shall determine its Council tax requirement by setting a budget. The Council shall set a precept for this amount no later than the end of January for the ensuing financial year.
- 4.8. **Any Member with Council tax unpaid for more than two months is prohibited from voting on the budget or precept by Section 106 of the Local Government Finance Act 1992 and must and must disclose at the start of the meeting that Section 106 applies to them.**
- 4.9. The RFO shall **issue the precept to the billing authority no later than the end of February** and supply each Member with a copy of the agreed annual budget.
- 4.10. The agreed budget provides a basis for monitoring progress during the year by comparing actual spending and income against what was planned.
- 4.11. Any addition to, or withdrawal from, any earmarked reserve shall be agreed by the Council or Policy & Finance Committee.

5. Procurement

- 5.1. **Members and officers are responsible for obtaining value for money at all times.** Any officer procuring goods, services or works should ensure, as far as practicable, that the best available terms are obtained, usually by obtaining prices from several suppliers.
- 5.2. The RFO should verify the lawful nature of any proposed purchase before it is made and in the case of new or infrequent purchases, should ensure that the legal power being used is reported to the meeting at which the order is authorised and also recorded in the minutes.
- 5.3. Every contract shall comply with these the Council's Standing Orders and these Financial Regulations and no exceptions shall be made, except in an emergency.
- 5.4. ~~For a contract for the supply of goods, services or works where the estimated value will exceed the thresholds set by Parliament, the full requirements of The Public Contracts Regulations 2015 or any superseding legislation ("the Legislation"), must be followed in respect of the tendering, award and notification of that contract.~~

For a contract for the supply of goods, services or works where the estimated value will exceed the thresholds set by Parliament, the full requirements of The Procurement Act 2023 and The Procurement Regulations 2024 or any superseding legislation ("the Legislation"), must

be followed in respect of the tendering, award and notification of that contract.

- 5.5. Where the estimated value is below the Government threshold, the Council shall (with the exception of items listed in paragraph 6.12) obtain prices as follows:
- 5.6. For contracts estimated to exceed £60,000 including VAT, the Clerk shall seek formal tenders from at least three suppliers agreed by the Council OR advertise an open invitation for tenders in compliance with any relevant provisions of the Legislation. Tenders shall be invited in accordance with Appendix 1.
- 5.7. ~~For contracts estimated to be over £30,000 including VAT, the Council must comply with any requirements of the Legislation¹ regarding the advertising of contract opportunities and the publication of notices about the award of contracts.~~

For contracts estimated to be over £30,000 including VAT, the council must comply with any requirements of the Legislation regarding the publication of invitations and notices.

- 5.8. For contracts greater than £4,000 excluding VAT the Clerk shall seek at least 3 fixed-price quotes;
- 5.9. Where the value is between £500 and £4,000 excluding VAT, the Clerk shall try to obtain 3 estimates which might include evidence of online prices, or recent prices from regular suppliers.
- 5.10. For smaller purchases, the clerk shall seek to achieve value for money.
- 5.11. ~~Contracts must not be split into smaller lots to avoid compliance with these rules.~~

Contracts must not be split to avoid compliance with these rules.

- 5.12. The requirement to obtain competitive prices in these regulations need not apply to contracts that relate to items (i) to (iv) below:
- i. specialist services, such as legal professionals acting in disputes;
 - ii. repairs to, or parts for, existing machinery or equipment;
 - iii. works, goods or services that constitute an extension of an existing contract;
 - iv. goods or services that are only available from one supplier or are sold at a fixed price.
- 5.13. When applications are made to waive this financial regulation to enable a price to be negotiated without competition, the reason should be set out in a

¹ The Regulations require Councils to use the Contracts Finder website if they advertise contract opportunities and also to publicise the award of contracts over £30,000 including VAT, regardless of whether they were advertised.

recommendation to the Council. Avoidance of competition is not a valid reason.

- 5.14. The Council shall not be obliged to accept the lowest or any tender, quote or estimate.
- 5.15. Individual purchases within an agreed budget for that type of expenditure may be authorised by:
- the Clerk, under delegated authority, for any items below £2,500 excluding VAT.
 - the Clerk, in consultation with the Chair of the Council or Chair of the appropriate Committee, for any items below £5,000 excluding VAT.
 - in respect of grants, a duly authorised Committee within any limits set by Council and in accordance with any policy statement agreed by the Council.
 - the Council for all items over £5,000;
- Such authorisation must be supported by a minute (in the case of Council or Committee decisions) or other auditable evidence trail.
- 5.16. No individual Member, or informal group of Members may issue an official order or make any contract on behalf of the Council.
- 5.17. No expenditure may be authorised that will exceed the budget for that type of expenditure other than by resolution of the Council or a duly delegated Committee acting within its Terms of Reference except in an emergency.
- 5.18. In cases of serious risk to the delivery of Council services or to public safety on Council premises, the clerk may authorise expenditure of up to £30,000 excluding VAT on repair, replacement or other work that in their judgement is necessary, whether or not there is any budget for such expenditure. The Clerk shall report such action to the Chair as soon as possible and to the Council as soon as practicable thereafter.
- 5.19. No expenditure shall be authorised, no contract entered into or tender accepted in relation to any major project, unless the Council is satisfied that the necessary funds are available and that where a loan is required, Government borrowing approval has been obtained first.
- 5.20. An official order or letter shall be issued for all work, goods and services above £250 excluding VAT unless a formal contract is to be prepared or an official order would be inappropriate. Copies of orders shall be retained, along with evidence of receipt of goods.
- 5.21. Any ordering system can be misused and access to them shall be controlled by the RFO.

6. Banking and payments

- 6.1. The Council's banking arrangements, including the bank mandate, shall be made by the RFO and authorised by the Council; banking arrangements shall

not be delegated to a Committee. The Council has resolved to bank with Barclays bank. The arrangements shall be reviewed annually for security and efficiency.

- 6.2. The Council must have safe and efficient arrangements for making payments, to safeguard against the possibility of fraud or error. Wherever possible, more than one person should be involved in any payment, for example by dual online authorisation or dual cheque signing. Even where a purchase has been authorised, the payment must also be authorised, and only authorised payments shall be approved or signed to allow the funds to leave the Council's bank.
- 6.3. All invoices for payment should be examined for arithmetical accuracy, analysed to the appropriate expenditure heading and verified to confirm that the work, goods or services were received, checked and represent expenditure previously authorised by the Council before being certified by the RFO. Where the certification of invoices is done as a batch, this shall include a dated signature by the RFO that all invoices listed have been 'examined, verified and certified' by the RFO.
- 6.4. Personal payments (including salaries, wages, expenses and any payment made in relation to the termination of employment) may be summarised to avoid disclosing any personal information.
- 6.5. All payments shall be made by online banking or cheque, in accordance with a resolution of the Council or a delegated decision by the clerk, unless the Council resolves to use a different payment method.
- 6.6. For each financial year the RFO may draw up a schedule of regular payments due in relation to a continuing contract or obligation (such as Salaries, PAYE, National Insurance, pension contributions, rent, rates, regular maintenance contracts and similar items), which the Council or a duly delegated Committee may authorise in advance for the year.
- 6.7. A copy of this schedule of regular payments shall be approved by Policy & Finance Committee - to reduce the risk of duplicate payments.
- 6.8. A list of such payments shall be reported to the next appropriate meeting of the Policy & Finance Committee for information only.
- 6.9. The Clerk and RFO shall have delegated authority to authorise payments in the following circumstances:
 - i. any payments of up to £50,000 excluding VAT, within an agreed budget.
 - ii. payments of up to £30,000 excluding VAT in cases of serious risk to the delivery of Council services or to public safety on Council premises.
 - iii. any payment necessary to avoid a charge under the Late Payment of Commercial Debts (Interest) Act 1998 or to comply with contractual terms, where the due date for payment is before the next scheduled meeting of [the Council], where the Clerk certifies that there is no dispute or other reason to delay payment, provided that a list of such payments shall be

submitted to the next appropriate meeting of Policy & Finance Committee.

- iv. Fund transfers within the Councils banking arrangements up to the sum of £100,000, provided that a list of such payments shall be submitted to the next appropriate meeting of Policy & Finance Committee.

6.10. The RFO shall present a schedule of payments made, or requiring authorisation, forming part of the agenda for the Policy & Finance Committee meeting. The Committee shall review the schedule for compliance and, having satisfied itself, shall approve payments made, or requiring authorisation, by resolution. A detailed list of all payments shall be disclosed within or as an attachment to the minutes of that meeting.

7. Electronic payments

- 7.1. Where internet banking arrangements are made with any bank, the RFO shall be appointed as the Service Administrator. The bank mandate agreed by the Council shall identify a number of Councillors who will be authorised to approve transactions on those accounts and a minimum of two people will be involved in any online approval process.
- 7.2. All authorised signatories shall have access to view the Council's bank statements.
- 7.3. No employee or Councillor shall disclose any PIN or password, relevant to the Council or its banking, to anyone not authorised in writing by the Council.
- 7.4. The Service Administrator shall approve all items due for payment online. A list of payments for approval shall be provided to all Councillors by email; and together with copies of the relevant invoices, shall be provided by email or as a paper copy to two authorised signatories.
- 7.5. If the prolonged absence of the Service Administrator delays online payment of invoices, the invoices shall be approved by the deputy clerk paid by cheque before the return of the Service Administrator.
- 7.6. Two Councillors who are authorised signatories shall check the payment details against the invoices before approving each payment using the online banking system or by cheque.
- 7.7. Evidence shall be retained showing which Members approved the payment online and the transaction reference confirming that the payment has been made shall be appended to the invoice for audit purposes.
- 7.8. A full list of all payments made in a month shall be provided to the next Policy & Finance meeting.
- 7.9. With the approval of the Town Clerk in each case, regular payments (such as gas, electricity, telephone, broadband, water, National Non-Domestic Rates, refuse collection, pension contributions and HMRC payments) may be made by

variable direct debit, provided that the instructions are signed/approved by two authorised Members or the RFO. All direct debits payments are reported retrospectively in a timely manner to Policy and Finance Committee as part of their financial monitoring remit. The approval of the use of each variable direct debit shall be reviewed by the Council at least annually.

- 7.10. Payment may be made by BACS or CHAPS by resolution of the Council or Policy & Finance Committee provided that each payment is approved online by two authorised bank signatories, evidence is retained, and any payments are reported to Policy & Finance Committee at the next meeting. The approval of the use of BACS or CHAPS shall be renewed by resolution of the Council at least every two years.
- 7.11. If thought appropriate by the Council, regular payments of fixed sums may be made by banker's standing order, provided that the instructions are signed or approved by two Members, evidence of this is retained and any payments are reported to Council when made. The approval of the use of a banker's standing order shall be reviewed by the Council at least every two years.
- 7.12. Account details for suppliers may only be changed upon written notification by the supplier verified by the Clerk. This is a potential area for fraud and the clerk should ensure that any change is genuine. Data held should be checked with suppliers every two years.
- 7.13. Members and officers shall ensure that any computer used for the Council's financial business has adequate security, with anti-virus, anti-spyware and firewall software installed and regularly updated.
- 7.14. Remembered password facilities other than secure password stores requiring separate identity verification should not be used on any computer used for Council banking.

8. Cheque payments

- 8.1. Cheques or orders for payment in accordance with a resolution or delegated decision shall be signed by two Members and countersigned by the Clerk.
- 8.2. A signatory having a family or business relationship with the beneficiary of a payment shall not, under normal circumstances, be a signatory to that payment.
- 8.3. To indicate agreement of the details on the cheque with the counterfoil and the invoice or similar documentation, the signatories shall also initial the cheque counterfoil and invoice.

9. Payment cards

- 9.1. Any Debit Card issued for use will be specifically restricted to the Clerk and will also be restricted to a single transaction maximum value of £5,000 unless authorised by Council or Policy and Finance Committee in writing before any order is placed.

- 9.2. A pre-paid debit card may be issued to employees with varying limits. These limits will be set by the Council. Transactions and purchases made will be reported to Policy & Finance Committee and authority for topping-up shall be at the discretion of the clerk.
- 9.3. Any corporate credit card or trade card account opened by the Council will be specifically restricted to use by the clerk and officers authorised by the clerk and any balance shall be paid in full each month.
- 9.4. Personal credit or debit cards of Members or staff shall not be used except for expenses of up to £250 including VAT, authorised by the clerk and incurred in accordance with Council policy.

10. Petty Cash

- 10.1. The RFO shall maintain a petty cash imprest account of £200 and may provide petty cash to officers for the purpose of defraying operational and other expenses. In addition, approved cash floats for providing change for service users are £50 for museum till, £20 for the market, and £30 for the toilet coin, and are recorded on the balance sheet.
- a) Vouchers for payments made from petty cash shall be kept, along with receipts to substantiate every payment. Replenishment of floats is recorded in writing on each occurrence.
 - b) Cash income received must not be paid into the petty cash float without being separately recorded on the banking record, to ensure there is an audit trail for all income as provided elsewhere in these regulations.
 - c) Payments to maintain the petty cash float shall be shown separately on any schedule of payments presented for approval.

11. Payment of salaries and allowances

- 11.1. **As an employer, the Council must make arrangements to comply with the statutory requirements of PAYE legislation.**
- 11.2. **Councillors allowances (where paid) are also liable to deduction of tax under PAYE rules and must be taxed correctly before payment.**
- 11.3. Salary rates shall be agreed by the Council or Staffing Committee. No changes shall be made to any employee's gross pay, emoluments, or terms and conditions of employment without the prior consent of the Council or Staffing Committee.
- 11.4. Payment of salaries shall be made, after deduction of tax, national insurance, pension contributions and any similar statutory or discretionary deductions, on the dates stipulated in employment contracts.
- 11.5. Deductions from salary shall be paid to the relevant bodies within the required timescales, provided that each payment is reported, as set out in these regulations above.

- 11.6. Each payment to employees of net salary and to the appropriate creditor of the statutory and discretionary deductions shall be recorded in a payroll control account or other separate confidential record, with the total of such payments each calendar month reported in the cashbook. The Establishment list will be reviewed annually by the Staffing Committee to ensure that the correct payments have been made.
- 11.7. Any termination payments shall be supported by a report to the Council, setting out a clear business case. Termination payments shall only be authorised by the full Council.
- 11.8. Before employing interim staff, the Council must consider a full business case.

12. Loans and investments

- 12.1. Any application for Government approval to borrow money and subsequent arrangements for a loan must be authorised by the full Council and recorded in the minutes. All borrowing shall be in the name of the Council, after obtaining any necessary approval.
- 12.2. Any financial arrangement which does not require formal borrowing approval from the Secretary of State (such as Hire Purchase, Leasing of tangible assets or loans to be repaid within the financial year) must be authorised by the full Council, following a written report on the value for money of the proposed transaction.
- 12.3. The Council shall consider the requirement for an Investment Strategy and Policy in accordance with Statutory Guidance on Local Government Investments, which must be written in accordance with relevant regulations, proper practices and guidance. Any Strategy and Policy shall be reviewed by the Council at least annually.
- 12.4. All investment of money under the control of the Council shall be in the name of the Council.
- 12.5. All investment certificates and other documents relating thereto shall be retained in the custody of the RFO.
- 12.6. Payments in respect of short term or long-term investments, including transfers between bank accounts held in the same bank, shall be made in accordance with these regulations.

13. Income

- 13.1. The collection of all sums due to the Council shall be the responsibility of and under the supervision of the RFO.
- 13.2. The Council will review all fees and charges for work done, services provided, or goods sold at least annually as part of the budget-setting process, following

a report of the Clerk. The Clerk shall be responsible for the collection of all amounts due to the Council.

- 13.3. Any sums found to be irrecoverable and any bad debts shall be reported to the Council by the Clerk / RFO and shall be written off in the year. The Council's approval shall be shown in the accounting records.
- 13.4. All sums received on behalf of the Council shall be recorded for audit trail purposes deposited with the Council's bankers, with such frequency as the RFO considers necessary. The origin of each receipt shall clearly be recorded on the paying-in slip or other record.
- 13.5. Personal cheques shall not be cashed out of money held on behalf of the Council.
- 13.6. Any repayment claim under section 33 of the VAT Act 1994 shall be made quarterly where the claim exceeds £100 and at least annually at the end of the financial year.
- 13.7. Where significant sums of cash are regularly received by the Council, the RFO shall ensure that more than one person is present when the cash is counted in the first instance, that there is a reconciliation to some form of control record such as ticket issues, and that appropriate care is taken for the security and safety of individuals banking such cash.

14. Payments under contracts for building or other construction works

- 14.1. Where contracts provide for payment by instalments the RFO shall maintain a record of all such payments, which shall be made within the time specified in the contract based on signed certificates from the architect or other consultant engaged to supervise the works.
- 14.2. Any variation of, addition to or omission from a contract must be authorised by the Clerk to the contractor in writing, with the Council being informed where the final cost is likely to exceed the contract sum by 15% or more, or likely to exceed the budget available.

15. Stores and equipment

- 15.1. The officer in charge of each section shall be responsible for the care and custody of stores and equipment in that section.
- 15.2. Delivery notes shall be obtained in respect of all goods received into store or otherwise delivered and goods must be checked as to order and quality at the time delivery is made.
- 15.3. Stocks shall be kept at the minimum levels consistent with operational requirements.

- 15.4. The RFO shall be responsible for periodic checks of stocks and stores, at least annually.

16. Assets, properties and estates

- 16.1. The Clerk shall make arrangements for the safe custody of all title deeds and Land Registry Certificates of properties held by the Council.
- 16.2. The RFO shall ensure that an appropriate and accurate Register of Assets and Investments is kept up to date, with a record of all properties held by the Council, their location, extent, plan, reference, purchase details, nature of the interest, tenancies granted, rents payable and purpose for which held, in accordance with Accounts and Audit Regulations.
- 16.3. The continued existence of tangible assets shown in the Register shall be verified at least annually, possibly in conjunction with a health and safety inspection of assets.
- 16.4. No interest in land shall be purchased or otherwise acquired, sold, leased or otherwise disposed of without the authority of the Council, together with any other consents required by law. In each case a written report shall be provided to Council in respect of valuation and surveyed condition of the property (including matters such as planning permissions and covenants) together with a proper business case (including an adequate level of consultation with the electorate where required by law).
- 16.5. No tangible moveable property shall be purchased or otherwise acquired, sold, leased or otherwise disposed of, without the authority of the Council, together with any other consents required by law, except where the estimated value of any one item does not exceed the values stated in the Council's asset disposal policy. In each case a written report shall be provided to Council with a full business case.

17. Insurance

- 17.1. The RFO shall keep a record of all insurances effected by the Council and the property and risks covered, reviewing these annually before the renewal date in conjunction with the Council's review of risk management.
- 17.2. The Clerk shall give prompt notification to insurers of all new risks, properties or vehicles which require to be insured and of any alterations affecting existing insurances.
- 17.3. The RFO shall be notified of any loss, liability, damage or event likely to lead to a claim, and shall report these to the Council at the next available meeting. The RFO shall negotiate all claims on the Council's insurers.

- 17.4. All appropriate Members and employees of the Council shall be included in a suitable form of security or fidelity guarantee insurance which shall cover the maximum risk exposure as determined annually by the Council.

18. Suspension and revision of Financial Regulations

- 18.1. The Council shall review these Financial Regulations annually and following any change of clerk / RFO. The Clerk shall monitor changes in legislation or proper practices and advise the Council of any need to amend these Financial Regulations.
- 18.2. The Council may, by resolution duly notified prior to the relevant meeting of Council, suspend any part of these Financial Regulations, provided that reasons for the suspension are recorded and that an assessment of the risks arising has been presented to all Members. Suspension does not disapply any legislation or permit the Council to act unlawfully.
- 18.3. The Council may temporarily amend these Financial Regulations by a duly notified resolution, to cope with periods of absence, local government reorganisation, national restrictions or other exceptional circumstances.

Appendix 1 - Tender process

- 1) Any invitation to tender shall state the general nature of the intended contract and the Clerk shall obtain the necessary technical assistance to prepare a specification in appropriate cases.
- 2) The invitation shall in addition state that tenders must be addressed to the Clerk in the ordinary course of post, unless an electronic tendering process has been agreed by the Council.
- 3) Where a postal process is used, each tendering firm shall be supplied with a specifically marked envelope in which the tender is to be sealed and remain sealed until the prescribed date for opening tenders for that contract. All sealed tenders shall be opened at the same time on the prescribed date by the Clerk in the presence of at least one Member of Council.
- 4) Where an electronic tendering process is used, the Council shall use a specific email address that will be monitored to ensure that nobody accesses any tender before the expiry of the deadline for submission.
- 5) Any invitation to tender issued under this regulation shall be subject to Standing Order 18 and shall refer to the terms of the Bribery Act 2010.
- 6) Where the Council, or duly delegated Committee, does not accept any tender, quote or estimate, the work is not allocated and the Council requires further pricing, no person shall be permitted to submit a later tender, estimate or quote who was present when the original decision-making process was being undertaken.

Item 17.

PROJECT UPDATE

Action Plan 2024 / 25 – Updated April 2025

Governance	Aims	Objectives	Actions	Budget	Completion Date(s)
Minutes	Maintain effective communication.	Councillors and public have access to up-to-date information.	Draft minutes released to Councillors within five working days of completion. Approved minutes appear on website within 10 working days of approval.	102/4000	Ongoing as per meeting calendar. https://www.ludlow.gov.uk/your-council/council-and-committee-meetings
Items to Action (ITA)	Maintain adequate monitoring of items to be actioned.	Timely reporting / monitoring for Council and committee.	ITAs are reviewed and progress reported on a quarterly basis.	102/4000	Ongoing for each committee to note item as per meeting calendar. Full review in March, June, September, and December.
Project updates	Maintain adequate reporting and monitoring of the progress of projects	Councillors and public have access to up-to-date information.	To provide quarterly updates on each stage of projects to completion.	102/4000	Reported to Council in March, June, September, and December.
Governance	Area	Aims	Objectives		Actions
Policies	Improve access to policies.	Easy to read and understand policies.	Update policies on website	102/4000	Ongoing
			Change the format of all 80 policies to the agreed policy template.		Ongoing through P&F Committee
Assets	Improve reporting and budget preparation.	To create an asset register that is easy to integrate and update with a robust audit trail; and create an asset register that supports forward budgeting planning.	Creation of an Asset Disposal Policy and procedure		Completed
			Purchase RBS asset software, train staff, and populate with existing data, and manage ongoing updates.	501/ 4800 £1,500.00	Existing asset register spreadsheet in use. Change to RBS software pending.

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Local Services	Aims	Objectives	Actions	Budget	Completion Date(s)
Town Council Services	To provide a high standard of service provision	<p>To maintain adequate financial, asset, and staffing resources to support a high standard of service.</p> <p>Appropriate annual budgeting process, staff roles and staff management enable the town council to provide a range of services.</p>	<ul style="list-style-type: none"> • Open spaces, • Play areas. • Life buoys. • Henley Road Cemetery. • The Guildhall customer services, • social media and website. • Public meetings. • Civic events, seasonal events • May Fair. • Allotment provision. • Bus shelters, • Litter bins, • public benches. • Ludlow market, • Street trading • Entertainment Square permits. • Ludlow Museum at the Buttercross. • Christmas lights. • Grants. <p>Please visit: https://www.ludlow.gov.uk/your-council/services-we-provide</p>	<p>Precept</p> <p>Recruitment of Communications Officer</p>	<p>Budget setting commenced in August 2024.</p> <p>March 2025.</p>
Shropshire Council	To support a high standard of service provision in Ludlow and surrounding area.	To find out what services are at risk and any options on offer from SC.	<p>Update: March 2025</p> <ul style="list-style-type: none"> • SC released a Devolution Statement in March 2025 - provided to LTC FC in April 2025. • SC figures for landlord repair and maintenance costs for Teme Leisure in Ludlow have been provided to LTC. 		Ongoing.

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Projects		Aims	Objectives	Actions	Status	Budget / EMR	Completion Date(s)
1	CCTV	Increase crime deterrents and detection.	Activate 13 Wi-Fi CCTV cameras	Final stage: Sign off on Faculty from Chancellor of Diocese of Hereford to install WiFi transmitters in the church tower.	Faculty granted 12 April 2024.	EMR 326: £10,796.00	Complete
				Final Stages: Installation of the WI-FI transmitters and activate lines of sight to the CCTV cameras.	Agreement between LTC and PCC signed – May 2024.		Complete
					Initial scoping site visit to the tower undertaken by ORP		Complete
					Detailed plan of works being compiled for approval by PCC.		Pending
					Contractor ORP has supplied a plan, and the electrical install details are being negotiated with PCC		
				Once approval received, ORP will schedule works			TBC.
2	Churchyard Wall	To ensure the council acts in the interests of the residents of Ludlow	To work with partners under a no liability agreement.	To agree a suitable structure for the no liability group.	At FC on 3 rd February 2025 FC/320 <u>RESOLVED</u> BW/GG (unanimous)	111 / 4182 PWLB - £1,152.00	Ongoing
					That Ludlow Town Council agrees to take a full and active part in joining the partnership on a no liability basis with the stated aim of pursuing external grant funding for repairing and reinforcing the collapsed section of Ludlow Town Wall, bounding the Garden of Rest adjacent to St. Laurence Church Ludlow. Agreed to assist PCC, TWT and SC with works to supporting structures in March 2025	Contingencies budget: Projacks Tree Services £420.00 – removal of saplings and vegetation.	Date of works 1 April 2025.
3	The Guildhall	Improve the council's meeting facilities	Refurbish and improve the Guildhall Chamber.	Final stage: To install electrical sockets on meeting table; install data points; strengthen Wi-Fi signal in chamber; install adequate hearing loop.	Electrical works required. Contractor to confirm date.	EMR 345: £55,433.00	Pending
		To heat the Guildhall Chamber	To replace the electric heating system	Preliminary Stage: Inspection	Local electrician made initial visit to confirm that current heaters are unusable.		Completed
				Interim stage: Repositioning existing heaters	Existing Infra-red heaters have been repositioned to provide more heat than previously. This has improved the warmth of the room during meetings, but more heating is needed.		Complete.

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				Mid stage: Alternative heating being researched	No local (Shropshire) solution is available. Town Clerk to undertake initial research of HE guidance and suitable companies.		Complete.
					Senior Admin Assistant (commenced work in January 2025) to arrange site visits and seek quotations for an infra-red system.	<p>Site visit from Herschel - Halo and far infrared heating options – took place in March – quotation received.</p> <p>Site visit undertaken by local electrician in March – quotation awaited.</p> <p>Site visit undertaken by out of county company in March – quotation awaited.</p>	Ongoing
				Final Stage: Conservation Officer approval required. Project costings to be approved by Full Council			Ongoing
		Improve the internal and external condition of the rear wall.	Inspection of wall six months after initial works completed.	Mid-stage: Liaise with SC CO to inspect the back wall to assess if it requires re-rendering.	CO officer unable to advise directly and local companies will be approached.		April 2025
				Final Stage: undertake works agreed with SC CO.			September 2025
		Replacement / Repair of kitchen window – (ground floor).	To make safe.	Approval for works given by Services Committee – 27th November 2024.		Contingencies revenue budget.	January 2025
				Preliminary stage: Seek advice of Conservation officer re: repair / replace options.	CO advised that window is not historic and a like for like repair / replacement would not require LBC; and that a joiner should assess if repair is an option.		
				Mid Stage: Create a specification for either repair or replacement (dependant on advice of the joiner) to include a specification for a safe working platform over the neighbouring extension; and approach three local heritage quality companies for quotes.	<p>Initial site inspection by local firm and discussion with neighbour has led to a timeline of Spring 2026 that encompasses other works due to difficult access.</p> <p>Quotations for works to windows and erecting scaffolding are being sought.</p>		
				Final Stage: To bring the quotation to FC for approval.			

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4	Henley Road Cemetery	Create sustainable provision for burials and cremated remains in Ludlow.	Bring the final section of the cemetery into active use.	Preliminary Stage: To undertake a ground water survey.	Contract awarded. Works undertaken 11 th & 12 th March 2024 Groundwater Risk Assessment Report received April 2024 – reported to FC in June 2024.	EMR 331: Cemetery Extension £33,548.00 EMR 332: Cemetery Paths £10,355.00	Completed
				Mid stage: Groundwater Risk Assessment informed design of layout plan	To assess the risk assessment, identify the community needs, and seek quotes for appropriate layout plans.	Quotations are being sought.	
				Final stage: ground works undertaken.			To be confirmed
5	Market Parking	To reduce unauthorised parking on the Market Square.	To ensure that market traders are not prevented from trading by unauthorised parking.	Mid stage: To work with Shropshire Council to create a parking order for the market square.	September 2024: Shropshire Council Cabinet has made a commitment to undertake the TRO consultation, but no timescale agreed. SC unitary Cllrs to chase. Ludlow Future Partnership has also agreed to chase with highways colleagues. Due to be continued after the election.	No budget	Ongoing
				Final stage: SC to implement scheme.			TBC
6	Ludlow Market	Improve appearance of Market square	Clean, bright, and attractive market canopies	Final stage Implement phase II of the market canopy replacement programme.	Manufacture of canopies completed in October. Christmas lights meant there was no opportunity to put them on in October / November. The market is trading seven days a week in December – so they will be fitted on a Tuesday in January 2025.		Completed January 2025.
7	Ludlow Winter Festival	To create a sustainable annual festival in November	To consolidate the existing activities and events in the last weekend of November to launch Ludlow's Christmas campaign.	To contribute to and facilitate meetings with partner organisations to brand the activities as Ludlow Winter festival and agree a programme of sustainable expansion of the festival over a three-to-five-year period.	LWF meetings have taken place in Jan, Feb & March 2025. Social media call out for extra events took place prior to the March meeting. Parking and litter provision need to be considered in 2025.	Revenue budget for Christmas Lights and Event: (111 / 4158) in 2025 is £20,000.00	2022 – 2026 ongoing
8	Castle Gardens	To improve the safety and attractiveness of the gardens outside Ludlow castle.	To replace the posts and chains as necessary and repair damaged sections of the low retaining wall.	Preliminary Stage: Create a specification and tender for the work.	Services Committee received report in November 2024 and decided to consult with the Civic Society.	No allocated budget – no project costings established to date.	Unspecified.
9	Bus Shelter	To improve the provision of bus shelters in Ludlow.	To install one new bus shelter a year.	Preliminary Stage: To consult on bus stop location	Representational Committee selected alternative site for a new shelter at Tollgate Road bus stop.	Revenue budget – 101/ 4072 £5,200.00	Install date – 25 th April 2025.

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				Mid-stage: To agree siting with SC.	SC have approved the site and shelter has been ordered.	Purchase and install costs: £4725.00	
				Final Stage: Installation by the contractor.			25 th April 2025
	Bus Shelter	To improve the provision of bus shelters in Ludlow.	To refurbish an existing shelter in the 2025 / 26 financial year.	To refurbish the Mill Street bus shelter in the next financial year.		2025 / 26. budget agreed - £16,000	March 2026
					Quotation for Mill Street approved by Rep in March 2025. Colour to be agreed with CO.	Agreed expenditure £3,661.92.00	March 2026
					Henley Road shelter will be refurbished by a company for material costs only.	Paint and material costs only.	March 2026
10	Orientation Boards	To improve visitor experience.	To install 5 x orientation on boards at:	Mid-stage: To apply for advertising consent from SC for locations at: <ul style="list-style-type: none"> • Castle Street car park, • Outside LAR (to the side by bus shelter) • Smithfield Car Park • Galdeford car park. 	All ADV consent applications were approved in October 2024.	SC Grant Funding Revenue Budget 111 / 4109 £1,096.00	October 2024
				Final Stage: To arrange install at sites.	Installation delayed by October – December seasonal workload.	Revenue contingencies fund.	Completed 28 March 2025
				Remedial works:	The Galdeford, and Castle Street signs were damage during the installation by an external contractor and remedial actions are being sought.	Further details to follow.	
11	Wheeler Road Recreation Area	To improve sense of youth engagement / ownership of facility.	To improve the facilities.	Preliminary Stage: Install new teen shelter and remove old ones / repaint the MUGA panels / improve surface of paly area and repair safety gates.		EMR 334 Wheeler PlayArea Resurface £13,876.00 EMR 325 Play Areas Fund £17,713.00	February & March 2023
				Mid-stage: graffiti artist to repaint the skate park / install full size goal posts	Progress delayed by onsite vandalism and council has decided that the CCTV cameras need to be active before they will proceed with this project.		Pending
				Final Stage: install a MUGA play surface / increase height of surrounding MUGA fences / install additional seating.	Progress delayed by onsite vandalism and council has decided that the CCTV cameras need to be active before they will proceed with this project.		Pending
12	VE Day 2025	To improve community cohesion	To create a free to attend community event.	Partnership working meeting between PCC, LTC and Ludlow RBL took place on 9 th April.	Draft Order of Service agreed. Road Closure in place. PA to be booked.	To be funded from contingencies.	Ongoing

Action Plan 2024 / 25 – Updated April 2025

13	Henley Helper Volunteer days	To improve community cohesion. To improve biodiversity.	To improve community cohesion through volunteer work and improve biodiversity of Henley Road Cemetery site through volunteer projects.	Event Plan to be devised.	Risk assessment and site management plan to be created.	Revenue contingencies fund.	Completed July 2024
				Inaugural Event	Volunteers attended event and learned about the ecology of the area and began creating a bug hotel.		Completed 5 th August 2024
				Second Event	Volunteers to be invited to attend a session on 24 th September 2024.		24 th September 2024
13	Henley Helper Volunteer days	To improve community cohesion. To improve biodiversity	To improve community cohesion through volunteer work and improve biodiversity of Henley Road Cemetery site through volunteer projects.	First Monthly Event of 2025 on 1 st April 2025	Social media call out for volunteers. SurveyMonkey sign up process created. Risk assessment and site management plan to be reviewed prior to first event.		Ongoing from April to October 2025.
14	Ludlow Market Street lights	To provide a high standard of service provision	To maintain electricity supply to the market traders and for the Christmas lights.	Contractor began works on site on Tuesday 11 June.	The contractor is only able to work onsite one day a week because markets take place every day except Tuesday, and no work was possible in August because of the Tuesday Makers Markets. Work has progressed well. Update to Services to be made in 2025.	EMR 340 street lighting £4,970.00 301/4222 (2023 / 24 budget cfwd) £5,781.00 301/4222 (2024 / 25 budget) £2,000.00 501/4800 (2024 / 25 budget) £804.00 Total £13,555.00	Commenced November 2025 and ongoing.
15	Ludlow Museum at the Buttercross Accreditation	To renew the Accreditation status granted by the Arts Council	To maintain the high standards and improvements necessary to be awarded accreditation status.	To produce documents and evidence to meet the criteria set by the Arts Council.	Full Accreditation awarded for 5 years from 2025.	No budget allocated.	Completed End of February 2025
16	Bathing Water Status	To comply with Bathing Water Status requirements of Environment Agency (EA) and Defra.	To develop a good working relationship with the EA.	To create and install the required signage (funded by Defra).	Signage has been ordered – awaiting delivery.	Grant Funded 110 / 1123 £431.00	Installed in October 2024.
				To hold monthly meetings with the EA team.	First meeting took place in August and subsequent monthly meetings timetabled for Town Clerk and Deputy Town Clerk.		Ongoing

Action Plan 2024 / 25 – Updated April 2025

					<p>December 2024 - Ludlow received a poor water status classification – this was expected, and the EA will develop a plan to identify key sources of pollution and improve the water quality over time.</p>		
					<p>February 2025 –New Project to Monitor Water Quality at Ludlow Bathing Spot was launched in February 2025.</p> <p>The Environment Agency, with funding from the River Severn Partnership Advanced Wireless Innovation Region, has installed high-tech sensors to track bacteria levels, including E.coli, every day. Initial funding period ends in March 2025.</p>		Initial project dates Feb – March 2025 – possible extension of initial period (subject to confirmation of funding.)
17	Ludlow Future Partnership	To bring SC, LTC, and local orgs together in support of achieving common aims to improve Ludlow.	To improve decide on short, mid and long terms projects to improve Ludlow.	To meet quarterly to progress short, mid and long terms projects for Ludlow.	<p>Priorities workshop to take place in October 2024</p> <p>Inaugural meeting of Ludlow Future Partnership took place in November 2024. A series of quarterly meeting are now due to take place in 2024 / 25 and beyond.</p> <p>Group suspended until after 1 May 2025 Elections.</p>	Contingencies Revenue.	Ongoing
18	Shaping Lives Grant Funding	To support local organisations is the delivery of initiatives to help reduce the impact of food poverty in the local community.	To successfully bid with other local organisations for a grant of £15,000.	<p>Successful submission of bid</p> <p>Signing of grant agreement and raising of invoice for the grant</p> <p>Inaugural project meeting with LTC and Hands Together Ludlow.</p>	<p>Submission reviewed by Shropshire Council panel in September 2024 and a grant of £15,000 awarded to Ludlow Town Council.</p> <p>Agreement received from SC and signed. Invoice submitted.</p> <p>Took place on 21 October 2024</p>	Grant Funded £15,000.00	Complete
				Five Phase Project Plan drafted by HTL	Initial plan phases agreed. Detailed planning for each phase is the next step.		Completion Date September 2025
				First Phase	<p>Recipe Videos for Food Parcels are being created.</p> <p>Recipe card template design is being created.</p>	New Communications & Marketing Officer started work on 8 th April 2025.	Ongoing
19	Ludlow Market Website	To support the continued success of Ludlow market, and the local economy of Ludlow.	To refresh the market website to support traders and help the public enjoy and engage with the market.	Final stage: to add trader content and market dates with basket system to enable traders to sign up and pay for specialist markets.	<p>E-commerce set up.</p> <p>Trader details partially entered.</p> <p>Market days to be set up in calendar format.</p>	New Communications & Marketing Officer started work on 8 th April 2025.	Launch date is end of May 2025.



Action Plan 2024 / 25 – Updated April 2025

Projects to be added in 2025 / 26

- EV Charging points at Henley Road Depot
- Upstairs at Guildhall

Item 18.

PROJECT SUPPORT GRANTS



24 MAR 2025

ANNUAL & PROJECT SUPPORT GRANT APPLICATION

CONTACT DETAILS

Name of Group/Organisation

LUDLOW FRENCH TWINNING ASSOCIATION

Address

40 TALL TREES, BURWAY LANE, LUDLOW

Post Code: SY8 1DT

Email: philiphorsfall2@gmail.com

Fax:

Tel No: 07751 214194

Contact Person

Title: MR

First Name: PHILIP

Surname: HORSFALL

Position held in Group: TREASURER

AIMS AND PURPOSE OF YOUR COMMUNITY GROUP

Charity Registration Number

If you are not a registered charity you must
enclose a copy of your constitution ☒

VAT registration number if applicable

N/A

What does your community group/organisation do and how are you financed?

IN 2007, BOTH TOWNS' MAYORS SIGNED A JOINT DECLARATION FOR FUTURE CULTURAL EVENTS AND EXCHANGES. ANNUAL VISITS ARE MADE BY FAMILIES WHERE WE TAKE IT IN TURNS TO HOST EACH OTHER. WE ARE FINANCED THROUGH MEMBERSHIP FEES AND FUND-RAISING EVENTS.

How many people are in your group/organisation

AS OF MARCH 2025 THERE ARE 40 FAMILIES INVOLVED AS PAYING MEMBERS (MEMBERSHIP IS £12 PER HOUSEHOLD PER ANNUM), BUT MANY MORE ATTEND FUND-RAISING EVENTS, FILM NIGHTS etc.

ABOUT YOUR PROJECT

Project/Grant Title

VISIT TO LA FERTE-MACÉ

Briefly describe your project or reason for applying to enable the Town Council to understand how its grant will be used:

THIS YEAR A GROUP OF 45 WILL GO BY COACH TO FRANCE. THE USE OF THE £300 GRANT WILL HELP DEFRAID THE COST OF TAKING CHILDREN (10 IN TOTAL) FOR WHOM WE MAKE NO CHARGE. THE COACH COSTS £4800, THE FERRY £2564, SO THE TOTAL COST OF THE JOURNEY WILL BE £7364. ADULTS WILL PAY £190 EACH. SUBSIDY FOR 10 CHILDREN = £1900.

How many people will benefit from this project or activities? **Details of the number of members of your group that are from Ludlow and the numbers of people from Ludlow that will directly benefit from your project would be most helpful.**

45. OUR MEMBERSHIP COMPRISES PEOPLE OF ALL AGES AND WALKS OF LIFE, AND WE STRONGLY ENCOURAGE FAMILIES, SO ALL EXPENSES FOR CHILDREN BOTH WHEN VISITING AND HOSTING ARE MET FROM OUR OWN FUNDS.

Estimated cost of project £ 300

Desired grant from Ludlow Town Council £

Please note that the maximum you can apply for is £1,000.

FINANCIAL DETAILS

You must include an up to date statement of your group's financial position (a copy of the latest accounts or a treasurer's report). If you are holding substantial reserves you must provide an explanation as to why this project cannot be supported from your own funds

DECLARATION

If a grant is awarded, please complete the section below for BACS payment

Bank... BARCLAYS... Branch... ? WAS LUDLOW... Postcode...
Account number... 90533866...
Sort code... 20-53-22...
- ALL SORT CODE + ACCOUNT NO DETAILS ARE AS BEFORE

We are authorised to submit this application on behalf of the Group and certify that the information enclosed is correct. We understand that there is no appeal procedure should this application be rejected. If Ludlow Town Council gives a grant, we agreed to use it only for the purpose given and according to any conditions specified. We understand that within six months after payment of a grant, we are expected to provide Ludlow Town Council with a report on the progress of this project and how the money has been spent.

Signature 1 (Person submitting form)		Date: 23/3/25
Signature 2 (Chairperson or senior representative of the Management Committee)		Date: 24/3/2025

CHECKLIST

It is essential that you fill in every question and send the appropriate supporting documentation. Complete the following checklist to show what you have done. If you do not include all the information requested, your application will be incomplete and will take longer to assess or be ineligible. Please do not send any documentation other than that requested.

I have: (Please tick)	<table style="width: 100%;"> <tr> <td style="width: 70%;">tion</td> <td style="width: 30%; text-align: center;">✓</td> </tr> <tr> <td>ur constitution (if you are not a registered</td> <td style="text-align: center;">✓</td> </tr> <tr> <td>ur latest accounts and/or treasurer's</td> <td style="text-align: center;">✓</td> </tr> </table>	tion	✓	ur constitution (if you are not a registered	✓	ur latest accounts and/or treasurer's	✓
tion	✓						
ur constitution (if you are not a registered	✓						
ur latest accounts and/or treasurer's	✓						

ALL APPLICATIONS FOR FINANCIAL ASSISTANCE ARE CONSIDERED ON THEIR INDIVIDUAL MERITS. APPLICATIONS MUST BE SUBMITTED WELL IN ADVANCE OF YOUR PROJECT TAKING PLACE IN ORDER TO BE CONSIDERED AT THE APPROPRIATE MEETING

Completed Application Forms should be returned to:
 Gina Wilding, Town Clerk, Ludlow Town Council, Guildhall, Mill Street, Ludlow, Shropshire, SY8 1AZ
 Tel: 01584 871 970 Email: townclerk@ludlow.gov.uk

PRIVACY NOTICE

Ludlow Town Council collects and manages personal data under the Data Protection Act 1998 and the General Data Protection Regulations 2018.

Your information will be lawfully processed by the Council within the terms of our privacy policy.

To find out more about our privacy arrangements, please access the Council's website www.ludlow.gov.uk where our full Privacy Notice and Privacy Policy can be viewed.

In the public interest details of applicants are in the public domain.

LUDLOW TWINNING ASSOCIATION TWINNED WITH LA FERTÉ MACÉ

Constitution

1. Name of the Association: The name of the association shall be the Ludlow Twinning Association.

2. Aims of the Association: To promote and foster friendship and understanding between the people of Ludlow and district and those of La Ferté Macé and district in Normandy, France, and those of other towns with which the association may later form links.

To encourage visits by individual and groups to and from the linked towns, and the development of personal contacts, and by so doing to broaden the mutual understanding of cultural and recreational activities of the linked towns.

To organise social activities to foster the aims of the association.

3. Membership: Membership shall be open to all persons or organisations in sympathy with the aims of the association.

There shall be three classes of membership:

-Individual Membership.

-Family Membership. Family membership being open to all members of a family excepting sons or daughters over the age of eighteen years.

-Corporate Membership. Corporate membership does not of itself entitle members or employees of the organisation which is a member to the rights of individual or family members. Corporate membership entitles not more than two named members of the organisation to the rights conferred on individual or family members.

4. Committee: The affairs of the association shall be conducted by the Management Committee consisting of not more than twelve and not less than six members to be elected by the members of the association.

The committee shall have the powers to co-opt and co-opted members shall have the right to vote.

The quorum shall be five.

The committee shall have the power to set up a sub-committee which shall have the power to co-opt their membership, with the power to vote.

5. Election of Committee: The committee shall be elected at the annual general meeting of the association. The association shall appoint a chairman, honorary secretary, honorary treasurer and such other officers as it seems necessary.

The Chairman of the management committee, the Honorary Secretary and Honorary Treasurer shall be ex-office members of all sub-committees.

The management committee shall call an Annual General Meeting of the association between 1 st January and 31 st March each year, giving each member at least fourteen days notice in writing.

Terms of Office: Chairman, Secretary and Treasurer serve subject to annual re-election at the annual general meeting.

6. Voting at the AGM: Only members present at the meeting shall be entitled to vote.

Each individual member shall be entitled to one vote and each family or corporate member shall be entitled to two votes providing that two members of such family or organisation are present at the meeting. The chairman shall have a casting vote.

7. Special General Meeting: A Special General Meeting of the Association may be called at any time on a written request signed by at least twenty members of the association and delivered to the honorary secretary containing details of the matter to be discussed. At least twenty-eight days' notice must be given.

8. Accounts: Independently examined accounts to 31 st December of each year shall be submitted at the annual general meeting.

All monies received on behalf of the Association shall be kept in safe custody by the Honorary Treasurer, and all cheques drawn on the associations' account shall be signed by any two of the Chairman, Honorary Treasurer or Honorary Secretary.

9. Subscriptions: All subscriptions shall be determined at the Annual General Meeting and be payable within two months thereof.

10. Amendments to the constitution: Amendments to the constitution shall only be made at the Annual General Meeting or a Special General Meeting. Notice of the proposed amendments shall be given in writing to the honorary secretary at least twenty-one days before the meeting and details shall be given in notice convening the meeting. No such amendment shall be carried unless not less than two thirds of the members present and voting at the meeting vote in its favour.

11. Dissolution of the association: In the event of the dissolution of the association, all surplus funds shall be transferred to such charity or charities as the committee shall in its absolute discretion decide.

12. Adoption of Constitution: The constitution was adopted by the association at its Annual General Meeting at the Feathers Hotel on 18 th February 1988, by unanimous vote of those present. The constitution was amended at the AGM held at the Bull Inn on 7 th February 2007 and at the AGM in 2023 held at The Blue Boar.

See paragraph 5 on "Terms of Office".

Ludlow Twinning Association

2023

2024

Accounts for the Year to 31st December 2024**Income**

Subscriptions	348.00	415.61
Donations- film night	610.00	615.76
Fundraising	3,311.85	1,771.90
Members Meal	1,102.00	782.00
Annual Visit (La Ferté Macé)	5,569.50	2,721.48
Bank interest received	17.10	71.24
	<u>10,958.45</u>	<u>6,377.99</u>

Expenditure

Hire	75.00	161.00
Public Liability Insurance	224.92	224.92
Films purchased	60.19	25.84
Fundraising expenses	1,510.00	1,161.00
Annual Members meal	844.00	693.00
Annual visit (La Ferté- Macé)	6,057.22	4,670.75
	<u>8,771.33</u>	<u>6,936.51</u>

Surplus (shortfall) of Income over expenditure	2,187.12	-558.52
--	----------	---------

Bank balances

	Year end 2023	Year end 2024
Barclays Current account	1809.49	741.69
Barclays Business Premium account	<u>4431.45</u>	<u>4940.73</u>
	<u>6240.94</u>	<u>5682.42</u>

Notes

- 1 The Association has no other Bank accounts
- 2 There are no loan or overdraft facilities
- 3 All payments must be authorised by 2 out of 3 nominated signatories
- 4 The Association is not a registered charity
- 5 The Association is not VAT Registered

ANNUAL AND PROJECT SUPPORT GRANT CRITERIA

Organisations will be considered for a Ludlow Town Council grant aid where they meet the following criteria:

1. The organisation is based, or has a local branch, in Ludlow.
2. The work of the organisation directly benefits a number of residents of Ludlow.
3. The organisation has a written constitution with clearly defined aims and objectives.
4. The local organisation has a clear financial need. Account will be taken regarding how much money the organisation has, including any special reserves set aside for particular projects. Additionally, if the balance is high in relation to spending then an explanation will be required to justify the reasons why the organisation is still applying for a grant.
5. The organisation has its own bank account with at least two authorised signatories.
6. The organisations non-party political and non-profit making. Individuals will not be funded.
7. Retrospective applications will not be considered.
8. Applications may be linked to a specific project or an ongoing initiative and consideration will also be given to grant applications for revenue funding.
9. Grant applications that require matching funding as evidence of local/community support to lever in additional grants from other funding sources will be considered.
10. Grant applications for amounts of £1,000 or less will be considered at Full Council meetings.
11. **Successful recipients of a Core Grant Funding are permitted to apply for, and if successful, receive up to three Projects Support Grants in the same year.**

Conditions

1. Any Grant Aid awarded must be used for purposes stated on the application only. If the organisation decides that it wishes to spend the monies on an alternative project, it must ask the council for written permission to do so.

- Grants must not be used to settle debts on behalf of the organisation, nor be used to retrospectively fund projects.
- Ludlow Town Council reserves the right to recall any grant given to an organisation which ceases to operate during the financial year for which the grant has been given. The council should be consulted prior to distribution of any remaining assets. Full details and accounts must be submitted to the council as soon as possible.

Successful organisations must:

1. Be prepared to participate in any publicity or awareness initiatives organised by the council.
2. Be willing to attend a reception organised by Ludlow Town Council to receive their cheque.
3. Provide evidence within the financial year that the grant has been used for the purpose stated in the application, and where possible provide Ludlow Town Council with images of the project funded.
4. Acknowledge the grant aid together with other sources of funding in appropriate publicity and detailing how it was spent in its annual report and accounts, a copy of which should be sent to the Town Council as soon as it has been published.

CORE GRANT CRITERIA

Ludlow Town Council has powers to award grants to local organisations to support their activities in the Parish of Ludlow. In doing so, the Town Council is aware of its responsibility for public funds and for the distribution of these funds to be properly managed.

Organisations will be considered for a Ludlow Town Council grant aid where they meet the following criteria:

1. The organisation is based, or has a local branch, in Ludlow.
2. The work of the organisation directly benefits a number of residents of Ludlow.
3. The organisation has a written constitution with clearly defined aims and objectives.
4. The local organisation has a clear financial need. Account will be taken regarding how much money the organisation has, including any special reserves set aside for particular projects. Additionally, if the balance is high in relation to spending then an explanation will be required to justify the reasons why the organisation is still applying for a grant.
5. The organisation has its own bank account with at least 2 authorised signatories.
6. The organisation is non-party political and non-profit making. Individuals will not be funded.
7. Retrospective applications will not be considered.
8. Applications should be linked to a specific project but consideration will also be given to grant applications for revenue funding.
9. Organisations will be expected to explore alternative funding opportunities which may exist as well as fund raising for their particular project before applying to the Council.
10. Grant applications that require matching funding as evidence of local/community support to lever in additional grants from other funding sources will also be considered.
11. Applications for the subsequent financial year will be considered annually at Full Council meetings in September and October.

Conditions

- The maximum amount any organisation may apply for is up to £5,000.
- **Successful recipients of a Core Grant Funding are permitted to apply for and, if successful, receive up to three Projects Support Grants in the same year.**
- Any Grant Aid awarded must be used for the purposes stated on the application only. If the organisation decides that it wishes to spend the monies on an alternative project it must ask the Council for written permission to do so.
- To avoid misunderstandings, please note that in all circumstances, permission must be given by Ludlow Town Council prior to awarded grant funds being used for any purpose that is different to the one stated on the application form.

- Grants must not be used to settle debts on behalf of the organisation, nor be used to retrospectively fund projects.
- Ludlow Town Council reserves the right to recall any grant given to an organisation which ceases to operate during the financial year for which the grant has been given. The Council should be consulted prior to distribution of any remaining assets.
- Full details and accounts must be submitted to the Council as soon as possible.

Successful organisations must:

1. Be prepared to participate in any publicity or awareness initiatives organised by the Council.
2. Be willing to attend a reception organised by Ludlow Town Council to receive their cheque.
3. Complete and return a Monitoring and Evaluation Form within the financial year to demonstrate that the grant has been used for the purpose stated in the application, and where possible provide Ludlow Town Council with photograph(s) of the project funded. If the Monitoring and Evaluation form is not received then future grant applications from that group may not be accepted.
4. Acknowledge the grant aid together with other sources of funding in appropriate publicity and detailing how it was spent in its annual report and accounts, a copy of which should be sent to the Town Council as soon as it has been published.

Amended and adopted Full Council 14th April 2025.

Item 19.

LUDLOW CONCERT BAND

Ludlow Concert Band request to play in the Square, Summer 2025

Hi Gina

Just emailing to ask if the band could play in the Square or on the grass area outside the Castle for a date in the Summer, possibly two if we can.

Thinking of maybe possible dates to choose from:

8 June

22 June

6 July

27 July (Castle Concerts are on)

It would be a free open air performance of about an hour, for the general public.

We have played in the Castle gardens and by the events Square in the past and they were always enjoyed by everyone and it would be nice to do this again this year, as part of supporting the town.

I don't know what else may be being organised in the town re Fringe Festival and it was hard to find out so hopefully none of the dates suggested above would clash with anything else.

Could you let me know if this is something that would be ok. All we need really is an area that we could put chairs and cross fingers that the weather will be ok.

Best wishes

Amanda

Treasurer Ludlow Concert Band

Item 20.

CYCLE TO WORK SCHEME



REPORT

Ludlow Town Council

CYCLE TO WORK Report No. FC/25/15

**Full Council
14th April 2025**

1. INTRODUCTION

- 1.1 This report provides information about setting up a Cycle to Work Scheme for staff.

2. RECOMMENDATION

- 2.1 To approve further research into organisational procedures identified in 4.4 through 4.13 by Staffing Committee.

3. BACKGROUND

- 3.1 There is a government scheme that <https://www.bike2workscheme.co.uk/>
- 3.2 The website explains that it is an employee benefit that saves the employer money. Bike2Work is not only free, but it can save the employer paying as much national insurance contributions and contribute to workplace productivity.
- 3.3 Setting up a successful cycle salary sacrifice scheme requires careful planning, clear communication, and close coordination of HR, finance, and legal matters.

Key considerations are:

- choosing a reliable provider,
- defining transparent terms,

- and continuously engaging with employees.

4. CURRENT SITUATION

- 4.1 Implementing a cycle salary sacrifice scheme can be an excellent way to promote employee well-being, boost sustainability, and potentially deliver tax and National Insurance savings for both employees and the business.
- 4.2 In a cycle salary sacrifice (or “cycle to work”) scheme, employees agree to exchange part of their gross salary in return for the use of a bicycle and related equipment, and because the sacrifice is made before tax and National Insurance contributions are calculated, employees can often enjoy significant savings.

Employers can create a positive environmental message, reduced parking demand, and potential savings on employer National Insurance contributions.

- 4.3 Ludlow Town Council has not run a Cycle to Work Scheme previously, and needs to develop a clear understanding of the process involved.
- 4.4 **The Cycle to Work scheme** allows employers to loan bicycles and related safety equipment to employees as a tax-free benefit. Employees agree to a salary sacrifice arrangement, where they forgo a portion of their pre-tax salary in exchange for the benefit. This reduces their taxable income and National Insurance contributions, leading to cost savings.
- 4.5 **Employer Eligibility:** All employers, regardless of size or sector, can implement the scheme.

Employee Eligibility: Generally, all employees who receive their salary via the PAYE system are eligible. However, ensure that participation doesn’t reduce an employee’s earnings below the National Minimum Wage.

- 4.6 **Equipment Options:**
The scheme can include:
- Bicycles for commuting
 - Cyclist safety equipment (e.g., helmets, lights, reflective clothing)
- 4.7 **Establish a Salary Sacrifice Arrangement:**
A salary sacrifice arrangement involves amending the employee’s contract to reflect the reduced salary and the benefit received.
Key considerations include:

- **Contractual Changes:** Document the agreement clearly, specifying the amount of salary to be sacrificed and the duration.
- **National Minimum Wage:** Ensure that the salary sacrifice doesn't bring the employee's earnings below the minimum wage threshold.

4.8 **Set Up Hire Agreements**

Since the scheme operates on a loan basis, establish a hire agreement for the equipment. This agreement should detail:

- The hire period
- Ownership during and after the hire period
- Be aware of consumer credit regulations that may apply, especially for higher-value equipment.

4.9 **Consider Regulatory Compliance**

Depending on the value of the equipment and the terms of the hire agreement, you may need to comply with consumer credit regulations. In some cases, obtaining authorisation from the Financial Conduct Authority (FCA) is necessary. Review the guidance to determine if your scheme requires such authorisation.

4.10 **Communicate the Scheme to Employees**

Effectively promote the scheme to ensure employee participation:

- Explain the benefits and how the scheme operates.
- Provide clear instructions on how to join.
- Address common questions and concerns.

4.11 **Administer Payroll Adjustments**

Coordinate with your payroll department to implement the salary sacrifice deductions accurately. Ensure that these adjustments are reflected in payslips and that tax and National Insurance contributions are calculated correctly.

4.12 **Manage the End of the Hire Period**

At the conclusion of the hire agreement, decide on the equipment's disposition:

- **Return:** Employees return the equipment.
- **Extended Hire:** Offer an extended hire period.
- **Transfer of Ownership:** Sell the equipment to the employee at fair market value, considering tax implications.

4.13 **Maintain Records and Compliance**

Keep detailed records of all agreements, transactions, and communications related to the scheme. Regularly review the scheme to ensure ongoing compliance with tax laws and regulations.

Town Clerk
April 2025

Implications

Wards Affected (All)

Financial (as described in the report)

Health & Safety (none)

Law & Order (none)

Environmental Implications (undetermined)

Item 21.

CIVIC AWARDS



CIVIC AWARDS CRITERIA

There are **five** awards:

- for people over 18 – **Voluntary Work** Civic Award
- for people under 18 - Young Persons' **Voluntary Work** Civic Award
- Community Group – **Voluntary Work** Civic Award
- Public Bench Memorial Plaque for **Voluntary Work**
- **For Voluntary Work in support of biodiversity, energy reduction and environmental sustainability**

Criteria

1. Nominees should have:
 - a. Made a material contribution to the advancement, well being and welfare of the people of Ludlow: or
 - b. Demonstrated outstanding citizenship: or
 - c. Carried out unpaid work in the community for some time: or
 - d. Through their endeavours put Ludlow on the map: or
 - e. Through their contribution made Ludlow a better place to live.
2. No nominations will be put forward or initiated by Members or current staff.
3. Any nominations considered must have been proposed and seconded by residents within the Ludlow Parish Boundary and / or appear in the electoral register for Ludlow.
4. Members of the Council may in their private capacity nominate individuals.
5. No nomination be considered in respect of any sitting Town, Unitary Councillors or serving employees. However past Councillors and employees are eligible.
6. Each valid nomination be considered on its own merits and no firm criteria be specified.
7. Each nomination will need to be accompanied by a citation setting out the reasons why they have been nominated.
8. The Civic award will comprise of a framed A4 certificate on high quality paper and include the words "in recognition of outstanding service to the people of Ludlow on whose behalf Ludlow Town Council records its appreciation".
9. The Public Bench Memorial Plaque will be awarded in remembrance and / or celebration of a person who meets one or more of the five criteria. The metal plaque will measure 3" x 5" and be engraved with a short inscription to include the name of the person, their year of birth and death (if appropriate)

and a short inscription of up to 15 words. Nominators may also indicate a preferred location for the plaque.

10. Nominations will be invited in March every year through the local press, posters, notice boards, website and social media.
11. All nominations must be received with all relevant accompaniments by the date on the form so that they can go onto the Full Council Agenda. Those received after that time and date will not be eligible for consideration.
12. Successful nominees will be notified in writing and invited to attend Mayor Making for presentation of the Civic Award.
13. The presentation of all Civic Awards will be made at the Mayor Making ceremony held every May and the Award will be presented by the newly elected Town Mayor.



A CIVIC AWARD/YOUNG PERSONS' CIVIC AWARD NOMINATION FORM 2025

Name of person/Group being nominated: _____

Address: _____

Email Address: _____ Telephone No. _____

Please ensure that either the email address or telephone number is provided as successful nominees will be contacted directly and invited to accept their award.

Award being nominated for (please tick ONE box below):

- ☐ Over 18 – **Voluntary Work** Civic Award
- ☐ Under 18 - Young Persons' **Voluntary Work** Civic Award
- ☐ Community Group - **Voluntary Work** Civic Award
- ☐ Public Bench Memorial Plaque **for Voluntary Work**
- ☐ **For Voluntary Work in support of biodiversity, energy reduction and environmental sustainability**

Reason for nomination (please tick all boxes below which apply):

- ☐ Material contribution to the advancement, well-being and welfare of the people of Ludlow
- ☐ Demonstrated outstanding citizenship
- ☐ Carried out unpaid work in the community for some time
- ☐ Through their endeavours put Ludlow on the map, and / or
- ☐ Through their contribution made Ludlow a better place to live
- ☐ Voluntary community work during the Covid-19 pandemic
- ☐ Voluntary community work **in support of Climate Action**

I certify that the details given are correct, that I have not been influenced or canvassed in any way and that the person nominated has no knowledge of the present application and understand that all matters relating to the nomination are confidential and that should the present nomination fail, it may be re-submitted after next May.

PROPOSER:

Name: _____ Signature: _____

Address: _____ Tel: _____

Email Address: _____

SECONDER:

Name: _____ Signature: _____

Address: _____ Tel: _____

Email Address: _____

Please return to: Gina Wilding Town Clerk, Ludlow Town Council, The Guildhall, Mill Street, Ludlow SY8 1AZ Tel: 01584 871970 townclerk@ludlow.gov.uk by 12 noon Wednesday 30th April 2025.

The reason for the nomination is detailed below:

PRIVACY NOTICE

Ludlow Town Council collects and manages personal data under the Data Protection Act 1998 and the General Data Protection Regulations 2018. Your information will be lawfully processed by the Council and will not be shared with any third parties without consent. To find out more about our privacy arrangements, please access the Council's website www.ludlow.gov.uk where our full Privacy Notice and Privacy Policy can be viewed.

Please return to: Gina Wilding Town Clerk, Ludlow Town Council, The Guildhall, Mill Street, Ludlow SY8 1AZ Tel: 01584 871970 townclerk@ludlow.gov.uk by 12 noon Wednesday 30th April 2025.

Please return to: Gina Wilding Town Clerk, Ludlow Town Council, The Guildhall, Mill Street, Ludlow SY8 1AZ Tel: 01584 871970 townclerk@ludlow.gov.uk by 12 noon Wednesday 30th April 2025.

Item 22.

CLIMATE ACTION PLAN

CLIMATE ACTION TASK & FINISH GROUP

Thursday 27th March 2025

Staff present: K Adams (Notes)

Committee: V Parry (Chair), A Tapley & D Thompson

Apologies: E Garner & R Hall

Items discussed:

1. Review actions from the last meeting.
2. Receive updates from the last meeting:
 - CAP reviewed later in the meeting
 - Nature Recovery document to be begun
 - Seeds etc to be discussed later in the meeting
 - Cllr Thompson mentioned some recent 'Climate Fresk' training she had attended. She said it was useful interlinking actions with results and made you think.
3. Consider the document 'Wild Justice Lost Nature Summary'
 - To contact Shropshire Council and ask them to reduce non-essential grass cutting of verges throughout Ludlow to allow native wild o wæ st o g o w
4. Consider the latest Shropshire Climate Action Newsletter
 - Noted
 - Could we promote Ludlow's Men Shed and Repair Café more?
5. Discuss suggestions for the Green Festival stall.
 - We need to make the stall as interesting as possible and include the 'free seed' giveaway
 - Promote green actions in town, promote Henley Road helpers
 - Costs for seed giveaway to be approved by Policy and Finance Committee
 - Wigley Field allotments – food theme to Festival
6. Discuss suggestions for budget expenditure.
 - As per above for seed giveaway
Broken down as: £63.60 for 400 seed balls, £3.99 for 100 envelopes (6 x 10cm),
100 Labels off: £25.51 plus vat TOTAL £93.10
7. Consider revising the Climate Action Plan (CAP)
 - To note updates to the plan which are highlighted in pink.
 - To alter the tone of the green highlighted box so text is still legible.

8. Consider report to be recommended to Policy and Finance meeting on 7 April:
 - To inform Shropshire Council planning team of the 'Wild Justice Lost Nature Summary' document in the hope that more enforcement will be carried out in Shropshire to ensure housing developers in Shropshire follow through with their environmental promises.
 - Budget for seed giveaway at Green Festival
Broken down as: £63.60 for 400 seed balls, £3.99 for 100 envelopes (6 x 10cm), 100 Labels off: £25.51 plus vat TOTAL £93.10
9. Consider report to be recommended to Full Council on 14th April:
 - To contact Shropshire Council and ask them to reduce non-essential grass cutting of verges throughout Ludlow to allow native wild flowers to grow
10. To note the next meeting date is Thursday 5th June.

Actions for next meeting:

1. Deputy Town Clerk to invite Ludlow's Fairtrade Group to the next meeting to talk about their climate activities.
2. Deputy Town Clerk to update Climate Action Plan to be reviewed by Policy & Finance Committee
3. Deputy Town Clerk to begin work on a Nature Recovery document for Ludlow Town Council's sites and to bring back in sections to the Climate Action Task & Finish Group for consideration.
4. Deputy Town Clerk to discuss with the DLF Supervisor ideas for mowing equipment and green waste disposal. To look at a local more environmentally friendly way of disposal (Jonathan Lewis, Priors Halton Farm aka Overton Energy Ltd).
5. E Garner to discuss with Ludlow 21/Green Festival a community engagement project relating to a 'flower drawing competition & different age categories and a prize of colouring books or similar. This could be a joint initiative.
6. To consider the possibility of a 'planting event' in the square hosted by Councillors and staff assisted by Incredible Edible or Ludlow 21.
7. Photos of how waste is managed at Henley Road cemetery to be brought to the next meeting for information.
8. Look into the 'green doors' project.

LUDLOW TOWN COUNCIL – CLIMATE ACTION PLAN



Adopted by Full Council on 7th March 2022
Approved by Full Council on 3rd March 2025.
Reviewed and revised 19/03/2025

Red – not begun, amber - ongoing,
green – completed, pink – new action

Action	Topic	Task	Status	Date / reference approved by Council	Target Date for completion	Est. Cost	How	Review date Update on progress
1	Mobilisation & Leadership	We will aim to review and update appropriate council policies to align with LTC's Climate Emergency commitment.			As each policy comes up for review	£ legal advice		18/3/2025
3		We will aim to agree a template for commenting on planning applications which do not include renewable energy or improved sustainability measures.			January 2026	£0		18/3/2025
4		We will aim to include Climate Emergency references in all new contract specifications and Invitations to Tender and we will include these references in the evaluation process.	A policy of criteria and statement to be drafted by December meeting.		Dec 2024/Jan 2025	£ legal advice		18/3/2025 no further progress
5		Arrange in house Carbon Literacy training for staff and Councillors			June 2025			18/3/2025
6	Energy Efficiency	We will aim to review the Carbon Audit report and deliver its recommendations.	To be taken to Policy & Finance 24 th Feb 2025		May 2025			18/3/2025
7		We will aim to change to a green energy provider and review annually or when contract is due for renewal.	To continue to review, however, green energy providers also need to be cost effective		Review annually / ongoing			18/3/2025
8		If compliant with safety regulations, we will aim to replace internal lighting with LED movement-sensor lights at all Council properties	Will be completed as required/ when lighting needs replacing		May 2025			18/3/2025 No issues with current lighting
9		We will aim to install solar/PV panels at DLF depot and Henley Road cemetery	To obtain information about any grants.		May 2025			18/3/2025
10		To investigate replacing the immersion heater (used for heating water at the Guildhall) with an 'on demand' water heater	Obtaining quotes from local plumbers		August 2025			18/3/2025 new item
11	Consumption & Waste	We will aim to ensure all contractors have a 'Zero to Landfill' policy which is regularly reviewed and updated.	A policy of criteria and statement to be drafted by December meeting.		Dec 2024/Jan 2025	£0		18/3/2025
12		We will aim to renew planting vessels with built-in water reservoirs to reduce the need for watering (Ludlow-in-Bloom)			Review annually / ongoing	£		18/3/2025 Review annually, currently too expensive
13		We will aim to refill hand-washing and washing- up liquid single use plastic bottle with eco-friendly alternative products e.g. Bio-D or Eco-Leaf	Refillable containers are used, however not eco-friendly products due to cost.		Review annually / ongoing			18/3/2025
14		Introduce a more efficient stock control process for cleaning materials at Town Council buildings. To ensure minimal waste and most cost effective spending			Next meeting – Dec 2024			18/3/2025

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Action	Topic	Task	Status	Date/reference approved by Council	Target date for completion	Est cost	How	Review date Update on progress
15	Biodiversity	We will aim to participate in the annual No Mow May initiative, reduce grass cutting and introduce wild-flower meadow alternatives.	Report to Services Committee in Feb 2025 for approval	Approved 19.2.2025	Review annually/ ongoing			18/3/2025
16		We will aim to undertake a biodiversity audit of all LTC owned land and produce a Management Plan for each space.	Work in collaboration with Shropshire Wildlife Trust.		August 2025	£0		18/3/2025
17		Management of Sidney Road town green as a traditional grass verge/meadow to encourage native plants and wildlife			Review annually/ ongoing			18/3/2025
18		Work being undertaken at Henley Road cemetery by 'Henley Road Helpers' volunteers to protect wildlife and increase the habitats provided on site.			Review annually/ ongoing			18/3/2025
19		Reduce strimming near hedgerows	Deputy Town Clerk to discuss with DLF		June 2025	£0		18/3/2025 new item
20		Find alternatives to toxic weedkillers	Report to be brought to Services Committee to get approval for alternative methods.		June 2025	£0		18/3/2025 new item
21		Hedgerow management and maintenance plan	Report to be brought to Services Committee to get approval for Hedgerow Management and Maintenance Plan.		June 2025	£0		18/3/2025 new item
22		Introduce a quarterly discussion with DLF staff prior to a new season beginning re biodiversity matters for the season ahead.	Report to be brought to Services committee to share ideas for approval and to arrange training for staff (if required).		June 2025	£0		18/3/2025 new item
23		To contact Shropshire Council and ask them to reduce non-essential grass cutting of verges throughout Ludlow to allow native wildflowers to grow	To write to Shropshire Council		June 2025	£0		27/3/2025 new item
24	Engaging the Community	We will aim to include Climate Action in Civic Awards	Draft a report for Full Council to introduce another Civic Award		April 2025	£0		18/3/2025
25		We will aim to include climate-related criteria in Grant funding	To be considered when Grant application form is reviewed.		April 2025	£0		18/3/2025
26		We will aim to hold or facilitate a community meeting to discuss environmental issues and climate change			May 2024			18/3/2025
27		LTC to Join the Refill.org.uk association and look at how it can be used at the Guildhall, Museum and Castle Street car park office for people to refill their water bottles	To continue to promote the scheme		Review annually/ ongoing	£0		18/3/2025

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28		We will aim to support local community events, and be present at the Ludlow Green Festival with a market stall to promote Ludlow Town Council's actions and sub-committee	To be approved by Full Council March 2025	Approved for 2025 FC/339 3.3.2025	Review annually/ ongoing	£0		18/3/2025
29		Encourage a volunteer group of gardeners at St Johns Garden	Report to be brought to Services Committee for approval.		August 2025	£0		18/3/2025 new item
30		Encourage home composting and share information on social platforms	To continue to share appropriate posts.		Ongoing	£0		18/3/2025 new item
31		To donate two medicine blister pack recycling boxes to Ludlow Cancer Support Group for their current community initiative.	To be approved by Full Council March 2025.	Approved FC/339 3.3.2025				Complete.
32	Extreme weather	We will aim to share flooding alerts received from the Emergency Planning Unit (Shropshire Council) and Environment Agency on social media and website. To include information such as location of sandbags for residents collection	Flood alerts shared on social media and LTC website news items.		June 2025			18/3/2025
33		We will ask Shropshire Council to confirm arrangements for the supply of sandbags to residential areas prone to flooding.			New meeting – Dec 2024	£0		18/3/2025

Completed actions

2	Mobilisation & leadership	Create/update the Climate Emergency page on website and publicise commitment, initiatives, and achievements in reducing LTC carbon footprint as recommended by the Climate Action Group	Completed		2023	£0		Complete.
9	Energy efficiency	Continue to replace LTC streetlights with LED as and when needed.	Street lights replaced with LED when new lamps are required.		May 2025	£		Complete
10	Energy efficiency	Agree timetable to replace existing plant and machinery with electric power	Two electric vehicles have been leased for three years. Replacing existing plant with electric alternatives will be undertaken when needed/when suitable alternatives are cost effective.		2023	Budget unknown		Complete
11	Energy efficiency	Retain and replace existing taps with lever taps as and when needed. Working taps should not be replaced unnecessarily.			2023 ongoing	a) staff time b) unknown		Ongoing

LUDLOW TOWN COUNCIL – CLIMATE ACTION PLAN



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12	Energy efficiency	a) Investigate the replacement of water-flushing limitations in all toilets. An easy option is to install 'hippo-bags' or similar in single-flush toilet cisterns b) Then carry out the works when suitable replacements have been found	Bags have been purchased for Guildhall toilets (there are four on the ground floor) to see if they have an impact on water usage.		2023	a) staff time b) unknown		
	Energy efficiency	All lighting within Museum exhibition cabinets changed to LED lighting						Complete Sept 2024
15	Consumption and waste	Install rainwater butts where possible, but especially at the DLF depot.	Water butts have been purchased and will be installed in December.		2023	£ unknown		Complete
16	Consumption and waste	With L-i-B, plant where possible perennials, with emphasis on bee, insect & butterfly-friendly plants and herbs including drought-resilient plants.	LTC has an adopted perennials planting policy		2023/23	Budget £500 (LTC)		Complete
17	Consumption and waste	With Shropshire Council, review Dog bin/Litter bin locations.	No further action.		2023 and ongoing	Zero		No further action
18	Consumption and waste	In all Council premises discourage single-use plastic containers and packaging for staff refreshments and lunches e.g. buy locally-made fresh sandwiches, cakes, fruit, etc not pre-packed; consider making fresh hot drinks using loose coffee and tea and purchasing milk from local dairies.	Complete		2023 and ongoing	£		Complete
19	Consumption and waste	Continue to ensure all waste is recycled and re-used wherever possible; consider Terra-cycle as an additional recycle option.	Waste packaging is recycled by a member of staff.		2023 and ongoing	£		Complete
22	Biodiversity	Agree tree-planting strategy for all LTC-owned spaces	Subsidised trees have been applied for under Shropshire Council Community Tree scheme. Location of trees to be confirmed. Oak tree to be planted at Sidney Road green in memorial of covid victims.		2023 and ongoing	£ grants available		Complete
23	Biodiversity	Purchase peat-free compost	DLF have a large composing bay at their Henley Road site Woodchippings created by the DLF or contractors are used at Wigley Field allotments and in our gardens.		2023 and ongoing	£		Complete. Peat free compost produced



Adopted by Full Council on 7th March 2022
Approved by Full Council on 3rd March 2025.
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10		Use of a portable charging cable to charge EV vehicles at the Henley Road depot as and when needed	Will need to be replaced with a specially installed charging point		May 2025			Complete
----	--	--	--	--	----------	--	--	----------

Item 23.

INTERNATIONAL DAY OF PEACE

Possible meeting on Sunday 21st September at Peace Memorial by Ludlow Quakers

Dear Gina

The International Day of Peace (“Peace Day”) is observed around the world each year on 21 September. Established in 1981 by unanimous United Nations resolution, Peace Day provides a globally shared date for all humanity to commit to Peace above all differences and to contribute to building a Culture of Peace.

Ludlow Quaker Meeting would like to organize a short meeting at the Peace Memorial on that day to mark the event. We have held such meetings in the past, we would invite other interested groups and hopefully attract passersby and hand out white poppies to those attending.

We envisage the meeting taking place between 9:30 am and 10:30am and wondered if that slot could be pencilled in please? We are happy to discuss any further detail you may need.

Best wishes

Colin

for Ludlow Quaker Meeting

Item 24.

TOWN CRIER



REPORT

Ludlow Town Council LUDLOW TOWN CRIER Report No. FC/25/16

**Full Council
14th April 2025**

1. INTRODUCTION

- 1.1 This report provides an update on the role of Ludlow Town Crier.

2. RECOMMENDATION

- 2.1 To approve the Town Crier's attendance at the events requested.

3. BACKGROUND

- 3.1 Ludlow Town Crier undertook his first cry in Ludlow at the market on 28th March 2025, and visitors and residents have warmly welcomed him in Ludlow's newest civic role.

4. CURRENT SITUATION

- 4.1 The Town Crier received approval from the Council to attend council services and events and has since received requests to attend other local events.

Specifically, Local to Ludlow Producers Market would like the Town Crier to attend their 25th anniversary 'party' in July.

Ludlow Rotary Club have requested 26th May for the duck race.

Town Clerk
April 2025

Implications

Wards Affected (All)

Financial (none)

Health & Safety (HASAWA 1974)

Law & Order (none)

Environmental Implications (undetermined)

Item 25.

**RECOGNISING AND RESPONDING TO EARLY
WARNING SIGNS IN PUBLIC SECTOR BODIES**

Summary of the report “Recognising and responding to early warning signs in public sector bodies” by the Committee on Standards in Public Life (March 2025):

Purpose of the Review

The report aims to help public sector organisations identify and respond to early warning signs of failure, improve accountability, and create cultures where speaking up is encouraged and acted upon.

Key Findings

Repeated Scandals Share Common Themes

Incidents like Grenfell, Windrush, Horizon, and Infected Blood involved:

- Failures to listen to concerns
- Weak internal accountability
- Defensive cultures
- Lack of learning from past failures
- **Prevention Over Punishment** - legal accountability matters, but cultural and structural reforms can prevent crises from escalating in the first place.
- **Leadership is Central** - effective leadership involves being open, consistent, and willing to act on concerns. Leaders must model ethical behaviour and encourage transparency.

Core Themes & Recommendations

1. The Principles of Public Life (Nolan Principles)

These include honesty, openness, integrity, objectivity, accountability, leadership, and selflessness.

Embedding these principles guides good decision-making and promotes trust.

2. Accountability in Service Delivery

Clear governance, well-defined objectives, performance monitoring, and strong relationships (especially between departments and arm's length bodies) are critical.

3. Risk and Data

Everyone must identify risks, especially front-line workers.

Data analysis and AI can help spot trends, but must be used ethically.

Curiosity and proactive “risk hunting” are needed at all levels.

4. Board Scrutiny

Boards must be diverse, independent, inquisitive, and constructively challenging.

Timely and transparent information sharing is key.

5. Public Transparency

Openness builds trust and accountability.

Withholding information to protect reputations contradicts public service ethics.

6. Learning from Mistakes

Failures must trigger honest reflection and institutional learning.

Complaints should be seen as opportunities, not threats.

7. Leadership and Culture

Leaders must make it safe to speak up and encourage feedback.

The government plans to legislate a “duty of candour” with possible criminal sanctions for failures in public service honesty.

? 20 Points for Reflection

The report provides practical self-assessment questions across 6 areas:

- Accountability
- Risk Management
- Speaking Up
- Leadership Development
- Public Scrutiny
- Board Governance

These questions aim to help leaders and employees evaluate and improve their organisational culture and responsiveness.

Barriers Identified

Key obstacles to early problem identification include:

- Institutional defensiveness
- Groupthink
- Poor internal relationships
- Weak board scrutiny
- Fear of retaliation for whistleblowers

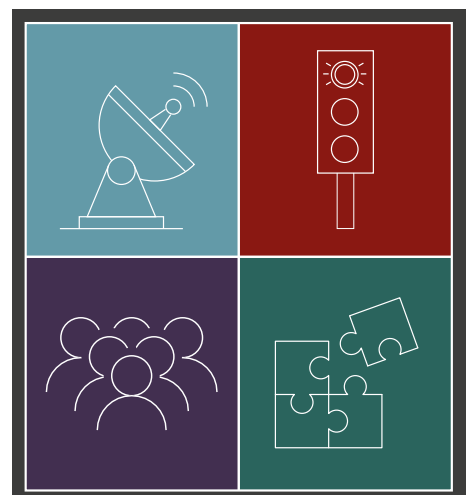
Conclusion

Creating a culture of early warning and openness is “an art, not a science.” Leadership, curiosity, responsiveness, and ethical behaviour are crucial for rebuilding public trust and improving service outcomes.

Recognising and responding to early warning signs in public sector bodies

**A review by the Committee
on Standards in Public Life**

**The Committee
on Standards
in Public Life**



March 2025



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Recognising and responding to early warning signs in public sector bodies

**A review by the Committee
on Standards in Public Life**

Chair, Doug Chalmers CB DSO OBE

March 2025



Chair's foreword

Grenfell, Windrush, Infected Blood, Post Office Horizon IT: each scandal very different in nature, but all with a catastrophic impact on human lives.

It isn't hard to find common themes among these scandals – a failure to listen to and act on concerns raised, a failure to learn lessons from similar incidents, and a failure to identify and share emerging risks.

Of course, hindsight is an unforgiving prism through which to view past decisions made in complex environments. But there is value in taking a step back and asking why so many of the same themes come up time and again in public life and to consider whether there is more that public sector bodies can do to spot problems at the earliest possible stage – while there is still time to act and potentially avert a disaster.

That is the task we set ourselves for this review. What did we find? That there are things organisations can do to increase the likelihood of risks and issues being uncovered. That culture and leadership, at all levels, are central to ensuring that these processes are effective. And that building an organisation where it is second nature for people to speak up about concerns is an art and not a science. By this I mean that there is no blueprint to follow, but when leaders are committed to advocating the benefits of an open culture and listen with curiosity when staff raise concerns, or suggestions for better ways of doing things, organisations can catch risks or make improvements and, as a result, are better able to deliver their purpose in the public interest.

It is not always easy to speak up – it requires moral courage to be the person who says, 'I'm not sure this is going to plan,' or, 'is there a risk that if we do X, it will have these negative consequences?' But in doing so, we honour the basic contract that we as holders of public office have with the public we serve.

Readers of our reports will notice that we revisit and expand on some of the themes we first discussed in our 2023 report, 'Leading in Practice', as well as exploring new areas. We share the same aspiration that we had for Leading in Practice, that this report will stimulate discussion and be a useful resource for leaders in the public sector as they reflect on how they can best equip their organisations to identify and resolve problems or issues that might get in the way of delivering the core purpose of their organisation. With this in mind, we have included 20 points for reflection to assist leaders and which employees can use to hold their leaders to account.

Doug Chalmers CB DSO OBE

Chair, Committee on Standards in Public Life



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Executive summary

The common themes among organisations that have failed the public in recent years are clear for all to see.

Many of the reports of public inquiries and other independent reviews have revealed weaknesses in organisational culture, characterised by defensiveness and a reluctance to listen to and act on concerns raised by employees and members of the public. There was often a failure to identify and address emerging issues before they escalated and a failure to learn from previous mistakes or similar incidents and failures.

While addressing failures in public life requires clear and unambiguous law to sanction misconduct, it is equally important to focus on what public sector bodies can do to stop these failures from happening in the first place.

The purpose of this review is to support public sector bodies to put in place the processes needed to recognise the early warning signs of emerging problems and to facilitate a culture where speaking up about concerns and learning from mistakes are seen as a personal duty and are valued by everyone in the organisation. Our aspiration is better outcomes for the public by mitigating the risk of harm, saving taxpayers' money and leading to the more effective delivery of public services.

We include examples of how organisations have sought to identify and respond to the early warning signs of emerging problems and have identified **20 points for reflection** which we hope will assist leaders to consider whether improvements can be made to their organisations' processes and culture, and which employees can use to hold their leaders to account.

Chapter 1: The Principles of Public Life and the public interest

The Principles of Public Life – honesty, openness, objectivity, selflessness, integrity, accountability and leadership – require holders of public office to act solely in terms of the public interest.

The public interest should guide the actions and behaviours of public office holders at all times. At the most prosaic level, pursuing the public interest means getting the basics right and providing a good service. Public bodies must be cognisant of the power imbalance between them and the users of their services and should be approachable and responsive when people have cause to complain.

Acting in line with the public interest is an obligation. But it also offers huge benefits. It promotes public trust, which, in turn, is necessary for compliance, supports good decision-making in complex and fast-moving situations and builds a culture where the workforce is unified by a common purpose.



Chapter 2: Accountability within the delivery chain

Public service delivery is complex, which is why it is crucial that there are robust accountability mechanisms running through each delivery chain. The specific mechanisms and processes will vary between organisations and sectors but there are four basic characteristics that should be common to all organisations:

1. A clear governance and accountability structure.
2. A well-defined set of objectives.
3. Effective systems for monitoring performance, finance and risk.
4. A strong and active sponsorship relationship between organisations in the same delivery chain.

This chapter explores these factors with reference to the relationship between government departments and their arm's length bodies (ALBs). We share examples of best practice with the intention that they will be of assistance to departments and their ALBs as they work together to deliver public services in the public interest. In particular, we include examples of how departments ensure an ongoing dialogue with their ALBs about the ALBs' objectives and examples of the methods used by departments to gain assurance about their ALBs' management of risk and performance.

Building strong relationships based on trust matters. When these relationships work well, they enable effective accountability. The importance of sponsorship can sometimes be underplayed within departments. Effective sponsorship can help to identify and address risks and potential problems before they escalate.

Chapter 3: Risk and data

Successful organisations are effective at managing risk. This does not mean that all risk can or should be avoided, rather it means that controls should be put in place to manage risk, to the tolerance level agreed by the senior leadership.

Everyone within a public sector body has a responsibility to identify and report risks. People working in public-facing roles often see the first signs that there may be an emerging problem in the delivery of public services. It is therefore crucial that frontline workers and their managers have processes in place that enable them to identify potential issues. Creating a culture where people feel safe to speak up is a core part of an organisation's ability to identify and act on risks.

Bringing together high-quality data and interpreting it intelligently allows links to be made across the records held by an organisation and can enhance understanding of the risks it carries. Organisations need analysts who can triangulate data and spot trends, but they also require leaders to be curious about what the data is saying about their organisation and, as one of our contributors put it, to "poke in the dusty corners".



AI has the potential to support risk management, given its capability to process huge volumes of data at speed. On the evidence that we heard, the use of AI to help public sector organisations with understanding the risks to which they are exposed is at an early stage.

However, it is crucial that wherever AI is procured, deployed and monitored, it is done so appropriately and in line with the Nolan Principles of openness, accountability and objectivity. Our 2020 report on AI and Public Standards contained recommendations about the safeguards and standards required as AI becomes adopted more widely across the public sector.

Chapter 4: Effective scrutiny by the board

There have been many high-profile failures in public life, where the governance structures and mechanisms were in place but for a variety of reasons the board failed to grasp the significance of red flags and failed to act before it was too late.

The quality and timeliness of the information to which a board has access and the thoroughness with which it exercises its challenge role are critical to the exercise of the board's scrutiny function. Providing effective challenge means asking difficult questions constructively.

We heard how a breadth of skills and experience on a board can mitigate the risk of groupthink. Equally, refreshing membership of boards by setting limits on the length of tenure or staggering appointment terms can ensure a board remains responsive and alert to new issues. Considering values and motivation at the recruitment stage helps with the appointment of people with a public service ethic and sends the message that how board members go about their work will be considered central to the delivery of their role.

The culture of the board is a crucial factor in its effectiveness and will be heavily influenced by the quality of the relationships between and among the executive leadership and non-executive directors.

Bringing an independent, external perspective to board meetings and hearing directly from the users of public services enhances insight into the organisation's delivery of its services.

Chapter 5: Being open to public scrutiny

Making information available about what an organisation does and how it does it enables the public and those bodies charged with holding the organisation to account to scrutinise its performance and expenditure. Withholding information merely to protect the institution (or its members) from scrutiny does not meet the Nolan Principle of openness.

The more power an organisation has over citizens' lives, the more transparent it needs to be about what it is doing and how. Meaningful transparency also requires that information is presented in a manner that is clear, intelligible and, where appropriate, in context so that the full significance of the information can be understood.

Good records management is a prerequisite for an accountable organisation. It means that information about why decisions were made is preserved should it be necessary to



review these decisions in the future. The contemporaneous nature of the record provides some assurance that it is an accurate reflection of what happened. Documenting decisions accurately also enables organisations to learn lessons when things go wrong and to evaluate comprehensively the success or failure of projects or policies.

Accountability requires bodies to be approachable and to make it easy for people to raise issues with them. It also requires organisations to engage proactively with the public to increase understanding of how they can best meet their needs.

Parliament, ombudsmen, regulators and inspectorates all have a role in scrutinising public sector bodies and holding them to account for their delivery of public services. Public sector bodies need to support these scrutiny bodies in their task by being responsive to requests for information and by seeing them not as a threat, but as a provider of constructive challenge and a source of insight about how they can be better.

Chapter 6: Learning from successes and failures

Failing to make time to ensure that lessons are learnt when things go wrong may mean that opportunities to avert subsequent disasters are missed.

Organisations need to have processes in place for reviewing scenarios where things do not go according to plan, identifying the lessons that can be learned and then ensuring that these lessons are embedded within the organisation. Public sector bodies should also take note of recurring themes when things go wrong elsewhere in public life and consider what their own organisation might learn from these crises.

Putting the public first also requires public office holders to share learning when projects, policies and procedures work well so that these successes can support improvements in public service delivery elsewhere.

Complaints can provide valuable insight for an organisation into how the public is experiencing its services and flag issues that warrant closer investigation.

Whether complaints are viewed as an opportunity or a threat is determined by the tone set by the leadership of an organisation. It requires leaders to value and prioritise the learning to be gained rather than resorting to blame, defensiveness and reputation management.

Chapter 7: Leadership and culture

It is clear to us that leadership is the most important factor in an organisation that successfully identifies and addresses emerging issues promptly and is willing to learn from its mistakes.

Clarity. Leaders must be clear that they welcome potential problems being brought to their attention early and that everyone in the organisation has a duty to deal with the public with openness and honesty.



Consistency. Leaders must be role models for the standards they expect of others, even when they are under pressure. When employees speak, leaders must listen.

Consequences. Leaders must address behaviour that is inconsistent with a culture that values people raising concerns. In public life, the ‘how’ is as important as the ‘what’ in getting things done.

This chapter discusses existing duty of candour obligations in public life and the government’s commitment to legislate to introduce a duty of candour for public servants.

We have seen in the reports of independent inquiries how, when the public has suffered as a result of action or inaction by a public sector body, it is often the defensive response of the body and its failure to admit where it went wrong and apologise, that compounds the pain suffered by those affected by its actions. When public officer holders make mistakes, they must acknowledge the failure and offer a meaningful apology.

An organisation that approaches public scrutiny openly and transparently, does not seek to defend the indefensible and treats the public with respect, needs an open internal culture that supports employees to speak up if they become aware of actions or behaviours that are falling short of these standards.

Employees need to feel that leaders are genuinely interested in what they have to say, and leaders need to be visible and available. The way leaders respond when people raise concerns has a ripple effect though an organisation – for good or bad. Strong leadership requires leaders to be curious about their organisation and to welcome concerns and complaints as information that will enable them to make improvements.

While the aspiration is a culture where people feel comfortable raising concerns as and when they arise, formal speak up/whistleblowing mechanisms are a crucial safety net and there will always be a need to have effective and trusted formal processes in place.

Public sector organisations must train their leaders how to handle a crisis appropriately so that they are better prepared when things go wrong and less inclined to minimise problems that are raised with them. Leaders must also actively search out the first signs of issues that may be bubbling under the surface.

Organisations need to be careful not to disincentivise leaders from identifying issues and learning lessons from them. How expectations and priorities are communicated is very important. If it is made clear that leaders will be judged by the way they learn from complaints rather than how they manage them, this approach may have a positive impact throughout the organisation.

One of the perceived barriers to leaders escalating concerns to the organisation at the next level in the accountability chain is concern about that organisation’s response. Providing the right targeted leadership and improvement support may help people feel that it is worth raising concerns and asking for help.



Points for reflection

Building accountable organisations

1. How do you support your employees in understanding how their role, and the purposes of your organisation, serves the public?
2. Is it clear to your employees how decisions are made within your organisation and who is accountable for them?
3. What do you do to build strong relationships with those bodies that report to your organisation as well as those bodies you are accountable to?

Identifying and assessing risks

4. How do you know that the arrangements you have in place for the identification and mitigation of risks are effective?
5. How do you assure yourself that the data your organisation collects to assess its activities is of a high quality and that there is sufficient capability within the organisation to interpret the data intelligently?
6. How do you ensure your organisation views complaints as valuable feedback reflecting the public's experience of its service and uses that data to spot systemic issues and make improvements?

Speaking up

7. What do you do to build an open culture where people feel comfortable raising issues, asking questions and sharing their ideas?
8. How do you help your employees to understand that everyone in your organisation has a responsibility to speak up when they see something going wrong?
9. Are there clear and well-understood ways for people to raise concerns formally? How do you know these routes are trusted? How do you ensure that when people speak up, they are protected and not victimised?

Development and performance management

10. How does your organisation support the development of leaders who have the skills and confidence to handle a crisis appropriately?
11. How is listening to feedback and embedding learning incorporated into the process for assessing your organisation's executive and non-executive leaders?



Public scrutiny

12. Is your organisation as transparent as it can be when deciding what information to publish about its activities, including the provision of contextual detail where appropriate?
13. Could your organisation do more to engage proactively with the public and to understand the public's perspectives on how to improve your organisation's public services?
14. When things go wrong, how quickly do you acknowledge the failure and offer a meaningful apology?

Learning lessons

15. Does your organisation have mechanisms in place to support a robust corporate memory of why previous decisions were or were not taken?
16. How do you ensure that the lessons learned from evaluating projects and policies are shared within the organisation and that these lessons inform future decisions?
17. How do you ensure that your organisation regularly considers what it can learn from the successes and failures of other public bodies?

Board scrutiny

18. How do you ensure that your board receives the information it needs about risks and issues in a format that is most useful to board members, enabling them to evaluate the significance of that information?
19. How is your board encouraged to scrutinise robustly the decisions made by your organisation? Is it sufficiently curious? Does it listen to the views of public service users?
20. What do you do to ensure that your board has the right balance of skills, backgrounds, experiences and independence of judgement? Is understanding prospective board members' values and commitment part of the recruitment process?



Introduction

Why this review matters

1. In recent years we have seen a number of catastrophic failures within public life, with a high cost to the individuals affected, the public purse and trust in public institutions. In the most serious cases there has been avoidable loss of life. Chairs presiding over public inquiries into disasters such as the Infected Blood scandal and the Grenfell Tower fire have described in stark terms the catalogues of failures, why they happened and who was responsible.
2. The areas of public life examined by public inquiries and other independent reviews have been varied, yet the reports reveal that many of the same organisational failures were present within the different public sector bodies involved. Many of the reports describe weaknesses in organisational culture, characterised by defensiveness and a reluctance to listen to and act on concerns raised by employees and members of the public. There was often a failure to identify and address emerging issues before they escalated and a failure to learn from previous mistakes or similar incidents and failures. Figure 1 identifies some of the common themes evident in four recent examples.
3. We are not claiming that identifying and acting on these factors would necessarily have averted disaster in each of these cases. Indeed, it is important to read the individual reports to understand each inquiry chair's conclusions and the complex mix of elements which contributed to the flawed decision-making. Instead, we include this table to illustrate the types of factors that are common among organisations that have failed and to which public sector bodies would therefore do well to pay close attention. They may indicate that the initial conditions are present for problems to emerge and grow and for warning signs to go unheeded.
4. The pattern in themes across different cases was echoed in the evidence we took from contributors to our review who had experience of multiple inquiries.

“What I discovered was that the patterns of behaviour that you are talking about spread across different sectors. Bishop James Jones and I summed that up in the phrase ‘the patronising disposition of unaccountable power’, which is the report we prepared in 2017.¹

Those words came from what the Hillsborough Independent Panel found, looking at Hillsborough, but they have recurred in pretty well every scandal that has emerged since we wrote that report in 2017. The Grenfell families contacted us and said, ‘In this report, you have written our story.’ In East Kent, there were similar patterns of behaviour from the Trust.”²

Ken Sutton, secretary to the Hillsborough Independent Panel and secretary to the reviews into maternity care at East Kent Hospitals NHS Trust, 11 July 2024

1 HM Government, ‘The patronising disposition of unaccountable power’, 1 November 2017, available at: www.gov.uk/government/publications/hillsborough-stadium-disaster-lessons-that-must-be-learned

2 Department of Health and Social Care, ‘Reading the signals’, 19 October 2022, available at: www.gov.uk/government/publications/maternity-and-neonatal-services-in-east-kent-reading-the-signals-report



5. When major failings occur, members of the public will want to know that those identified as culpable will face consequences. They rightly will want those responsible to be ‘held accountable’. But how much better would it be if public sector bodies took steps to mitigate or even prevent such crises from happening in the first place? How much suffering could be prevented? And how much time and money could be saved to spend on public services rather than dealing with the aftermath?³
6. The law can punish and it can act as a deterrent. However, for the law to be effective, it must be clear and unambiguous. The Law Commission has identified shortcomings in the offence of Misconduct in Public Office, which it found was outdated and confusing. In 2020, the Law Commission recommended replacing the current common law offence of Misconduct in Public Office, which has existed for hundreds of years, with two offences – an offence of corruption in public office and an offence of breach of duty in public office.⁴ It argued these new offences would make the law clearer and easier to follow.
7. We note the government’s announcement in the 2024 King’s Speech that the government would legislate to introduce a duty of candour for public servants and the Prime Minister has said that the law will include criminal sanctions for those who breach it.^{5, 6}
8. The law must be backed up by a culture of accountability. While the principle of accountability is often concerned with how people are held to account for their actions after the event, it must also guide the decisions and behaviour of public office holders in the daily exercise of their roles. Leaders have a responsibility to make sure that the processes and culture are in place to both support the identification and reporting of issues up through the chain of command. They must also respond appropriately to requests for information from the public and those organisations who are tasked with holding the public body to account.
9. The purpose of this review is to support public sector bodies to equip their employees to identify and address problems when they first start to emerge and before they deteriorate into a full-scale crisis. Hence, our focus is on those matters that are within the direct control of public sector organisations. We examine the role of leaders in facilitating a culture where speaking up about concerns and learning from mistakes are seen as

3 The cost to the public purse when organisations fail the public was illustrated by the whistleblowing charity, Protect, in their report, ‘The Cost of Whistleblowing’, February 2025, available at: https://public-concern-at-work.s3.eu-west-1.amazonaws.com/wp-content/uploads/images/2025/01/30100543/PROTECT_Costs-of-Whistleblowing-ONLINE.pdf

4 Law Commission, ‘Misconduct in Public Office’, 4 December 2020, available at: <https://lawcom.gov.uk/project/misconduct-in-public-office/>

5 Prime Minister’s Office, ‘The King’s Speech 2024’, 17 July 2024, available at: www.gov.uk/government/speeches/the-kings-speech-2024

6 Civil Service World, ‘New ‘duty of candour’ for officials will include criminal sanctions, Starmer says’, 25 September 2024, available at: www.civilserviceworld.com/professions/article/duty-of-candour-public-servants-criminal-sanctions-starmer-says



personal duties and are valued by organisations. This would result in better outcomes for the public by mitigating the risk of harm, saving taxpayers' money and leading to the more effective delivery of public services.

Barriers to overcome

10. Public office holders are dealing with some of the most difficult challenges we face in the UK today, particularly those who work in parts of the public sector that have an impact on the safety and health of the British public. While general policy may be framed at the national, and to some extent, the local levels, the delivery of services on which the public necessarily relies is undertaken by a wide variety of bodies. These bodies include government departments, NHS England, the different police forces across the United Kingdom, councils and executive agencies such as HM Prison and Probation Service and the Driver and Vehicle Licensing Agency. Some bodies such as the Post Office combine public service and commercial goals. These bodies employ a wide variety of personnel – civil servants, police officers, nurses and council officers in addition to the ministers and councillors who determine policy.
11. The size, constrained resources, multiple levels of authority and outsourcing to other bodies all mean that decision-making across the wide span of the public sector is challenging. Errors will on occasion be made and inevitably some things will go wrong. We believe that if people in public office respond quickly to correct errors, learn the wider lessons and apply them to improve public services, the benefit to the public will be considerable.
12. To gain a sense of the barriers to identifying and addressing problems, we asked contributors to our review what they saw as the main reasons that public bodies might fail to act quickly and decisively at the first sign of a problem within an organisation. Given the broad scope of our review, no report could analyse the processes and cultures of individual public bodies. Instead, we have sought to identify themes. Some selected themes that came out strongly were: institutional defensiveness and reputation management, groupthink, poor relationships, fear of speaking up and failure of board scrutiny. Figure 2 discusses their meaning.
13. There are no easy answers and what works for one organisation might not work for another. We hope that the examples and stories we have included will offer food for thought and challenge those working in the public sector to reflect on whether there are barriers to identifying problems within their own organisation and how those barriers might be overcome. Central to this process is keeping at the forefront the primary purpose of the organisation and the underlying responsibility to serve the public interest while nurturing open organisational cultures where problems are reported without fear.



Figure 1: Common themes from recent inquiries

This table identifies themes common to a range of recent inquiries and reviews that contributed to the failure of public sector organisations to identify warning signs and act appropriately. See appendix 1 for some relevant quotations from the reports.

	Theme	Windrush Lessons Learned Review ⁷	Ockenden Review ⁸	Infected Blood Inquiry ⁹	Grenfell Tower Inquiry ¹⁰
1	Failure to listen to and act on concerns raised by employees and/or the public				
2	Failure to investigate properly when things went wrong				
3	Failure of the board to have effective oversight of issues and concerns				
4	Overly defensive organisational culture				
5	Failure to support a ‘speak up’ culture				
6	Poor relationships within the organisation				
7	Failure to understand the unintended consequences of policy decisions				
8	Failure to learn from past mistakes, or similar incidents and failures				
9	Failure to identify and share emerging themes that might have alerted the organisation to a developing risk				

7 Home Office, ‘Windrush Lessons Learned Review’, 19 March 2020, available at: www.gov.uk/government/publications/windrush-lessons-learned-review

8 Department of Health and Social Care, ‘Findings, conclusions and essential actions from the independent review of maternity services at the Shrewsbury and Telford Hospital NHS Trust’, 30 March 2022, available at: www.gov.uk/government/publications/final-report-of-the-ockenden-review

9 Infected Blood Inquiry, ‘The Inquiry Report’, 20 May 2024, available at: www.infectedbloodinquiry.org.uk/reports/inquiry-report

10 Grenfell Tower Inquiry, ‘Grenfell Tower Inquiry: Phase 2 Report. Report of the public inquiry into the fire at Grenfell Tower on 14 June 2017’, September 2024, available at: www.grenfelltowerinquiry.org.uk/phase-2-report



Figure 2: What are the barriers to identifying, addressing and learning from problems in public sector bodies?

We asked contributors to our review what they saw as the main reasons why public sector bodies might fail to act quickly and decisively at the first sign of a problem within the organisation.

These are the themes that were raised with us.

Institutional defensiveness and reputation management

It can be tempting for leaders to minimise the problems they are presented with and choose to focus on the facts that are more convenient. There can be a cultural disposition to prioritise the protection of the organisation's reputation over addressing mistakes. If problems are routinely denied or explained away, this is at odds with an organisational culture that values people being curious when things go wrong and asking appropriately probing questions.

"We counted eight separate occasions when there were what should have been clear red flags for the trust in East Kent, every one of which they managed to explain away, ignore, think that they had addressed the problem by writing an action plan that was never implemented. The problem went on for at least 10 years."

Dr Bill Kirkup, Chair of reviews into maternity care at East Kent Hospitals NHS Trust and Morecambe Bay maternity services

Groupthink

Groupthink has a number of causes. It can occur when people think the same way because they have similar backgrounds and skills, or when micro-cultures develop due to isolated workplaces that have little interaction with other teams. It can also arise when people are reluctant to challenge or to be seen as an outlier.

"If you look, for example, at leadership teams within public bodies, they tend to be people who think very similarly, people who come from a very similar background and people who will not challenge because they do not want to be the outlier. You always need somebody who will think a bit differently and ask those difficult probing questions to perhaps change the course in which they are going. Bringing some external lens into that leadership group is really important."

Amerdeep Somal, Local Government and Social Care Ombudsman



Poor relationships within organisations

Often scandals in public life are the result of poor relationships. We have seen this in the many reports of inquiries into the failures of maternity services and in the relations between the Tenant Management Organisation and the residents of Grenfell Tower as described in the report of the Grenfell Tower Inquiry.

“The culture which exists in the NHS is informed by ministerial steers, ill-functioning legislation on duty of candour and whistle-blowing, insensitive handling of clinicians by Boards and management and sometimes by the consequences of a hierarchy of clinicians. There are disputes between professions, between clinicians, and between midwives and nurses, and all this gets in the way of listening to patients and patient safety.”

Sir Rob Behrens, Former Parliamentary and Health Service Ombudsman

Failure to build a speak up culture

If employees feel that they won’t be listened to or supported if they speak up, or that they will be blamed for the problem they are raising, the organisation loses a valuable opportunity to bring potential problems to awareness and resolve concerns before they escalate.

“I do think the most powerful thing you can have is a culture that says it is actually alright to say to your leaders, ‘Something is going really wrong here,’ or, ‘I do not like how this looks,’ or, ‘Actually, my ward is under-resourced’. That you are not going to get sat on from a height if you do that. To me, that is one of the most powerful things senior leaders ought to be doing.”

Mark Fisher, Chief Executive, NHS Greater Manchester Integrated Care Board

Failure of board scrutiny

The board performs an important role in scrutinising the decisions and practices of the organisation. We have seen examples in independent inquiries and reviews where a lack of curiosity or robust challenge on the part of the board meant that opportunities to identify and act on issues of concern were missed.

“Ultimately the final responsibility for an organisation failing should rest with the board, creating a system where oversight stops problems developing at an early stage, and where this fails, the board are then held to account. However, the failings at the Post Office, and repeated failings in the NHS, show the cost organisations can pay where they have weak boards.”

Protect, open consultation, submission 20



Chapter 1: The Principles of Public Life and the public interest

1. The primary obligation of public office holders is to the public. Public service is central to the Principles of Public Life, which were set out by the first chair of CSPL, Lord Nolan, in 1995.¹¹ The principles are: honesty, openness, objectivity, selflessness, integrity, accountability and leadership. Our 2021 report, ‘Upholding Standards in Public Life’, found that the Nolan Principles have stood the test of time and are reflected in rules and codes of conduct across public life.¹²
2. The Principles of Public Life require holders of public office to act solely in terms of the public interest. Yet the notion of the public interest being front and centre will not have been evident to those who have suffered as a result of the failures of public sector bodies over recent decades – cases such as the Infected Blood scandal, the Post Office Horizon IT scandal, the failure of multiple maternity services and the response to the Hillsborough disaster.
3. In his 2017 report, ‘The patronising disposition of unaccountable power’, Bishop James Jones called for a substantial change in the culture of public bodies. To help bring about that cultural change, he proposed a Charter for Families Bereaved through Public Tragedy, inspired by the experience of the Hillsborough families and made up of a series of commitments to change.¹³ Point 2 commits public bodies adopting the charter to “place the public interest above our own reputation,” which explicitly addresses what Bishop Jones describes as one of the core features of the patronising disposition of unaccountable power: “an instinctive prioritisation of the reputation of an organisation over the citizen’s right to expect people to be held to account for their actions.”
4. Acting in line with the public interest certainly means responding appropriately to public tragedy, but it should also guide the actions and behaviours of public office holders in their day-to-day work. At the most prosaic level, pursuing the public interest means getting the basics right and providing a good service. Most people just want the services they need to be there when they need them. They do not want to feel they have no choice other than to make a complaint. Should a complaint be necessary, organisations need to be approachable and responsive. There is, inevitably, an imbalance between public service users and the body they are dealing with and it is important that public bodies recognise this. That people who try

11 The Principles are referred to interchangeably in this report as the Principles of Public Life and the Nolan Principles.

12 Committee on Standards in Public Life, ‘Upholding Standards in Public Life’, 1 November 2021, available at: www.gov.uk/government/publications/upholding-standards-in-public-life-published-report

13 HM Government, ‘The patronising disposition of unaccountable power’, 1 November 2017, available at: www.gov.uk/government/publications/hillsborough-stadium-disaster-lessons-that-must-be-learned



to raise issues with public institutions can end up locked in a ‘David and Goliath’ type battle has been seen vividly in the experiences of sub-postmasters who sought to raise concerns about the Horizon computer system but were wrongly prosecuted.¹⁴

“Public service users, however educated and powerful, will face situations where they are heavily outgunned by the public body they are up against. We have to challenge ourselves to make it easier for that person to raise a concern or red flag and for us to provide that route to accountability.”

Rebecca Hilsenrath, Ombudsman and Chair, Parliamentary and Health Service Ombudsman, Joint Association of Chief Executives and Public Chairs’ Forum event, 3 July 2024

5. Acting solely in terms of the public interest is a requirement for all public office holders but being guided by the public interest also offers considerable benefits, both to individuals and to the institutions for which they work.
6. First, public confidence that a public institution is committed to the public interest is crucial for trust in the organisation, which in turn is necessary for compliance. Two examples illustrate this point: the tax system and policing. To take the first, voluntary compliance is at the heart of how the tax system works in the UK. While HMRC has methods and mechanisms to support compliance, high levels of trust, transparency and customer focus are critical to a culture of people paying their taxes. In the second example, the British model of policing is based on the Peelian principles of policing by consent. Those principles recognise that the power of the police to fulfil their functions and duties is dependent on the public approval of the police’s existence, actions and behaviour and on their ability to secure and maintain public respect. Damage has been caused in recent years by some very high-profile failings and erosion of standards, but public trust continues to be of critical importance to the operation of the British policing model. Transparency and public engagement are critical to building public confidence that an institution is committed to acting only in the public interest. We discuss these subjects further in chapter 5.
7. Secondly, public office holders are often required to make complex decisions, sometimes in ambiguous and fast-moving operational environments. In such circumstances, taking a step back and viewing problems through the prism of the public interest can help public office holders focus on what really matters. The Principles of Public Life provide a compass to help navigate decisions. Figure 3 features examples of the tools used by public sector bodies to support employees to act in line with them.

14 BBC News, ‘Post Office Horizon scandal: Why hundreds were wrongly prosecuted’, 30 July 2024, available at: www.bbc.co.uk/news/business-56718036



8. Thirdly, we heard compelling testimony that a shared understanding among employees of the objectives that the organisation is there to achieve, and how they serve the public interest, plays an important role in building a culture where people are valued for spotting and addressing potential problems. Tying the culture of an organisation to its purpose can unify a workforce and give meaning to its work. This is in keeping with evidence to the committee's 2023 review, *Leading in Practice*.¹⁵ Contributors to that review explained how defining organisational values that link to the purpose and mission of their organisation gave the values resonance and had a galvanising effect.

“Strong connection to purpose is really important. Ideally, colleagues care about the organisation that they are a part of. They care about the customers that they serve, they do not see it as just a transaction. It is important as leaders to set really clear standards and expectations about values and how we do things around here, how we expect managers and their teams to behave to each other. We also have to be really clear about how we expect to deal with our customers.”

Angela MacDonald, Deputy Chief Executive and Second Permanent Secretary, HMRC, 11 July 2024

9. It is important to note that what the public interest requires in any situation will depend on the relevant facts in each case. Further, the ‘public’ is not a single homogeneous group – the public is often both the users of a public service and the taxpayer, and the balance between whose needs should have precedence may vary according to the circumstances.¹⁶ But resolving tensions between different dimensions of the public interest calls for active, critical and reflective engagement within the organisation, and clarity about the organisation's core purposes.
10. Ensuring that the public interest is at the forefront when decisions are made within public sector bodies will support high quality conversations and a deeper understanding of the trade-offs that are part of public life.

15 Committee on Standards in Public Life, ‘Leading in Practice’, 24 January 2023, available at: www.gov.uk/government/publications/leading-in-practice

16 Committee on Standards in Public Life, ‘The Nolan Principles: Public Standards, the Public Interest and Public Service’, 24 October 2024, available at: www.gov.uk/government/publications/30th-anniversary-of-the-nolan-principles



Figure 3: Codes and guidance to support employees to act in line with the Nolan Principles

Board members of NHS organisations are subject to the Fit and Proper Person Test (FPPT) supervised by the Care Quality Commission. Adherence to the Seven Principles of Public Life is included in the guidance for assessing good character.

Care Quality Commission, open consultation, submission 4

The 2024 Code of Ethics for policing sets out the professional behaviours that the public can expect to see from officers, staff and volunteers. It is intended to help police professionals to do “the right things in the right way for the right reasons.”¹⁷ The three ethical policing principles: courage, respect and empathy, and public service, draw from the policing principles contained in the 2014 Code of Ethics, which included the Seven Principles of Public Life.

Academy Trusts are required as a condition of their funding agreements with the Secretary of State for Education to commit to uphold the Seven Principles of Public Life. The Academy Trust Handbook provides the overarching framework for implementation of effective financial management and other controls. It states that accounting officers must adhere to the Seven Principles of Public Life.¹⁸ The board chair and the accounting officer must manage personal relationships with related parties to avoid both real and perceived conflicts of interest, promoting integrity and openness in accordance with the Seven Principles of Public Life.

The Chartered Institute of Public Finance and Accountancy (CIPFA) has incorporated the Seven Principles of Public Life into its professional standards and guidance to the local government sector.

CIPFA, open consultation, submission 5

17 College of Policing, ‘2024 Code of Ethics’, January 2024, available at: www.college.police.uk/ethics/code-of-ethics

18 Education and Skills Funding Agency, ‘Academy trust handbook 2024’, July 2024, available at: https://assets.publishing.service.gov.uk/media/66a3909aab418ab055592dda/Academy_trust_handbook_2024_FINAL.pdf



The Framework for Ethical Leadership in Education adapts the descriptors of the Seven Principles of Public Life to explain what they mean in the context of educational leadership and sets out a set of personal characteristics or virtues expected of leaders.¹⁹ The National Governance Association's (NGA) Pathfinder Project has supported schools and college leaders to use the framework to navigate through ethical thinking and decision-making. The NGA has integrated the framework into its guidance, publications and professional development.²⁰

"I am not sure that we have done anything that has been so positive, especially in terms of one of the results being that adopting this did not add to overstretched workloads. It gave leaders and boards confidence. It gave them permission to have these conversations. It gave us all common language, but it did not add to their workload. That was phenomenally positive."

Emma Knights, then CEO, National Governance Association, 10 May 2024

"We use the Nolan Principles in the training that we give to our staff. We audit against them where we have either been asked to do a specific piece of work in that area, so in behaviour or culture, but also, if we were looking at something like a financial management review that was drawing on the managing public money framework, that would be aligned to the Nolan Principles."

Harriet Aldridge, Chief Executive, Government Internal Audit Agency, 24 May 2024

The Principles of Public Life are core and fundamental to the principles of the Civility and Respect project led by the National Association of Local Councils (NALC), One Voice Wales and the Society of Local Council Clerks.

"The pledge is easy for councils to sign up to and it will enable councils to demonstrate that they are committed to standing up to poor behaviour across our sector and to driving through positive changes which support civil and respectful conduct."

NALC open consultation, submission 16

19 ASCL, 'Framework for ethical leadership in education', 2019, available at: www.ascl.org.uk/ASCL/media/ASCL/Our%20view/Campaigns/Framework-for-Ethical-Leadership-in-Education.pdf

20 National Governance Association, 'Paving the way for Ethical Leadership in Education', January 2021, available at: www.nga.org.uk/media/ylteeeuz/ethical-leadership-report-final.pdf



Chapter 2: Accountability within the delivery chain

Accountability mechanisms

1. When a member of the public engages with the government, in most cases, they will be interacting with a public body or a private provider delivering a service on the government's behalf. Public bodies may be linked in a hierarchy, with each body being accountable to the body that sits above it. Where companies are providing a service paid for by the taxpayer, there must be proper governance of these outsourcing arrangements.
2. The organisations in a delivery chain have different roles, but a common overarching purpose. For example, NHS England and the Department for Health and Social Care do different jobs but their combined purpose is to support the Secretary of State to deliver the goal of improving the health of the nation.
3. Public service delivery is complex, which is why it is crucial that there are robust accountability mechanisms running through each delivery chain. The specific mechanisms and processes will vary between organisations and sectors and no review could examine them all. Instead, we highlight the following four basic characteristics that should be common to all organisations and explore these characteristics with reference to government departments and their ALBs.²¹
 - A clear governance and accountability structure.
 - A well-defined set of objectives.
 - Effective systems for monitoring performance, finance and risk.
 - A strong and active sponsorship relationship between organisations in the same delivery chain.
4. In selecting government departments and their ALBs to discuss the characteristics of accountable organisations, we are not saying that the system is perfect. We are aware of criticism that the ALB landscape is opaque and that ALBs are subject to insufficient oversight. Lord Maude's 2023 report on governance and accountability in the Civil Service contains recommendations on ALBs.²² In December 2024 the Parliamentary Administration and Constitutional Affairs Committee announced an inquiry into public bodies policy.²³

21 CSPL is an arm's length body sponsored by the Cabinet Office

22 'Independent Review of Governance and Accountability in the Civil Service: The Rt Hon Lord Maude of Horsham', 13 November 2023, available at: www.gov.uk/government/publications/review-of-governance-and-accountability/independent-review-of-governance-and-accountability-in-the-civil-service-the-rt-hon-lord-maude-of-horsham-html

23 Public Administration and Constitutional Affairs Committee, 'Public Bodies: Inquiry', 13 December 2024, available at: <https://committees.parliament.uk/work/8745/>



5. In this chapter we discuss some of the themes that arose in the evidence and share examples of best practice that were drawn to our attention with the aspiration that they will be of assistance to departments and their ALBs as they work together to deliver public services in the public interest.

Accountability and independence

6. ALBs are administratively classified by the Cabinet Office. While there are three categories of ALBs (executive agencies, non-departmental public bodies and non-ministerial departments), in practice, public bodies of the same classification can operate very differently.²⁴ Government departments sponsor the ALBs within their remit, supported by advice from the Public Bodies team in the Cabinet Office, which provides guidance to departments and issues the ALB sponsorship code of good practice.²⁵ There is no statutory framework for ALBs in the UK.
7. We heard how the level of scrutiny and oversight of ALBs practised by departments will vary according to the degree of independence that the ALB requires from government to deliver its functions. Some ALBs are set up to have a high level of scrutiny and oversight, with clear direction set through departmental plans. Regulators usually require a high degree of independence to maintain confidence in their impartiality and tend to be set up to be free from political interference. For example, in the case of the Office for Students (OfS), the independent regulator of higher education in England, while ministers can guide the OfS on its strategic priorities for the sector, the OfS is only required to have regard to this guidance. Furthermore, the OfS is completely independent from government in terms of its operational priorities.
8. When we spoke to ALBs we picked up on a sentiment from some bodies that there has been a shift in the degree of oversight exercised by departments in recent years. A non-executive who has worked in a number of large public bodies over the last six years told us that these bodies felt that “the arm was getting shorter” and there was a greater tendency for departments to micromanage. We were told that this is problematic because it muddies accountability.

24 Cabinet Office, ‘Public Bodies Handbook – Part 1, Classification Of Public Bodies: Guidance For Departments’, page 8, available at: www.gov.uk/government/publications/classification-of-public-bodies-information-and-guidance

25 Cabinet Office, ‘Arm’s length body sponsorship code of good practice’, 23 May 2022, available at: www.gov.uk/government/publications/arms-length-body-sponsorship-code-of-good-practice/arms-length-body-sponsorship-code-of-good-practice



A clear governance and accountability structure

9. The wide range of ALBs and differences in the intended degree of independence from government mean the governance and accountability mechanisms required will vary. The HM Treasury document, ‘Managing Public Money’, explains that the terms of engagement between a department and its ALBs should be documented in a framework agreement. This describes the governance and accountability framework that applies between the body and its sponsor department and sets out how the day-to-day relationship should work in practice.²⁶
10. The board of an ALB provides leadership, strategic direction, advocacy and independent scrutiny to both the ALB and the department. The Chief Executive of the ALB is usually the Accounting Officer (AO), who has a set of obligations to the Principal Accounting Officer (PAO), who is normally the department’s Permanent Secretary. The PAO is accountable to Parliament for the management of public money. Routine oversight of each ALB within the departmental group should be led by a senior sponsor, who is normally supported by a sponsorship team.
11. The Secretary of State is ultimately accountable to Parliament for the performance of each ALB for which their department is responsible. We spoke to Lord Maude, who was commissioned by the previous government to conduct a review into governance and accountability in the Civil Service.²⁷ Lord Maude raised with us his observation that ministers frequently have little exposure to the work and delivery plans of public bodies and it is unrealistic therefore to expect ministers to be accountable for an ALB’s performance. He told us, “There needs to be a much richer connectivity between ministers and the public bodies.”
12. Other contributors acknowledged the complexities that exist around the accountability of ALBs.

“I agree there is a potential accountability gap there, but when you work with good ministers, they accept that it is a joint endeavour and that is what we should be trying to achieve together. They cannot do it on their own. They have to rely on the system underneath them to help them deliver it.”

**Kathryn Cearns, Non-Executive Director, Nuclear Decommissioning Agency,
Joint Association of Chief Executives and Public Chairs’ Forum event,
3 July 2024**

26 HM Treasury, ‘Managing Public Money’, May 2023, available at: www.gov.uk/government/publications/managing-public-money

27 ‘Independent Review of Governance and Accountability in the Civil Service: The Rt Hon Lord Maude of Horsham’, 13 November 2023, available at: www.gov.uk/government/publications/review-of-governance-and-accountability/independent-review-of-governance-and-accountability-in-the-civil-service-the-rt-hon-lord-maude-of-horsham-html



A well-defined set of objectives

13. A strong ALB has a clear set of objectives articulated by the department. We spoke to a group of departmental sponsorship leads about how their departments communicate objectives and priorities to their ALB. One department, which has a range of different types of ALBs, told us how it takes a proportionate approach to how it engages with its ALBs on priorities and deliverables, with the degree and intensity of engagement depending on the size and nature of the entity and the level of oversight and assurance required by the department.
14. The departmental sponsorship leads described a range of methods, both formal and informal, set out below, that they use to ensure that dialogue around the objectives is ongoing.
 - Ministers send annual chair's letters with ministerial priorities (noting the degree of independence from government in some cases means that this is not always appropriate).
 - Departmental representation on ALB boards.
 - Letter from the senior sponsor to the CEO of the ALB setting out the agreed programme funding.
 - Regular meetings between the senior sponsor and the CEO (with the frequency differing between bodies).
 - Regular engagement with customers receiving services provided by the ALB.
 - Yearly chair appraisal process, some conducted by ministers, some by departmental officials.
 - Sponsor meetings between the departmental and ALB finance and policy counterparts.
 - Ministerial meetings with the ALB.
 - An annual conference run by the department, which brings together the department's ALBs and provides an opportunity to talk through the department's strategic objectives and key priorities.



Effective systems for monitoring performance, finance and risk

15. Outcome assurance, financial oversight and risk management are three of the six key capabilities set out in the sponsorship code (the other three are: agreeing strategy and setting objectives, governance, and accountability and relationship management).
16. Harriet Aldridge, Chief Executive of the Government Internal Audit Agency (GIAA) told us that there is variation in whether departments have appropriate oversight of the delivery risks held by ALBs.

“If you are looking at the flow through of red flags there is an interesting question around, where significant delivery is done by an arm’s length body, whether the delivery risks that that arm’s length body holds are making their way through to the central department’s risk register. We absolutely see variation in that respect. In some departments audit committee chairs will speak regularly to their arm’s length body audit committee chairs and that flow of information up and down is really in place, but there are other departments where there is not that level of engagement at all, and therefore, I am confident that those delivery risks – which really are part of the central department’s – are not getting through.”

**Harriet Aldridge, Chief Executive, Government Internal Audit Agency,
24 May 2024**

Examples of methods for monitoring performance, finance and risk

17. Set out below are examples of the methods used by government departments to gain assurance relating to their ALB’s management of performance, finance and risk.

“ We do an annual assurance assessment, which red-amber-green (RAG) rates the arm’s length bodies against a number of criteria, establishing the risk that they present to the department. We ask the bodies for a self-assessment as well. We do not always agree, but we work through the issues and decide on an overall RAG rating as well as individual ratings against those criteria. A paper is then taken to our department audit risk and assurance committee. That allows the risks to be socialised with a bigger group, and we update against those risks on a quarterly basis. If, for example, we think there is a change or digital capability gap, it enables us to connect the right parts of the department with the bodies to try to support them and help them lift those capabilities.”



“ We have a system of monthly pillar meetings with the relevant team that principally covers risk, performance and finance, but also governance, which is one we are bringing on stream. We also have intelligence streams. There are 16 of those. We find that that is quite effective in terms of getting a sense of the pulse of an organisation. It encourages the team to be factfinders and to be curious. For example, it would include HR, anti-fraud and commercial, and we look at those individually. There is a named lead within the team on that, and we look at those collectively once a month and look for patterns and resonances. As sponsors, we have that cross-cutting perspective that others working on each of those individual areas do not, so we can maybe see patterns that would then collectively constitute what we could judge as a red flag.”

“ We have policy deep dives. Where we see a risk that looks, from a common sense point of view, as if it might be quite complex, and we want to test the rationale for it and whether the mitigations are right, we increasingly reach out to the relevant [departmental] policy teams and join them up with the relevant policy teams in the body. We convene and participate in that conversation. We also just recently started attending internal meetings of the risk teams and the group leads inside our ALB, so we can understand a bit better their internal process for escalating, and we can take a view as to whether they are making the right judgement calls there.”

“ In terms of risk, my Deputy Director sits on the board and so would expect any risks to come to the board. Then we have fortnightly meetings with [the ALB] where they would raise risks with us and we would feed them up through the [department] chain.”



“ [The department] has a central online reporting system for reporting risks, which is managed by our risk team. As well as getting the discussions, every quarter, policy sponsors will update those risk registers for their organisations, which the risk team can then look at centrally to spot any trends across the organisations and, if necessary, escalate that to our senior board in the department. In addition to discussions between policy sponsor teams and arm’s length bodies, the risk team and the central team with oversight of sponsorship have introduced regular meetings with individual policy sponsors to discuss risks.”

“ Our performance and risk committee (PRC) has appointed an independent member who attends the [ALB] risk committee approximately twice a year, so we have that independent oversight. The [ALB] also shares its risk report with us regularly, which we are sighted on as part of the [ALB] board papers, which we receive six times a year. Our senior sponsor attends the [ALB] board meetings as well. In addition, we also have regular meetings with the [ALB’s] director of finance, where we discuss risk, finance and governance issues.”

“ One member of the [department] Audit and Risk Assurance Committee (ARAC) is like an ARAC buddy for [ALB]. They do not formally sit on the committee, but they attend the sponsored body’s ARAC meetings. Similarly, we have a lot of interactions with the relevant functional leads for digital risks. We discuss them fairly regularly.”

“ Our standard practice is to have somebody to be a member of both the [ALB’s] board and the audit and risk committee. In that position, I will look at the internal risk register of the organisation alongside the other ARAC members and can therefore help to make sure that the serious things are escalated.”



“The functional capability of the organisations is quite often critical. Whether it is their change capability or HR capability or finance, we have fairly regular forums with the ALB functional lead. The finance directors will come in and meet our finance function. The digital directors will come in and meet our digital function. That is a way of setting standards with functions. What are the department’s expectations of the bodies? Are there capability issues? Are there risks emerging? Can the department lend more support to the bodies? It is about making sure that ALB professions are plugged into our professions.”

A strong and active sponsorship relationship

18. A factor to which departments and ALBs gave equal weight is the importance of building strong relationships based on trust. When these relationships work well, they enable effective accountability. Conversely, when trust breaks down, it is less likely that issues will be exposed transparently at an early stage. A department can act as a critical friend, providing challenge and supporting an ALB to be at its most effective in delivering its purposes.

“Trust and relationships are so important, so I think as an accounting officer it is my job to have a close, trusted relationship with the chairs and the chief executives of all of my ALBs. I want them to feel able to come to me with any questions, concerns, and advice, and I want them to know that I take an interest and I care about what they are doing. That takes time to build that level of relationship and trust.”

Cat Little, Permanent Secretary, Cabinet Office, 24 July 2024

19. A department’s working level relationship with the ALB is held by the sponsorship team, with oversight led by a senior sponsor. It is critical that the sponsorship team really understands the ALB and we heard from a number of ALBs how a lack of continuity, as a result of people moving on within departments, can impact on that depth of shared understanding.
20. We were told that there can on occasion be a lack of alignment between different teams in the same department, which can make ALBs feel they are getting pulled in different directions. One ALB chair told us that ensuring that people from both the departmental finance and policy teams attend meetings with the ALB was an effective way of overcoming this problem.
21. The level at which departments engage with their ALBs is variable. In one department, the sponsorship team has quarterly meetings with the permanent secretary to talk about each ALB. Another department told us how the level of seniority varies. In some cases the senior sponsor is the Permanent Secretary and in other cases it is the Director General, depending on the size of the ALB and the importance of what it is delivering.



22. We heard from departments that ministerial engagement with the ALBs within their remit also varies and is influenced by their level of interest in the entity. Some ALBs told us that they would welcome greater exposure to ministers but had a sense that this was not actively encouraged.

“Ministers are not exposed at all to what these bodies do, or they are encouraged to think that it is not really their business, and that is wrong too. It is important that the Permanent Secretary as part of his or her duty to the minister should make it possible and encourage it. If ministers do not want to do it, then you cannot make them. It is making it possible that is important. A lot of problems occur because ministers do not know what they can do and what they cannot do. There is often a lack of clarity over what their powers are. They are often discouraged from getting involved with things that they are perfectly entitled to be involved with, and very often should be involved with.”

The Rt Hon Lord Maude of Horsham, 31 May 2024

23. The importance of sponsorship can sometimes be underplayed within departments. Senior leaders can be very focused on what is happening on the ground and we heard that it is sometimes challenging to get the balance right between sponsorship activity and focusing on matters that are more pressing in the moment. We heard that resourcing constraints mean that sponsorship can sometimes lose out to “shinier and newer programmes and priorities such as digital and AI.” Lorna Horton, Deputy Director of the Cabinet Office Public Bodies team told us that departmental sponsorship teams are usually very small, and they often have other responsibilities as well, which then makes it difficult to focus on good sponsorship and the building of relationships. For example, many departments combine their public appointments and public bodies’ sponsorship teams. Public appointments can generate more immediate, short-term activity that has to be prioritised, in comparison to the work of sponsorship, which is more long-term activity.
24. When done well, effective sponsorship can help to identify and address risks and issues before they escalate. Success in the sponsorship context may go under the radar, but supporting ALBs, through quiet competence, is of critical importance to departments.

“You just need to have sufficiently experienced people doing the sponsorship and sitting on the boards and making sure that you have enough resource. That comes down to people knowing what sponsorship is there for and what value it has. A lot of what you do is trying to prevent things going wrong, so it is not always that visible what you have done, but the whole point is not to have a splash.”

Departmental sponsorship lead, roundtable, 18 July 2024



Chapter 3: Risk and data

Risk Management is the co-ordinated activities designed and operated to manage risk and exercise internal control within an organisation.

The Orange Book: Management of Risk – Principles and Concepts²⁸

1. This chapter sets out examples that were shared with us of the role of risk management in identifying emerging issues, and the benefits of data in building a deeper insight into these risks. We illustrate the value of maximising the use of high-quality data to enhance understanding of risks across an organisation and look at how AI is starting to be used as a tool to draw together these insights.
2. We do not seek to summarise the key principles of risk management or provide guidance on risk management techniques as these are readily available from professional bodies, specialists and consultants. The first port of call for government departments and their ALBs should be The Orange Book, which sets out the applicable standard for risk management in government.

Understanding and managing risk

3. Successful organisations are effective at managing risk. This does not mean that all risk can or should be avoided, but that controls should be put in place to manage risk, to the tolerance level agreed by the leadership of the organisation. In the case of public sector organisations, the risk appetite will be influenced by the potential impact on public lives and expenditure but also the appetite for innovation in specific areas.
4. Governance in government departments reflects the political environment, with ministers working with the executive and supported by non-executive advisors. Cat Little, Permanent Secretary at the Cabinet Office, told us that while there is variation in how boards at the top of government departments operate, the executive functions of government departments operate in accordance with normal corporate governance standards and are publicly accountable to Parliament through the annual report and accounts process. Every government department sets out their performance on governance and is accountable to Parliament for it.
5. Home Office lead non-executive director, Tim Robinson, set out in the Home Office Annual Report and Accounts for 2023 to 2024 how the department has redefined the Home Office operating model to ensure greater clarity of accountability through the line management chain.²⁹ Sir Matthew Rycroft, Permanent Secretary at the Home Office, told us how this involved cutting some executive committees, including the Risk and Delivery Committee and instead folding the consideration of risk into each

28 UK Government, 'The Orange Book: Management of Risk – Principles and Concepts', page 57, May 2023, available at: www.gov.uk/government/publications/orange-book

29 Home Office, 'Annual report and accounts 2023 to 2024', 30 July 2024, available at: www.gov.uk/government/publications/home-office-annual-report-and-accounts-2023-to-2024



element of the department's Outcome Delivery Plan, which is the substance of what the department is trying to achieve. In addition, the Executive Committee looks at performance and risk across the piece in order to ensure that performance and risk are also considered holistically.

"The thing that we have done, which I would advocate every other department doing, is to have a monthly stocktake between the Permanent Secretary and the direct report, so the Director General or the Second Permanent Secretary, on the basis of a standardised pack of data. It is still relatively early days, but I would say it has made a really big difference. On anything to do with the finance, I hold the chief operating officer to account, or, if it is down the line, the relevant Director General. Each of these stocktakes is structured around six rows: performance, risk, people, finance, our portfolio and commercial arrangements. Those are the six headings, which are accompanied by a standardised set of data. We are measuring changes in the same things each month."

Sir Matthew Rycroft, Permanent Secretary, Home Office, 16 May 2024

6. Risk is not a matter that is reserved for senior leaders and boards. Everyone within a public sector body has a responsibility to identify and report potential risks. People working at the sharp end of an organisation, such as frontline officers who come into direct contact with the public, often see the first signs that there may be an emerging problem. It is therefore crucial that frontline workers and their managers have processes in place that enable them to identify and report potential issues.

"Public bodies should consider what their 'frontline defence' looks like – one core aspect of spotting problems at an early stage is ensuring that frontline managers and middle managers have processes in place to help them identify patterns and problems, which can then be escalated to the senior management team (SLT) as needed."

Northern Ireland Public Sector Chairs' Forum, open consultation, submission 19

7. Creating a culture where people feel safe to speak up is a core part of an organisation's ability to identify and act on risks. Protect, the whistleblowing charity, told us in their response to our consultation that whistleblowing is one of the best early warning systems for organisations and a key tool to manage risk. In our 2023 report, *Leading in Practice*, we explored how leaders can create a speak up culture, supported by effective whistleblowing arrangements and we return to this subject in chapter 7.



“My starting point is that, when something does go wrong, as it did on Windrush, and often elsewhere in organisations, it is never the case that no one knew what was going on. There is always someone who knew. Quite often they are relatively junior, relatively frontline, and feel as though they do not have a voice. They feel as though it is not their job to wave a red flag. On top of the specific things we have done, the cultural change is to make sure that every single person knows that they do have a voice and they use that voice to flag their concerns.”

Sir Matthew Rycroft, Permanent Secretary, Home Office, 16 May 2024

8. We heard that maturity of risk management varies across government. Harriet Aldridge, Chief Executive at the Government Internal Audit Agency (GIAA), told us that she has seen a tendency within government to focus on mitigations that will prevent risk indicators from materialising. This approach can mean corrective action comes too late when things do go wrong. If there was a clearer acceptance at the outset that a major project or initiative is likely to experience setbacks, those responsible would be better equipped to manage the setbacks and ensure the original intended benefits do not become lost. GIAA often sees customers continue with a project or initiative after initial assumptions have changed (e.g. spiralling costs being mitigated by project scope reductions) without properly determining whether the intended benefits remain sufficiently achievable, or whether they could be better achieved in a different way.
9. GIAA has an important role to play in supporting Accounting Officers (both Permanent Secretaries and ALB chief executives) to discharge their responsibilities, but this is not always fully understood. We would encourage Accounting Officers to make the most of this valuable resource.
10. We heard about the checks and balances in place in local government to test how a council is managing its risks. Key internal controls include: appropriate policies and procedures which are regularly reviewed and reflect good practice; regular reporting on performance, finance, risk and project management; internal audit; corporate statutory officers; and overview and scrutiny, audit and standards committees. Heather Wills, Principal Adviser, Finance and Governance at the Local Government Association (LGA), described the complex environment in which local government operates – the challenge of understanding the compound implications of identified risks, within a ‘shrinking envelope of finances’.
11. External audit is an important part of delivering accountability and transparency within local government. Councillor Marianne Overton, Vice Chair of the LGA, shared her concern about the delays in external audits, with the system unable to cope with demand.



“The lack of good external audits, which is just not coping with the volume, is very worrying. It is just not coping at all. The proportion of councils who have had a proper external audit in good time is very small, and that is not good enough. We need to get that right.”

Councillor Marianne Overton, Vice Chair and Leader of the Independent Group, Local Government Association, 14 June 2024

12. The LGA has developed an improvement and assurance framework for local government that can be used by councils to help them to identify all of the checks and balances and parts of the system that should be supporting councils to identify any issues.³⁰ All local authorities are required to conduct an annual review of the effectiveness of controls in the organisation and publicly report the findings of this review and the actions they are taking to address areas for improvement in their annual governance statement. Through its guidance and analysis services, the Chartered Institute of Public Finance and Accountancy (CIPFA) also provides tools to support local authorities in their management of risk. CIPFA provides a Financial Resilience Index and a range of statistical data and analysis tools, offering comparators through the Nearest Neighbour Model tool and a Value for Money toolkit that compare costs and performance score against a range of services.
13. Emma Knights, then CEO of the National Governance Association (NGA), told us about the big issues that represent risks for the schools and trusts sector: falling pupil numbers; funding levels; increasing numbers of pupils with special education needs; and challenges recruiting teachers and classroom assistants. She explained how, fifteen years ago, consideration of risk was not something local authority-maintained schools did or talked about but that, with the development of the Multi-Academy Trust system, it is now taken very seriously.

“Risk management is now absolutely part of the process we would expect to see any board managing, not just on the surface, but with purpose and impact.”

Emma Knights, then CEO, National Governance Association

14. The Confederation of School Trusts has worked with a group of sector organisations, including the NGA, to develop the Academy Trust Governance Code, which is based on the Charity Governance Code and sets out all of the duties in law and in regulation that apply to trust governance.³¹ It starts with the fundamental principle that academy trusts’ directors are aware of and accept the Seven Principles of Public Life and that they understand the legal, regulatory and contractual obligations that they must meet, and adhere to the statutory guidance published by the Secretary of State.

30 Local Government Association, ‘Improvement and assurance framework for local government’, 24 May 2024, available at: www.local.gov.uk/publications/improvement-and-assurance-framework-local-government

31 Academy Trust Governance Code, available at: <https://atgc.org.uk/>



Data

The value of data

15. Bringing together and interpreting data intelligently allows links to be made across the records held by a department. It can provide a level of insight that is more than the sum of its parts. It is not just a tool that is ‘nice to have’, but a critical instrument for understanding an organisation and assessing its performance and the risks it faces.
16. Failing to identify patterns in the data held by an organisation can have grave consequences. A real-world example can be seen in Baroness Casey’s review into the Metropolitan Police Service. The review concluded that the Met’s misconduct process did not identify and discipline officers with repeated or patterns of unacceptable behaviour. “We noted the crucial result is that repeated or escalating misconduct is not spotted. The Met therefore misses those who potentially pose the most risk to others.”³²
17. Contributors to our review were clear that the answer to identifying and acting on issues in an organisation does not lie in data alone, rather, it can be an indicator that something requires a closer look. Hard data is one lens but must be combined with soft indicators to maximise insight. We also heard that leaders should not be slaves to data, nor default to requesting more data to defer making a decision. Collecting more and more data points does not in itself provide the answer to complex problems, which requires the application of the right standards and values, along with contextual understanding, in assessing the relevant information. Leaders must be willing to scrutinise what is really happening within their organisation and ask probing questions of the various sources of information to which they have access.

“Numbers will never tell you anything unless you are curious. It is curiosity and willingness, which is sometimes quite hard as a leader, to go, ‘Could this happen in my organisation? Could this be happening here?’”

Steve Russell, Chief Delivery Officer, NHS England, 24 July 2024

“All the systems, processes and data in the world only takes you so far. You just have, as a leader, to have a degree of curiosity about what is going on in your organisation. Poke in the dusty corners, get around, be visible, and try and promote a culture whereby it is the teams themselves who tell you what is going on rather than relying wholly on data.”

Mark Fisher, Chief Executive, NHS Greater Manchester Integrated Care Board, 20 June 2024

32 Metropolitan Police Service, ‘Baroness Casey Review’, March 2023, page 213, available at: www.met.police.uk/SysSiteAssets/media/downloads/met/about-us/baroness-casey-review/update-march-2023/baroness-casey-review-march-2023a.pdf



Data quality

18. There is a lot of data in organisations, but it is the quality of data and how an organisation makes sense of it that determines its value.

“One of the essential components to enable good governance is accurate and reliable data. Instead of having a debate about what is happening, you start debating what you are going to do about it. Too often, the discussion in policing is arguing over incomplete data in an inaccurate position rather than saying, ‘This is what has happened. This is what we should do about it’. Having accurate data and an accurate picture of what is happening is essential to so many things.”

Chief Constable, Sir Andy Marsh, CEO, College of Policing, 31 May 2024

19. The Statistics Code of Practice, which sets the standards which producers of official statistics should uphold, is instructive on data quality (one of three pillars on which the code is based, the others being trustworthiness and value). The code outlines the principles and practices that producers of official statistics should adhere to to ensure their data is reliable, accurate and fit for purpose. The data must be relevant, the methods must be sound and the assurance around the outputs must be clear so that statistics are the best available estimate of what they aim to measure, are not misleading and are therefore worthwhile.³³
20. We heard from the NHS that consistency in reporting of data really matters. This can be improved by increased use of real-time extracts from electronic systems over inputting data second-hand for secondary datasets or data extracts. Real-time data capture reduces error and has obvious resourcing benefits over manual data entry. It also eliminates time lag, which makes it more difficult to identify trends.

“On the data point, the key message is that, although there is a lot of it, it is about how you make sense of it, how you ensure that there is one source of the truth, because some of the data gets put in manually. What we would like to do over time is to ensure that it comes up through electronic patient records. For instance, when I am visiting all the comprehensive stroke services in the country, we go through the data with them and we always find there are discrepancies between what is reported nationally and what their local data shows. The more we can get to real-time extracts from electronic systems, the better.”

Professor Stephen Powis, National Medical Director, NHS England, 24 July 2024

33 UK Statistics Authority, ‘Code of Practice for Statistics Edition 2.1’, 5 May 2022, available at: <https://code.statisticsauthority.gov.uk/wp-content/uploads/2022/05/Code-of-Practice-for-Statistics-REVISED.pdf>



21. In a recent cross-government study of data management, the Government Internal Audit Agency (GIAA) identified a relatively immature approach within government departments in terms of the management of data, the quality of data and the way it is shared across government. GIAA has identified only limited examples of predictive data being used effectively.

Examples of the data points available to multi-academy trusts

Finance data. “If the school is overspent – that is often a lead indicator that there is more wrong in the school.”

Data on performance and standards. “That data is often lagged data. By the time you get that, things have already gone wrong. You need to know your schools, work alongside your schools and be in your schools. That soft intelligence, the qualitative intelligence, makes a huge difference.”

Workforce data. “For example, if you have a good school, which has been securely good, and you suddenly start to see very significant staff turnover, that might be an indicator that all is not well in that school. It will be different for different schools. If you have just taken into your trust a school that has failed its Ofsted inspection, you might expect to see staff turnover. In that case, staff turnover would not worry you. Context matters hugely in your analysis of the data.”

Pupil attendance data. “What is the story that attendance data is telling you? More or less, everybody in the Western democracies is struggling with school attendance [post pandemic] If you have a school where you are seeing declining attendance, that would be a cause for concern. You would want to go in and look at what is happening in that school.”

“There is a lot of data that trusts will have about their schools. It is about making sure that somebody is looking at the data, trends in the data and where the data does not look quite right or is going in the wrong direction. ‘That is unusual’. ‘That has not happened before’. Those are important red flags to go and make an inquiry.”

Leora Cruddas, Chief Executive, Confederation of School Trusts, 25 June 2024

Data analysis capability

22. To get the most out of the available data, organisations require the capacity to interpret data intelligently. This can be a problem for some organisations who lack analysts who can triangulate data, spot trends and present the data to leaders in a way that enables them to make decisions. The data analytics capability needs to bring all of the information together to determine what is going on in the organisation. Analysis within discrete business areas can lead to more detailed understanding of specific issues but it needs to be brought together to get the full contextual view.



23. Chief Constable Sir Andy Marsh told us how, when he was Chief Constable of Avon and Somerset Police, his team developed a tool that harvested data automatically collected through a ‘digital twin’ system, creating a data trail that was used to help the organisation, individuals and teams use the insight from the data to learn, improve and solve both organisational and operational problems. The data could also be used to identify the early warning signs of poor performance and corruption, giving the opportunity of intervening early to improve officer wellbeing and service to the public. The system is fed by approximately 30 different databases and includes data such as body worn video activation data, geolocation data, computer use captured through keystrokes, stop and search data, and complaints.
24. Dr Bill Kirkup has led independent investigations into aspects of healthcare, including maternity services. He told us that there is a lot of data in maternity services but very little of it is clinically meaningful. One of the recommendations in his review into maternity services at East Kent Hospital NHS Trust was to introduce a signalling system that was related to outcomes – to allow trusts to compare the way their units were functioning on the basis of a meaningful outcome measure around deaths of babies and severe brain damage to babies.³⁴ This would allow those responsible for the provision of maternity services to see how they were doing and where they might do better. If they did not take that seriously and act, that would flag a signal further up the chain, so that regulators, like the Care Quality Commission or NHS England, would be able to identify outliers and investigate appropriately. The NHS has committed to developing the maternity outcomes signal system to highlight safety issues promptly.³⁵
25. HMRC told us how the department brings together data from a range of sources to identify trends in customer experience and levels of trust in HMRC. They compile a weekly customer insight dashboard for internal use, which includes customers’ interaction with digital, telephony and post channels, stakeholder sentiment and social media sentiment. If any worrying trends are spotted, they can be escalated and fixed. The department externally commissions three annual customer surveys for their main customer groups which are published annually on GOV.UK.³⁶ HMRC also gathers insights and information from the parts of the tax system that operate outside of the department by running a number of stakeholder forums and groups. Angela MacDonald, Deputy Chief Executive at HMRC, told us that when it comes to spotting trends, the

34 Department of Health and Social Care, ‘Maternity and neonatal services in East Kent: ‘Reading the signals’ report’, 19 October 2022, available at: www.gov.uk/government/publications/maternity-and-neonatal-services-in-east-kent-reading-the-signals-report

35 NHS England, ‘An update on delivery of the first year of the Maternity and neonatal three-year delivery plan and next steps’, 16 May 2024, available at: www.england.nhs.uk/long-read/an-update-on-delivery-of-the-first-year-of-the-maternity-and-neonatal-three-year-delivery-plan-and-next-steps/

36 HM Revenue & Customs, ‘Individuals, Small Businesses and Agents Customer Survey 2023’, 30 July 2024, available at: www.gov.uk/government/publications/individuals-small-businesses-and-agents-customer-survey-2023



annual cycle can be really important. Methods such as their annual customer surveys as well as their reporting on how the department is meeting its charter standards all provide an opportunity to stand back and assess whether sentiment has shifted over time.³⁷

Data-benchmarking

26. We heard how benchmarking is used in different parts of the public sector to compare performance between similar organisations. This can flag areas where performance is below the expected standard but can also identify those organisations with strong performance from whom others may be able to learn. Some examples are listed below:

- The ‘Model Hospital’ allows NHS hospital providers to compare how they are performing compared to other providers. It is part of the Model Health System, which is, “a data-driven improvement tool that enables NHS health systems and trusts to benchmark quality and productivity. By identifying opportunities for improvement, the Model Health System empowers NHS teams to continuously improve care for patients.”³⁸
- The local government sector has LG Inform, the LGA’s data benchmarking platform, which enables council officers, councillors or local authority users to compare any council’s performance with any other council or group of councils.³⁹
- The Public Bodies team in the Cabinet Office is developing a Corporate Function Benchmarking resource for the biggest ALBs. The primary aim is for benchmarking to be used by departments and ALBs to ask questions about whether corporate functions could be procured and used more efficiently.

27. The disclosure of data to the public, which can include comparative data between organisations and public service providers, is discussed in chapter 5.

Data-sharing

28. Some contributors told us about the responsibility they have to share data about concerns with other organisations. The Local Government and Social Care Ombudsman (LGSCO) shares information with the Care Quality Commission, Ofsted and other bodies where there is a crossover in remits, when they have a concern that is sufficiently serious for it to be recorded in the LGSCO’s decision notice. The NHS comes together with ALBs and regulators to share any concerns they have about services.

37 HM Revenue & Customs, ‘HMRC Charter annual report: 2023 to 2024’, 30 July 2024, available at: www.gov.uk/government/publications/hmrc-charter-annual-report-2023-to-2024

38 NHS England, ‘The Model Health System’, available at: www.england.nhs.uk/applications/model-hospital/

39 Local Government Association, ‘LG Inform’, available at: <https://lginform.local.gov.uk/>



“As a publicly funded body we have a responsibility to share what we and only we know. For example, the Care Quality Commission (CQC) has a responsibility for overseeing the quality and standards of social care. We investigate social care. We have a mechanism that wherever we see concerns about social care that are sufficiently serious for us to formally note them down in our decision, we will pass it on to the CQC, we will publish that. We will let the various parties, the body in our jurisdiction, the person who made the complaint and the CQC know that we are doing that. We do exactly the same with Ofsted in relation to children’s services. We do the same with any organisation where there is likely to be a crossover and other ombudsmen as well. By sharing information in a timely and useful way is the way that we try to do that.”

**Nigel Ellis, Chief Executive, Local Government and Social Care Ombudsman,
10 May 2024**

“It is important to say that we and others spend a lot of time visiting and getting information. Of course, CQC and other regulators have a statutory role in doing that, and we link in with them very closely. Some red flags and concerns may well come through CQC inspections, for instance, and not just CQC, but also GMC [General Medical Council] and NMC [Nursing and Midwifery Council]. We have mechanisms both regionally and nationally to ensure that we come together as a set of ALBs and regulators to share any concerns we have about services. The alignment with the other regulators is important.”

**Professor Stephen Powis, National Medical Director, NHS England,
24 July 2024**

29. The Information Commissioner’s response to our open consultation notes that Part 5 of the Digital Economy Act (DEA) creates legal gateways to share information for public service delivery, allowing important data sharing to take place. The response explains that any organisation which uses personal information must protect that information but notes that protecting personal information from harm and unlocking its potential should not be seen as conflicting.

“Protecting personal information from harm and unlocking its potential should not be seen as conflicting. Organisations who put transparency, privacy and public trust at the heart of their processes will see much more effective results. Especially when using personal information for public service delivery.”

Information Commissioner’s Office, open consultation, submission 10

30. The Information Commissioner’s Office’s response notes that public authorities should minimise the use of personal information in data collection, publication and analysis. The consultation response from the Royal Statistical Society notes there are ways to make data available for independent analysis while maintaining control over risks to



security and privacy. Examples given are the Secure Research Service currently run by the Office for National Statistics for academic research access to sensitive data produced by government and other bodies, and the deposit of data relating to school examinations in England so that the impact of the grading developed and then withdrawn could be better understood retrospectively.⁴⁰

Can AI help with understanding risks?

31. The use of AI in public life is a particular area of interest for the committee. Our report on AI and public standards, published in February 2020, considered: the risks and opportunities for the Nolan Principles of openness, accountability and objectivity; whether the broader regulatory framework for AI in the public sector was fit for purpose; and the responsibilities of those in public bodies using AI. The report contained recommendations about the safeguards and standards required as AI becomes adopted more widely across the public sector.⁴¹ Since our report was published, AI technologies have been continuing to develop at a rapid pace and governments around the world are grappling with how to harness its benefits while mitigating the risks it presents. In March 2024 we held a seminar with experts to revisit some of the themes discussed in our 2020 report, with a particular focus on how to ensure that public office holders remain accountable for advice and decisions derived from, or made by, AI.⁴²
32. Given the capability of AI to process huge volumes of data at speed, we were interested to find out whether AI is yet being used in the public sector to support risk management. During our review, we came across only a few examples of AI being used for this purpose.

“If the big strength of this technology [AI] will be reading large volumes of data, interpreting them in an artificially intelligent way, and presenting it in a useful form, then it has to be really helpful, particularly for organisations with large transaction workloads. HMRC and DWP are the two classic examples in government. It would be able to give you much more rapid and relevant information about what is happening in their systems, what is happening to the service quality they are providing, preventing fraud, and so on. You can just see how there are many use cases there, given the scale of data that lots of public bodies deal with.”

**Gareth Davies, Comptroller and Auditor General, National Audit Office,
24 May 2024**

40 Royal Statistical Society, Data Ethics and Governance Section, open consultation, submission 22

41 Committee on Standards in Public Life, Artificial Intelligence and Public Standards: report', 10 February 2020', available at: www.gov.uk/government/publications/artificial-intelligence-and-public-standards-report

42 Committee on Standards in Public Life, 'AI and Public Standards: 2024 AI seminar summary note', 24 May 2024, available at: www.gov.uk/government/publications/ai-and-public-standards-2024-ai-seminar-summary-note



33. Steve Russell, Chief Delivery Officer at NHS England, told us that complaints are a really good example of an area where AI tools could be used to identify themes but where this technology is not yet in place.

“Complaints are a really good example [of an area where AI tools could be used to identify themes]. You can see the numbers, but spotting a pattern and going, ‘there has been the same cluster of complaints about these issues or this practitioner over a longitudinal period,’ is less sophisticated in most, but not all, organisations. One thing we have been considering is the opportunity to use AI to spot patterns in complaints. I am not an expert in this [area], so I do not know the extent to which it is widely available, although it could be.”

Steve Russell, Chief Delivery Officer, NHS England, 24 July 2024

34. The consultation response from the Care Quality Commission drew attention to an example of using AI to improve care in a care home from their State of Care report 2022/23.

Example of using AI to understand and manage risk in a care home

Staff at one care home were noticing that large quantities of antipsychotic medicines were being prescribed for people with dementia. When people were distressed and were communicating this through behaviour, there appeared to be little consideration of the reasons why, and so they were given antipsychotics in response. But staff were convinced that these distress responses were a reaction to pain – not because the person had a diagnosis of dementia. The care home therefore worked with developers to pilot a new app that used artificial intelligence (AI) technology to help care staff identify when people were in pain. The app helps the caregiver to recognise and record facial muscle movements and identify other behaviours that indicate pain. It then calculates an overall pain score and stores the result. After it was introduced in 2021, the care home has not only been able to offer more pain relief to people, but there have been fewer conflict-related safeguarding referrals and more time available for staff. Importantly, there has also been a 10% decrease in antipsychotic medicine use across all 23 homes. This has improved the quality of life for people with dementia.⁴³

Care Quality Commission, open consultation, submission 4

43 Care Quality Commission, ‘State of Care 2022/23’, 20 October 2023, available at: www.cqc.org.uk/publications/major-report/state-care/2022-2023



35. We discussed with the Government Internal Audit Agency (GIAA) the use of AI in providing third-line assurance for organisations. The GIAA has developed an ‘insights engine’ which allows them to quickly undertake sentiment analysis of a specific area of work to identify themes of good as well as poor practice that can then be shared more widely across government and prompt areas for further investigation.
36. GIAA is also at the early stages of using AI as part of a concept of continuous auditing that involves real-time checking of data against defined criteria. We were told that within this context, it would be possible to train AI to detect a drift towards alert thresholds and the reporting of early warning signs. GIAA is starting to make its AI tools available to other parts of government so that they can also be applied within the first and second lines of assurance. Harriet Aldridge explained that the GIAA’s design philosophy for their Insights Engine, and all their AI tools, is that they always have a human in the loop, meaning, “the AI output becomes an input into the analysis of a trained human.”

“Given that it is typically not one big thing that leads to organisational failure, but a series of smaller things occurring in concert, investment in human intelligence continues to be needed to interpret the implications of different indicators veering off track (‘joining the dots’). This is particularly the case where confidence in the completeness and accuracy of data is lacking. While AI will help organisations to undertake assurance at greater scale and speed than with a human alone, the effective application of human intelligence continues to be a vital part of the landscape of risk, assurance and controls.

Within three years we expect generative AI to be able to reliably analyse numerical (e.g. financial) data and to create reports that present this analysis in a meaningful way. It will continue to be important to train people to ask the questions (prompt engineering) of the AI. Even where the AI can analyse scenarios taking into account risks, the ultimate decision-making, and therefore accountability frameworks will need to evolve, alongside appropriate training, to ensure decision-makers have sufficient assurance around the inputs and outputs of any AI tool. Whilst larger and more complex in an AI-enabled world, similar principles exist today in the way in which government relies on the integrity of financial models (e.g. actuarial models, operational service demand models and budgeting tools).”

**Harriet Aldridge, Chief Executive, Government Internal Audit Agency,
31 July 2024**



37. One of the core findings of our 2020 report on AI and Public Standards was the importance of public officials retaining involvement in all automated decision-making processes and taking responsibility for decisions made by AI systems. The models for upholding human responsibility can be placed on a spectrum from limited to full responsibility and we said that the senior leadership will have to choose which level of responsibility is most appropriate for the application of AI in their organisation. It is also critical that public sector bodies understand and make available an explanation of an AI system's decision-making process so as to uphold the principle of accountability.⁴⁴
38. Our 2020 report made recommendations to providers of public services, both public and private, to help them develop effective risk-based governance for their use of AI, and which put into practice the Nolan Principles of openness, accountability and objectivity.
39. We discussed with Gareth Davies, Comptroller and Auditor General, the challenges around ensuring human accountability is maintained when AI outputs inform decisions. He suggested that the governance processes for auditing the use decisions would need to be very clear; a standard control that will need to be in place, where the risk is high enough, is to take a sample of the recommendations coming out of the AI system, manually reproduce those decisions using experts, and have a failure threshold that triggers a review of whether the system is operating as intended.

"This is obviously a developing field, but working through the risks involved, and anything where there are consequences for people of decisions being made by machines, we are going to have to build in a sufficient human check to make sure that it is operating as intended."

**Gareth Davies, Comptroller and Auditor General, National Audit Office,
24 May 2024**

40. On the evidence that we heard, the use of AI to help public sector organisations with understanding the risks to which they are exposed is at an early stage and there is potential for AI to be used more widely for this purpose. However, it is crucial that wherever AI is procured, deployed and monitored, it is done so appropriately and in line with the Nolan Principles of openness, accountability and objectivity.

44 Committee on Standards in Public Life, 'Artificial Intelligence and Public Standards: report', 10 February 2020, available at: www.gov.uk/government/publications/artificial-intelligence-and-public-standards-report



Chapter 4: Effective scrutiny by the board

1. Chapter 2 set out that clear governance and accountability structures are an essential requirement if public sector bodies are to be accountable. There must be a defined reporting line through the hierarchy of an organisation, with a clear sight of the risks to which the organisation is exposed. However, there have been many high-profile failures in public life, where the governance structures and mechanisms were in place but for a variety of reasons the board failed to grasp the significance of red flags and failed to act before it was too late.
2. In this chapter we explore four key themes in the evidence we took that seem to us to be fundamental to the effective exercise of the board's scrutiny function, before concluding with some examples of how public bodies have used Board Effectiveness Reviews:
 - **Information and challenge.** Ensuring the board has the information it needs and is willing to ask the difficult questions.
 - **Appointing people with the right skills and motivations.** Populating the board with people with a breadth of skills and experience and a strong public service ethic.
 - **Board culture.** Building an open and trusting relationship between and among the executive leadership and non-executive directors.
 - **External perspectives.** Bringing an independent, external perspective to board meetings and hearing directly from the users of public services.

Information and challenge

3. For non-executive directors to be able to provide constructive challenge to an organisation, they must have good access to information. The responsibility for ensuring this happens is two-way – the executive needs to provide accurate and candid information about the organisation's performance and any emerging issues that may stand in the way of the organisation delivering its objectives, but non-executives also have a responsibility to ask for the information they need.
4. New non-executive directors need to develop a good understanding of the organisation and the risks it is facing and need to do so quickly. Phase 6 of the Post Office Horizon IT Inquiry revealed how, "Many Post Office directors started their roles with an incomplete understanding of the issues facing the organisation. There was an absence of corporate memory, with each director seemingly starting from a blank sheet. Unresolved historical issues only became visible to board members when it was too late." The Institute of Directors has recommended that directors "undertake rigorous due diligence of organisations before they accept board roles. Following appointment, the induction process needs to be systematic and expose them to the history and culture of the organisation."⁴⁵

45 Institute of Directors, 'The Post Office Scandal: A failure of governance', October 2024, available at: www.iod.com/app/uploads/2024/10/IoD-The-Post-Office-Scandal-%E2%80%93-A-Failure-of-Governance-1-f04f78664e5242c6bebb0a01035806c2.pdf



5. Contributors to our review told us that how board papers are presented is important, with the issues needing to be clearly and succinctly identified and set out and supported by verbal explanation in board meetings.

“It is very important that people do not assume reports should be taken as read. It is important that officers in the context of local authorities, or executives in the context of my current employer, take board members through it and identify the salient issues so if they have not read every word, they have the opportunity to at least understand it in summary form. I also think things like reading rooms, where additional data and linked information can be posted, are very useful because sometimes people need to go away, think about it and come back to it. There are all sorts of tools and techniques that you can use to make sure that people get the right information. It is an ongoing challenge because people learn, disseminate, distinguish and assimilate information in different ways. It depends on what sort of a learner you are.”

**Anthony May, Chief Executive, Nottingham University Hospitals NHS Trust,
24 May 2024**

6. Depending on the complexity of the information and the background and skillset of the non-executive directors, it may be necessary for staff with the necessary expertise to explain what the information means so that the board is able to evaluate the significance of the information they are presented with. In chapter 3 we noted that there is no shortage of data in organisations, but that interpreting the data intelligently can require specific expertise. We also noted in our Leading in Practice report that it is helpful to boards to have data from a range of sources brought together in a way which allows them to connect the dots and understand the bigger picture.⁴⁶

“It is vitally important that those charged with governance understand the complex information that is being presented to them and that they are in a position to make a meaningful evaluation of it. To aid in this, suitably qualified data analysts or operational staff members should be made available to present complex data to the board to provide clarity and explain what the data means, rather than members being given the information without sufficient context or explanation.”

**Northern Ireland Public Sector Chairs’ Forum, open consultation,
submission 19**

7. We heard that the timeliness with which the board receives information is important. One chair of an ALB shared an example where an executive told the chair that the executive had received a report about an issue that they were looking at and they would give the report to the board with the organisation’s response once this had

⁴⁶ Committee on Standards in Public Life, ‘Leading in Practice’, January 2023, available at: www.gov.uk/government/publications/leading-in-practice



been prepared. “My answer to that is, ‘No, give us the information now. We have to respond properly at the board to that, but I do not want you to hold back. I want you to be willing to give us the information straight away and deliver it.’”

8. To help non-executive directors deepen their understanding of the organisation and to hear perspectives other than those presented by the executive leadership, it can be valuable to make site visits and speak to staff working on the frontline of the organisation.

“In my experience as a non-executive director, I could achieve very little sitting in a four or five hour trust board meeting looking at reams and reams of grids with red, amber and green squares on them. But, by going out and visiting some wards, some clinics and some theatres, saying to people, ‘What is on your mind? How is it going?’ I found a wealth of information that can make you very curious about where there may be problems beneath the surface.”

Dr Bill Kirkup, Chair of reviews into maternity care at East Kent Hospitals NHS Trust and Morecambe Bay maternity services, 11 July 2024

9. Providing effective challenge means asking difficult questions constructively. For organisations in the public sector, an important aspect of this should be testing the ethical implications of strategic or operational decisions or business practices undergoing change and ensuring that the public interest is a central part of the conversations that take place.
10. Alan Kershaw, Chair of the Legal Services Board, pointed out that challenge goes both ways and having executive to non-executive challenge is important too. He also found the presence of apprentices from the Government Board Apprentice Scheme helped challenge the established ways of doing things.

“I like the executive to challenge the board as well, and that is quite helpful. Recently executive members have challenged me on the way I put some things in an interview, and that is fine. I am very happy about it. I am happy to give the lead of saying, ‘I did not get that as right as I would like to. Let us see how we can all learn from this.’ That is okay. Challenge both ways because they [the executive] know the stuff day-by-day in ways that we do not necessarily. We even have apprentices from the government board apprentice scheme. We encourage them to challenge as well, to ask the extremely naive questions: Why do you do it this way? Why is that important? That makes us think as well. Challenge in all directions.”

Alan Kershaw, Chair, Legal Services Board, Joint Association of Chief Executives and Public Chairs’ Forum event, 3 July 2024

11. In a local government context, the full council can be considered to be the equivalent of a council’s board. The National Association of Local Councils told us that councillors must be prepared to ask questions and hold the council’s officers to account for their actions.



“Councillors should brief themselves fully on the contents of the agenda for local council meetings, read council reports and be prepared to ask questions. Councillors must overcome any reluctance to question the clerk or the chair, it is important that councillors hold the council’s officers to account for their actions. As soon as new councillors, clerks and chairs are in post they should be offered a one-to-one meeting, offered finance training and have a journey pack.”

National Association of Local Councils, open consultation, submission 16

Appointing people with the right skills and motivations

12. A board will be capable of exercising constructive challenge only if its members have the skills and experience necessary to ask the pertinent questions. We heard how a breadth of backgrounds and expertise can mitigate the risk of groupthink, as can refreshing membership of boards through setting limits on the length of tenure or staggering appointment terms.

“You need the competence within the organisation and on the board to spot the red flags. It is having a broader view of the range of competencies you need, both at the executive level, but more importantly on the board. There is no point in having four identikit non-executive directors who are all the same. I would also add to that, a regular churn of non-executive directors, so you do not start to develop groupthink, or think, ‘I will not challenge him, because he is a great guy and we have known each other for 12 years while we have been on this board.’ You need to bring awkward new faces who will not be worried about upsetting their colleagues and who will ask the open questions and prod the accepted nostrums.”

Kate Ellis, Chair, Oil and Pipelines Agency, Joint Association of Chief Executives and Public Chairs’ Forum event, 3 July 2024

13. Ministers are responsible and accountable to Parliament for appointments to the boards of public bodies, generally referred to as public appointments. Sponsoring departments are responsible for running the recruitment process for these appointments in consultation with ministers. The Governance Code on Public Appointments says that departmental advice to ministers must include information on the make-up and diversity of the current board and that departments “should ensure there is sufficient opportunity for ministers to engage with the chair of the board the role is being appointed to. Chairs are well placed to advise on the skills and experience needed to ensure the board as a whole is effective.”⁴⁷

47 Cabinet Office, ‘Governance Code on Public Appointments’, 31 January 2024, available at: www.gov.uk/government/publications/governance-code-for-public-appointments



14. The chair of a public body will be a member of the Advisory Assessment Panel that assesses candidates for non-executive board members positions and submits appointable candidates to ministers for them to make the final appointment. One chair with experience of being on the board of a variety of public bodies raised the importance of appointing people with the right values and motivations. In interviews for board positions, she questions people about their adherence to the Principles of Public Life and seeks to glean whether they truly understand how to live and breathe the principles in difficult situations.

“When interviewing now, we spend a lot of time really trying to understand people’s motivations, what they think about these things, how do they do the right things, in quite difficult situations sometimes, and try to get them out in an interview. Of course, that is quite hard, but people do develop reputations around that when they become more experienced, which can help. I would say that getting the right people there with the right motivations is one way of getting a good start.”

Kathryn Cearn, Non-Executive Director, Nuclear Decommissioning Agency, Joint Association of Chief Executives and Public Chairs’ Forum event, 3 July 2024

15. We touched on values-based recruitment in our report, *Leading in Practice*, and encouraged organisations to embed the Principles of Public Life within their recruitment and selection processes. We noted how focusing on values at the recruitment stage also helps set expectations that the public interest should guide behaviour and decision-making and that how board members go about their work will be considered central to the delivery of their role. This is particularly important when appointing non-executive directors who have come from other sectors and may be used to a different operating culture.

“We would encourage public sector organisations to consider how they can best incorporate within their recruitment and selection processes an assessment of how the personal values of candidates align with the Principles of Public Life, particularly for senior leadership positions.”

Committee on Standards in Public Life, *Leading in Practice*, January 2023

16. Several contributors to our review raised frustrations with delays within the public appointments process and the impact this has on securing the best people for the job. We heard that this is a major problem for ALBs and one of the hardest aspects for departmental sponsorship leads in managing the relationship with them. We heard that the process needs to be faster and communication needs to be better for people who have applied and are left waiting to hear if they have been successful.



“People who are building portfolio careers and want to apply for non-executive director positions will have a number of irons in the fire. They will nearly always have applications in with organisations that are nimbler than the machinery of government, so we find that, quite often, some of our best candidates drop out of the process because it is just so long. Typically, our appointments can take a year, and so we find all the time that good-quality non-executive directors either cannot take the position when it is finally offered or drop out. The chairs are frustrated about that, particularly with roles that require particular professional expertise, such as somebody to advise on digital transformation in a non-executive capacity. We often go down to our second or third choices just because of the time that it takes to navigate the decision points across government.”

Departmental sponsorship lead, roundtable, 18 July 2024

17. Once appointed it is important that non-executive directors and their organisations invest in their on-going development. To take the health sector as an example, a leadership competency framework for board members was introduced in 2024, which will support the appraisal and development of board members.⁴⁸

Board culture

“In my experience there are good boards and there are bad boards, in short. The good boards, effective ones, are those that have an open relationship with the chief executive and the executive team. There are no secrets, nothing is hidden, and the board have carte blanche to ask for any information they want so they can really get under the skin of the organisation but are non-executive. The ones which I have seen to be ineffective are those where the relationship between the chair and the chief executive has been dysfunctional. That is when information is hidden from the board and that is when things go very badly wrong. It sounds very basic, but it really does come down to relationships and trust and integrity and openness.”

**Amerdeep Somal, Local Government and Social Care Ombudsman,
10 May 2024**

18. The culture of the board is a crucial factor in its effectiveness and will be heavily influenced by the quality of the relationships between and among the executive leadership and non-executive directors. An open and trusting relationship will support the exchange of ideas and perspectives and allow risks to be exposed more quickly, even though conversations will not always be comfortable. How a chair chooses to perform their role really matters to the smooth running of a board. If a chair is too assertive, this

⁴⁸ NHS England, ‘NHS leadership competency framework for board members’, 28 February 2024, available at: www.england.nhs.uk/publication/nhs-leadership-competency-framework/



can create a climate of fear, which can get in the way of good quality decisions, but a weak chair can be equally damaging. Being an effective chair requires good judgement, strong people skills and a firm commitment to the public interest.

“We at the Welsh Revenue Authority brought in an external consultant to look at ourselves and decide what people we were and how we operated both individually and collectively as a board. We had two days of doing it, but we decided that this should be done with the executive and non-executive members involved. We learnt an awful lot as individuals, which helped when it got to developing a culture within the board and also from the point of view of getting ourselves in a place where we could challenge in a positive way and move forward as a unit, as they say.”

Rheon Tomos, Non-Executive Director, Welsh Revenue Authority, Joint Association of Chief Executives and Public Chairs’ Forum event, 3 July 2024

External perspectives

19. Some organisations have found they benefit from bringing an external perspective to their board meetings. Examples are the Pension Protection Fund, which has co-opted members on many of its committees with specialised backgrounds, and the General Medical Council, which has co-opted external members of the Audit and Risk Committee. The recruitment of independent co-opted members with specialist backgrounds in areas such as accounting or risk management is strongly recommended by the LGA as a way of supplementing the skills of local government audit committees.⁴⁹
20. Some boards of public bodies have in place mechanisms for hearing directly from the users of their services. The Local Government and Social Care Ombudsman has an advisory forum made up of a majority of members of the public who have used their service.⁵⁰ The Parliamentary and Health Service Ombudsman (PHSO) has a Public Engagement Advisory Group formed of members of the public who use the PHSO’s services. Both organisations find these bodies enhance executive and non-executive understanding of how the public experience aspects of their service and bring a good source of constructive challenge.
21. In the NHS, many trusts include patient stories at their board meetings, told by the patient or relative or by staff who provided the care. We heard that these can give a powerful and helpful insight into the patient experience, but we also heard a view that it may be tempting to select the stories that show the organisation in a good light.

49 Local Government Association, ‘Ten questions for audit committees’, 12 April 2024, available at: www.local.gov.uk/publications/ten-questions-audit-committees

50 Local Government & Social Care Ombudsman, ‘Advisory Forum’, available at: www.lgo.org.uk/information-centre/about-us/public-advisory-forum



“At every meeting we have a patient story. They are poignant, informative and thought provoking. It is our attempt to make sure we are open to direct access from people who use our services or who we employ, and I think that they are generally well received.”

**Sir Neil McKay, Chair, Shrewsbury, Telford and Wrekin Integrated Care Board,
4 July 2024**

Board effectiveness reviews

22. Board effectiveness reviews (also referred to as board performance reviews) are used by public and private sector organisations to identify and act on weaknesses, including whether the board has the structure, processes, people and performance to deliver its purpose. The Sponsorship Code of Good Practice lists completing an annual board effectiveness review and, at least triennially, an externally-led board effectiveness review, as one of the activities which government departments should require of the ALBs they sponsor.⁵¹ UK Government Investments has issued guidance on the principles that should underpin the board effectiveness review.⁵²
23. We asked contributors to our review how public sector bodies should conduct their annual board effectiveness evaluations. The following is a summary of some of the examples and best practice shared with us.
- The Financial Reporting Advisory Board (FRAB) commissioned the National Audit Office (NAO) to carry out an external board effectiveness review. The FRAB committed to making significant changes as a result and published its action plan for doing so.⁵³ The NAO cited this as an example of a Board Effectiveness Review making a positive difference.
 - In schools and multi-academy trusts, governing boards are expected to carry out an annual self-evaluation and commission independent external reviews of governance every third year. The National Governance Association (NGA) has developed questions for schools and multi-academy trusts to use when conducting their own reviews.⁵⁴

51 Cabinet Office, ‘Arm’s length body sponsorship code of good practice’, 23 May 2022, available at: www.gov.uk/government/publications/arms-length-body-sponsorship-code-of-good-practice/arms-length-body-sponsorship-code-of-good-practice

52 UK Government Investments, ‘Board effectiveness reviews’, 11 April 2022, available at: www.gov.uk/government/publications/arms-length-body-boards-guidance-on-reviews-and-appraisals/board-effectiveness-reviews-principles-and-resources-for-arms-length-bodies-and-sponsoring-departments

53 HM Treasury, ‘Financial Reporting Advisory Board effectiveness review: October 2020’, 22 July 2021, available at: www.gov.uk/government/publications/financial-reporting-advisory-board-effectiveness-review-october-2020

54 NGA, ‘Governing board self-evaluation questions’, 29 March 2022, available at: www.nga.org.uk/knowledge-centre/governing-board-self-evaluation-questions/



- One contributor shared an example of an internal review at a public body. He described three elements:
 - The senior independent director gathered all the non-executive directors together without the chair in the room and had a very open discussion about how the board felt about the way that the chair operated and how the board meetings were conducted.
 - The senior independent director then had individual conversations with the non-executive directors.
 - The non-executive directors were then sent a detailed questionnaire with approximately 35 questions.

The collective feedback was then compiled into a report to be reviewed by the board.

“In my view, the questions were searching. They were not drafted to prevent an opportunity for criticism or constructive challenge. I think that is a good board effectiveness review. It is not the board sitting around for 10 minutes at the end of a meeting and saying, ‘We need to do an internal board effectiveness review. Are we all happy with how it is all going?’ I think that is self-evident.”

- The Northern Ireland Public Sector Chairs’ Forum drew our attention to the NI Audit Office board effectiveness good practice guide⁵⁵ which contains sample templates for assessing chairs and board members.⁵⁶
- In local government there is no formal requirement to conduct an annual board effectiveness evaluation, although CIPFA told us the annual review of the system of internal control should consider decision-making and leadership arrangements. The scope of the annual review should cover each of the seven principles of good governance in the framework. CIPFA and Solace will be undertaking a review of its guidance for the annual review during 2024 to 2025. In their response to our consultation, LGA told us, “the outcome of this review [annual review of the effectiveness of controls] should be documented clearly and transparently in their [local authority] annual governance statement. Best practice includes ensuring that there has been engagement across the council to inform the review, and that statements are easily understood and accessible to residents, partners, government, external auditors, inspectorates and regulators. Statements should openly and honestly identify issues and remedial actions and provide an update on progress in addressing issues previously identified. The audit committee will review the draft statement before it is finalised, providing challenge to ensure that it is honest and robust. The content of statements should inform the internal audit plan for the next year.”⁵⁷

55 Northern Ireland Audit Office, ‘Board Effectiveness: A Good Practice Guide’, June 2022, available at: www.niauditoffice.gov.uk/publications/board-effectiveness-good-practice-guide-june-2022

56 Northern Ireland Public Sector Chairs’ Forum, open consultation, submission 19

57 Local Government Association, open consultation, submission 14



Chapter 5: Being open to public scrutiny

1. The Nolan Principle of accountability requires holders of public office to be accountable to the public for their decisions and actions and to submit themselves to the scrutiny necessary to ensure this. Being open to public scrutiny is also central to the Hillsborough Charter, which, in point 6, commits organisations that sign it to strive to “Recognise that we are accountable and open to challenge. We will ensure that processes are in place to allow the public to hold us to account for the work we do and for the way in which we do it. We do not knowingly mislead the public or the media.”⁵⁸
2. This chapter explores how public sector bodies submit themselves to scrutiny and shares the examples we heard in our evidence of how they have sought to do so. We focus on matters that are within the control of public sector bodies, widely defined, with the intent of supporting them to live up to the high standards of accountability that the public are right to expect.

Transparency

Openness

Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.⁵⁹

3. Making information available about what an organisation does and how it does it enables the public and those bodies charged with holding the organisation to account to scrutinise its performance and expenditure. The Nolan Principle of openness is clear that information should not be withheld from the public unless there are clear and lawful reasons for doing so. Withholding information merely to protect the institution (or its members) from scrutiny does not meet this high bar.

“Openness and transparency are not ends in themselves; they empower people, among other things, to hold government and public authorities to account.”

Information Commissioner’s Office, open consultation, submission 10

58 Cabinet Office, ‘Hillsborough Charter’, 13 December 2023, available at: www.gov.uk/government/publications/hillsborough-charter/hillsborough-charter-accessible

59 Committee on Standards in Public Life, ‘The Seven Principles of Public Life’, 31 May 1995, available at: www.gov.uk/government/publications/the-7-principles-of-public-life



“... self-serving institutional self-protection is not a plausible interpretation of the fiduciary responsibilities that the institutions of government owe to the public and that the principles set out. Derelictions from openness must not be self-serving, and they must not be institution serving; they could only ever be a temporary expedient that calls for a special justification that is able to appeal to the wider public interest, and must, through accountability, be made to that wider public in a transparent way as soon as it is possible to do so.”

Professor Mark Philp, Chair of CSPL’s Research Advisory Board, The Nolan Principles: Public Standards, the Public Interest and Public Service, 24 October 2024⁶⁰

4. The more power an organisation has over citizens’ lives, the more transparent it needs to be about what it is doing and how. To take policing and health as an example, these are areas where intervention into physical or mental rights or wellbeing require particularly high levels of transparency.

“I think that there has to be a conceptual change: the more power you hold over a citizen’s life, the more responsibility you have to be transparent about why you are doing something and how. It is about understanding the responsibilities of people in public positions who hold public office, be it a surgeon, a doctor, a police officer or a nurse, where you actually have control over people’s lives and their bodies in a very physical way and mental way. I think you have to have a different responsibility towards that.”

Baroness Casey of Blackstock, 17 July 2024

5. Meaningful transparency also requires that information is presented in a manner that is clear and intelligible. It may also need to be seen in context so that the full significance of the information can be understood.
6. Being transparent is not always the easy option. Making available information that is in the public interest, but that does not show the organisation in the best light, can be uncomfortable. It requires strong leadership because such revelations may result in bad publicity in the short term. Leaders who advocate proactive disclosure in these circumstances are setting a good example for their teams to follow and are helping to shape an open and transparent culture. As well as being the right thing to do, being transparent is also a pragmatically wise option, since the information may end up becoming public anyway and being accused of a cover-up can be additionally damaging in the long run.

⁶⁰ Committee on Standards in Public Life, ‘The Nolan Principles: Public Standards, the Public Interest and Public Service’, 24 October 2024, available at: www.gov.uk/government/publications/30th-anniversary-of-the-nolan-principles



7. It is a requirement under the Freedom of Information Act for Public Authorities in England, Wales and Northern Ireland to make information available to the public. In their response to our open consultation, the Information Commissioner's Office (ICO) drew attention to an open letter that the commissioner sent to public authorities, calling on senior leaders to take transparency seriously. The letter emphasised the need to dedicate resources to improving access to information and to ensuring that the right training, processes and culture are in place. The letter includes case studies that show how organisations have implemented good practice or made improvements in their handling of FOI requests.⁶¹

"Transparency is essential if people and communities are to have confidence in the way public services are delivered. Proactive publication is a key to this."

Information Commissioner's Office, open consultation, submission 10

8. The ICO told us that the International Conference of Information Commissioners have published 'Principles Relating to Transparency by Design', recognising "the value of Transparency in supporting democratic accountability, good governance, good administration and the effective use of public funds, enhancing public accountability, fighting corruption and maladministration, and in empowering people, enabling their participation in decision-making processes."⁶²
9. The Office for Statistics Regulation has issued regulatory guidance on the transparent release and use of statistics and data, informed by the Code of Practice for Statistics.⁶³ The 2024 Parliamentary Administration and Constitutional Affairs Committee (PACAC) report, 'Transforming the UK's Evidence Base', says this has "helped to unlock important evidence for Parliament, business, researchers and citizens, but there remains more to do."⁶⁴ In their report, PACAC also endorsed the recommendation made by Lord Maude in his 2023 report of his review of governance and accountability in the Civil Service that, when a major policy decision is announced, the government should proactively publish the evidence and data underpinning that decision.⁶⁵

61 ICO, 'Information Commissioner calls for senior leaders to take transparency seriously', 4 March 2024, available at: <https://ico.org.uk/about-the-ico/media-centre/news-and-blogs/2024/03/information-commissioner-calls-for-senior-leaders-to-take-transparency-seriously/>

62 International Conference of Information Commissioners, 'Principles Relating to Transparency by Design', June 2024, available at: <https://home.redrta.org/wp-content/uploads/2024/06/TbD-Paper-WG-approved.pdf>

63 Office for Statistics Regulation, 'Regulatory guidance on intelligent transparency', 2 February 2022, available at: <https://osr.statisticsauthority.gov.uk/publication/regulatory-guidance-on-intelligent-transparency/>

64 PACAC, 'Transforming the UK's Evidence Base, Fifth Report of Session 2023–24', 21 May 2024, available at: <https://committees.parliament.uk/publications/44964/documents/223187/default/>

65 'Independent Review of Governance and Accountability in the Civil Service: The Rt Hon Lord Maude of Horsham', recommendation 32, 13 November 2023, available at: www.gov.uk/government/publications/review-of-governance-and-accountability/independent-review-of-governance-and-accountability-in-the-civil-service-the-rt-hon-lord-maude-of-horsham-html



10. We have summarised below some of the examples shared with us of how public sector organisations seek to practise transparency.

- The Parliamentary and Health Services Ombudsman and the Local Government and Social Care Ombudsman publish their decisions on their websites with the names anonymised.⁶⁶
- HMRC publishes complaints data as part of the HMRC Annual Report and Accounts.⁶⁷ The Adjudicator's Office provides an independent tier of complaint handling for HMRC and investigates complaints that have gone through HMRC's internal two-tier complaints process, where the complainant remains dissatisfied. Each year, the adjudicator's office publishes an annual report that looks at their own performance and also provides commentary on HMRC's performance. HMRC's response to the adjudicator's annual report sets out how they have learned from customer complaints to improve their services.⁶⁸ The adjudicator can publish thematic reports looking at a specific issue, for example, the 2023 to 2024 annual report includes an insight report on how to apply customer circumstances to decision-making.⁶⁹
- NHS England publishes data on areas of high public interest such as monthly cancer treatment waiting times.⁷⁰ Professor Sir Stephen Powis, National Medical Director for NHS England, told us that a lot of data about performance is public so people can compare the performance of their provider with those in other locations.⁷¹
- The LGA told us that councils make decisions based on openly available written advice, and an overwhelming majority of decisions are made in public meetings. The full council approves the annual budget in public and external audit reports and any findings of maladministration are considered in public meetings.
- The Public Bodies team in the Cabinet Office has produced an interactive transparency report of all ALBs of the UK government. The tool brings together data on ALBs to show the landscape as a whole.⁷²

66 Parliamentary and Health Services Ombudsman, 'Decisions', available at: <https://decisions.ombudsman.org.uk/>; Local Government and Social Care Ombudsman, 'Decisions', available at: www.lgo.org.uk/decisions

67 HMRC, 'HMRC's annual report and accounts 2023 to 2024: performance analysis', 30 July 2024, available at: www.gov.uk/government/publications/hmrc-annual-report-and-accounts-2023-to-2024/hmracs-annual-report-and-accounts-2023-to-2024-performance-analysis

68 HMRC, 'HMRC and VOA's response to the Adjudicator's Office 2023 annual report', 14 December 2023, available at: www.gov.uk/government/news/hmrc-and-voas-response-to-the-adjudicators-office-2023-annual-report

69 The Adjudicator's Office, 'The Adjudicator's Office annual report 2024', 26 September 2024, available at: www.gov.uk/government/publications/the-adjudicators-office-annual-report-2024

70 NHS England, '2024-25 Monthly Cancer Waiting Times Statistics', available at: www.england.nhs.uk/statistics/statistical-work-areas/cancer-waiting-times/monthly-data-and-summaries/2024-25-monthly-cancer-waiting-times-statistics/

71 NHS England, 'Data dashboards', available at: <https://digital.nhs.uk/dashboards>

72 Cabinet Office, 'Public Bodies 2023', 17 December 2024, available at: www.gov.uk/government/publications/public-bodies-2023



“One of our objectives was to be an exemplar around transparency, FOI responses and so on, so we hired somebody who was very experienced at running a good FOI system. We said to her, ‘Your job is to make sure that we are 100% on all of the measures on freedom of information requests. Our culture is that we provide as much as we can and we get it out quickly.’ That has had a big impact over a few years. They won a prize this year for being FOI team of the year. You might say, ‘If the NAO cannot do that, who can?’ but that did not just happen because we are the NAO. We made it a priority. We keep putting management effort in. The team leader comes along to the management team quite regularly, to give us an update, and we show an interest in whether it is working or not, whether she has the resources, and so on.”

**Gareth Davies, Comptroller and Auditor General, National Audit Office,
24 May 2024**

Records management

11. Good records management is a prerequisite for an accountable organisation. It means that information about why decisions were made is preserved should it be necessary to review these decisions in the future. The contemporaneous nature of the record provides some assurance that it is an accurate reflection of what happened.
12. Documenting decisions accurately also enables organisations to learn lessons when things go wrong and to evaluate comprehensively the success or failure of projects or policies.
13. The Infected Blood Inquiry showed the disastrous consequences that can result from poor record keeping. It found there was no mechanism to ensure that there was a sufficient corporate memory in the Civil Service of why previous decisions were, or were not taken, and the facts that informed those decisions so the reasons behind them could be understood. This weakened corporate memory led to the repeated use of inaccurate, misleading and defensive ‘lines to take’ first adopted in the 1980s and then used repeatedly by successive governments without an understanding of the facts underpinning them. These lines were either liable to be misunderstood – for example, the unqualified line that there was “no conclusive proof that AIDS can be transmitted by blood or blood products” – or were wrong, such as the assertion that patients had received “the best available treatment in the light of medical knowledge at the time.”⁷³ The report also found that documents had been lost or destroyed.

73 Infected Blood Inquiry, ‘The Inquiry Report, Vol. 1’, page 215, 20 May 2024, available at: www.infectedbloodinquiry.org.uk/sites/default/files/Volume_1.pdf



14. The ICO consultation response to our review states, “Openness and transparency should be seen as core functions on a day-to-day basis, but they are particularly important at times of crisis. Indeed, the FOIA s.46 Code of Practice in force at the start of the covid pandemic made clear the importance of record keeping by public authorities in crisis situations. This included maintaining good quality records in situations where public bodies may “need to explain and, if necessary, justify past actions in the event of a... public inquiry.”
15. In his 2022 report ‘Behind the Screens’, the Information Commissioner carried out an investigation into concerns about the use of non-corporate channels and the risk of key information not being appropriately recorded and retained by ministers and officials.⁷⁴ Following a letter from the ICO to her consultation on the Covid Inquiry’s terms of reference, Baroness Hallett, the chair of the inquiry agreed to consider the quality of record keeping during the pandemic as part of the Inquiry.

Public engagement

16. How organisations handle queries and complaints from the public speaks volumes about the culture of the organisation and the importance it attaches to the principle of accountability. People working for public sector bodies should be cognisant of the inherent imbalance between the organisation and the member of the public who is coming to them with a concern. Accountability requires bodies to be approachable and to make it easy for people to raise issues with them. As we have sought to emphasise throughout this report, it is also in the interests of the organisation to listen to concerns raised from within and outside the organisation. These concerns provide an opportunity for issues to be dealt with before they get worse and a number of complaints raising similar themes may flag up a systemic problem which can then be addressed.
17. As well as reactive complaints handling, accountability requires organisations to engage proactively with the public to increase understanding of how they can best meet the needs of the public. Baroness Casey noted that when seeking the perspective of the service-user it is important to ask the right question – users should be asked about their own practical experience and views on the system rather than just seeking wider views on how the organisation or system should be run.

⁷⁴ ICO, ‘Behind the screens – maintaining government transparency and data security in the age of messaging apps’, July 2022, available at: <https://ico.org.uk/media/about-the-ico/documents/4020886/behind-the-screens.pdf>



18. Contributors to our review from different parts of the public sector shared some examples of how they have sought to engage with the public.
- Various bodies, such as local councils, NHS Trusts, Integrated Care Boards and the Care Quality Commission hold board meetings which are open to the public. In some cases, the public can ask questions from the floor. In other cases, the body will take questions and commit to reply to the question in writing within a certain period and report it to the next board meeting.
 - Some local authorities conduct budget and financial strategy consultations to provide greater transparency over decisions about spending priorities. These seek the views of the public on the choices to be made, such as whether to turn off all streetlights at midnight.⁷⁵
 - The Parliamentary and Health Services Ombudsman holds roadshows, where they go to different parts of the country to hear the views and experiences of people who access their services.
 - Some sectors have independent bodies which act as the customer voice. Transport Focus provides this role for transport users, making research available about what people think about their experience of the road, rail, bus and tram network.
19. The Institute of Chartered Accountants (ICAEW) told us there is a need for public bodies to make it easier for the public to engage in the work that they do, for example by holding regular online events at which the public can get involved, ask questions and participate in debates. They also called for the inclusion in the public sector of ‘formal accountability events’ that are a feature of the private sector, such as annual results presentations and annual general meetings, at which boards provide an account to their key stakeholders of their performance and at which stakeholders can ask questions and receive answers on how boards have discharged their duties.⁷⁶
20. When there are failures in public services, being accountable means that leaders need to make themselves available to listen to the people affected. We heard from Anthony May, Chief Executive of Nottingham University Hospitals NHS Trust about how the trust leadership is engaging with the families impacted by the maternity services scandal.⁷⁷

75 CIPFA open consultation, submission 5

76 Institute of Chartered Accountants (ICAEW), open consultation, submission 12

77 BBC News, ‘Nottingham maternity review to become UK’s largest’, 10 July 2023, available at: www.bbc.co.uk/news/uk-england-nottinghamshire-66151746



“At our annual public meeting last year, we invited the families and we said we would be happy to make a public apology. Their view was it was too soon and what we should instead say is that we wanted to build a new relationship with them. That is what we did, and we built our whole day around it. There are systems and processes you can put in place, like making sure it really is a public meeting and broadcasting it, for example, and there are symbolic things that you can do which show that you really mean it. Recently, the families affected by the maternity review have been engaging with a production company to produce a documentary about their experiences. The last time we met them, in a room like this, in a hotel, they asked me whether I would be happy to have a microphone taped to my chest and be filmed throughout the whole meeting. I have to say, the natural inclination of the people that advise me was not to do that, but I did and the chairman of the trust did it with me. That is not a system or a process. It is a symbol that when you say you are going to be open and transparent, you really mean it because that is a stressful thing to do for three hours but we did it.”

**Anthony May, Chief Executive, Nottingham University Hospitals NHS Trust,
24 May 2024**

Supporting Parliament, ombudsmen and regulators to hold public bodies to account

21. Parliament, ombudsmen, regulators and inspectorates all have a role in scrutinising public sector bodies and holding them to account for their delivery of public services. The powers, mechanisms and processes for doing so vary and we will not explore these here. One theme that is common to all is the importance of supporting those bodies with oversight and scrutiny responsibilities to do their job effectively. This theme is about leaders needing to be responsive to requests for information and making themselves available to account for their decisions. It is also about seeing these ‘scrutiny’ bodies not as a threat, but as a provider of constructive challenge and a source of insight about how they can be better.
22. Officials with experience of Parliamentary select committees shared what they have learned about how best to approach Parliamentary scrutiny. Based on their input we have identified some key principles:
 - Try to respond quickly to requests.
 - Stick to professional judgement and facts.
 - Be as transparent as possible within the parameters set by ministers.
 - Think of the select committee as an important stakeholder rather than an inconvenience. In addition to public sessions, private meetings allow information to be shared that it would not be in the public interest to disclose openly.
 - For major projects, be proactive in holding events in Parliament to build a base understanding among MPs about the project, the benefits and how constituents might be affected.



23. A sector's relationship with its regulators or inspectorates will always be complex, but it is important that it is based on trust. Building trust is a two-way process and requires investment from both sides. We heard that the need to maintain personal relationships can be underestimated and it is important that leaders make time to get to know senior people in regulatory bodies.
24. It is also important to ensure that public sector bodies have sufficient capacity and processes in place to be able to report to the regulator or inspectorate and provide the level of service needed. Gareth Davies, Comptroller and Auditor General, told us that the NAO's job is made easier when organisations have a dedicated person to facilitate the department's work with them who become experts in the NAO's approach and what they need to do the job efficiently. He also identified the value of a mindset that sees a NAO audit as a learning experience from which the organisation can improve.

"Every piece of our work has an improvement objective as well as an accountability objective, so, as people become experienced in that kind of role, they become helpful in encouraging the teams that we are working with and that we are auditing to make the most of the opportunity. It can sound a bit counterintuitive, but it is a big learning opportunity as well for them and for us. It is helpful to have that mindset in that relationship, and for that reason it is also helpful to have that person experienced in the way the process works."

**Gareth Davies, Comptroller and Auditor General, National Audit Office,
24 May 2024**

25. Investing in engaging with those holding bodies to account naturally extends to independent inquiries. Anthony May, Chief Executive, Nottingham University Hospitals NHS Trust, shared his experience of engaging with the Ockenden inquiry into maternity services. He told us how he put in place a team of people whose job it was to engage with the inquiry team, to build good relationships, and about the approach he took to supporting the review within the organisation and in the media.

"We have a team of people whose job it is to engage with the inquiry. My job is to make sure that Donna [Ockenden] gets exactly what she needs, when she needs it and in a format that her reviewers can use to analyse the cases and bring out the themes. It is also then my job to make sure that I build and sustain a good relationship with Donna because she has a difficult job to do. My job is to make sure that we respect the terms of reference and respect Donna's role and then lastly, it is about relentlessly communicating in the organisation and in the media that we think this is a good thing. The corporate position is that we welcome it. We think it will make things better for women and families and we will engage positively with it and we will put the resource aside to make sure it is done properly."

**Anthony May, Chief Executive, Nottingham University Hospitals NHS Trust,
24 May 2024**



Chapter 6: Learning from successes and failures

1. It may be tempting for organisations under pressure to meet targets to concentrate solely on them. But making time to ensure that lessons are truly learnt, when things go wrong, pays dividends. We have repeatedly seen, in the reports of inquiries into major public service failures, that not doing so may mean that opportunities to avert subsequent disasters are missed. Putting the public first also requires public office holders to share learning when projects, policies and procedures work well so that these successes can support improvements in public service delivery elsewhere.

Sharing what works

2. There are, of course, many public bodies who share learning and expertise among the sectors in which they operate. Within the government, two examples – whose chief executives we spoke to for this review – are the Government Internal Audit Agency (GIAA), which provides internal audit services and support for the UK government, and the Infrastructure and Projects Authority (IPA), which is the government's centre of expertise for infrastructure and major projects.

How the Government Internal Audit Agency shares best practice

The Government Internal Audit Agency uses a variety of methods to share information across government about best practice: voluntary sharing by departments, sharing based on a formal sharing protocol and thematic reports in which GIAA draws together anonymised material across departments. These cross-government insight reports review risks across departments and agencies and share examples of good practice from which others can learn and improve their own performance. The reports are launched into each department's audit committee and spark discussion about how the material relates to that department and what the committee needs to consider to improve.

The GIAA has an Insights Engine which enables staff in different departments to search a large volume of documents and reports to find and retrieve content quickly and effectively.

3. There is value in reviewing examples of successful ventures in order to distil core principles that can guide future activity. An example of this is the IPA's principles for project success, a short guide for everyone delivering projects and programmes across government, to help ensure that practitioners get the basics right and deliver government projects successfully.



The IPA's eight principles for project success⁷⁸

Principle 1: Focus on outcomes

Principle 2: Plan realistically

Principle 3: Prioritise people and behaviour

Principle 4: Tell it like it is

Principle 5: Control scope

Principle 6: Manage complexity and risk

Principle 7: Be an intelligent client

Principle 8: Learn from experience

“You really have to be clear on what it is that you are trying to deliver as an outcome and not rush to the scope of a thing. Once you have decided on what that outcome looks like and what the criteria for success would be, you have to align everybody to what you are endeavouring to deliver. Then you have to estimate it with accuracy and work out how long it is going to take you, because the starting point is all agreeing on the size of the thing.”

Nick Smallwood, Chief Executive, Infrastructure and Projects Authority, 18 April 2024

4. We heard examples from different parts of the public sector where membership organisations with a sector-wide remit seek to share good practice and provide support to public bodies through the training they provide and by bringing together organisations to learn from each other. From the Local Government Association to the Confederation of School Trusts, to the Public Chairs Forum, these organisations perform an important role in connecting and professionalising their sectors, ensuring that experiences are shared and best practice is promulgated.

Learning lessons when things go wrong

5. Organisations need to have processes in place for reviewing instances where things did not go according to plan, identifying the lessons that can be learned, and then ensuring that these lessons are embedded within the organisation. To support this, organisations need sufficient corporate memory of why previous decisions were or were not taken and the facts that informed those decisions.

⁷⁸ Infrastructure and Projects Authority, ‘Principles for project success’, 2020, available at: www.gov.uk/government/publications/principles-for-project-success



“Overall, a culture of curiosity within our organisations where we are keen to identify and learn from things that have gone wrong requires documenting those things and having open ‘lessons learned’ conversations. That will hopefully reduce the incidence of taking actions purely on the basis of reputation and the imperative to protect the organisation over a particular public interest.”

John Edwards, Information Commissioner, Joint Association of Chief Executives and Public Chairs’ Forum event, 3 July 2024

6. A topic of conversation at a roundtable with public body chairs and chief executives hosted by the Association of Chief Executives and the Public Chairs’ Forum was how public bodies should take note of recurring themes when things go wrong elsewhere in public life and consider what their own organisation might learn from them. For example, a constant theme in maternity services failures is the poor relationships between nurses, midwives and doctors. Poor relationships should therefore be viewed as a warning sign that the conditions are present for problems to develop in the delivery of public services. Learning from this insight, leaders may wish to reflect on, and invest in, the health of the working relationships within their own teams. Another example is the Post Office Horizon IT inquiry, which is considering the failings of the Horizon IT system which led to sub-postmasters being wrongly prosecuted for theft, fraud and false accounting. Leaders of organisations that use ‘black-box’ systems should be asking themselves whether they are confident that they have sufficient understanding and oversight of how these systems operate or whether they need greater assurance about their use.

“It is crucial that public bodies do not overlook learning from previous experience and good practice, both inside and outside of the organisation, as this can also lead to failings. This includes implementing recommendations from external reviews of organisations. For example, the Francis Report, the RHI inquiry report, and the independent review of Invest NI. Good practice specifically on raising concerns is set out in ‘Raising Concerns: A Good Practice Guide for the Northern Ireland Public Sector.’”

Northern Ireland Public Sector Chairs’ Forum, open consultation, submission 19

7. We asked Chief Constable Gavin Stephens, Chair of the National Police Chiefs’ Council (NPCC), how the NPCC ensures that learning from independent inquiries into the police is shared across all the police forces in the UK. The NPCC has a series of co-ordinating committees on topics such as crime, local policing, workforce and finance, each chaired by a chief constable. Within these co-ordinating committees, there are a series of portfolios and working groups. When an independent inquiry reports, the chief constables of all the police forces come together through the Chiefs’ Council to consider the recommendations and the individual portfolios are tasked as appropriate.



“If we take a current [inquiry] the Angiolini Inquiry Part 1 report has a series of recommendations in there. I will chair a gold group looking at the series of recommendations. Naturally, they will fall into individual portfolios within that committee structure. They will do the work. We will come together in a national co-ordinating mechanism and take lessons or any key decisions through what we call the Chief Constables’ Council. Effectively, that is all the chiefs coming together to address those issues. Alongside that, we have a series of other mechanisms, such as all chief officer education days, feedback into Andy [Chief Constable Andy Marsh] at the college’s [College of Policing] service provision, executive leadership courses and middle management leadership courses.”

**Chief Constable Gavin Stephens, Chair, National Police Chiefs’ Council,
10 May 2024**

8. Some contributors mentioned how fear of blame can inhibit learning when things go wrong. An example of an approach to investigations that addresses this potential obstacle to putting learning first is the Health Services Safety Investigations Body, set up in October 2023 to investigate patient safety concerns across the NHS in England and in independent healthcare settings. The body’s core role is to carry out independent patient safety investigations that do not attribute blame or liability to individuals or organisations. Taking as a model the approach of other ‘safety-critical’ industries such as aerospace, aviation, maritime, rail, oil and gas, defence and nuclear power, the Health Services Safety Investigations Body investigates with a focus on system factors, rather than human error, with the aim of reducing the likelihood of patient safety incidents from happening.⁷⁹

Improvement and evaluation

9. We were told about various mechanisms for improvement and evaluation in the public sector. Cat Little told us how evaluation in government has been improving over the last few years, in particular through the Evaluation Task Force and the What Works Network. The Evaluation Task Force is a joint Cabinet Office-HM Treasury unit that provides departments with evaluation advice and support (in response to department requests), as well as a ‘proactive’ scrutiny and challenge function.⁸⁰ The What Works Network, which is a network of research centres covering a range of policy areas from education to crime to health, aims to improve the way government and other public sector organisations create, share and use high-quality evidence in decision-making.

79 Health Services Safety Investigations Body, ‘Annual Report and Accounts 2023/24’, 22 July 2024, available at: <https://hssib-ovd42x6f-media.s3.amazonaws.com/production-assets/documents/hssib-annual-report-and-accounts-2023-24-accessible.pdf>

80 Evaluation Task Force, ‘The Evaluation Task Force Strategy 2022 – 2025’, 22 March 2024, available at: www.gov.uk/government/publications/the-evaluation-task-force-strategy-2022-2025



“I think if you do not evaluate and humbly get people to properly evaluate things, how else do you learn lessons? I would like to see much more evaluation and evaluation strategies at the start of policy development.”

Cat Little, Permanent Secretary, Cabinet Office, 24 July 2024

10. The College of Policing holds the evidence base for policing. Chief Constable Sir Andy Marsh told us that as well as hosting the What Works Centre for Crime Reduction, the College of Policing has a practice bank for innovative and promising practice which is not yet fully evaluated. The college has produced a piece of research called Perennial Problems in Policing that clusters recommendations from His Majesty’s Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS), Coroner’s Court and the Independent Office for Police Conduct into 10 perennial problems to guide their research, training and investment. These include the prioritisation of short-term reactive policing, a lack of structured problem solving by frontline officers, limited assessment of the impact of specific interventions and strategies, and challenges in sharing information across partners.⁸¹ The What Works Board, chaired by Chief Constable Marsh and attended by the NPCC, HMICFRS, APCC and other senior leaders prioritises the areas of learning, knowledge and innovation for testing.

“We are turning more and more of these gaps into knowledge, and we are turning more and more of this knowledge into insight, which we share.”

Chief Constable Sir Andy Marsh, Chief Executive, College of Policing, 31 May 2024

11. Chief Constable Sir Andy Marsh and Chief Constable Gavin Stephens share the view that there is under-investment in central capacity to help police forces to improve. There is a focus within the policing system on understanding why things have gone wrong, but insufficient investment in central capacity to help organisations with routine learning and improvement. Policing is a localised system, but at the local level, police forces are often wrestling with many conflicting priorities including balancing the budget, implementing the latest IT system or doing the latest training programme to ensure legal compliance.

“In a policing landscape or system that is heavily localised, I feel like we underinvest in the central capability. For example, policing is a £18 billion service or industry. The College of Policing – you have learned a little bit about our role, which I would characterise, by the way, as standards, performance, leadership – is a £70 million organisation.”

Chief Constable Sir Andy Marsh, Chief Executive, College of Policing, 31 May 2024

81 College of Policing, ‘Problem-oriented policing’, January 2021, available at: <https://assets.college.police.uk/s3fs-public/2021-05/problem-solving-scope-of-practice-guidelines-250521.pdf>



“There is a real absence of change and improvement capability in policing. I will put that alongside there is not an absence or a shortage of diagnostics about the things that are going wrong so whether that is coming from the Independent Office for Police Conduct (IOPC) who produce very good and effective learning reports, or HMICFRS, who have also produced lots of recommendations. We have probably struggled since the years of austerity and the closure of what was called the National Policing Improvement Agency. We lost that during the years of austerity. So, what is missing in policing is that there is not any central capacity to help forces improve.”

**Chief Constable Gavin Stephens, Chair, National Police Chiefs’ Council,
10 May 2024**

12. In the health sector there are various programmes and schemes that NHS England have in place to support hospital trusts and Integrated Care Boards (ICBs). NHS England has statutory accountability for oversight of ICBs, NHS Trusts and foundation trusts. The NHS oversight framework describes how this oversight operates.⁸²
13. The support provided by NHS England to an ICB or trust is based on earned autonomy principles. The NHS will identify the scale and nature of support needs by making an assessment about the maturity of the leadership in place within an ICB or trust and its performance. This will vary from a high degree of autonomy at one end of the scale and at the other end, mandated intensive support delivered through the Recovery Support Programme.⁸³
14. We were also told about the Getting it Right First Time programme (GIRFT) which is a NHS England programme designed to improve treatment and care by reviewing health services in England.⁸⁴ GIRFT assists organisations to understand where they might be out of line with national data in the delivery of services by asking why variation might be occurring and, where it is unwarranted, assisting local teams to do the work that is needed to improve. Often, the NHS does this by pointing to another organisation that has had similar issues and has successfully put in place measures to resolve them.

82 NHS England, ‘NHS oversight framework’, June 2022, available at: www.england.nhs.uk/publication/nhs-oversight-framework-22-23/; ‘A consultation on a draft updated NHS Oversight and Assessment Framework’, May 2024, available at: www.england.nhs.uk/long-read/consultation-on-the-draft-updated-nhs-oversight-and-assessment-framework/

83 NHS England, ‘Recovery Support Programme’, available at: www.england.nhs.uk/system-and-organisational-oversight/national-recovery-support-programme/

84 NHS England, ‘About the GIRFT programme at NHS England’, available at: <https://gettingitrightfirsttime.co.uk/what-we-do/>



“Let me give you a case, at the moment, I am visiting all 24 comprehensive stroke centres in the country. We go through the data with them, and that allows us to ask questions around, ‘Why are fewer of your population having a certain procedure?’ The GIRFT programme partly physically visits, and partly looks at the data and issues reports based on analysis of that data, but fundamentally it is there to assist.”

**Professor Stephen Powis, National Medical Director, NHS England,
24 July 2024**

15. Peer challenge can be a valuable tool to support improvement in public services. In the local government sector, the LGA facilitates a programme of corporate peer challenges (CPCs) for councils.

Corporate peer challenges for councils

Openness to external challenge contributes to honesty and openness. The LGA facilitates a programme of corporate peer challenges (CPCs) for councils, where a team of member and officer peers from local authorities provide ‘critical friend’ challenge on the themes of: local priorities and outcomes; organisational and place leadership; governance and culture; financial planning and management; and capacity for improvement.

CPCs are recognised as an effective tool for identifying any cultural and relationship weaknesses in councils and recommending improvements that help to mitigate individual or systemic risks. The government has set out its expectation in the Best Value Standards that all local authorities have a corporate or finance peer challenge at least every five years, to help identify any issues an authority might be facing and suggest possible solutions.⁸⁵

Following each CPC, a report outlining the key findings and recommendations from the peer team is shared with the council. In the spirit of openness and transparency, councils are required to publish this report, alongside an action plan, within three months of the CPC. If the council is unable to publish the plan with the report, it is required to publish the plan no later than five months after the CPC. In 2023/4, 61 CPCs were conducted: reports are also published on the LGA website.

Local Government Association, open consultation, submission 14

⁸⁵ Ministry of Housing, Communities & Local Government, ‘Best value standards and intervention: a statutory guide for best value authorities’, 8 May 2024, available at: www.gov.uk/government/publications/best-value-standards-and-intervention-a-statutory-guide-for-best-value-authorities



Complaints

16. Complaints can provide valuable insight for an organisation into how the public is experiencing its services. A spike in the volume of complaints in a specific geographical area or about particular policies or practices can be an early warning sign that there are issues that warrant closer investigation. Problems may start to reveal themselves in the complaints data before they materialise elsewhere in the department.
17. Whether complaints are viewed as an opportunity or a threat is determined by the tone set by the leadership of an organisation. It requires leaders, at all levels, to value and prioritise the learning to be gained rather than resorting to blame, defensiveness and reputation management.

“Creating a learning organisation and one that does not blame is absolutely essential. You need all kinds of ways of doing that. We brought into our office former complainants who described what it was like to be on the receiving end of the behaviour of our people. We [also] brought in ombudsman leaders from Canada, Africa and across the world to talk about their experience and what they had done.”

**Sir Rob Behrens, Former Parliamentary and Health Service Ombudsman,
26 April 2024**

18. The role of the complaints caseworker is of critical importance to an organisation, in resolving issues that the members of the public are experiencing with public services and in identifying early warning signs of emerging problems. It is another role, like that of managing the sponsorship relationship with ALBs, which is crucial to the effective operation of public services but is at risk of being undervalued.

Government departments, public bodies and the NHS

19. The Parliamentary and Health Service Ombudsman (PHSO) was set up by Parliament to consider complaints that government departments, other public bodies and the NHS in England, have not acted properly or fairly or have provided a poor service. The PHSO also works with organisations to help them improve how they handle complaints and in 2022 published the UK Central Government Complaint Standards and the NHS Complaint Standards. The complaint standards have professionalised complaints handling by promoting a consistent cross-government approach to complaint handling.
20. The complaints standards encourage a learning culture by supporting organisations to see complaints as opportunities to improve services. The standards were developed in collaboration with departments and supported by the Cross Government Complaints Forum, which has the aim of improving the quality of complaint handling across government by enabling cross-departmental engagement and learning.



21. We were keen to hear the perspective of complaint handlers and were grateful to be invited to a meeting of the working level branch of the forum. It was clear to us that the forum is hugely valued by its members as a mechanism for bringing together people from a wide range of departments with contrasting complaints functions. Some departments may have a single person who handles complaints and may receive around 100 complaints a year. The larger departments will have large customer services departments and may receive around 90,000 complaints a year. The forum allows complaints handlers from all types of departments to come together to share best practice and experiences.
22. We were interested to hear how departments identify themes in the complaints they receive and how they use this to identify and resolve issues. We heard that departments that have the largest number of complaints as a consequence of the high volume of their customer service interactions, have a data analysis capability that is able to identify and report on trends and themes. In some smaller departments, the analysis is carried out by the team investigating the complaints.
23. There is also variation in the technical systems for recording and analysing the complaints data. For example, one larger department has a new handling system which pulls themes and outcomes into a performance report which is sent monthly to their board. We heard that the technology is lacking in some of the smaller departments. In some departments the case management system does not allow more than one reason for a complaint to be recorded or for detailed analysis of the data to be extracted. Some departments were in the process of building better systems, while others had not been supported by the resources necessary to invest in more appropriate systems for capturing the level of data necessary. For departments without sophisticated case management systems, complaints teams were relying on manual sifts to identify the granularity needed to pull out useful data.
24. One participant from an ALB shared with us an example of how they use their complaints data to identify red flags. The agency overlays data on the volumes of complaints about specific themes with the peaks that they would expect to see based on seasonal factors that impact on the work of their organisation. This method reveals increases that it is able to discount because they are in line with expectations. The agency is looking for peaks that are not attributable to seasonal variations, which might therefore suggest an anomaly which requires closer investigation.
25. We heard that there are some initial conversations taking place around whether AI can and should be used to support analysis of themes in complaints. One complaints handler noted that early dialogue within their public sector body seemed to be focused on the scope for AI to make efficiencies through potentially generating acknowledgments and complaint responses and not, rather worryingly, on how it can be used to facilitate learning and improvement.



26. We heard several examples where there was a clear route for themes identified in the complaints received to be escalated through the organisation to the executive leadership team and to the departmental board, including how the data is fed into the organisation's risk and assurance committee. Timeliness is important if the red flags are to be spotted and addressed before issues become more serious.
27. One participant at the forum shared how complaints handlers are able to see the changes that happen as a result of the feedback they are recording and the work of the data analysts to bring the reports together. This approach reinforces the message that identifying problems at the first opportunity and making improvements is a priority for the organisation. In contrast, another contributor spoke about how they thought that the staff handling complaints within their department would feel encouraged to collect the best data if they knew that change would happen once they collect the data. They felt that if the senior civil servants within their department were more visible, listening and taking on board the opinions of staff, this would encourage feedback to come from the frontline staff up the chain. We also heard that in some cases boards can be more interested in reducing backlogs and meeting key performance indicators than in asking what learning the organisation can take from the complaints.
28. One complaints handler from an ALB that operates nationally with regional offices told us how variations in the complaints that were being received for the regions led them to establish that the body was applying different processes in different regions. They were able to use complaints data to help them to determine what the policy should be nationally, and to publicise it to the public. This led to an increase in complaints in the short term, but in the long term it led to an overall decrease in complaints.

“Complaints are not necessarily a bad thing. They are a way of ably informing you about how we can focus our efforts, and that has caused an overall benefit to our customers and the business in general.”

Participant, Cross Government Complaints Forum, 24 October 2024



29. One participant from an ALB explained how common themes in the complaints received revealed that customers were unhappy with the service the agency was providing. Customers were having difficulty getting through on the helplines, the waiting times were too long and when they did get through, the staff in the customer service centres were not trained well enough to be able to answer their queries. They were offered callbacks that then never happened. As a result of the complaints received, there was recognition that change was needed and this led to a huge culture shift in the agency.

“There has been a really big push on, ‘Let us pick up the phone. Let us talk to our customers. Let us get to know our customers again.’ We have gone full circle back to the good old days when we used to speak to customers. It is a work in progress. We are not there yet, but I think that has been a really big change that we have seen just through complaint handling. That has been some of the things that we have put in play because of what we saw coming through complaints.”

Participant, Cross Government Complaints Forum, 24 October 2024

Local government

30. The Local Government and Social Care Ombudsman (LGSCO) conducts independent investigations into complaints about local councils (excluding town and parish councils) and some other authorities and organisations. The LGSCO also investigates complaints about adult social care providers in both the public and private sectors.
31. The LGSCO published the Complaint Handling Code in 2024, which sets out guidance on how local councils should handle complaints. Like the complaints standards issued by the PHSO, the Complaint Handling Code promotes a learning culture.⁸⁶ It advises organisations to look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.
32. The LGSCO shared with us an example of a council which has demonstrated that it is moving to a learning culture. Liverpool City Council had been through serious problems and was subject to a government intervention. It approached the LGSCO to ask for guidance on how to handle complaints effectively and on how to use the information gained from complaints to improve their services. Investigators from the ombudsman spent some time at the council and produced a report, which the council then implemented.⁸⁷

86 Local Government & Social Care Ombudsman, ‘Complaint Handling Code’, February 2024, available at: www.lgo.org.uk/information-centre/information-for-organisations-we-investigate/complaint-handling-code

87 Local Government & Social Care Ombudsman, ‘Ombudsman encouraged by Liverpool’s response to complaints review’, 27 July 2023, available at: www.lgo.org.uk/information-centre/news/2023/jul/ombudsman-encouraged-by-liverpool-s-response-to-complaints-review



“Liverpool City Council have seen an absolute shift in internal culture, whereby they have started listening to people in a different way. It has not been that immediate defensive, ‘No, it is not us.’ People get caught up in that, where there is no direction within the organisation. Somebody then makes a complaint about something they have done, and it is the last thing they want to hear. If you shift the attitude to say, ‘Okay, if we listen to what this person is saying, give them the space and time to express their views, it is likely that is going to help us understand how what we are doing is landing with the people who are relying on our service.’ Liverpool is a very good example of an open mind and a bold approach.”

**Nigel Ellis, Chief Executive, Local Government and Social Care Ombudsman,
10 May 2024**

33. The LGSCO shares learning that it has identified through the complaints it investigates in thematic reports, which conclude with a list of questions for councillors to ask when scrutinising services in their authority.⁸⁸
34. Councillor Marianne Overton, Vice Chair of the LGA, shared the LGA view that it is good practice for an annual report on complaints to go to the full council. Councillor Overton also drew attention to a web service called Fix My Street run by the charity mySociety, which allows people to report problems in their local area, such as potholes or graffiti, using a shared ‘front door’. The service sends the report to the right council which sends instructions directly to their contractors to fix the problem before a formal complaint is necessary. We heard from many contributors to our review that people do not tend to want to make complaints – they just want their problem to be fixed.

“It is again about culture, because you have to be prepared to see every complaint, not as something to defend against, but as a lesson. It is so vital.”

**Councillor Marianne Overton, Vice Chair of the Local Government
Association, 14 June 2024**

88 Local Government & Social Care Ombudsman, ‘Focus Reports and Good Practice Guides’, available at: www.lgo.org.uk/information-centre/reports/focus-reports



Chapter 7: Leadership and culture

The role of leaders in setting the tone

“If you have the ‘right’ people, people with the right skills, the right attitudes, the right behaviours, the right experience and confidence to do the right thing, that is a large part of the battle on this. The best governance systems in the world and the best data in the world cannot protect an organisation or the public interest against the wrong individuals. People and behaviour are, in my experience, always the biggest single factor, but they are then part of a whole system.”

**Gareth Davies, Comptroller and Auditor General, National Audit Office,
24 May 2024**

1. It is clear to us that leadership is the most important factor in an organisation that identifies and addresses emerging issues promptly and is willing to learn from its mistakes. Leaders, at all levels, must create an expectation that employees will speak up if they notice something that ‘doesn’t quite feel right’ and that doing so will be welcomed and valued. This goes deeper than warm words shared in a ‘town-hall’ meeting or an all-staff email. It is about how leaders demonstrate day in and day out through their actions and behaviours that they believe problems should be identified and confronted head-on.
2. In our 2023 report, *Leading in Practice*, we said that leaders must communicate the high standards they expect from their workforce with **clarity** and **consistency**, and that there must be **consequences** for people whose behaviour does not align with the values of the organisation. We discuss below what these themes mean for building a culture that supports identifying and addressing problems.
3. **Clarity.** Leaders must be clear that they welcome potential problems being brought to their attention early, before matters start to deteriorate, and they must emphasise that they expect all line managers to be receptive to issues and concerns being raised with them. Leaders must look for opportunities to help the people working in their organisation to understand how serving the public interest should guide their actions and behaviour. They must be clear that everyone in the organisation has a duty to deal with the public with openness and honesty.
4. **Consistency.** Leaders must be role models for the standards they expect of others, even when they are under pressure. They should demonstrate that they welcome people sharing their concerns or opinions by listening attentively. The organisation’s internal culture should align with its public interactions. Ensuring consistency between its internal and external behaviours fosters honesty and transparency.
5. **Consequences.** Leaders must address behaviour that is inconsistent with a culture which values people raising concerns. The appropriate response will depend on the circumstances. Where malpractice has occurred, such as deliberately concealing relevant information, disciplinary action may be appropriate. In other instances, it may be right for the leader to call out a particular type of behaviour and explain why it is not acceptable.



Leaders must be careful not to reward people who downplay problems or sweep them under the carpet through favourable performance management decisions. In public life, the ‘how’ is as important as the ‘what’ in getting things done.

6. In the report of the Infected Blood Inquiry, Sir Brian Langstaff drew attention to the high number of high-profile failures of care over the last five decades that have been the subject of inquiries of different types which have ended with a recommendation that the culture needed to change to be more open and forthcoming.⁸⁹ He noted how these concerns have led to a statutory duty of candour being placed on health service bodies in England, Scotland and Wales, warnings from the Parliamentary and Health Service Ombudsman and a strengthening of whistleblower protection. However, he noted that there had not yet been the desired culture change.

“Whistleblowers are recognised as capable of providing a valuable service. The protection given to them consists of ensuring they do not suffer a detriment for making the revelations which they do. However, the system is one in which it is almost assumed that, but for the Act [Public Interest Disclosure Act 1998], a whistleblower would otherwise be subject to blame. It is that cultural assumption which most needs to be addressed. What most needs to be valued is ensuring that reporting near misses (‘sentinel events’) as well as harmful acts is prized, so that we may learn how to avoid them next time a similar situation occurs.”

Infected Blood Inquiry, The Inquiry Report, Vol. 1, page 238

7. One of these inquiries was Sir Robert Francis’ 2013 report into Mid Staffordshire NHS Foundation Trust, in which he recommended that, “Reporting of incidents of concern relevant to patient safety, compliance with fundamental standards or some higher requirement of the employer needs to be not only encouraged but insisted upon.”⁹⁰ Sir Brian Langstaff said that insisting on the reporting of concerns on the part of those in leadership roles was vital if culture is to change, along with the better organisation of the systems dealing with safety across healthcare. “Rather than seeing a whistleblower as needing protection from retribution which would otherwise follow, the culture should be one in which the reporting of the concerns of which Sir Robert Francis speaks is recognised as a human, professional and statutory duty.” The duty should also rest on those to whom a report is made. Sir Brian recommended that those in leadership positions be required to record, consider and respond to any concern about the healthcare being provided and any person in authority to whom such a report is made should be personally accountable for a failure to consider it adequately.

89 Infected Blood Inquiry, ‘The Inquiry Report’, 20 May 2024, available at: www.infectedbloodinquiry.org.uk/reports/inquiry-report

90 ‘Report of the Mid Staffordshire NHS Foundation Trust Public Inquiry’, 6 February 2013, available at: www.gov.uk/government/publications/report-of-the-mid-staffordshire-nhs-foundation-trust-public-inquiry



“Where an individual is responsible for something going wrong that was, or might have been, harmful, they should not usually be blamed for ‘owning up’ (for that enables patient safety to be better achieved), but they should certainly be blamed if they keep silent.”

Infected Blood Inquiry, The Inquiry Report, Vol. 1, Sir Brian Langstaff, page 241

8. In his 2017 report, ‘The patronising disposition of unaccountable power’, Bishop James Jones proposed a charter intended to support leaders of public bodies to demonstrate to their employees that they are in favour of openness and against defensiveness. The Hillsborough Charter has since been adopted by the government, the National Police Chiefs’ Council on behalf of all 43 police forces, the College of Policing, the Crown Prosecution Service, National Fire Chiefs’ Council and others.⁹¹

“The Hillsborough Charter works by looking to public authorities to adopt principles. It is about principles and the principles are about openness, candour and transparency. There needs to be that signal sent through the organisation, so that, when there are signs then staff feel, ‘Yes, I want to bring this to the attention of others up the line’, not, ‘My job is to somehow pretend that this signal is a false signal or a minimal signal.’ That can make all the difference.”

Ken Sutton, secretary to the Hillsborough Independent Panel and secretary to the reviews into maternity care at East Kent Hospitals NHS Trust, 11 July 2024

9. There has been a statutory duty of candour for health and social care providers since November 2014 and an organisational duty of candour for policing was put in place through the 2023 Code of Practice for Ethical Policing.^{92, 93} Campaigners have long called for a Hillsborough Law to set out in statute that all public authorities and public servants must tell the truth and act with candour. The government announced in the 2024 King’s Speech that it would legislate to introduce a duty of candour for all public servants and the law would include criminal sanctions for those who breach it.⁹⁴

91 Oral statement to Parliament, ‘Hillsborough Charter is legacy of victims’ families’, 6 December 2023, available at: www.gov.uk/government/speeches/hillsborough-charter-is-legacy-of-victims-families

92 A review of the operation of the statutory duty of candour for health and social care providers in England was announced in the government’s response to the Hillsborough disaster report on 6 December 2023. A call for evidence was launched in April 2024 and the findings were published in November 2024, available at: www.gov.uk/government/publications/findings-of-the-call-for-evidence-on-the-statutory-duty-of-candour

93 College of Policing, ‘Code of Practice for Ethical Policing’, 7 December 2023, available at: www.college.police.uk/ethics/code-of-practice

94 BBC News, “Hillsborough Law’ on the table by anniversary – PM”, 24 September 2024, available at: www.bbc.co.uk/news/articles/c0jwzgpzzjxo



10. We welcome the government's commitment to increasing candour and openness in public life. The new legislation will need to be supported by sustained attention from leaders of public bodies to ensure that the law is both the catalyst for change and is supported by a culture that values and promotes openness over defensiveness.
11. We have seen in the reports of independent inquiries how, when the public has suffered as a result of action or inaction by a public sector body, it is often the defensive response of the body and its failure to acknowledge where it went wrong and offer a meaningful apology, that compounds the pain suffered. Point 5 of the Hillsborough Charter calls on organisations which sign it to strive to, "Ensure all members of staff treat members of the public and each other with mutual respect and with courtesy. Where we fall short, we should apologise straightforwardly and genuinely."
12. Some contributors to our review noted the difference between a legalistic approach and an approach centred on ethics and values. For example, a CEO may feel pressure from legal advisers to protect against potential legal liability and will need to balance this with the delivery of timely and effective public services in line with the organisation's values. Leaders need to decide what kind of culture they want for their organisation.

"If you make a mistake, and we all do, I make them all the time, be able to say, 'Yes, I got that wrong.' That goes such a long way. It is not trying to live by some kind of virtuous code that other people cannot aspire to. It is trying to do the basic things which are about humanity and humility."

**Anthony May, Chief Executive, Nottingham University Hospitals NHS Trust,
24 May 2024**

Building a speak up culture

Speaking up and whistleblowing

'Speaking up' can include 'whistleblowing'. Whistleblowing of certain categories of wrongdoing is protected in law. Where a concern falls within the scope of the Public Interest Disclosure Act 1998 (PIDA), a worker making a 'protected disclosure' will be protected from negative treatment or unfair dismissal.

When we refer to speaking up in this report, we have in mind formal speak up and whistleblowing complaints, supported by effective policies and procedures for people to raise concerns. But we also have in mind a culture where people feel comfortable flagging issues informally, asking questions and sharing their ideas. This can enhance the engagement and collaboration that makes for good decision-making in the public interest.



13. An organisation that approaches public scrutiny openly and transparently, does not seek to defend the indefensible and treats the public with respect, needs an open internal culture that supports employees to speak up if they become aware of actions or behaviours that are falling short of these standards.
14. The annual ‘Ethics at Work’ research published by the Institute of Business Ethics consistently finds that the main barriers to speaking up are fear and futility. People fear that speaking up will have a negative impact on their career and lack confidence that any action will be taken if they do raise their concerns. Other reasons that may apply include a fear of blame or not wanting to be seen to undermine colleagues.⁹⁵
15. To inform their contribution to our public consultation, the Society of Local Council Clerks conducted a survey of their membership. The survey asked whether members feel safe to speak up about concerns with 62% responding ‘yes’ and 38% responding ‘no’. The survey asked those who had responded no, what they believed were the reasons for this response. 37% said their negative response was due to a lack of proper sanctions for poor behaviour which in turn can mean that councillors and staff feel it is not worth raising an issue.⁹⁶
16. Some contributors raised with us the importance of psychological safety for creating a culture where people are willing to speak up. Academic and author, Dr Amy Edmondson, defined team psychological safety in 1999 as, “a belief that one will not be punished or humiliated for speaking up with ideas, questions, concerns, or mistakes, and that the team is safe for interpersonal risk taking.”⁹⁷
17. In our 2023 report, *Leading in Practice*, we explored the role of leaders in creating an environment where people feel they can speak up. Three observations from that report are worth summarising here:
 - People need to feel that leaders are genuinely interested in what they have to say, and leaders need to be visible and available.
 - The way leaders respond when people raise concerns has a ripple effect though an organisation – for good or bad.
 - Strong leadership requires leaders to be curious about their organisation and to welcome concerns and complaints as information that will enable them to make improvements.
18. These themes continued to be prominent in the evidence we took for this report. When leaders take action, this demonstrates that leaders take seriously the matters being raised with them. Baroness Casey described the chicken and egg nature of the problem, “If you do not take action, people will not come forward. If people do not come forward, you will not be able to take action.”

95 Institute of Business Ethics, open consultation, submission 11

96 Society of Local Council Clerks, open consultation, submission 23

97 Amy C. Edmondson, ‘Psychological Safety’, available at: <https://amycedmondson.com/psychological-safety/>



“If your first action on receiving a whistleblowing complaint internally, or negative feedback from somebody outside the organisation, is to get into reputational protection mode then, however good your policy, you have lost that point. It is again leadership, culture, behaviour and so on.”

**Gareth Davies, Comptroller and Auditor General, National Audit Office,
24 July 2024**

“In our confidential staff surveys, since 2016, you can see that there is appreciation for the leaders getting out, talking to their colleagues and staff, listening to them, taking onboard what they say and welcoming when they have done something wrong, to be told that they have done something wrong. The leaders have to practise what they preach. If they do not, people become cynical and fearful.”

**Sir Rob Behrens, Former Parliamentary and Health Service Ombudsman,
26 April 2024**

“A key part of building a speak up culture is for managers to be trained in active listening, for all contributions, challenges and ideas to be valued, and to maintain the virtuous triangle through following up when issues are raised, to let colleagues know what has happened to their feedback – speak up, listen up, feed back.”

Institute of Business Ethics, open consultation, submission 11 Speak up and whistleblowing processes

19. We have discussed in this chapter the importance of an open culture in which people feel it is their duty to speak up about concerns and near misses. It could be said that there has already been a failure of an organisation’s culture if an employee feels that they need to report a concern formally. However, it is also the case that formal mechanisms are a crucial safety net and there will always be a need to have effective and trusted processes in place.⁹⁸
20. Five key components of an effective speak up/whistleblowing system came through in the evidence we took.
 - It is important that there are a range of routes for people to speak up and that these are publicised within the organisation. There should be regular training and awareness programmes on the process, which are available to staff and board members.

⁹⁸ There has been much debate in recent years about whether existing whistleblowing law is sufficient. Proposals have been made for improvements to the regime. For example, see: <https://protect-advice.org.uk/campaign-for-a-new-whistleblowing-bill/>



“It is important that there are regular training and awareness programmes on the whistleblowing process, which are available to staff and board members as appropriate.”

Northern Ireland Public Sector Chairs’ Forum, open consultation, submission 19

- Organisations have a duty of care to people who speak up and need to support employees through what can be a difficult and emotionally challenging time.

“We want to get the information from the whistleblower as quickly as possible, to reassure them that it has been understood and is being dealt with properly, which is often a challenge, but let them get back to their job. We have seen really serious effects on whistleblowers’ mental health and their performance in the job. While everybody was well intentioned about protecting them, it has almost become impossible because they are under such stress. There is a duty of care point there, which is still not well managed.”

Gareth Davies, Comptroller and Auditor General, National Audit Office, 24 May 2024

- All too often people who raise concerns face aggression and denial. Organisations should ensure that victimisation is dealt with firmly and that this is seen to happen.

“We are aware of employers in the public and private sector who successfully use a victimisation risk assessment to prepare and address the risk of victimisation of a whistleblower at a very early stage. A risk assessment can also identify risks to breaches to a whistleblower’s confidentiality as well as situation.”

Protect, open consultation, submission 21

- Boards should regularly review the operation of the speak up system and make improvements where necessary. So that the board can understand the experiences of people who report concerns, organisations need to collect data on the operation of the speak up system.

“Ensuring the effectiveness and awareness of a whistleblowing policy that empowers employees to disclose any serious wrongdoing or unlawful conduct without fear of victimisation is vital. Regular review of the policy and supporting training and communication is essential.”

Local Government Association, open consultation, submission 14

- Boards should ensure that speak up reports are analysed for themes and patterns and that this information is combined with other datasets to form a single insight into the culture of the organisation.



“I think it is partly about training. I think it is about rewarding whistleblowers. I do not mean necessarily financially. I think it is about building it into the culture of the organisation. In particular, I think the boards of both public and commercial bodies need to be specifically trained on why whistleblowing can be a positive, its importance and the risks and costs of ignoring whistleblowers.”

**John Bowers, Principal of Brasenose College, University of Oxford,
25 June 2024**

21. Protect, the whistleblowing charity, has developed a whistleblowing benchmark, which has codified best practice into an evaluation tool to support employers to analyse their performance in three areas: governance (policies and procedures, accountability, review, and reporting arrangements), staff engagement (communications and training) and operations (support and protection, recording and investigations, resolution, and feedback). On completion, an organisation receives a score under each area, allowing comparisons with other organisations and against best practice, and providing a gap-analysis so that organisations know where to improve.⁹⁹

Developing leaders

22. It is clear that leaders – at all levels of an organisation – are critical to a culture where people both feel that it is their duty to report mistakes and concerns and that they will not be unfairly treated for doing so. So how can public sector organisations ensure they are populated by leaders who have the motivation, character and skills necessary to build these cultures?
23. Dr Bill Kirkup shared his view with us, based on his experience of the health sector, that leaders often do not feel confident that they have solutions to problems so would rather not hear about them. He felt that if people were better prepared for the fact that things will go wrong and have thought about how they would deal with the challenges that could arise, they may be less inclined to minimise problems.

“Very often, when you first go to do an investigation in somewhere like Morecambe Bay, the first thing that everybody tells you is, ‘Everybody knew that there was a problem.’ ‘Yes, but why did you not say so?’ ‘Because we thought that people were not ready to listen.’ If you are prepared to listen to those and you show that a report of potential problems is going to be welcomed and not rejected, that will add a lot to it. If people, again, thought that they had solutions to some of these problems, they would not be so frightened of them and they would not want to minimise them quite so much.”

Dr Bill Kirkup, Chair of reviews into maternity care at East Kent Hospitals NHS Trust and Morecambe Bay maternity services, 11 July 2024

⁹⁹ Protect, open consultation, submission 21



24. Developing the confidence of leaders to deal with problems in the right way seems to us to be a worthwhile area of focus in leadership training. This should include how to handle a crisis appropriately and how to get comfortable delivering bad news to their leaders and ministers – and doing it early.
25. We heard from contributors how leaders need to be curious in order to uncover and address issues as early as possible. Leaders must take action when issues are raised with them, but this alone is insufficient. Leaders must actively search out the first signs of issues that may be bubbling under the surface. We discussed in chapter 3 how hard and soft data across a range of areas can provide indicators that something may be going wrong and requires a closer look. But for this data to be used to best effect, leaders must want to listen to and interpret the story it is telling.

“I am constantly looking for corroborating evidence or dissonance with the formal paperwork I see through governance. When there is dissonance, then you start pulling at the thread. Is the whistleblowing process not being used? Why are those the complaint numbers that we get? I see one of my roles, as part of the senior team, as making sure there is enough grit in the machine which ensures the infrastructure that I set up is asking some of the challenging questions, to make sure that things are what they appear to be.”

Angela MacDonald, Deputy Chief Executive and Second Permanent Secretary, HMRC, 11 July 2024

26. This is not the place for an in-depth summary of the different forms of leadership training and development that are available in the public sector. However, the following schemes and methods are examples that were shared with us of training that supports leaders to develop organisational cultures where issues are addressed when they arise and the public interest comes first.
- The Infrastructure Project Authority (IPA) Project Hub and Major Project Leadership Academy (MPLA) train people to be accountable. All Senior Responsible Officers must go through the MPLA course, which is 18 months duration and is equivalent to a master's degree. The MPLA course includes a mix of training and experience-based work. The IPA has also given training to ministers.
 - Immersive learning uses realistic environments to simulate major incidents and real-world scenarios. This allows participants to practise making decisions in a safe learning environment. Immersive learning is used by the police and in health, among other sectors.^{100, 101}

¹⁰⁰ College of Policing, ‘Immersive learning’, available at: www.college.police.uk/career-learning/immersive-learning

¹⁰¹ NHS England, ‘Simulation and immersive technologies’, available at: www.hee.nhs.uk/our-work/technology-enhanced-learning/simulation-immersive-technologies



- UK Government Investments (UKGI) has a shareholder non-executive director development programme and an aspiring shareholder non-executive director development programme to build a pipeline of expertise. They hold formal training sessions three or four times a year. Every time the UKGI produces an internal good practice note, they hold a seminar on it to disseminate expertise across the organisation. They currently have a programme where every six to eight weeks they bring in a FTSE 100 Chair to talk to the group about how effective boards operate. Charles Donald, Chief Executive of UKGI told us, “It is all about trying to build a group of people who a) do not feel like they are on their own and b) feel like they are being trained and developed to understand a good way to operate on a board. Those people also encounter problems that may exist in one ALB and a shared understanding of which means colleagues might be in a better position to recognise them elsewhere in another ALB. It is amazing how many themes that are common.”
- Cross-sector learning allows for cross-fertilisation of ideas across the public sector. An example is the Ethos Network, attended by senior representatives from the Police, Military, NHS, Civil Service and academics researching ethics in diverse public services. Subject to securing funding, the Ethos Network will develop a cross-sector research agenda and evidence base for ethics in (and of) public service, facilitate mutual learning on, and advancement of, ethics in (and of) public service, through interprofessional and multidisciplinary networking and engagement, and identify and share best practice on education, standards, and services for ethics in public service.
- The LGA's member and officer development programmes promote the importance of fostering open and transparent communication and engagement in local authorities between Cabinet/committee chairs and senior officers and with the public and stakeholders to facilitate information exchange and feedback in an open, honest and accountable way.¹⁰²

27. In our Leading in Practice report, we were clear that while the tone at the top of the senior leadership is important for setting culture, most people working in organisations will have limited visibility of the top team but daily interactions with their more immediate managers. Line managers at all levels need training and support so that they are able to create the right atmosphere for their staff to feel safe saying they have made a mistake, or that they feel a project may not be going to plan, and line managers need to know how to handle such challenging conversations.
28. Another area we touched on in Leading in Practice was the role of professional standards in supporting members of the professions to maintain high standards and act as role models within the public sector organisations where they work.

¹⁰² Local Government Association, open consultation, submission 14



“As part of the professional training [for accountants], there is an ethics module, and professional staff must review and remind themselves of their ethical responsibilities under the Standard of Professional Practice on Ethics. Things like honesty and courage are part of that, being able to speak truth to power and to do the right thing where required. It is absolutely acknowledged that that can be hugely difficult, and sticking your head above the parapet when circumstances are hard is a personally very challenging thing to do.”

Diana Melville, Governance Advisor, The Chartered Institute of Public Finance and Accountancy (CIPFA), 24 May 2024

29. Cat Little told us that she would like to see greater professionalisation of what it means to be a civil servant and uphold the Civil Service Code.

“We have got good frameworks, but I think we need to go further. The Civil Service Code, for example, has our four core values. We talk about honesty and impartiality, but we do not really have a professionalisation of what that means in practice. I compare that to my experience as a chartered accountant, where every year I had to explain how I had upheld my professional duties. I think the same is required of the Civil Service as professionals in policy making and with the responsibilities that we have.”

Cat Little, Permanent Secretary, Cabinet Office, 24 July 2024

Removing disincentives to identifying issues and learning from them

30. We heard a view that some chief executives, when things go wrong, view their role as managing the organisation through a period of turbulence, rather than being curious about the cause. And when it comes to complaints, these can be seen as unwelcome rather than a source of helpful intelligence about the operation of the organisation. Part of the reason for this perspective may be down to how expectations and priorities are communicated. If it is made clear that leaders will be judged by the way they learn from complaints rather than how they manage them, this approach may have a positive impact on behaviour throughout the organisation.
31. One of the perceived barriers to the leaders of organisations escalating concerns to the organisation at the next level in the accountability chain is concern about that organisation's response. NHS England told us that it is a challenge to find a mechanism to protect and reward people for curiosity without layering on more processes. When concerns are raised in a trust, the regulatory process is engaged and a leader will need to go through a process of reviews and, potentially, special financial measures. As regulation can sometimes be a blunt tool for improvement when used in isolation, NHS England is focused on finding ways to ensure that the leadership and improvement support from the NHS available to trusts means that people feel it is worth raising concerns, asking for help and building a culture of learning.



32. We have discussed how addressing issues is the right thing to do in the public interest, but there is another consideration that leaders would do well to have in mind. With social media, it is becoming harder for organisations to avoid transparency. Organisations that construct a narrative to defend a situation are more likely to be exposed. This creates an opportunity to help people to recognise that it is better to be straightforward and upfront, rather than have to face the consequences for their reputation and career and if they are later revealed to have been responsible for a cover-up.

Recognising and responding to early warning signs

33. We have discussed in this chapter how public office-holders have a duty to speak up when they notice something going wrong and the importance of an organisational culture that values and facilitates open communication between colleagues. In many recent public sector failures, such as those mentioned in this report, there were warning signs that things were not as they should be. These warning signs were either not recognised or, for a variety of reasons, they were not acted on.
34. Public sector leaders have a responsibility to lead organisations that put the public first, and this means recognising mistakes, correcting course when things are going wrong and learning the wider lessons, even when this may be uncomfortable in the short term.
35. It is imperative that leaders make time to reflect on whether their organisation's processes and culture support recognising and responding to early warning signs. We have included in this report suggestions for how this might be achieved by sharing the experiences of people we spoke to from different parts of public life. But each organisation is different and constantly evolving, and what works for one organisation might not be the right approach for another.
36. Our 20 'points for reflection' are intended to help leaders to think deeply about the processes and culture in their organisation and consider whether there are improvements to be made. But the questions are not only for leaders. They are a resource to help public office holders at all levels to challenge their leaders to think about these important matters.
37. The 'points for reflection' must be read alongside the Principles of Public Life. As we explored in chapter 1, the Nolan Principles help to keep the decisions and behaviours of public office holders rooted in the public interest when priorities change and difficulties arise. Hindsight may show decisions to have been flawed – it is futile to expect perfection, but being guided by the Nolan Principles ensures that decisions are taken in the right way, for the right reasons. The public deserves no less.



Appendix 1: Common themes from recent inquiries

1. Failure to listen to and act on concerns raised by employees and/or the public

Windrush Lessons Learned Review

“Our evidence shows individual cases being brought to the attention of the Home Office, and people living in the UK legally feeling the force of Immigration Enforcement measures as far back as mid-2000s, well before the 2014 and 2016 hostile environment measures were in full effect.”¹⁰³

Ockenden Review

“It appears from our survey and interviews, albeit with limited staff numbers engaging, that many staff had raised concerns about safe staffing levels over a protracted period of time. Within the survey, 61% of respondents said that they escalated staffing concerns but just 33% of these received an adequate response.”¹⁰⁴

Infected Blood Inquiry

“One of the most striking aspects of the evidence has been a failure adequately to listen to patients and to hear what they wanted, rather than assume the “listener” already knew.”¹⁰⁵

“It is, in my view, of particular importance that where it is known (as is beyond doubt here) that there is a voice to be heard, but that it is currently speaking in a very quiet whisper, steps must be taken, as best can be done, to enable those who should listen to it to hear it far more loudly.”¹⁰⁶

Grenfell Tower Inquiry

“Some, perhaps many, occupants of Grenfell Tower regarded the TMO [Tenant Management Organisation] as an uncaring and bullying overlord, which belittled and marginalised them, regarded them as a nuisance or worse, and simply failed to take their concerns seriously.”¹⁰⁷

103 Windrush lessons learned review, page 44, 20 March 2020

104 Final report of the Ockenden review, page 187, 30 March 2022

105 Infected Blood Inquiry, Volume 1, page 272, 20 May 2024

106 Infected Blood Inquiry, Volume 1, page 274, 20 May 2024

107 Grenfell Tower Inquiry: Phase 2 report, Volume 3, page 37, 4 September 2024



2. Failure to investigate properly when things went wrong

Windrush Lessons Learned Review

“Ministers set the policy and the direction of travel and did not sufficiently question unintended consequences. Officials could and should have done more to examine, consider and explain the impacts of decisions.”¹⁰⁸

Ockenden Review

“... by early 2009 there was already a systematic failure within the Trust to investigate its maternity services. Following on from their failure to investigate the deaths of Joshua, Thomas and Kate, the Shrewsbury and Telford Hospital NHS Trust completely failed to identify appropriate actions for learning from the deaths of these babies.”¹⁰⁹

“Our consideration of clinical governance processes and documents at the Trust has shown that investigatory processes were not followed to a standard that would have been expected for the particular time the incident occurred. The reviews were often cursory, not multidisciplinary and did not identify the underlying systemic failings and some significant cases of concern were not investigated at all.”¹¹⁰

Infected Blood Inquiry

“The NHS did not respond to the infection of thousands of people with HIV and hepatitis, through transfusion or treatment with blood products, by undertaking investigations, providing detailed explanations, making sincere apologies and doing everything that could be done to learn lessons. Instead, what is apparent is a defensive closing of ranks.”¹¹¹

Grenfell Tower Inquiry

“... we consider that more should have been done to investigate the propensity of composite panels to contribute to the downward spread of fire, the adequacy and clarity of the statutory guidance on the construction of external walls, including the suitability of Class 0 as a criterion and whether the use of materials liable to create flaming droplets when exposed to fire ought to be regulated.”¹¹²

108 Windrush lessons learned review, page 7, 20 March 2020

109 Final report of the Ockenden review, page 17, 30 March 2022

110 Final report of the Ockenden review, Executive summary, page xi, 30 March 2022

111 Infected Blood Inquiry, Volume 1, page 190, 20 May 2024

112 Grenfell Tower Inquiry: Phase 2 report, Volume 1, page 143, 4 September 2024



3. Failure of the board to have proper oversight of issues and concerns

Windrush Lessons Learned Review

“In this review, the evidence shows that for the hostile environment measures ministers and officials did not fully consider risks and, after the measures were implemented, gave inadequate attention to understanding their effect, including whether discrimination had occurred. The review also found that mitigating action was insufficient and that ministers and officials neither considered nor requested a broader range of policy options. Arrangements for senior oversight were unclear and unstructured, as were the levels of approval for decisions.”¹¹³

Ockenden Review

“The review has found the Trust leadership team up to Board level to be in a constant state of churn and change. Therefore, it failed to foster a positive environment to support and encourage service improvement at all levels. In addition, the Trust Board did not have oversight, or a full understanding of issues and concerns within the maternity service, resulting in a lack of strategic direction and effective change, nor the development of accountable implementation plans.”¹¹⁴

Grenfell Tower Inquiry

“The board of the TMO [Tenant Management Organisation] was the body ultimately responsible for its affairs, including strategic decisions relating to matters affecting fire safety in the buildings it managed. It was therefore important that it be kept informed of developments as they occurred, but regrettably there were many instances in which important information was not drawn to its attention. RBKC [Royal Borough of Kensington and Chelsea] was responsible for the oversight of the TMO which reported to its scrutiny committees. Reports to the scrutiny committees did not always contain the information that might reasonably have been expected.”¹¹⁵

¹¹³ Windrush lessons learned review, page 149, 20 March 2020

¹¹⁴ Final report of the Ockenden review, Executive summary, page x, 30 March 2022

¹¹⁵ Grenfell Tower Inquiry: Phase 2 report, Volume 3, page 14, 4 September 2024



4. Overly defensive organisational culture

Windrush Lessons Learned Review

“Given its [the Home Office’s] sensitivity to public criticism, there is the sense that priorities and decisions have been driven by an overwhelming desire to defend positions of policy and strategy – often at the expense of protecting individuals from the impact of the policies.”¹¹⁶

Ockenden Review

“The Trust consistently demonstrated negative behaviours and practices, resulting in many staff learning to accept poor standards as it became the cultural norm; this constitutes organisational abuse, similar to that found in the Mid Staffordshire NHS Foundation Trust Public Inquiry (2013).”¹¹⁷

Infected Blood Inquiry

“Standing back, and viewing the response of the NHS and of government, the answer to the question “was there a cover up?” is that there has been. Not in the sense of a handful of people plotting in an orchestrated conspiracy to mislead, but in a way that was more subtle, more pervasive and more chilling in its implications. To save face and to save expense, there has been a hiding of much of the truth. This failure to bring the true facts to life has come partly from the inertia of groupthink; but partly, it must be recognised from instinctive defensiveness, to save face and to save expense.”¹¹⁸

Grenfell Tower Inquiry

“The Department [for Communities and Local Government] displayed a complacent and at times defensive attitude to matters affecting fire safety.”¹¹⁹

“... for its part, the TMO ought to have reacted less defensively and, instead of retreating, should have made a greater effort to engage with Mr Daffarn, both on a personal and public level. It allowed its fear and personal mistrust of him and his methods to influence the way in which it engaged with the residents more generally. As custodian of the safety and security of its residents, it must take responsibility for the breakdown in trust.”

¹¹⁶ Windrush lessons learned review, page 90, 20 March 2020

¹¹⁷ Final report of the Ockenden review, page 66, 30 March 2022

¹¹⁸ Infected Blood Inquiry, Volume 1, pages 190 to 191, 20 May 2024

¹¹⁹ Grenfell Tower Inquiry: Phase 2 report, Volume 1, page 10, 4 September 2024



5. Failure to support a ‘speak up’ culture

Ockenden Review

“Many staff members told the review team of the fear of speaking out within maternity services. This included those who are currently working in maternity services at the Trust.”¹²⁰

“During the staff voices interviews some staff stated to the review team that there was a culture of bullying within the leadership team, and that this was not confined to the senior maternity management team but went across the Trust management structure.”¹²¹

Infected Blood Inquiry

“The fifth theme is that of institutional defensiveness, from the NHS and in particular from government, compounded by groupthink amongst civil servants and ministers, and a lack of transparency and candour. These factors drove the response of government over the decades.”¹²²

Grenfell Tower Inquiry

“It is disappointing that when officials became aware of matters which posed serious risks to life, effective steps were not taken to draw those risks to the attention of ministers. The failure to foster a culture in which concerns could be raised and frank advice given represents a serious failure of leadership on the part of ministers and senior officials.”¹²³

120 Final report of the Ockenden review, page 184, 30 March 2022

121 Final report of the Ockenden review, page 67, 30 March 2022

122 Infected Blood Inquiry, Volume 1, page 14, 20 May 2024

123 Grenfell Tower Inquiry: Phase 2 report, Volume 1, page 160, 4 September 2024



6. Poor relationships within the organisation

Ockenden Review

“... there was a culture of ‘them and us’ between the midwifery and obstetric staff, which engendered fear amongst midwives to escalate concerns to consultants. This demonstrates a lack of psychological safety in the workplace, and limited the ability of the service to make positive changes. Unfortunately, these poor working relationships were also witnessed by families, and in some cases mothers have described the additional stress these interactions had on them at one of the most vulnerable moments in their lives. In addition, repeatedly throughout this review we have heard from parents about a lack of compassion expressed by staff either while they were still receiving care or in follow-up appointments and during complaints processes.”¹²⁴

Grenfell Tower Inquiry

“... between 2011 and 2017 relations between the TMO and many of the residents of the tower were increasingly characterised by distrust, dislike, personal antagonism and anger ... for the TMO to have allowed the relationship to deteriorate to such an extent reflects a serious failure on its part to observe its basic responsibilities.”¹²⁵

7. Failure to understand the unintended consequences of policy decisions

Windrush Lessons Learned Review

“Warning flags about the potential consequences of the policy were raised at various stages, in various ways and by various interested parties. Yet ministers and officials were impervious to these warnings because of their resolute conviction that the implementation of the relevant policies was effective, should be vigorously pursued and would achieve the policy intent.”¹²⁶

Grenfell Tower Inquiry

“In the years that followed the Lakanal House fire the government’s deregulatory agenda, enthusiastically supported by some junior ministers and the Secretary of State, dominated the department’s thinking to such an extent that even matters affecting the safety of life were ignored, delayed or disregarded.”¹²⁷

124 Final report of the Ockenden review, page 184, 30 March 2022

125 Grenfell Tower Inquiry, Volume 3, page 40, 4 September 2024

126 Windrush lessons learned review, page 137, 20 March 2020

127 Grenfell Tower Inquiry, Volume 1, page 11, 4 September 2024



8. Failure to learn from past mistakes, or similar incidents and failures

Windrush Lessons Learned Review

“A defensiveness borne of dealing with issues in the past, coupled with an inadequate comprehension of the potential scale and complexity of the problem, led to a lack of curiosity or willingness to learn or reflect.”¹²⁸

Ockenden Review

“In our interactions with families, we have seen clearly that the Shrewsbury and Telford Hospital NHS Trust failed to learn, failed to improve and failed to safeguard families over a prolonged period of time.”¹²⁹

“The review team ... found evidence, over many years, of how a failure to investigate harm appropriately at the time meant learning opportunities were missed and subsequently led to other women suffering similar harm.”¹³⁰

Infected Blood Inquiry

“When it became apparent in the mid 1980s how many people had suffered serious illness as a result of their treatment with blood or blood products by the NHS, there was little apparent effort to establish precisely why that was, and to learn the lessons for the future.”¹³¹

Grenfell Tower Inquiry

“Both the department and BRE [Building Research Establishment] were warned on a number of occasions about the problems that could be caused by the use of combustible materials in the external walls of tall buildings with specific reference to cladding fires that had occurred abroad. Those warnings appear to have generated at best some informal conversations between BRE and the department, but more could and should have been done.”¹³²

“Although we recognise that the Lakanal House fire had particular features that were not directly relevant to what occurred later at Grenfell Tower, there were lessons that could and should have been learnt from it which might have improved the robustness and clarity of the regulatory regime before the Grenfell refurbishment took place.”¹³³

128 Windrush lessons learned review, page 88, 20 March 2020

129 Final report of the Ockenden review, page 149, 30 March 2022

130 Final report of the Ockenden review, page 40, 30 March 2022

131 Infected Blood Inquiry, Volume 1, page 219, 20 May 2024

132 Grenfell Tower Inquiry, Volume 1, page 129, 4 September 2024

133 Grenfell Tower Inquiry, Volume 1, page 143, 4 September 2024



9. Failure to identify emerging themes that might have alerted the organisation to a developing risk

Windrush Lessons Learned Review

“When we were looking for information about specific issues, we found it impossible to access all the complaints, correspondence, press queries, Freedom of Information requests and Parliamentary questions which came into the department before Windrush became a departmental label. This information is held on disparate IT systems, and in no standardised format. The systems monitor response times and service standards rather than the emerging themes that might help the department more broadly as to the full extent of a risk once it’s identified.”¹³⁴

Ockenden Review

“In summary, this was a Trust which had a number of problems, but the perception was that until 2017 the maternity service was not a major risk... The review team believes that the Trust Board and the CCGs [Clinical Commissioning Groups] were ‘reassured’ rather than ‘assured’ with regards to governance and safety within the maternity service. Although independent and external reports consistently indicated that the maternity service should improve its governance and investigatory procedures, this message was lost in a wider healthcare system which was struggling with other significant concerns.”¹³⁵

Infected Blood Inquiry

“It was not until May 1983 that there was within the DHSS [Department of Health and Social Security] any real focus on how best to respond to the risks of AIDS from blood or blood products and that was as a response to press reporting.”¹³⁶

Grenfell Tower Inquiry

“There was no analysis of the lessons to be learnt from significant single incidents, from the identification of patterns across different reporting periods, or from significant fires overseas. The work was being carried out at such a high level of generality that it would have been difficult for BRE [Building Research Establishment] to identify any patterns indicating that changes to the statutory guidance were necessary to ensure that it remained relevant to the risks posed by the built environment.”¹³⁷

¹³⁴ Windrush lessons learned review, page 88, 20 March 2020

¹³⁵ Final report of the Ockenden review, page 13, 30 March 2022

¹³⁶ Infected Blood Inquiry, Volume 4, page 21, 20 May 2024

¹³⁷ Grenfell Tower Inquiry, Volume 1, page 130, 4 September 2024



Appendix 2: About the Committee on Standards in Public Life

The Committee on Standards in Public Life (CSPL) advises the Prime Minister on ethical standards across the whole of public life in England. It monitors and reports on arrangements for upholding ethical standards of conduct across public life in England. The committee is an advisory non-departmental public body sponsored by the Cabinet Office. The chair and members are appointed by the Prime Minister.

CSPL was established in October 1994, by the then Prime Minister, with the following terms of reference:

“To examine current concerns about standards of conduct of all holders of public office, including arrangements relating to financial and commercial activities, and make recommendations as to any changes in present arrangements which might be required to ensure the highest standards of propriety in public life.”

The remit of CSPL excludes investigation of individual allegations of misconduct. On 12 November 1997, the terms of reference were extended by the then Prime Minister:

“To review issues in relation to the funding of political parties, and to make recommendations as to any changes in present arrangements.”

The terms of reference were clarified following the Triennial Review of CSPL in 2013. The then Minister for the Cabinet Office confirmed that CSPL “should not inquire into matters relating to the devolved legislatures and governments except with the agreement of those bodies”, and that “the government understands the committee’s remit to examine ‘standards of conduct of all holders of public office’ as encompassing all those involved in the delivery of public services, not solely those appointed or elected to public office”.

CSPL is a standing committee. It not only conducts inquiries into areas of concern about standards in public life but can also revisit those areas to monitor whether and how well its recommendations have been put into effect.



CSPL membership

Doug Chalmers CB DSO OBE, Chair

Professor Gillian Peele

Ewen Fergusson

The Rt Hon Lady Arden of Heswall DBE

John Henderson CB

The Rt Hon Baroness Beckett GBE

Baroness Finn

The Rt Hon Ian Blackford

Councillor Ruth Dombey OBE (from November 2024)

Chair of CSPL's Research Advisory Board

Professor Mark Philp

Secretariat

CSPL is assisted by a secretariat formed of Lesley Bainsfair (Secretary to the Committee), Nicola Richardson (Deputy Head of the Secretariat), Peter Keheller (Senior Policy Adviser), Amy Austin (Senior Policy Adviser) and Lesley Glanz (Executive Assistant). Press support is provided by Maggie O'Boyle.

Declarations of Interest

Members' declarations of interest can be found on CSPL's website and are updated regularly.¹³⁸

Maggie O'Boyle also provides part-time press support to the Office of the Commissioner for Public Appointments, the Advisory Committee on Business Appointments, the House of Lords Appointments Commission, and the Civil Service Commission.

¹³⁸ Committee on Standards in Public Life, available at: www.gov.uk/government/organisations/the-committee-on-standards-in-public-life



Appendix 3: The Seven Principles of Public Life

The Seven Principles of Public Life apply to anyone who works as a public office holder. This includes all those who are elected or appointed to public office, nationally and locally, and all people appointed to work in the Civil Service, local government, the police, courts and probation services, non-departmental public bodies (NDPBs), and in the health, education, social and care services. All public office holders are both servants of the public and stewards of public resources. The principles also apply to all those in other sectors delivering public services.

Selflessness

Holders of public office should act solely in terms of the public interest.

Integrity

Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.

Objectivity

Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

Accountability

Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.

Openness

Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.

Honesty

Holders of public office should be truthful.

Leadership

Holders of public office should exhibit these principles in their own behaviour and treat others with respect. They should actively promote and robustly support the principles and challenge poor behaviour wherever it occurs.



Appendix 4: Stakeholders

Methodology

The committee used the following methods for gathering evidence for the review:

- An open consultation, which received 29 responses.
- 25 individual stakeholder meetings.
- Three roundtables.

Stakeholder meetings

	Organisation	Name and role
1	Cabinet Office	Cat Little, Permanent Secretary
2	Cabinet Office, Public Bodies Team	Lorna Horton, Deputy Director
3	Chartered Institute of Public Finance and Accountancy	Diana Melville, Governance Advisor
4	College of Policing	Chief Constable, Sir Andy Marsh QPM, Chief Executive
5	Confederation of School Trusts	Leora Cruddas CBE, Chief Executive
6	Government Internal Audit Agency	Harriet Aldridge, Chief Executive Karen Holland, Operational director
7	Home Office	Sir Matthew Rycroft KCMG CBE, Permanent Secretary
8	HMRC	Angela MacDonald CBE, Deputy Chief Executive and Second Permanent Secretary
9	Infrastructure and Projects Authority	Nick Smallwood, Chief Executive
10	Local Government Association	Cllr Marianne Overton, Vice-Chair and Leader of the Independent Group Heather Wills, Principal Adviser – Finance and Governance
11	Local Government and Social Care Ombudsman	Amerdeep Somal, Ombudsman Nigel Ellis, Chief Executive
12	Lower Thames Crossing	Matt Palmer, Executive Director
13	National Audit Office	Gareth Davies, Comptroller and Auditor General
14	National Governance Association	Emma Knights, Chief Executive (to August 2024)



	Organisation	Name and role
15	NHS England	Amanda Pritchard, Chief Executive Professor Stephen Powis, National Medical Director Steve Russell, Chief Delivery Officer
16	NHS Greater Manchester Integrated Care	Mark Fisher CBE, Chief Executive
17	National Police Chiefs' Council	Chief Constable Gavin Stephens, Chair
18	Nottingham University Hospitals NHS Trust	Anthony May OBE DL, Chief Executive
19	Shrewsbury, Telford and Wrekin Integrated Care Board	Sir Neil McKay, Chair Simon Whitehouse, Chief Executive
20	UK Government Investments	Charles Donald, Chief Executive

	Individuals	Name
21	Independent reviewers into public service failures	Dr Bill Kirkup CBE Ken Sutton
22	Independent reviewer into public service failures	Baroness Casey of Blackstock
23	Author of Independent Review of Governance and Accountability in the Civil Service	The Rt Hon Lord Maude of Horsham
24	Former Parliamentary and Health Service Ombudsman	Sir Rob Behrens CBE
25	Academic	John Bowers KC, Principal of Brasenose College, University of Oxford

Roundtables

1	Sponsorship officials from a range of government departments (hosted by Cabinet Office ALB sponsorship team)
2	Working level branch of Cross Government Complaints Forum
3	Chief Executives and Chairs of public bodies (hosted by the Association of Chief Executives and the Public Chairs' Forum)

Room G.07
1 Horse Guards Road
London
SW1A 2HQ

**Committee on
Standards in
Public Life**

25 March 2025

OPEN LETTER TO PUBLIC SECTOR LEADERS

Public service delivery is more complex today than ever, involving a range of public sector bodies and private providers and operating within resourcing constraints. We recognise that you are dealing with some of the most difficult challenges we face as a country.

It is inevitable that errors sometimes occur and things go wrong. But it is how public bodies respond that matters. If leaders quickly correct errors, identify the wider lessons to be learned and ensure that those lessons are embedded fully within the organisation, the public benefits.

Our report, 'Recognising and responding to early warning signs in public sector bodies', published today is designed to support you. We want to help you, as public sector leaders, reflect on how you can best equip your staff to identify and resolve problems or issues that might get in the way of delivering the core purpose of your organisation. We share insights from leaders and practitioners. And we have included '20 points for reflection' (attached) which we hope will assist you, and which your staff can use to encourage your organisation's attention on these areas.

We hope that this report will stimulate discussion and that you find these points for reflection a helpful resource.

If you would like to discuss our report, please do get in touch. Our email address is:
public@public-standards.gov.uk

Yours,



Doug Chalmers CB DSO OBE
Chair, Committee on Standards in Public Life

Points for reflection

Building accountable organisations

1. How do you support your employees in understanding how their role, and the purposes of your organisation, serves the public?
2. Is it clear to your employees how decisions are made within your organisation and who is accountable for them?
3. What do you do to build strong relationships with those bodies that report to your organisation as well as those bodies you are accountable to?

Identifying and assessing risks

4. How do you know that the arrangements you have in place for the identification and mitigation of risks are effective?
5. How do you assure yourself that the data your organisation collects to assess its activities is of a high quality and that there is sufficient capability within the organisation to interpret the data intelligently?
6. How do you ensure your organisation views complaints as valuable feedback reflecting the public's experience of its service and uses that data to spot systemic issues and make improvements?

Speaking up

7. What do you do to build an open culture where people feel comfortable raising issues, asking questions and sharing their ideas?
8. How do you help your employees to understand that everyone in your organisation has a responsibility to speak up when they see something going wrong?
9. Are there clear and well-understood ways for people to raise concerns formally? How do you know these routes are trusted? How do you ensure that when people speak up, they are protected and not victimised?

Development and performance management

10. How does your organisation support the development of leaders who have the skills and confidence to handle a crisis appropriately?

11. How is listening to feedback and embedding learning incorporated into the process for assessing your organisation's executive and non-executive leaders?

Public scrutiny

12. Is your organisation as transparent as it can be when deciding what information to publish about its activities, including the provision of contextual detail where appropriate?
13. Could your organisation do more to engage proactively with the public and to understand the public's perspectives on how to improve your organisation's public services?
14. When things go wrong, how quickly do you acknowledge the failure and offer a meaningful apology?

Learning lessons

15. Does your organisation have mechanisms in place to support a robust corporate memory of why previous decisions were or were not taken?
16. How do you ensure that the lessons learned from evaluating projects and policies are shared within the organisation and that these lessons inform future decisions?
17. How do you ensure that your organisation regularly considers what it can learn from the successes and failures of other public bodies?

Board scrutiny

18. How do you ensure that your board receives the information it needs about risks and issues in a format that is most useful to board members, enabling them to evaluate the significance of that information?
19. How is your board encouraged to scrutinise robustly the decisions made by your organisation? Is it sufficiently curious? Does it listen to the views of public service users?
20. What do you do to ensure that your board has the right balance of skills, backgrounds, experiences and independence of judgement? Is understanding prospective board members' values and commitment part of the recruitment process?

Item 26.

COMMITTEE RECOMMENDATIONS



RECOMMENDATION TO FULL COUNCIL 14TH APRIL 2025 FROM POLICY AND FINANCE COMMITTEE 7TH APRIL 2025

PF/218 POLICY REVIEW

RECOMMENDED SW/EG (Unanimous)

That the Neonatal Care Leave Policy amendment to the Staff handbook and new Contract of Employment, be adopted.

Item 27.

COMMITTEE MINUTES

MINUTES

Minutes of a meeting of the **POLICY AND FINANCE COMMITTEE** held in the Guildhall, Mill Street, Ludlow on **MONDAY 7th APRIL 2025** at **7.00PM**

PF/197 PRESENT

Chair: Councillor S. Waite
Councillors: Garner; Ginger; B Waite.
Officers: Gina Wilding, Town Clerk
Lucy Jones, Senior Finance Assistant

PF/198 ABSENT

Councillors Gill, Miller and Parry were absent.

PF/199 WELCOME

The Chair, Councillor S Waite, welcomed everyone to the Policy and Finance Committee meeting and advised on essential housekeeping information.

PF/200 RECORDING OF MEETINGS

The Chair notified those present that under the Openness of Local Government Regulations 2014, recording and broadcasting is permitted during public session of Council Meetings.

PF/201 APOLOGIES

There were no apologies for absence received.

PF/202 DECLARATIONS OF INTEREST

Disclosable Pecuniary Interests

None declared.

Declaration of Conflicts of Interest

None declared.

Declarations of Personal Interest

None declared.

PF/203 PUBLIC OPEN SESSION (15 minutes)

There were no members of the public or press present at the meeting.

PF/204 UNITARY COUNCILLORS' SESSION

There were no Unitary Councillors present.

PF/205 MINUTES

RESOLVED SW/GG (Unanimous)

That the minutes of the Policy and Finance Committee meeting held on the 24th February 2025, be approved as a correct record, and signed by the Chair.

PF/206 ITEMS TO ACTION

RESOLVED SW/EG (Unanimous)

That the items to action from the Policy and Finance Committee meeting held on the 24th February 2025, be noted.

PF/207 FINANCE INFORMATION

a) Payments & Income

RESOLVED SW/EG (Unanimous)

That the Cash Book Payments and Income for January and February 2025 be received.

PF/208 b) Payments & Income Reconciliation

RESOLVED SW/EG (Unanimous)

That the Cash Book Reconciliation for January and February 2025 be received.

PF/209 c) Barclaycard

RESOLVED SW/EG (Unanimous)

That the Barclaycard Reconciliation for January and February 2025 be received.

PF/210 d) PayPal

RESOLVED SW/EG (Unanimous)

That the PayPal Reconciliation for January and February 2025 be received.

PF/211 e) Petty Cash

RESOLVED SW/EG (Unanimous)

That the Petty Cash Reconciliation for January and February 2025 be received.

PF/212 f) Pubic Sector Deposit Fund

RESOLVED SW/BW (Unanimous)

That the Public Sector Deposit Fund Reconciliation for January and February 2025 be received.

PF/213 g) Income

RESOLVED SW/EG (Unanimous)

That the Income Cash Book Reconciliation for January and February 2025 be received.

PF/214 h) Electric Vehicle Charging

RESOLVED SW/GG (Unanimous)

That the Electric Vehicle Charging Reconciliation for January and February 2025 be received.

PF/215 i) Mayor's Charity Account & Income

RESOLVED SW/EG (Unanimous)

That the Mayor's Charity Account and Income Cash Book Reconciliation for October, November, December 2024, January and February 2025 be received.

PF/216 **AGED DEBTORS**

RESOLVED GG/EG (2:0:2)

That the Ludlow Pride debt be placed on hold until the group reestablishes.

PF/217 RESOLVED SW/EG (Unanimous)

That the Current and Aged Debtors report be received.

PF/218 POLICY REVIEW

RECOMMENDED SW/EG (Unanimous)

That the Neonatal Care Leave Policy amendment to the Staff handbook and new Contract of Employment, be adopted.

PF/219 CLIMATE ACTION TASK AND FINISH GROUP

a) Minutes

RESOLVED SW/EG (Unanimous)

That the minutes of the Climate Action Task and Finish Group meeting held on the 27th March 2025 be received.

PF/220 b) Task and Finish Group Recommendations

Councillor discussed the recommendations from the Climate Action Task and Finish Group and stated that they would like a member of the group at the meeting to present the recommendations. They also queried the proposed expenditure as a disproportionate amount of the annual budget for such a project and the potential to offer the project through donations.

RESOLVED SW/GG (Unanimous)

That the recommendations from the Climate Action Task and Finish Group meeting held on the 27th March 2025, be deferred to the next Policy and Finance Committee meeting.

PF/221 NON-DOMESTIC RATES

RESOLVED SW/EG (Unanimous)

That a virement of £549.00 be made from budget 501/4800 Contingency Fund to 411/4011 Linney Riverside Park Rates to cover the Non-Domestic Rates charge for the Linney Boat Shed in 2025/26.

PF/222 CIL NEIGHBOURHOOD

RESOLVED GG/EG (Unanimous)

That it be noted that Shropshire Council hopes to notify the CIL Neighbourhood figures around the start of April. The figures have been collated but are currently being checked by finance for their accuracy, and once that process is complete details will be sent out to all Councils.

PF/223 CCLA PUBLIC SECTOR DEPOSIT FUND INVESTMENT

RESOLVED SW/BW (Unanimous)

That the CCLA Public Sector Deposit Fund Investment statement for January and February 2025 be noted.

PF/224 WEST MERCIA ENERGY

RESOLVED SW/EG (Unanimous)

That the annual pricing update from West Mercia Energy, be noted.

The meeting closed at 7.40 pm

Chair

Date

N.B. Closed Session Minutes will NOT be issued for this meeting.

MINUTES

Minutes of a meeting of the **REPRESENTATIONAL COMMITTEE** held at the Guildhall Mill Street Ludlow on **TUESDAY 11th March 2025 at 7pm.**

R/278 PRESENT

Chair: Councillor G Ginger

Councillors: Councillors Gill, Hall, Harris (19:04), Jones, Parry, Tapley, B Waite, S Waite

Officers: Gina Wilding, Town Clerk
Charlotte Ambrazas Committee Officer

R/279 ABSENCES

Councillor Thompson was absent.

R/280 HEALTH AND SAFETY

The Chairman informed Councillors, and everyone present, of the fire exits, fire assembly point and asked that everyone sign the attendance log.

R/281 RECORDING OF MEETINGS

The Chairman notified those present that under the Openness of Local Government Regulations 2014, recording and broadcasting is permitted during public session of Council Meetings.

R/282 APOLOGIES

Apologies were received from Councillor Thompson (family funeral)

R/283 DECLARATIONS OF INTEREST

Disclosable Pecuniary Interests

None

Conflicts of Interest

None

Personal Interest

Cllr Parry	25/00443/LBC	Knows the applicant
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Cllr S Waite	25/00719/LBC	Knows the applicant
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R/284 PUBLIC OPEN SESSION (15 minutes)

There were no public present.

R/285 LUDLOW'S UNITARY COUNCILLORS QUESTION AND ANSWER SESSION

No updates were available.

R/286 MINUTES**RESOLVED GG/SW (unanimous)**

To approve the minutes of 11th March 2025 as a correct record for the Chairman to sign.

R/287 ITEMS TO ACTION**RESOLVED GG/BW (unanimous)**

To note the items to action of 11th March 2025

7.04pm Cllr Harris joined the meeting

R/288 SHROPSHIRE COUNCIL DECISIONS PENDING**RESOLVED GG/TG (unanimous)**

That the decisions pending by Shropshire Council be noted

R/289 SHROPSHIRE COUNCIL DECISIONS**RESOLVED GG/TG (unanimous)**

That the decisions by Shropshire Council be noted

R/290 PLANNING APPLICATIONS**24/04716/FUL Junction Off A49, Ludlow****RESOLVED GG/TG (unanimous)**

No Objection to the installation of a new roundabout.

R/291 25/00443/LBC Riverside , 18 Temeside, Ludlow, SY8 1PD

RESOLVED GG/TG (8:0:1)

No objection to the replacement of existing rear garage upvc windows with new Crittal style metal window and provision of wood burning stove / twin walled stainless steel external flue

R/292 25/00694/TCA Avalon, St Julians Avenue, Ludlow, SY8 1ET.

RESOLVED GG/SW (6:0:3)

No Objection to fell 1no Western Red Cedar within Ludlow (Gravel Hill) Conservation Area.

R/293 25/00688/TCA Burgess Court , Gravel Hill, Ludlow, SY8 1QW.

RESOLVED GG/SW (7:0:2)

No Objection to various works to trees (see attached survey ref: 46 Burgess Court) within Ludlow (Gravel Hill) Conservation Area.

R/294 25/00687/FUL 2 Linney Fields , Linney, Ludlow, SY8 1EE.

RESOLVED GG/RH (8:0:1)

No Objection to the erection of two storey extension to rear elevation

R/295 25/00347/FUL Proposed Dwelling To The North Of, Steventon New Road, Ludlow,

RESOLVED GG/SH (unanimous)

To Object to the erection of dwelling for the following reasons:

- i) The development overlooks other houses and is overbearing and out of keeping with the existing street scene
- ii) It is too large for the site
- iii) The development adds extra vehicular traffic to a shared narrow entrance / egress
- iv) The dwelling would create light pollution and disruption to wildlife including bats because it impinges on the otherwise dark corridor created by the railway line.
- v) There is a statement that the development is exempt from biodiversity net gain, but this is not adequately explained.

R/296 25/00573/FUL Proposed Residential Development Site, Steventon New Road, Ludlow

RESOLVED GG/RH (6:2:1)

No objection to erection of open-market dwelling.

R/297 25/00719/LBC 22 Old Street, Ludlow, SY8 1NP

RESOLVED GG/RJ (unanimous)

No Objection to replace existing kitchen sash window with a smaller size sash window

R/298 ROAD CLOSURE/ TRAFFIC MANAGEMENT

RESOLVED GG/SH (unanimous)

The road closures and traffic management were noted.

R/299 BUILDINGS, BUILDING LAND AND TREES

RESOLVED GG/TG (unanimous)

To update the spreadsheet with the following:

- i) Request an update from SC regarding on the historic well and Horse Chestnut tree on Livsey Road.
- ii) To insert the update from SC council regarding the TPO requests including the Black Walnut tree, and further to this update the tree officer that the committee consider the TPO to be an urgent matter that should be actioned as soon as possible.
- iii) To record the status of the application (believed to be refused) on the Land to the north of Menai Foam and Board site.

R/300 THE PEACE MEMORIAL HOLLY TREE

RESOLVED GG/RJ (unanimous)

To note that the essential tree works will be undertaken with permission from Shropshire Council.

R/301 GOVERNMENT GUIDANCE ON GREEN BELT

RESOLVED GG/RH (unanimous)

That the guidance be noted

R/302 EXCLUSION OF PRESS AND PUBLIC: PUBLIC BODIES (ADMISSION TO MEETINGS) ACT 1960

RESOLVED GG/BW (unanimous)

That the public be excluded from the meeting for the following item(s) of business pursuant to section 1 of the Public Bodies (Admission to Meetings) Act 1960, on the grounds that publicity would be prejudicial to the public interest by reason of the confidential nature of the business to be transacted

Meeting closed at 7:49 pm

Chairman

Date

Closed Session minutes will be issued.

CLOSED SESSION MINUTES

Minutes of a meeting of the **REPRESENTATIONAL COMMITTEE** held at the Guildhall Mill Street Ludlow on **TUESDAY 11th March 2025 at 7pm.**

R/303 REFURBISHMENT OF MILL STREET BUS SHELTER

RESOLVED GG/BW (unanimous)

- i) That the quotation provided by GW Shelter for the refurbishment of Mill Street bus shelter of £3,661.92.00 be accepted. The paint colour is to be approved by the Conservation Officer.
- ii) To approve obtaining quotations for the refurbishment of the Henley Road bus shelter to be brought to the Representational Committee in April for consideration.

Meeting closed at 7:49 pm

Chairman

Date



MINUTES

Minutes of a Staffing Meeting held in the Guildhall, Mill Street, Ludlow on **THURSDAY 13TH MARCH 2025** at 9:30 am.

ST/70 PRESENT

Chair: Councillor Garner

Councillors: Gill, Hall and B. Waite.

Officers: Gina Wilding, Town Clerk
Helen Jones, Senior Admin Assistant

ST/71 ABSENT

Councillor Jones and Thompson were absent.

ST/72 HEALTH & SAFETY

The Chair informed Councillors of the fire exits, fire assembly point and asked that everyone sign the attendance log.

ST/73 RECORDING OF MEETINGS

The Chair notified those present that under the Openness of Local Government Regulations 2014, recording and broadcasting is permitted during public session of Council Meetings.

ST/74 APOLOGIES

Apologies were received from Councillor Thompson (family funeral).

ST/75 DECLARATION OF INTERESTS

Disclosable Pecuniary Interests
None declared

Conflict of Interest

None declared

Personal Interests

None declared.

ST/76 PUBLIC OPEN SESSION

There were no members of the public or press present.

ST/77 MINUTES – 14th NOVEMBER 2024

RESOLVED EG/BW (unanimous)

That the open and closed session minutes of the Staffing Committee meeting held on the 14th November 2024 be approved as a true record and signed by the Chair.

ST/78 RESOLVED EG/RH (unanimous)

That the open and closed session minutes of the Staffing Committee meeting held on the 20th February 2025 be approved as a true record and signed by the Chair.

ST/79 ITEMS TO ACTION

RESOLVED EG/BW (unanimous)

That the items to action of the Staffing Committee meeting held on the 14th November 2024 be noted.

ST/80 PAY CLAIM

RESOLVED EG/BW (unanimous)

To note the Pay Claim for 2025/26.

ST/81 NEONATAL LEAVE AND PAY

RESOLVED EG/RH (unanimous)

To note the changes in legislation to be introduced in April 2025.

ST/82 EXCLUSION OF PRESS AND PUBLIC: PUBLIC BODIES (ADMISSION TO MEETINGS) ACT 1960

RESOLVED EG/BW (unanimous)

That that the public be excluded from the meeting for the following item(s) of business pursuant to section 1 of the Public Bodies (Admission to Meetings) Act 1960, on the grounds that publicity would be prejudicial to the public interest by reason of the confidential nature of the business to be transacted, the public be excluded and the meeting continue in closed session.

The meeting closed at 10:00 am.

Chair

Date

Closed Session minutes will be issued.

CLOSED SESSION MINUTES

Minutes of a Staffing Meeting held in the Guildhall, Mill Street, Ludlow on **THURSDAY 13TH MARCH 2025** at 9:30 am.

ST/83 HEALTH AND SAFETY

RESOLVED EG/TG (unanimous)

To note the investigation report and remedial actions.

That the standard operating procedure (SOP) for engaging contractors be further updated to ensure that risk assessment and method statements were received at the same time as quotations.

ST/84 STAFF TRAINING

RESOLVED EG/RH (unanimous)

To note staff training information from the previous year.

ST/85 STAFF APPRAISALS

RESOLVED EG/RH (unanimous)

To receive notice of completed staff appraisals in 2024 / 25.

ST/86 RECRUITMENT

RESOLVED EG/BW (unanimous)

To note the amended recruitment documents for the Communications and Marketing Officer position and to approve the interview panel as Cllr Garner, Cllr B. Waite and the Town Clerk.

The meeting closed at 10:00 am.

Chair

Date