



Friday, 12 September 2025

Dear Sir/Madam

A meeting of the Governance, Audit and Standards Committee will be held on Monday, 22 September 2025 in the Council Chamber, Council Offices, Foster Avenue, Beeston NG9 1AB, commencing at 6.00 pm.

Should you require advice on declaring an interest in any item on the agenda, please contact the Monitoring Officer at your earliest convenience.

Yours faithfully

Chief Executive

To Councillors:	S J Carr (Chair)	K A Harlow
	K Woodhead (Vice-Chair)	A Kingdon
	M Brown	S P Jeremiah
	R Bullock	J M Owen
	A Cooper	S Webb
	J Couch	E Winfield
	S Dannheimer	

A G E N D A

1. APOLOGIES

To receive apologies and to be notified of the attendance of substitutes.

2. DECLARATIONS OF INTEREST

(Pages 5 - 12)

Members are requested to declare the existence and nature of any disclosable pecuniary interest and/or other interest in any item on the agenda.

3. MINUTES

(Pages 13 - 16)

The Committee is asked to confirm as a correct record the

Council Offices, Foster Avenue, Beeston, Nottingham, NG9 1AB

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minutes of the meeting held on 21 July 2025.

4. AUDIT OF ACCOUNTS AND ASSOCIATED MATTERS

To receive a verbal update from the Council's external auditors on the progress made with the 2024/25 audit of accounts.

5. ANNUAL COUNTER FRAUD REPORT

(Pages 17 - 30)

To provide the Committee with the Annual Counter Fraud Report for 2024/25.

6. INTERNAL AUDIT PROGRESS REPORT

(Pages 31 - 38)

To inform the Committee of the recent work completed by Internal Audit.

7. GOING CONCERN STATEMENT

(Pages 39 - 44)

This report sets out the assessment by the designated Section 151 Officer of the Council's Going Concern status. This is in accordance with all the Council's priorities.

8. REVIEW OF STRATEGIC RISK REGISTER

(Pages 45 - 60)

To approve the amendments to the Strategic Risk Register and the action plans identified to mitigate risks. This is in accordance with all the Council's priorities.

9. QUARTERLY COMPLAINT REPORT

(Pages 61 - 86)

To provide Members with a summary of complaints made against the Council.

10. WORK PROGRAMME

(Pages 87 - 88)

To consider items for inclusion in the Work Programme for future meetings.

11. EXCLUSION OF THE PUBLIC AND PRESS

The Committee is asked to RESOLVE that, under Section 100A of the Local Government Act, 1972, the public and

press be excluded from the meeting for the following item of business on the grounds that it involves the likely disclosure of exempt information as defined in paragraph 3 of Schedule 12A of the Act.

12. Internal Audit Progress Report - Confidential

(Pages 89 - 90)

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Report of the Monitoring Officer

DECLARATIONS OF INTEREST

1. Purpose of Report

Members are requested to declare the existence and nature of any disclosable pecuniary interest and/or other interest in any item on the agenda. The following information is extracted from the Code of Conduct, in addition to advice from the Monitoring Officer which will assist Members to consider any declarations of interest.

Part 2 – Member Code of Conduct

General Obligations:

10. Interest

10.1 You will register and disclose your interests in accordance with the provisions set out in Appendix A.

Section 29 of the Localism Act 2011 requires the Monitoring Officer to establish and maintain a register of interests of Members of the Council. The register is publically available and protects you by demonstrating openness and willingness to be held accountable.

You are personally responsible for deciding whether or not you should disclose an interest in a meeting which allows the public, Council employees and fellow Councillors know which of your interests gives rise to a conflict of interest. If in doubt you should always seek advice from your Monitoring Officer.

You should note that failure to register or disclose a disclosable pecuniary interest as defined in Appendix A of the Code of Conduct, is a criminal offence under the Localism Act 2011.

Advice from the Monitoring Officer:

On reading the agenda it is advised that you:

1. Consider whether you have any form of interest to declare as set out in the Code of Conduct.
2. Consider whether you have a declaration of any bias or predetermination to make as set out at the end of this document
3. Update Democratic Services and the Monitoring Officer and or Deputy Monitoring Officers of any declarations you have to make ahead of the meeting and take advice as required.
4. Use the Member Interest flowchart to consider whether you have an interest to declare and what action to take.
5. Update the Chair at the meeting of any interest declarations as follows:

‘I have an interest in Item xx of the agenda’

'The nature of my interest is therefore the type of interest is
DPI/ORI/NRI/BIAS/PREDETERMINATION
'The action I will take is...'

This will help Officer record a more accurate record of the interest being declared and the actions taken. You will also be able to consider whether it is necessary to send a substitute Members in your place and to provide Democratic Services with notice of your substitute Members name.

Note: If at the meeting you recognise one of the speakers and only then become aware of an interest you should declare your interest and take any necessary action

6. Update your Member Interest Register of any registerable interests within 28days of becoming aware of the Interest.

Ask yourself do you have any of the following interest to declare?

1. DISCLOSABLE PECUNIARY INTERESTS (DPIs)

A "Disclosable Pecuniary Interest" is any interest described as such in the Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012 and includes an interest of yourself, or of your Spouse/Partner (if you are aware of your Partner's interest) that falls within the following categories: Employment, Trade, Profession, Sponsorship, Contracts, Land, Licences, Tenancies and Securities.

2. OTHER REGISTERABLE INTERESTS (ORIs)

An "Other Registerable Interest" is a personal interest in any business of your authority which relates to or is likely to affect:

- a) any body of which you are in general control or management and to which you are nominated or appointed by your authority; or
- b) any body
 - (i) exercising functions of a public nature
 - (ii) anybody directed to charitable purposes or
 - (iii) one of whose principal purposes includes the influence of public opinion or policy (including any political party or trade union) of which you are a Member or in a position of general control or management.

3. NON-REGISTRABLE INTERESTS (NRIs)

"Non-Registrable Interests" are those that you are not required to register but need to be disclosed when a matter arises at a meeting which directly relates to your financial interest or wellbeing or a financial interest or wellbeing of a relative or close associate that is not a DPI.

A matter "directly relates" to one of your interests where the matter is directly about that interest. For example, the matter being discussed is an application about a particular property in which you or somebody associated with you has a financial interest.

A matter “affects” your interest where the matter is not directly about that interest but would still have clear implications for the interest. For example, the matter concerns a neighbouring property.

Declarations and Participation in Meetings

1. DISCLOSABLE PECUNIARY INTERESTS (DPIs)

- 1.1 Where a matter arises at a meeting which **directly relates** to one of your Disclosable Pecuniary Interests which include both the interests of yourself and your partner then:

Action to be taken

- **you must disclose the nature of the interest** at the commencement of that consideration, or when the interest becomes apparent, whether or not such interest is registered in the Council's register of interests of Member and Co-opted Members or for which you have made a pending notification. If it is a sensitive interest you do not have to disclose the nature of the interest, just that you have an interest
- **you must not participate in any discussion** of that particular business at the meeting, or if you become aware of a disclosable pecuniary interest during the meeting you must not participate further in any discussion of the business, including by speaking as a member of the public
- **you must not participate in any vote** or further vote taken on the matter at the meeting and
- **you must withdraw from the room** at this point to make clear to the public that you are not influencing the meeting in anyway and to protect you from the criminal sanctions that apply should you take part, unless you have been granted a Dispensation.

2. OTHER REGISTERABLE INTERESTS (ORIs)

- 2.1 Where a matter arises at a meeting which **directly relates** to the financial interest or wellbeing of one of your Other Registerable Interests i.e. relating to a body you may be involved in:

- **you must disclose** the interest at the commencement of that consideration, or when the interest becomes apparent, whether or not such interest is registered in the Council's register of interests of Member and Co-opted Members or for which you have made a pending notification. If it is a sensitive interest you do not have to disclose the nature of the interest, just that you have an interest
- **you must not take part in any discussion or vote** on the matter, but may speak on the matter only if members of the public are also allowed to speak at the meeting
- **you must withdraw from the room** unless you have been granted a Dispensation.

3. NON-REGISTRABLE INTERESTS (NRIs)

3.1 Where a matter arises at a meeting, which is not registrable but may become relevant when a particular item arises i.e. interests which relate to you and /or other people you are connected with (e.g. friends, relative or close associates) then:

- **you must** disclose the interest; if it is a sensitive interest you do not have to disclose the nature of the interest, just that you have an interest
 - **you must not take part in any discussion or vote**, but may speak on the matter only if members of the public are also allowed to speak at the meeting; and
 - **you must withdraw** from the room unless you have been granted a Dispensation.
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Dispensation and Sensitive Interests

A “Dispensation” is agreement that you may continue to participate in the decision-making process notwithstanding your interest as detailed at section 12 of the Code of the Conduct and the Appendix.

A “Sensitive Interest” is as an interest which, if disclosed, could lead to the Member, or a person connected with the Member, being subject to violence or intimidation. In any case where this Code of Conduct requires to you to disclose an interest (subject to the agreement of the Monitoring Officer in accordance with paragraph 2.4 of this Appendix regarding registration of interests), you do not have to disclose the nature of the interest, if it is a Sensitive Interest in such circumstances you just have to disclose that you have a Sensitive Interest under S32(2) of the Localism Act 2011. You must update the Monitoring Officer when the interest is no longer sensitive, so that the interest can be recorded, made available for inspection and published.

BIAS and PREDETERMINATION

The following are not explicitly covered in the code of conduct but are important legal concepts to ensure that decisions are taken solely in the public interest and not to further any private interests.

The risk in both cases is that the decision maker does not approach the decision with an objective, open mind.

This makes the local authority’s decision challengeable (and may also be a breach of the Code of Conduct by the Councillor).

Please seek advice from the Monitoring Officer or Deputy Monitoring Officers, if you need assistance ahead of the meeting.

BIAS

Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias. If you have been involved in an issue in such a manner or to such an extent that the public are likely to perceive you to be biased in your judgement of the public interest:

- a) you should not take part in the decision-making process
- b) you should state that your position in this matter prohibits you from taking part
- c) you should leave the room.

PREDETERMINATION

Where a decision maker has completely made up his/her mind before the decision is taken or that the public are likely to perceive you to be predetermined due to comments or statements you have made:

- a) you should not take part in the decision-making process
- b) you should state that your position in this matter prohibits you from taking part
- c) you should leave the room.

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Registerable Interests

These are interests that you are required to register in accordance with the Code of Conduct. They are interests that you would know about in advance of an item coming up (e.g. land you own) and you should have included them when filling in your register of interests.

What type of Registerable Interest do you have in this matter?

Disclosable Pecuniary Interests

These are any interests that are described as DPIs under the Code of Conduct and include both the interests of yourself and of your partner.

Other Registerable Interests

These are personal interests that relate to certain types of bodies that you may be involved in as set out in the Code of Conduct.

Does the matter directly relate to one of your Disclosable Pecuniary Interests?

No

Does the matter directly relate to the financial interest or wellbeing of one of your Other Registerable Interests?

No

Does the matter affect a financial interest or the wellbeing of yourself or of a friend, relative or close associate?

No

Is the financial interest or wellbeing affected to a greater extent than the financial interests or wellbeing of the majority of inhabitants?

No

Would a reasonable member of the public knowing all the facts believe that it would affect your view of the wider public interest?

No

You must:

- Disclose the interest;
- Not speak on the matter;
- Not participate in any discussion or vote; and
- Not remain in the room unless you have a Dispensation

You must:

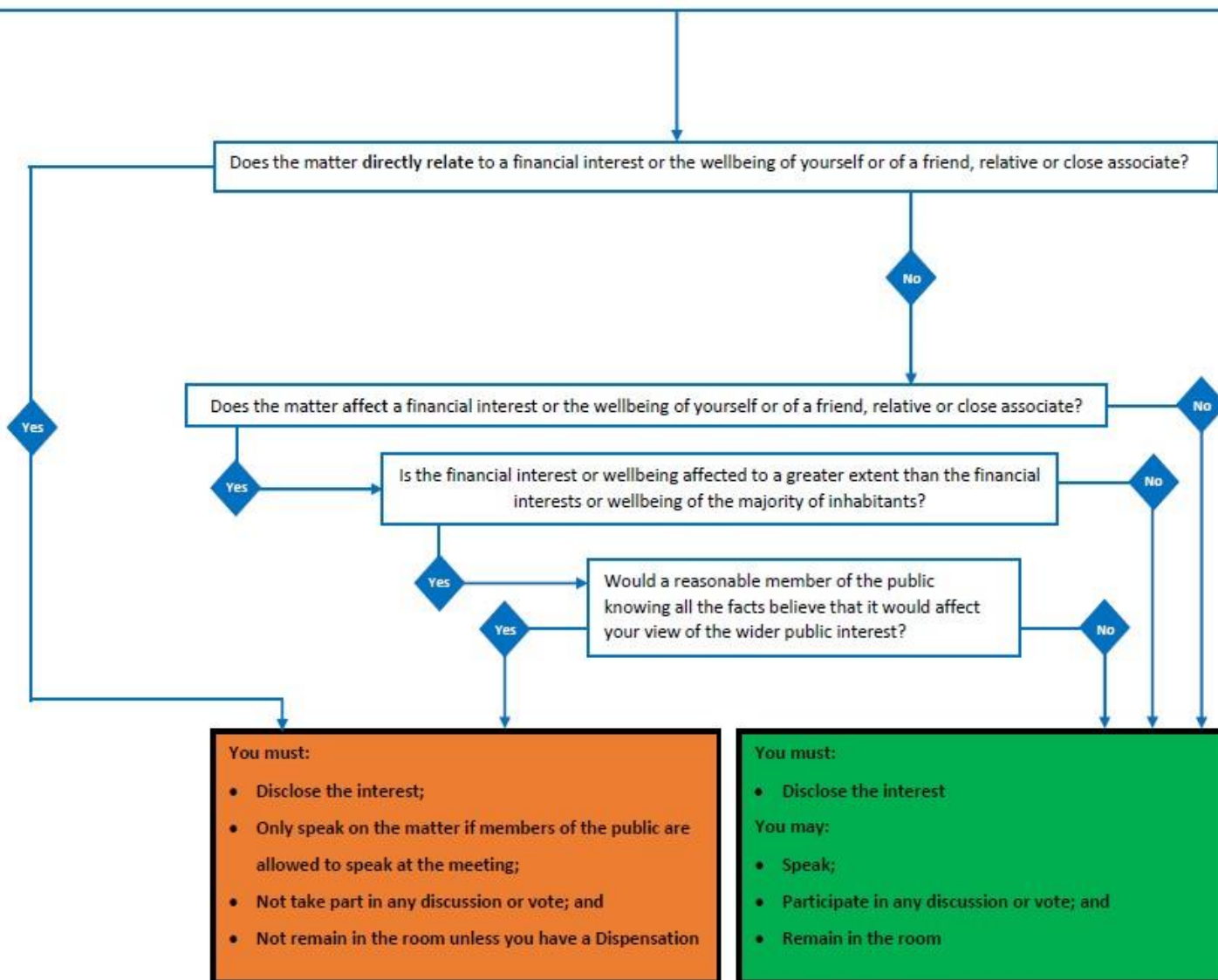
- Disclose the interest;
- Only speak on the matter if members of the public are allowed to speak at the meeting;
- Not take part in any discussion or vote; and
- Not remain in the room unless you have a Dispensation

You must:

- Disclose the interest
- You may:
- Speak;
 - Participate in any discussion or vote; and
 - Remain in the room

Non-Registerable Interests

These are interests that you are not required to register but may become relevant when a particular item arises. These are usually interests that relate to other people you are connected with (e.g. friends, relatives or close associates) but can include your own interests where you would not have been expected to register them.



GOVERNANCE, AUDIT AND STANDARDS COMMITTEE

MONDAY, 21 JULY 2025

Present: Councillor S J Carr, Chair

Councillors: K Woodhead (Vice-Chair)
M Brown
R Bullock
A Cooper
T Marsh (substitute)
J M Owen
P J Owen (substitute)
P Smith (substitute)
S Webb (substitute)
E Winfield

Apologies for absence were received from Councillors S Dannheimer, K A Harlow, S P Jeremiah, A Kingdon and W Mee.

7 **Declarations of Interest**

There were no declarations of interest.

8 **Minutes**

The minutes of the meeting held on 19 May 2025 were confirmed and signed as a correct record.

9 **Audit of Accounts and Associated Matters**

The Committee considered the latest Audit Progress Report from the Council's external auditors and noted progress made with the 2024/25 audit.

10 **Internal Audit Progress Report**

The Committee noted the recent work completed by Internal Audit.

It was noted that Internal Audit had also reviewed progress made by management in implementing agreed actions within six months of the completion of the respective audits.

11 **Internal Audit Review 2024/25**

The Committee noted the work of Internal Audit during 2024/25 and considered the annual Internal Audit Assurance Opinion that can be used by the Council to inform its Annual Governance Statement.

Overall, 72% of the planned audits were complete or awaiting finalisation as at the year-end, below the 90% target. Audit completion to 31 March 2025 was negatively impacted by a combination of the lag of overdue audits from 2023/24 impacting on completion in the first quarter of 2024/25 and a period of sickness within the team in the fourth quarter.

12 Major Projects Governance Dashboard

The Committee received an update on the 'Governance Dashboard' relating to the Council's major projects.

The Council currently has four major projects in progress: the Housing Delivery Plan, Stapleford Towns Fund, 'Kimberley Means Business' programme and the construction of the new Bramcote Leisure Centre.

It was reported that no issues had been noted with the governance arrangements for the four projects currently in progress.

13 Review of Strategic Risk Register

The Committee considered the Strategic Risk Register and the action plans identified to mitigate risks.

The Strategy provides a comprehensive framework and process designed to support both Members and Officers in ensuring that the Council is able to discharge its risk management responsibilities fully. The Strategy outlines the objectives and benefits of managing risk, describes the responsibilities for risk management, and provides an overview of the process that the Council has in place to manage risk successfully.

RESOLVED that the amendments to the Strategic Risk Register and the actions to mitigate risks as set out be approved.

14 Complaint Report 2024/25

The Committee noted the summary of complaints made against the Council.

It was noted that of the 429 stage 1 complaints received overall, 81 were investigated under the stage 2 complaints procedure and seven were investigated by the LGO. Under the stage 2 complaints procedure, 39 complaints were not upheld, 41 complaints were upheld and one was withdrawn (2%).

15 Findings of Fault Determinations Reported from the Ombudsman

The Committee considered the recent findings of fault determinations made by the Local Government and Social Care Ombudsman and the Housing Ombudsman.

RECOMMENDED that the Overview and Scrutiny Committee give consideration that a review of the Council's Anti-Social Behaviour procedure be undertaken.

16 Work Programme

The Committee considered the work programme.

RESOLVED that the Work Programme be approved.

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Report of the Chief Audit and Control Officer

Annual Counter Fraud Report

1. Purpose of Report

To provide the Committee with the Annual Counter Fraud Report for 2024/25.

2. Recommendation

The Committee is asked to NOTE the report.

3. Detail

As required by the Council's Fraud and Corruption Prevention Policy, the Annual Counter Fraud Report is presented to this Committee to provide a summary of the ongoing Counter Fraud work performed by Internal Audit and other relevant departments.

Internal Audit is pleased to report that no successful fraudulent activity within the Council has been noted during the financial year 2024/25.

The primary report is presented within **Appendix 1**, containing a summary (by department) of the work undertaken in response to the fraud risks facing the Council, including the Council's engagement with the National Fraud Initiative (NFI). The Council's Fraud Risk Register is presented in **Appendix 2**. This provides a summary of the key significant fraud risk areas within the Council along with the processes and procedures in place to mitigate those risks.

4. Financial Implications

The comments from the Assistant Director Finance Services were as follows:

Fraud perpetrated against the Council has a direct impact on the cost of providing services to the local community. The positive counter fraud work undertaken across the Council to complement and improve key controls is therefore vital in mitigating against the risk of fraud. The review of key significant fraud risk areas as part of Fraud Risk Register is an important tool in this regard.

5. Legal Implications

The comments from the Monitoring Officer / Head of Legal Services were as follows:

The Council's Fraud and Corruption Policy ensures the Council meets its legal obligations and there are adequate safeguards and reporting arrangements in place to protect the Council from fraud.

6. Human Resources Implications

The comments from the Human Resources Manager were as follows:

Not applicable.

7. Union Comments

The Union comments were as follows:

Not applicable.

8. Climate Change Implications

No climate change implications have been identified in relation to this report.

9. Data Protection Compliance Implications

This report does not contain any OFFICIAL(SENSITIVE) information and there are no Data Protection issues in relation to this report.

10. Equality Impact Assessment

As there is no change to policy an Equality Impact Assessment is not required.

11. Background Papers

Nil.

Appendix 1

Annual Counter Fraud Report 2024/25

1. Introduction – National Context and Council Policy

The Chartered Institute of Public Finance and Accountancy (CIPFA) estimates that up to £49bn of public money is lost each year as a result of fraud. Of this total, an estimated £8.8bn is specifically located within local government.

It is against this background that in response to the risks and threats presented to the Council by fraud, the Council has in place a Fraud and Corruption Prevention Policy. By way of this policy, the Council acknowledges the significant negative impact fraudulent and corrupt acts can have on the Council, the delivery of its Corporate Plan and the services provided to residents. The Policy also makes clear that the Council takes a zero-tolerance approach to fraud and corruption; will take all necessary steps to prevent, detect and punish fraudulent and corrupt acts; and will take all appropriate action against perpetrator(s) and pursue all available options to recover any losses.

The policy establishes two key processes for the prevention of Fraud and Corruption within the Council. Firstly, the policy outlines (in tandem with the Council's Whistleblowing Policy) a procedure for the reporting of suspected fraudulent and corrupt acts. Such reports are considered by senior management, with the potential for further investigation by Internal Audit, referral to specialist fraud investigation services and/or the Police.

The second key process established by the Policy is an ongoing programme of preventative measures established by relevant departments across the Council, supported by ongoing assurance and advisory work performed by Internal Audit. The basis for this programme is the Fraud Risk Register (presented in Appendix 2) which is maintained by Internal Audit and periodically reviewed in conjunction with relevant Assistant Directors, Heads of Service and other service managers.

A summary of the key measures and activity in each relevant department now follows.

2. Summary of Key Measures and Activity**Revenues and Benefits**

As part of the ordinary course of operations, documentary evidence for all claims for discounts, reliefs or benefits are required before any such discount, relief or benefit is awarded. Regular inspection work is also carried out.

The Council participates in a regular Single Person Discount data matching programme provided by the National Fraud Initiative. In addition, much of the current counter fraud activity within the Revenues and Benefits teams is in support of the Department for Work and Pensions (DWP). In 2024/25 this activity included issuing 14 fraud referrals to the DWP and completing 22 Local

Authority Information Exchange Forms (LAIEF) (being requests for information from the DWP to support their ongoing investigations).

Housing

Nationally, the risk of fraud relating to housing has been identified as high value. In a local context, the risks for this Council include the potential for tenancy fraud, sub-letting and risks associated with the 'Right to Buy'.

With regard to tenancy fraud the risks are that an applicant will make false claims on their application to increase their banding, omit information from their application which could demonstrate that they are not eligible or make false statements which could both impact banding and eligibility. To mitigate this, all applicants are asked to provide evidence to support their application, references are taken and records are checked.

All Housing employees are expected to report any concerns regarding sub-letting which will be fully investigated. The Housing Service has also run an awareness raising campaign, informing tenants of the action that can be taken if they sublet and also reminding neighbours of how concerns can be reported.

In respect of 'Right to Buy' applications, appropriate checks are undertaken to prevent and detect potential fraud, including:

- Requesting identity and proof of address for each applicant.
- Checking if the applicant is in receipt of Housing Benefit and referring this on for enquiry (particularly where the sale is expected to be financed without a mortgage).
- Checking each applicant's details with appropriate agencies (including the National Anti-Fraud Network) to see if the applicant has other mortgages and to check the persons registered at the address from electoral records.
- Requiring applicants to provide details as to how they intend to finance the purchase. If monies are being gifted, the Council will require the applicant to provide confirmation from the third party that these funds are available and seek proof of identification.

Procurement

The Council has formal Financial Regulations in place which provide considerable detail into the processes and procedures required in order to complete procurement exercises, including formal tenders. Contract opportunities are well-advertised, with a commonly-used online tendering system being utilised to help ensure transparency and fairness. The Council is also being supported with its procurement activity by the Nottinghamshire County Council Procurement team.

Payroll and Human Resources

All new employees and changes to employee details are subject to robust checking processes which involve, as required, documentary evidence and/or direct confirmation of details with the relevant employee. Areas such as probation, sickness absence, right-to-work and payroll data are similarly supported by established Council policy and documentary checks as required.

Finance Services

The Finance Services team engages with banks and other financial institutions to prevent fraudulent activity. This includes both treasury management activity and creditors payments to validate bank accounts. Barclays Bank, who provide the Council's banking services, regularly provides officers with fraud awareness briefings and email updates on developments and trends in fraudulent activity.

Environmental Health and Licensing

The Environmental Health team ensures that, where necessary, the identity and relevant details for applicants or premises owners are established and supported by documentary evidence. Reference is made to the National Anti-Fraud Network as required, in addition to cross-agency data sharing and checking.

In addition, the Licensing service continues to check right-to-work status for all new taxi and private hire drivers and for relevant alcohol licensing applications, while all drivers, operators and scrap metal dealers are required to provide proof that they are registered to pay tax on their earnings. These measures assist in preventing illegal working, unlawful employment of workers and unlawful payments to employees.

Insurance

The Council continues to work with its insurers who regularly provide briefings and advice to enable officers to remain vigilant to potential fraudulent claims. All claims continue to be rigorously reviewed at every stage to ensure that anything suspicious is identified and the appropriate outcome is achieved. Claimants are advised that information provided may be shared by the insurers with other appropriate bodies responsible for the prevention and detection of fraud, such as the Claims and Underwriting Exchange Register.

Training and Awareness

As part of the mandatory training provided through the Council's online learning platform (Broxtowe Learning Zone), employees are required to complete modules on Cyber Security and the Code of Conduct in addition to a number of Information Management and Security modules. Other specific courses are available for relevant service areas, including modules on Payment Card Security and Serious Organised Crime.

Internal Audit provides periodic general fraud awareness updates to employees in addition to providing more targeted fraud information to relevant officers.

National Fraud Initiative

The Council participates in the Cabinet Office's National Fraud Initiative programme (NFI), which matches electronic data within and between the public and private sector to assist in the prevention and detection of fraud. These include local authorities, police authorities, local probation boards, fire and rescue authorities as well as a number of private sector bodies. The NFI tool is helpful in assisting to identify potential fraud in areas such as council tax, housing benefit, pensions, payroll and housing tenancy.

The Council periodically provides specified sets of data to the Cabinet Office for matching. The data provided can include records relating to council tax, creditors, payroll, electoral register, housing tenants, housing waiting lists, insurance claims and licences. Whilst Internal Audit is the single point of contact for participation in the NFI data matching programme, the process does require the support of the respective service managers with responsibilities for the service/system being subjected to review under the scheme. A network has been established to enable departments to support Internal Audit with this work.

The latest NFI data matching exercise was performed in January 2025 with 1,687 matches being generated for further review. Upon release of the matches, Internal Audit completed a risk analysis (categorising the matches as 'high', 'medium' and 'low' priority for further investigation) and subsequently began work, in conjunction with relevant officers in other departments, to investigate and resolve the matches according to level of priority and quality of data available.

Internal Audit

No significant special investigations (beyond those performed as part of the NFI data matching exercise) have been carried out by Internal Audit during 2024/25.

Internal Audit has noted a small number of incidents where unknown third parties have attempted to redirect valid payments through false requests to change supplier bank details on the Council's financial system. These have taken the form of email requests, letters and telephone calls. Such attempts have been quickly detected and repelled.

As part of the audit of Creditors and Purchasing, undertaken as part of the Internal Audit Plan for 2024/25, the processes in place to maintain the integrity of supplier details held on the Council's system were reviewed and no issues were noted.

Internal Audit also recently complied and presented to the Council's General Management Team the Annual Assessment of Fraud Risk and Mitigation Report. This report, taking the form of a maturity model, is based upon the self-assessment by Assistant Directors, Heads of Service and other managers of the level of fraud risk within their departments. The focus is on internal / employee-based fraud and covers matters such as annual leave, use of corporate purchase cards and the completion of appropriate training.

3. Plans for 2025/26

The primary focus for the next 12 to 18 months will be the review of the results of the NFI data matching exercise noted above. In addition, the review of system access controls will be considered as a component of all scheduled Internal Audit reviews of Key Financial Systems.

Appendix 2

Fraud and Corruption Risk Register – September 2025

1. Introduction and Background

Compliance with the CIPFA Code of Practice on Managing the Risk of Fraud and Corruption is widely recognised as a key component of a quality governance framework. One of the key principles of the Code is to identify the fraud and corruption risks within an organisation; understand the exposure to these risks and routinely consider these as part of risk management arrangements.

The preparation of the Council's Fraud and Corruption Risk Register, presented in this appendix, satisfies this key principle of the Code. The Fraud and Corruption Risk Register is maintained by Internal Audit and periodically reviewed in conjunction with relevant Heads of Service and other managers. The register is also considered by the General Management Team and will be continue to be presented to this Committee alongside the Annual Counter Fraud Report.

2. Fraud Risk Assessment Matrix

The corporate 5x5 risk matrix is used for assessing the threats for each fraud risk in terms of both the likelihood and impact. A score is provided for both the inherent risk and the assessed residual risk. This matrix reflects the direction of travel in terms of the effect of mitigation measures implemented to help manage a particular risk. It also assists in directing resources to areas where they will have the most influence.

Risk – Threats						
Likelihood	Almost Certain - 5	5	10	15	20	25
	Likely – 4	4	8	12	16	20
	Possible - 3	3	6	9	12	15
	Unlikely - 2	2	4	6	8	10
	Rare – 1	1	2	3	4	5
		Insignificant – 1	Minor – 2	Moderate – 3	Major – 4	Catastrophic – 5
		Impact				

Risk Rating	Value	Action
Red Risk	25	Immediate action to prevent serious threat to provision and/or achievement of key services or duties
	15 to 20	Key risks which may potentially affect the provision of key services or duties
Amber Risk	12	Important risks which may potentially affect the provision of key services or duties
	8 to 10	Monitor as necessary being less important but still could have a serious effect on the provision of key services
	5 to 6	Monitor as necessary to ensure risk is properly managed
Green Risk	1 to 4	No strategic action necessary

In applying the matrix to the fraud and corruption risks posed to the Council, appropriate reference has been made to published guidance and reports from CIPFA, the National Fraud Initiative, Central Government, the external auditors and other relevant organisations. Existing knowledge of the Council's operations derived from previous counter fraud and Internal Audit work has also been drawn upon as appropriate.

This risk register will serve as a 'living document' and evolve over time as the nature of the services provided by the Council and the environment within which it operates changes, giving rise to variations in the Council's risk profile.

Fraud and Corruption Risk Register

Risk Area	Risk	Mitigation	Inherent Score	Residual Score
Housing Tenancy (Applications)	Fraudulent applications for new or successive tenancies	Documentary evidential requirements Checking, review and authorisation procedures Data-matching exercises through NFI	12	6
Housing Tenancy (Subletting)	Sub-letting of Housing properties	Direct and indirect monitoring of tenanted properties Data-matching exercises through NFI Employee training Awareness raising campaign	12	6
Right to Buy	Fraudulent Right-to-Buy applications	Documentary evidential requirements Checking, review and authorisation procedures Data-matching exercises through NFI	16	4
Benefits	Fraudulent applications for Housing Benefit	Documentary evidential requirements Checking, review and authorisation procedures Data-matching exercises through NFI Risk Based Verification of Claims	10	4
Disabled Facility Grants	Fraudulent applications for new or additional grants	Documentary evidential requirements Officer site visits Checking, review and authorisation procedures	12	3

Risk Area	Risk	Mitigation	Inherent Score	Residual Score
Council Tax	Fraudulent applications for discounts and reliefs, including Single Occupier Discount and Local Council Tax Support	Documentary evidential requirements Checking, review and authorisation procedures Data-matching exercises through NFI	15	4
Business Rates (Discounts/Relief)	Fraudulent applications for discounts and reliefs including Small Business Rate Relief and Charitable Relief	Documentary evidential requirements Checking, review and authorisation procedures Property Inspector visiting properties	12	4
Business Rates (Properties)	Unlisted / Concealed Properties	Officer knowledge of borough development Data-matching exercises through NFI Working with third party company to identify gaps	6	4
Procurement (Contract Awards)	Improper award of contracts due to lack of tendering and/or collusion with or between potential suppliers	Procurement and Commissioning Strategy Nottinghamshire County Council Procurement Team Internal monitoring of supplier spends Publication of Contracts Register Code of Conduct Register of interests, gifts and hospitality Contract Management Training and Guidance	16	8
Procurement (Purchases)	Purchase of items for personal use or profit through resale	Authorisation controls through Civica Financials Purchasing and Creditors systems Monitoring of Purchase Card transactions Inventories Budget Monitoring Training and Guidance	12	4

Risk Area	Risk	Mitigation	Inherent Score	Residual Score
Procurement (Payments)	Redirection of payments to third party bank accounts through fraudulent submission of changes in bank details	Restrictions on officer abilities to modify supplier bank details Checking, review and authorisation procedures Training and Guidance	16	8
Payroll (Bogus employees)	Creation of bogus ('ghost') employees	Documentary evidential requirements Checking, review and authorisation procedures Independent headcount reconciliation	9	3
Payroll (Overtime/Claims)	Fraudulent overtime or expenses claims	Documentary evidential requirements Checking, review and authorisation procedures	9	4
Human Resources (Applications)	False employment applications	Documentary evidential requirements Checking, review and authorisation procedures	12	4
Human Resources (Sickness)	False claims for sickness absence	Documentary evidential requirements Checking, review and authorisation procedures	12	4
Planning	Intentionally false or misleading information contained within planning applications	Documentary evidential requirements Officer site visits Checking, review and authorisation procedures	12	4
Grant Aid	Fraudulent grant applications for work or activities not carried out or by ineligible groups or individuals	Documentary evidential requirements Knowledge of local community groups and individuals	9	3
Money Laundering	Money Laundering, often in the form of significant cash overpayments then followed by an electronic or cheque refund	Anti-Money Laundering Policy and Procedures Reporting channels to Money Laundering Reporting Officer (MLRO) and Internal Audit Reviews of customer account credit balances Limited cash transactions Training and Guidance	12	3

Risk Area	Risk	Mitigation	Inherent Score	Residual Score
Internal Fraud and Corruption (Inducements)	Inappropriate favourable treatment of a supplier/customer/ applicant by a Council officer, often in exchange for financial reward.	Code of Conduct Disciplinary Procedure Whistleblowing Procedure Declarations of Interest Review/authorisation processes for decision making Training and Guidance	9	4
Internal Fraud and Corruption (Theft)	Theft of cash or other physical assets	Limited petty cash floats Bank reconciliation Inventories Training and Guidance	9	4
Internal Fraud and Corruption (Payments)	Redirection of payments to personal bank accounts	Restrictions on officers modifying supplier bank details Checking, review and authorisation procedures Training and Guidance Detection and prevention of 'phishing' emails	9	4
Internal Fraud and Corruption (Improper Use)	Improper personal use of Council assets (such as vehicles and fuel)	Code of Conduct Tachographs Monitoring of fuel usage Vehicle Tracking (Masternaut) Training and Guidance	9	4
Licensing	Fraudulent applications for new or renewed licences	Documentary evidential requirements Checking, review and authorisation procedures Data-matching exercises through NFI	12	4

Risk Area	Risk	Mitigation	Inherent Score	Residual Score
Insurance Fraud (Claims)	False, inflated or duplicate claims	Documentary evidential requirements Checking, review and authorisation procedures Internal and external (insurance company) monitoring of claims	12	3
Cybercrime (System Outage)	System outage, operational disruption, financial loss and / or reputational damage as a result of a targeted cyber attack	Firewalls and similar ICT security systems Disaster Recovery and Business Continuity Plans Frequent initial and refresher training for all staff Immutable technology for data storage Annual Cyber Security penetration testing XDR monitoring for all Endpoints Endpoint protection technologies	25	15
Cybercrime (Data Breach)	Loss of data and / or data breach as a result of targeted cyber attack	Firewalls and similar ICT security systems Disaster Recovery and Business Continuity Plans Frequent initial and refresher training for all staff Immutable technology for data storage Annual Cyber Security penetration testing XDR monitoring for all Endpoints Endpoint protection technologies	25	15
Cybercrime (Internal Theft)	Intentional theft of data by an employee	Code of Conduct Disciplinary Procedure Frequent initial and refresher training for all staff	16	8

Report of the Chief Audit and Control Officer

Internal Audit Progress Report

1. Purpose of Report

To inform the Committee of the recent work completed by Internal Audit.

2. Recommendation

The Committee is asked to NOTE the report.

3. Detail

Under the Council's Constitution and as part of the overall corporate governance arrangements, this Committee is responsible for monitoring the performance of Internal Audit. A summary of the reports issued and progress against the agreed Internal Audit Plan is included at **Appendix 1** and the confidential **Appendix 3**. A summary narrative of the work completed by Internal Audit since the previous report to this Committee is also included.

Internal Audit has also reviewed progress made by management in implementing agreed actions within six months of the completion of the respective audits. Details of this follow-up work are included at **Appendix 2**. Where agreed actions to address significant internal control weaknesses have not been implemented this may have implications for the Council. A key role of the Committee is to review the outcome of audit work and oversee the prompt implementation of agreed actions to help ensure that risks are adequately managed.

Further progress reports will be submitted to each future meeting of this Committee. A final report detailing the overall performance of Internal Audit for 2025/26 will be presented to this Committee in July 2026.

4. Financial Implications

The comments from the Assistant Director Finance Services were as follows:

The work of Internal Audit continues to provide crucial and independent assurance to management and Members over the key aspects of the Council's governance, risk management and internal control arrangements. The cost of Internal Audit is included within the established Finance Services budgets.

5. Legal Implications

The comments from the Monitoring Officer / Head of Legal Services were as follows:

This report already sets out the legal framework for Internal Audit to provide a summary of Internal Audit work. It addresses the statutory obligations for local audit processes. The Local Government Act 1972 and subsequent legislation sets out a duty for the Council to make arrangements for the proper administration of its financial affairs. This report also complies with the requirements of the following:

- Local Government Act 1972
- Accounts and Audit Regulations 2015
- CIPFA/IIA: Public Sector Internal Audit Standards (PSIAS)
- CIPFA/IIA: Local Government Application Note for the UK PSIAS 33.

The provision of an Internal Audit service is integral to financial management at the Council and assists in the discharge of its duties.

6. Human Resources Implications

Not applicable.

7. Union Comments

Not applicable.

8. Climate Change Implications

No climate change implications have been identified in relation to this report.

9. Data Protection Compliance Implications

This report does not contain any OFFICIAL(SENSITIVE) information and there are no Data Protection issues in relation to this report.

10. Equality Impact Assessment

As there is no change to policy an equality impact assessment is not required.

11. Background Papers

Nil.

Appendix 1

Internal Audit Reports

The following table summarises the audit assignments and similar work completed by Internal Audit since the last meeting of this Committee.

Audit Title	Report Issued	Assurance Opinion	Actions (High Priority)	Actions (Other)
Financial Appraisal – Capital Works	01/07/25	Advisory Report Only		
Financial Appraisal – Capital Works	01/07/25	Advisory Report Only		
Homelessness	08/07/25	Substantial	-	-
Garden Waste Management	23/07/25	Substantial	-	1
Commercial Property Management	24/07/25	Limited	3	2
Financial Appraisal – Bramcote Leisure Centre	13/08/25	Advisory Report Only		
Tenant Engagement	02/09/25	Substantial	-	-
Housing Repairs (Reactive)	At the time of writing, it is anticipated that these audits will be completed (or substantially completed) by the date of this meeting. A verbal update will be provided by the Chief Audit and Control Officer at this meeting.			
Climate Change				
Anti-Social Behaviour				

Remaining Internal Audit Plan 2025/26

Audit Title	Progress
Licensing	In Progress
Payroll	In Progress
Treasury Management	In Progress
Kimberley Depot - Compliance	In Progress
Benefits	Planning
Bramcote Leisure Centre - Governance Review	Planning
Capital Works	Planning
Information Management	Planning
Bank Reconciliation System	Not yet commenced
Business Rates (NNDR)	Not yet commenced
Committee Management System	Not yet commenced
Creditors and Purchasing	Not yet commenced
Fire and Asbestos Risk Management	Not yet commenced
Hickings Lane Pavilion	Not yet commenced
Housing Disrepair	Not yet commenced
Housing Lettings	Not yet commenced
Human Resources	Not yet commenced
Rents	Not yet commenced
Surveillance	Not yet commenced

Completed Audits

A report is prepared for each audit assignment and issued to the relevant senior management at the conclusion of a review that will:

- include an overall opinion on the effectiveness of the policies, procedures and other systems of control implemented by management in mitigation of the specific identified key risks relating to the area under audit. This opinion is categorised as either 'Substantial', 'Reasonable', 'Limited' or 'Little' assurance;
- identify inadequately addressed risks and ineffective control processes;
- detail the actions agreed with management and the timescales for completing those actions; and
- identify issues of good practice.

Recommendations made by Internal Audit are prioritised, with the agreed actions being categorised accordingly as follows:

- High Priority – Action considered necessary to avoid unmitigated exposure to significant risks
- Medium Priority – Action considered necessary to avoid unmitigated exposure to other key risks
- Best Practice – Action recommended in order to improve existing procedures and other systems of internal control

The following audit reports have been issued with key findings as follows:

1. Financial Appraisals**Advisory Reports Only**

Internal Audit is frequently requested to provide financial appraisals of companies, non-incorporated businesses and other organisations as part of the Council's 'due diligence' processes prior to the commencement of any commercial or similar relationship with the organisation in question. For each appraisal, Internal Audit provides a confidential report which summarises the results of a review of information provided by the organisation, information provided by third-party organisations (such as credit-referencing agencies and the National Anti-Fraud Network) and any other publicly available information.

2. Homelessness**Assurance Opinion – Substantial**

The primary purpose of the audit was to provide assurance over the effectiveness of the policies, procedures and other systems of control implemented by management in mitigation of the following specific identified key risks:

- Appropriate Policy and Procedure documentation may not be in place.
- People presenting to the Council as homeless, or who are identified as being at risk of homelessness, may not be appropriately and consistently advised and/or assisted.
- Appropriate Performance Monitoring and Reporting procedures may not be in place.

Internal Audit was pleased to report that no significant issues were identified in the course of this review, with no formal recommendations being deemed necessary.

3. **Garden Waste**

Assurance Opinion – Substantial

The primary purpose of the audit was to provide assurance over the effectiveness of the policies, procedures and other systems of control implemented by management in mitigation of the following specific identified key risks:

- Garden Waste Collection pricing may not be appropriate and correctly approved.
- Appropriate controls may not be in place for income collection, reconciliation and refunds.
- Garden Waste collections may be made at properties without an up-to-date account.
- Collection routes may not be reviewed to ensure they are efficient.

Internal Audit was pleased to report that no significant issues were identified in the course of this review, with a single recommendation ('medium priority') relating to the documentation of the review of reconciliations being proposed to and agreed with management.

4. **Commercial Property Management**

Assurance Opinion – Limited

The primary purpose of the audit was to provide assurance over the effectiveness of the policies, procedures and other systems of control implemented by management in mitigation of the following specific identified key risks:

- Processes for the commencement of new tenancies may not be sufficiently robust.
- Invoicing of rent and related charges may not be performed in an accurate and timely manner.
- Collection processes for rent and related charges may not be sufficiently robust and timely.
- Financial and non-financial performance reporting may be inadequate.

Three high priority and one medium priority recommendations were identified, details of which may be found in the confidential appendix.

One further recommendation ('medium priority') relating to document management and the implementation of a new property management system was proposed to and agreed with management.

5. Tenant Engagement

Assurance Opinion – Substantial

The primary purpose of the audit was to provide assurance over the effectiveness of the policies, procedures and other systems of control implemented by management in mitigation of the following specific identified key risk:

- Adequate arrangements may not be in place to ensure compliance with the expectations for engagement with tenants contained within section 2.2 of the Transparency, Influence and Accountability Standard published by the Regulator of Social Housing.

For reference, a link to the standard is included [here](#).

Internal Audit was pleased to report that no significant issues were identified in the course of this review, with no formal recommendations being deemed necessary.

Current Audit Performance

Progress on the Internal Audit Plan for 2025/26 is considered to be satisfactory, taking into account a significantly higher than usual number of Financial Appraisals undertaken during April and June.

A final report on the performance of the Internal Audit Service for 2025/26 will be presented to this Committee in July 2026.

Appendix 2

Internal Audit Follow-Up

Internal Audit has undertaken a review of progress made by management in implementing agreed actions within six months of the completion of the audit. The table below provides a summary of the progress made with high and medium priority agreed actions for such internal audit reports issued. Those audits where all actions have previously been reported as completed have been excluded from this list.

Audit Title	Report Issued	Original Assurance Opinion	Agreed Actions	Progress
Housing Delivery Plan	28/08/24	Reasonable	2	Complete
Damp and Mould	27/01/25	Reasonable	2	1 Outstanding
Financial Inclusion	24/02/25	Substantial	1	Complete
Allotments	05/03/25	Limited	3	Complete

Further details of progress being made with high and medium priority agreed actions that have not yet been fully implemented are included below along with comments from management reflecting any updates on progress. Evidence of implementation will not be routinely sought for all actions as part of this monitoring process. Instead, a risk-based approach will be applied to conducting further follow-up work. Actions marked as 'superseded' refer to occasions where either 1) developments within the relevant Council department, or the environment within which the department operates, have occurred since the date of the original audit report and the action is no longer relevant or considered a priority in light of the consequent change to the Council's risk profile; or, 2) an alternative action has been implemented to mitigate the risk identified.

Where the agreed actions to address significant internal control weaknesses have not been implemented this may have implications for the Council. A key role of the Committee is to review the outcome of audit work and oversee the prompt implementation of agreed actions to help ensure that risks are adequately managed.

Outstanding Actions**1. Damp and Mould****1.1 Procurement****Agreed Action (High Priority)**

The recently commenced procurement process for Damp and Mould related works will be completed at the earliest opportunity.

Managers Responsible

Assistant Director Housing

Housing Repairs and Compliance Manager

Target Date: 31 March 2025

Update from the Assistant Director Housing

This is still in progress. The Repairs team have a number of contracts requiring procurement and have prioritised those with the highest value.

Revised Target Date: 31 March 2026

Report of the Deputy Chief Executive

Going Concern Statement

1. Purpose of Report

This report sets out the assessment by the designated Section 151 Officer of the Council's Going Concern status. This is in accordance with all the Council's priorities.

2. Recommendation

The Committee is asked to NOTE the outcome of the assessment made of the Council's status as a going concern for the purposes of the Statement of Accounts 2024/25.

3. Detail

The concept of a 'going concern' assumes that a local authority, its functions and services will continue in operational existence for the foreseeable future. This assumption underpins the accounts drawn up under the Local Authority Code of Accounting Practice and is made because local authorities carry out functions essential to the community and are themselves revenue-raising bodies (with limits on their revenue-raising powers arising only at the discretion of central government). If a local authority was in financial difficulty, the prospects are thus that alternative arrangements might be made by central government either for the continuation of the services it provides or for assistance with the recovery of a deficit over more than one financial year.

Where the 'going concern' concept is not the case, particular care would be needed in the valuation of assets, as inventories and property, plant and equipment may not be realisable at their book values and provisions may be needed for closure costs or redundancies. An inability to apply the 'going concern' concept would potentially have a fundamental impact on the financial statements.

Given the significant reductions in funding for local government over many years and the potential risks that the wider economic context continues to pose to the ongoing viability of a number of local authorities as a consequence, external auditors place greater emphasis on local authorities undertaking an assessment of the 'going concern' basis on which they prepare their financial statements.

In response the position of this Council is set out in the **Appendix** to this report.

4. Financial Implications

The comments from the Assistant Director Finance Services were as follows:

The financial implications are included in the report.

5. Legal Implications

The comments from the Head of Legal Services were as follows:

There are no direct legal implications that arise from this report.

6. Human Resources Implications

There were no comments from the Human Resources Manager.

7. Union Comments

Not applicable.

8. Climate Change Implications

Any climate change implications are contained within the report.

9. Data Protection Compliance Implications

This report does not contain any OFFICIAL(SENSITIVE) information and there are no Data Protection issues in relation to this report.

10. Equality Impact Assessment

As there is no change to policy an equality impact assessment is not required.

11. Background Papers

Nil.

Appendix**Assessment of Going Concern**

As with all principal local authorities, the Council is required to compile its Statement of Accounts in accordance with the Code of Practice on Local Authority Accounting for 2024/25 (the Code) published by the Chartered Institute of Public Finance and Accountancy (CIPFA). In accordance with the Code, the Statement of Accounts are prepared assuming that the Council will continue to operate in the foreseeable future and that it is able to do so within the current and anticipated resources available. By this, it is meant that the Council will realise its assets and settle its obligations in the normal course of business.

The main factors which underpin the going concern assessment are the Council's current financial position; projected financial position; governance arrangements; and the regulatory and control environment applicable to it as a local authority. These are considered in more detail below.

Current Financial Position

The Council's financial outturn position 2024/25 showed a £1.369m underspend against revised budget which culminated with a £521k withdrawal from General Fund balances. The General Fund revenue reserves amounted to £5.557m as at 31 March 2025. In addition, the Council held earmarked reserves of £3.048m to meet specific identified pressures, but which ultimately may be diverted to support general expenditure by the Section 151 Officer should the need arise.

General reserves reflect the ability of the Council to deal with unforeseen events and unexpected financial pressures in any particular year and are a key indicator of the financial resilience of the organisation. As part of the Medium-Term Financial Strategy, the Section 151 Officer has assessed that the optimum level of general reserves to be held by the Council to be at or above £1.5m and at least equal to 5% of the Council's net operating expenditure. General Fund reserves were at £5.557m as at 31 March 2025.

At 31 March 2025, the Council held £12.9m in the form of either cash or short term investments maturing within the next financial year.

On capital, there was £31.4m of expenditure in the approved capital programme for the year. This represents an underspend of £33.4m against the budget, with the main reasons being general underspending and slippage on major capital schemes (predominantly the housing new build programme and grant funded economic regeneration projects). Budgets to the value of £31.0m have been carried forward into 2025/26. The Council funds its capital programme from a mixture of prudential borrowing, capital receipts, direct financing from revenue, government grants and partnership funding such as developer contributions.

The Council's balance sheet, as at 31 March 2025, shows a net worth of £255.2m with a significantly reduced net pension liability of £233k. There are statutory arrangements for funding the pension deficit through increasing contribution over the remaining working life of the employees, as assessed by an independent actuary. The financial position of the Council remains healthy.

Other factors giving rise to this assessment include:

- The adequacy of risk assessed provisions for doubtful debts.
- The range of reserves set aside to help manage expenditure.
- An adequate risk assessed working balance to meet unforeseen expenditure.

Projected Financial Position

In February/March 2025, the Council approved a balanced budget for 2025/26. This allowed for net spending of £15.429m and required a Council Tax increase of 2.94%, pressures/growth of £1.863m, savings/additional income of £1.994m and the use of £1.277m from General Fund reserves.

The Medium-Term Financial Strategy (MTFS) is updated twice-yearly and reflects a four-year assessment of the Council's spending plans and associated funding. It includes the ongoing implications of approved budgets and service levels and the revenue costs of the capital programme, as well as the management of debt and investments. An update on the MTFS, covering the four-year period to 2029/30 will be reported to Cabinet in early November 2025.

With the Council having already overcome significant reductions in central government grant funding, it is anticipated that the MTFS will identify a significant budget gap of around £9.7m over the period to 2025/26 to 2029/30. The Council has developed a Business Strategy to identify efficiency savings and additional income to manage the reduction in resources. The budget will be monitored over the medium-term period by Cabinet.

The Council has a well-established process for the development of the Capital Strategy, reported to Cabinet every year, which ensures the Council maintains a capital programme which is prudent, sustainable and affordable. The three-year capital budget for 2024/25 to 2026/27 is £67.8m, including the Housing Revenue Account (HRA) capital works, Housing Delivery Programme, Economic Regeneration Projects (Stapleford Towns Fund, Kimberley Means Business and UK Shared Prosperity Fund), Environmental Services and Climate Change and ICT.

Governance Arrangements

The Council has a well-established and robust corporate governance framework. This includes the statutory elements like the post of Head of Paid Service (Chief Executive); the Section 151 Officer (Deputy Chief Executive); and the Monitoring Officer (Director of Legal and Democratic Services); in addition to the current political arrangements.

The Data Protection Officer (DPO) role has also become a statutory governance requirement following the General Data Protection Regulations and the subsequent update to the Data Protection Act 2018.

An overview of this governance framework is provided in the Annual Governance Statement which is included within the Statement of Accounts. This was presented to this Committee on 19 May 2025 and included a detailed review of the effectiveness of the Council's governance arrangements.

External Regulatory and Control Environment

As a local authority, the Council must operate within a highly legislated and controlled environment. An example of this is the requirement for a balanced budget each year combined with the legal requirement for local authorities to have regard to consideration of such matters as the robustness of budget estimates and the adequacy of reserves. In addition to the legal framework and central government control, there are other factors such as the role undertaken by the external auditors as well as the statutory requirement in some cases for compliance with best practice and guidance published by CIPFA and other relevant bodies.

Against this backdrop it is considered unlikely that a local authority would be 'allowed to fail' with the likelihood being that, when faced with such a scenario, central government would intervene and be supported by organisations such as the Local Government Association to bring about the required improvements or help maintain service delivery. That said, given the severity of the earlier pandemic on the country's finances and the recent economic context and inflationary pressures, it would be complacent to sit back and wait for Government intervention.

Local Government Reorganisation

In December 2024, central government published the English Devolution White Paper setting out its vision for simpler local government structures. All two-tier county, district and small unitary councils will be replaced by larger unitary authorities. Councils are currently in the process of developing unitary proposals in line with the government's criteria and the expectation is that new unitary authorities will be in place by 2029.

Under these plans Broxtowe Borough Council as an entity would cease to exist but all its services, functions and finances would be transferred to the new unitary authority. As such, the proposed reorganisation does not impact on the Council's operational existence.

Conclusion

It is considered that having regard to the Council's arrangements and such factors as highlighted in this report that the Council remains a going concern.

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Report of the Deputy Chief Executive

Review of Strategic Risk Register
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1. Purpose of Report

To approve the amendments to the Strategic Risk Register and the action plans identified to mitigate risks. This is in accordance with all the Council's priorities.

2. Recommendation

The Committee is asked to RESOLVE that the amendments to the Strategic Risk Register and the actions to mitigate risks as set out be approved.

3. Detail

In accordance with the corporate Risk Management Strategy, the Strategic Risk Management Group met on 19 August 2025 to review the Strategic Risk Register. General Management Team (GMT) has since considered the proposals made by the Group. The objectives of the review were to:

- Identify the extent to which risks included in the register are still relevant
- Identify any new strategic risks to be included in the register
- Review action plans to mitigate risks.

A summary of the risk management process is included in **Appendix 1**. The Risk Management Strategy includes a risk map matrix to assess both the threats and opportunities for each strategic risk in terms of both the likelihood and impact. The risk map is included to assist the understanding of the inherent and residual risk scores allocated to each strategic risk. These scores will be considered further and amended as necessary in due course.

Details of the proposed amendments to the Strategic Risk Register and actions resulting from the process are attached in **Appendix 2**. The full Strategic Risk Register incorporating the proposed amendments is available on the intranet. An extract from the register of the entries relating to the highest rated 'red' risks are included in **Appendix 3**. This includes a new risk for Members consideration relating the failure to respond to the outcomes of Local Government Reorganisation in Nottingham and Nottinghamshire.

4. Financial Implications

The comments from the Assistant Director Finance Services were as follows:

There are no direct financial implications that arise from this report. Any future additional budgetary requirements will be considered separately by Cabinet.

5. Legal Implications

The comments from the Head of Legal Services and Deputy Monitoring Officer were as follows:

The Strategic Risk Register is the main mechanism used by the Council to identify, assess and monitor key risks. Whilst there are no direct legal implications arising from this report, it is important to assess whether the risks identified are being effectively mitigated and managed.

6. Human Resources Implications

There were no comments from the Human Resources Manager.

7. Union Comments

Not applicable.

8. Climate Change Implications

Climate Change is considered in this report as a strategic risk.

9. Data Protection Compliance Implications

This report does not contain any OFFICIAL(SENSITIVE) information and there are no Data Protection issues in relation to this report.

10. Equality Impact Assessment

As there is no change to policy an equality impact assessment is not required.

11. Background Papers

Nil.

Appendix 1**Review of Strategic Risk Register****Introduction**

The corporate Risk Management Strategy aims to improve the effectiveness of risk management across the Council. Effective risk management will help to ensure that the Council maximises its opportunities and minimises the impact of the risks it faces, thereby improving its ability to deliver priorities, improve outcomes for residents and mitigating legal action and financial claims against the Council and subsequent damage to its reputation.

The Strategy provides a comprehensive framework and process designed to support both Members and Officers in ensuring that the Council is able to discharge its risk management responsibilities fully. The Strategy outlines the objectives and benefits of managing risk, describes the responsibilities for risk management, and provides an overview of the process that the Council has in place to manage risk successfully. The risk management process outlined within the Strategy should be used to identify and manage all risks to the Council's ability to deliver its priorities. This covers both strategic priorities, operational activities and the delivery of projects or programmes.

The Council defines risk as "the chance of something happening that may have an impact on objectives". A risk is an event or occurrence that would prevent, obstruct or delay the Council from achieving its objectives or failing to capture business opportunities when pursuing its objectives.

Risk Management

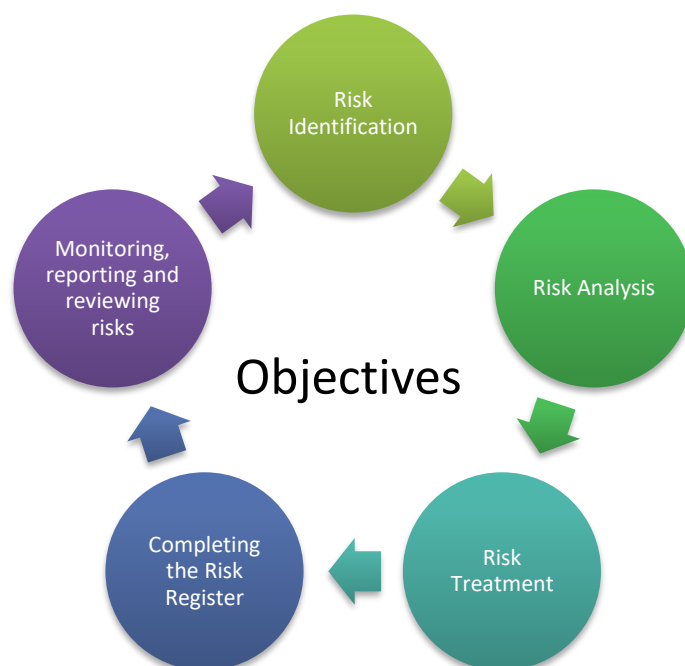
Risk management involves adopting a planned and systematic approach to the identification, evaluation and control of those risks which can threaten the objectives, assets, or financial wellbeing of the Council. It is a means of minimising the costs and disruption to the Council caused by undesired events.

Risk management covers the whole range of risks and not just those associated with finance, health and safety and insurance. It can also include risks as diverse as those associated with reputation, environment, technology and breach of confidentiality amongst others. The benefits of successful risk management include:

- Improved service delivery with fewer disruptions, efficient processes and improved controls
- Improved financial performance and value for money with increased achievement of objectives, fewer losses, reduced impact and frequency of critical risks
- Improved corporate governance and compliance systems with fewer legal challenges, robust corporate governance and fewer regulatory visits
- Improved insurance management with lower frequency and value of claims, lower impact of uninsured losses and reduced premiums.

Risk Management Process

The Council's risk management process has five key steps as outlined below.



Process Step	Description
Risk Identification	Identification of risks which could significantly impact the Council's aims and objectives – both strategic and operational.
Risk Analysis	Requires consideration to the identified risks potential consequences and likelihood of occurring. Risks should be scored against the Council's risk matrix
Risk Treatment	Treat; Tolerate; Transfer; Terminate – Identify which solution is best to manage the risk (may be one or a combination of a number of treatments)
Completing the Risk Register	Document the previous steps within the appropriate risk register. Tool for facilitating risk management discussions. Standard template to be utilised to ensure consistent reporting.
Monitoring, reporting and reviewing the risks	Review risks against agreed reporting structure to ensure they remain current and on target with what is expected or manageable.

Risk Matrix

		Risk – Threats				
Likelihood	Almost Certain – 5	5	10	15	20	25
	Likely – 4	4	8	12	16	20
	Possible – 3	3	6	9	12	15
	Unlikely – 2	2	4	6	8	10
	Rare – 1	1	2	3	4	5
		Insignificant – 1	Minor – 2	Moderate – 3	Major – 4	Catastrophic – 5
		Impact				




Risk Rating	Value	Action
Red Risk	25	Immediate action to prevent serious threat to provision and/or achievement of key services or duties
	15 to 20	Key risks which may potentially affect the provision of key services or duties
Amber Risk	12	Important risks which may potentially affect the provision of key services or duties
	8 to 10	Monitor as necessary being less important but still could have a serious effect on the provision of key services
	5 to 6	Monitor as necessary to ensure risk is properly managed
Green Risk	1 – 4	No strategic action necessary








Appendix 2







Strategic Risk Register – Summary of Proposed Changes







Inherent Risk – Gross risk **before** controls and mitigation





Residual Risk – Risk remaining **after** application of controls and mitigating measures

Risk	Inherent Risk	Residual Risk	Changes
<p>1. Failure to maintain effective corporate performance management and implement change management processes</p> <p><i>Although the residual risk score does not need to change, it was considered that the position with regards to this risk had worsened</i></p>	20	<p>4</p> <p> Green</p>	<p>No significant changes were proposed to the key controls, risk indicators and action points for this strategic risk.</p> <p>The challenges of Local Government Reorganisation and changes at GMT could have an impact on this risk.</p>
<p>2. Failure to obtain adequate resources to achieve service objectives</p> <p><i>Although the residual risk score does not need to change, it was considered that the position with regards to this risk had worsened.</i></p>	20	<p>16</p> <p> Red</p>	<p>The ongoing uncertainty surrounding the annual local government financial settlement means that this remains as a high-rated residual risk.</p> <p>The government recently consulted on the long-awaited 'Fair Funding Review 2.0'. This along with an associated Business Rates reset could have a significant impact upon the Council's finances. Figures will be confirmed as part of the Local Government Financial Settlement in December.</p>
<p>3. Failure to deliver the Housing Revenue Account (HRA) Business Plan</p> <p><i>Although the residual risk score does not need to change, it was considered that the position with regards to this risk had worsened</i></p>	25	<p>12</p> <p> Amber</p>	<p>The Social Housing Regulator inspection has commenced. This presents a significant risk to the Council as a social housing provider.</p> <p>The action to consider the outcomes and recommendations from the mock HQN audit and to develop and deliver on any subsequent action plans was supplemented with a new action to prepare for the Social Housing Regulator inspection and to consider and respond to the outcomes of the inspection.</p>

Risk	Inherent Risk	Residual Risk	Changes
<p>3a. Failure to deliver a Housing Repairs and Compliance Service which meets Right to Repair and Compliance legislation</p> <p><i>Although the residual risk score does not need to change, it was considered that the position with regards to this risk had worsened</i></p>	20	<p>12</p>  <p>Amber</p>	The action to consider the outcomes and recommendations from the mock HQN audit and to develop and deliver on any subsequent action plans was supplemented with a new action to prepare for the Social Housing Regulator inspection and to consider and respond to the outcomes of the inspection.
<p>4. Failure of strategic leisure initiatives</p> <p><i>The position with regards to this risk is unchanged.</i></p>	25	<p>20</p>  <p>Red</p>	The action to produce a programme to address the issues identified in the detailed property condition survey at Bramcote Leisure Centre has been completed and is being delivered as part of business-as-usual activity.
<p>5. Failure of Liberty Leisure (LLL) trading company</p> <p><i>Although the residual risk score does not need to change, it was considered that the position with regards to this risk had improved.</i></p>	25	<p>8</p>  <p>Amber</p>	<p>No significant changes were proposed to the key controls, risk indicators and action points for this strategic risk.</p> <p>The company had posted positive outturn figures for 2024/25 with efficient operating and improved revenues from membership sales.</p>
<p>6. Failure to manage the Beeston town centre development</p> <p><i>The position with regards to this risk is unchanged.</i></p>	25	<p>9</p>  <p>Amber</p>	A new action was added to respond effectively to the recommendations agreed following an Internal Audit of commercial properties.
<p>7. Not complying with legislation</p> <p><i>The position with regards to this risk is unchanged.</i></p>	25	<p>6</p>  <p>Amber</p>	The risk indicator of 'Backlog of compliance testing' was updated to 'Levels of compliance'.
<p>8. Failure of financial management and/or budgetary control and to implement agreed budget decisions</p> <p><i>The position with regards to this risk is unchanged.</i></p>	25	<p>4</p>  <p>Green</p>	No significant changes were proposed to the key controls, risk indicators and action points for this strategic risk.
<p>9. Failure to maximise collection of income due to the Council</p> <p><i>The position with regards to this risk is unchanged</i></p>	20	<p>9</p>  <p>Amber</p>	A new action was added to monitor the outcome of the recent government consultation on Council Tax administration.

Risk	Inherent Risk	Residual Risk	Changes
10. Failure of key ICT systems <i>The position with regards to this risk is unchanged.</i>	25	15  Red	This remains a high rated risk given the national/global picture in terms of cyber security and associated risks. No significant changes were proposed to the key controls, risk indicators and action points for this strategic risk.
11. Failure to implement Private Sector Housing Strategy in accordance with Government and Council expectations <i>The position with regards to this risk is unchanged.</i>	20	4  Green	No significant changes were proposed to the key controls, risk indicators and action points for this strategic risk.
12. Failure to engage with partners/community to implement the Broxtowe Borough Partnership Statement of Common Purpose <i>The position with regards to this risk is unchanged.</i>	15	4  Green	No significant changes were proposed to the key controls, risk indicators and action points for this strategic risk. The risk from Local Government Reorganisation will be monitored.
13. Failure to contribute effectively to dealing with crime and disorder <i>The position with regards to this risk is unchanged.</i>	15	3  Green	No significant changes were proposed to the key controls, risk indicators and action points for this strategic risk.
14. Failure to provide housing in accordance with the Local Development Framework <i>The position with regards to this risk is unchanged.</i>	20	12  Amber	No significant changes were proposed to the key controls, risk indicators and action points for this strategic risk.
15. Natural disaster or deliberate act, which affects major part of the Authority <i>The position with regards to this risk is unchanged.</i>	15	12  Amber	A new action was added to ensure that the ongoing maintenance arrangements are defined for the Chilwell Quarry site, including respective responsibilities. The Safety Advisory Group was added as a key control.

Risk	Inherent Risk	Residual Risk	Changes
<p>16. Failure to mitigate the impact of the Government's welfare reform agenda</p> <p><i>The position with regards to this risk is unchanged</i></p>	20	<p>4</p>  <p>Green</p>	<p>The action to assess the impact of the Household Support Fund coming to an end in March 2026 was replaced with a new action to monitor the outcome of the potential merger of the Discretionary Housing Payments (DHP) and Household Support Fund into a new Crisis Resilience Fund.</p> <p>The Cost of Living Working Group was added as a key control.</p>
<p>17. Failure to maximise opportunities and to recognise the risks in shared services arrangements</p> <p><i>The position with regards to this risk is unchanged</i></p>	20	<p>9</p>  <p>Amber</p>	<p>No significant changes were proposed to the key controls, risk indicators and action points for this strategic risk.</p> <p>The risk from Local Government Reorganisation will be monitored.</p>
<p>18. Corporate and/or political leadership adversely impacting upon service delivery</p> <p><i>Although the residual risk score does not need to change, it was considered that the position with regards to this risk had worsened.</i></p>	20	<p>12</p>  <p>Amber</p>	<p>Two new actions were added to:</p> <ul style="list-style-type: none"> Implement the necessary interim executive management arrangements from September 2025; and Complete the recruitment process for a new permanent Chief Executive as the 'head of paid service' statutory officer.
<p>19. High levels of sickness</p> <p><i>The position with regards to this risk is unchanged</i></p>	16	<p>6</p>  <p>Amber</p>	<p>No significant changes were proposed to the key controls, risk indicators and action points for this strategic risk.</p>
<p>20. Inability to recruit and retain staff with required skills and expertise to meet increasing demands and expectations.</p> <p><i>The position with regards to this risk is unchanged.</i></p>	20	<p>8</p>  <p>Amber</p>	<p>The action to complete a review of Broxtowe Local Pay Scales by benchmarking against national scales was completed.</p> <p>The risk from Local Government Reorganisation will be monitored.</p>
<p>21. Failure to comply with duty as a service provider and employer to groups such as children, the elderly, vulnerable adults etc.</p> <p><i>The position with regards to this risk is unchanged</i></p>	20	<p>4</p>  <p>Green</p>	<p>No significant changes were proposed to the key controls, risk indicators and action points for this strategic risk.</p>

Risk	Inherent Risk	Residual Risk	Changes
22. Unauthorised access of data <i>The position with regards to this risk is unchanged</i>	20	6  Amber	No significant changes were proposed to the key controls, risk indicators and action points for this strategic risk. System users are encouraged to adopt the principles of three-random-words for passwords to mitigate the risk of unauthorised system access.
23. High volumes of employee or client fraud <i>The position with regards to this risk is unchanged</i>	20	4  Green	No significant changes were proposed to the key controls, risk indicators and action points for this strategic risk.
24. <i>Failure to achieve commitment of being carbon neutral for the Council's own operations by 2027</i> <i>The position with regards to this risk is unchanged</i>	20	12  Amber	No significant changes were proposed to the key controls, risk indicators and action points for this strategic risk. The risk from Local Government Reorganisation will be monitored.
25. Failure to respond to the outcomes of Local Government Reorganisation in Nottingham and Nottinghamshire	25	20  Red	New risk – see Appendix 3 for details.

Appendix 3

Extract from the Strategic Risk Register – September 2025 – Entries Relating to the Highest Rated ‘Red’ Risks**Risk 2 - Failure to obtain adequate resources to achieve service objectives**

Risk Owner(s)	Inherent Risk	Residual Risk
Deputy Chief Executive Assistant Director Finance Services	20	16

Key Controls

- Medium Term Financial Strategy
- Business Strategy
- Economic Regeneration Strategy
- Procurement and Commissioning Strategy
- Capital Strategy and Treasury Management Strategy
- Asset Management Strategy
- Energy Procurement Strategy
- Commercial Strategy
- Land Disposals Policy

Risk Indicators

- Local Government Finance Settlement
- Budget gap
- Fuel and energy prices
- Fees and charges and other income levels
- Failed bids for external funding
- General economic indicators
- Interest rates
- Fluctuations in planning application fee income
- Cost of planning appeal decisions

Action Points

1. Review service objectives in response to changing resources.
2. Identify and assess external funding opportunities and ensure accompanying targets are met.
3. Investigate and develop opportunities for shared service collaboration.
4. Monitor the impact of the collection of Business Rates on the resources available to the Council.
5. Seek the disposal of surplus assets to generate additional capital receipts.
6. Be alert to potential funding opportunities for town centre regeneration initiatives and other capital investment schemes.

7. Identify potential budget savings and maximise income generating opportunities.
8. Maximise income from commercial properties and industrial units.
9. Work collaboratively with Nottinghamshire local authorities to maximise the recovery of business rates income.
10. Assess the impact of the anticipated Fair Funding Review, including proposals for greater localisation of business rates and any reset in the baseline, upon the Council's finances.
11. Produce a new Commercial Strategy that will support the Business Strategy being refreshed as part of the annual budget setting process.
12. Progress with the delivery of the Stapleford Towns Fund project.
13. Progress with the delivery of the Kimberley Mean Business project.
14. Develop a Town Investment Plan for Eastwood.
15. Complete the full recovery of the agreed tram compensation claim against Nottingham City Council.
16. Monitor the impact of inflation and the cost of living on the Council's service provision and its financial position.
17. Assess the impact of the government's food waste policies and the potential receipt of New Burdens Funding to meet the additional capital and revenues costs associated with its delivery.
18. Monitor progress made by the DWP on the migration of existing Housing Benefit cases onto Pension Credit.
19. Be mindful of budget risks arising from planning appeal decisions and to report any uplift in costs to GMT at the earliest opportunity.
20. Review trade waste operations and its pricing structure to remain effective and competitive in the market and to report the findings to Cabinet.
21. Monitor the funding implications of the increasing scope of Domestic Homicide Reviews being completed by the Community Safety Partnership.

Risk 4 - Failure of strategic leisure initiatives

Risk Owner(s)	Inherent Risk	Residual Risk
Deputy Chief Executive	25	20

Key Controls

- Leisure Facilities Strategy
- Leisure and Culture Service Specification
- Liberty Leisure Limited Business Plan
- External legal advice and support

Risk Indicators

- Results of consultation exercises
- Progress against Business Plans
- Progress against the Capital Programme
- Events impacting upon any Joint Use Agreements
- Visitor numbers at leisure facilities
- Income at leisure facilities
- Financial viability of Liberty Leisure Limited

Action Points

1. Determine future strategy for investment in leisure facilities.
2. Review leisure opportunities arising from major developments.
3. Utilise external legal advice and support as required.
4. Work with Chilwell School to assess leisure facilities options at Chilwell Olympia Sports Centre and report back to Cabinet.
5. Forward plan any necessary capital repair works anticipated at Bramcote Leisure Centre and to submit, consider and profile the financial impact as part of the proposed Capital Programme.
6. Complete the planning application and development of the detailed design (RIBA4) for a new replacement Bramcote Leisure Centre.
7. Establish a cross-party members group, supported by key officers in leisure, property and regeneration, to identify leisure opportunities in the north of the Borough.
8. Progress with the development of the new Community Pavilion and Young People's Centre on Hickings Lane.
9. Consider the outcomes of the asbestos survey at Bramcote Leisure Centre and to agree a robust management plan for the site in conjunction with Liberty Leisure Limited.

Risk 10 - Failure of key ICT systems

Risk Owner(s)	Inherent Risk	Residual Risk
Executive Director Assistant Director Corporate Services	25	15

Key Controls

- ICT Strategy
- Service agreements
- Systems mainly supplied by external supplier
- Back-up server offsite
- Security Policies
- System availability
- Server virtualisation
- Provision of emergency power supply
- Identification of failure at points of entry
- Shared service arrangements with other local authorities
- Geo-location blocking on the firewall
- Warning, Advice and Reporting Point (WARP) service
- Cyber Security Information Sharing Partnership (CISP)
- Business Continuity Plans

Risk Indicators

- Viruses
- Computer downtime
- Overrun/failure of overnight processing
- Key financial reconciliation processes
- Customer complaints
- Backlog of works
- Appropriate officer resources to support key systems
- Number of security incidents
- Public Services Network (PSN) compliance

Action Points

1. Monitor implementation of and regularly test the Business Continuity Plan for ICT Services
2. Pursue partnership working initiatives, where appropriate
3. Assess the impact of the National Cyber Security Standard.
4. Address the matters raised by the independent LGA specialist review of the Council's cyber-risk arrangements and key controls.

Risk 25 – Failure to respond to the outcomes of Local Government Reorganisation in Nottingham and Nottinghamshire

Risk Owner(s)	Inherent Risk	Residual Risk
Chief Executive / All Chief Officers	25	20

Key Controls

- Council and Cabinet (Members)
- Leader of the Council and the Chief Executive
- LGR Management and Planning Groups
- Nottinghamshire Finance Officers Association (NFOA)
- External Consultants reports from PWC and CIPFA

Risk Indicators

- Political acceptance or non-acceptance of the LGR option proposals
- Recent MHCLG ministerial letter outlining spending restrictions on local authorities progressing through LGR (Structural Change Order) expected next year, including requirements for approvals for capital expenditure over £1m, recruitment to senior permanent roles and limits on surplus/disposal assets
- Potential pause/slowdown in the delivery key strategic priorities, e.g. new leisure centre, affordable housebuilding, economic regeneration
- Potential challenge in recruiting to vacant senior posts – impact on service delivery and additional agency costs
- Potential to pause/slowdown of investment in ICT, thereby impacting on improvements to efficiency and output productivity.

Action Points

1. Ensure that the Council is represented on the various Nottinghamshire LGR programme groups covering option 1b, option 1e and the potential City option when developed.
2. Establish an internal LGR Implementation Group to plan and co-ordinate the Council's response to LGR.
3. Provide regular update reports to Members through Cabinet and Council.
4. Update the Council LGR intranet webpages developed to continually engage with staff.
5. Programme staff engagement sessions to provide updates on LGR developments.
6. Ensure that the Chief Executive's weekly employee briefings to includes regular updates on LGR.
7. Complete the Broxtowe residents survey on LGR to gauge local public views.

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Report of the Monitoring Officer

Quarterly Complaint Report

1. Purpose of Report

To provide Members with a summary of complaints made against the Council.

2. Recommendation

The Committee is asked to NOTE the report.

3. Detail

This report outlines the performance of the Council in dealing with complaints, including, at stage one those managed by the service areas, at stage two, managed by the Complaints and Compliments Officer and at stage three passed to the Local Government Ombudsman (LGO) or Housing Ombudsman (HO).

- **Appendix 1** provides a summary of the Council's internal complaints statistics.
- **Appendix 2** provides a summary of the complaints investigated by the Council formally under stage two of the Council's formal complaint procedure.
- **Appendix 3** provides a summary of the complaints determined by the Ombudsman.

Of the 163 stage one complaints received overall, 25 were investigated under the stage 2 complaints procedure and three were investigated by the LGO. Under the stage 2 complaints procedure, 13 complaints (52%) were not upheld, 12 complaints (48%) were upheld. Further details can be found in **Appendix 2**. The Ombudsman investigated seven complaints made against the Council. Three complaints were recorded as not upheld, resulting in no further action being required by the Council, four complaints were upheld. Further details can be found in **Appendix 3**.

4. Financial Implications

The comments from the Assistant Director Finance Services were as follows:

The cost of compensation is charged either directly to the service or recognised in a central corporate budget. There are no additional financial implications associated with this report. Any significant additional budgets required, above virement limits, would require approval by Cabinet.

5. Legal Implications

The comments from the Head of Legal Services were as follows:

Whilst there are no direct legal implications arising from this report, it is important to note that the Council's approach to handling complaints is within the parameters of the following key pieces of legislation: Part III of the Local Government Act 1974 and Chapter 6 of the Localism Act 2011 (for Housing Services complaints).

6. Human Resources Implications

The comments from the Human Resources Manager were as follows:

Not applicable.

7. Union Comments

The Union comments were as follows:

Not applicable.

8. Climate Change Implications

Not applicable.

9. Data Protection Compliance Implications

This report does not contain any OFFICIAL(SENSITIVE) information and there are no Data Protection issues in relation to this report.

10. Equality Impact Assessment

Not applicable.

11. Background Papers

Nil

Appendix 1

Summary of complaints and compliments
1 April 2025 – 30 June 2025

Complaints received

	Total	Chief Executive	Deputy Chief Executive	Executive Director	Monitoring Officer	LL Leisure
Number of Stage One complaints	163	109	14	40	0	0
No. of complaints concluded under Stage Two	25	24	0	1	0	0
No. of complaints determined by the Ombudsman	3	2	0	1	0	0

Breakdown of complaints and compliments by department and section**Chief Executive's department**

Service Areas	Stage 1 Complaints	Stage 2 Complaints	Ombudsman Complaints	Compliments
Communities	0	0	1	0
Development Control	7	2	0	0
Housing and Income	11	1	0	17
Housing Repairs	47	10	1	9
Housing Operations	41	9	0	12
Housing Strategy	0	0	0	3
Environmental Health	3	2	0	0
Total	109	24	2	41

Deputy Chief Executive's Department

Service Areas	Stage 1 Complaints	Stage 2 Complaints	Ombudsman Complaints	Compliments
Customer Services	1	0	0	0
Capital Works	5	0	0	0
Revenues	8	0	0	0
Total	14	0	0	0

Executive Director's Department

Service Areas	Stage 1 Complaints	Stage 2 Complaints	Ombudsman Complaints	Compliments
Environment	3	0	0	8
Waste and Recycling	34	0	0	0
Bereavement	1	0	1	9
Information Governance	2	1	0	0
Total	40	1	1	17

Monitoring Officer's Department

Service Areas	Stage 1 Complaints	Stage 2 Complaints	Ombudsman Complaints	Compliments
Democratic Services	0	0	0	0
Total	0	0	0	0

Liberty Leisure Ltd

Service Area	Stage 1 Complaints	Stage 2 Complaints	Ombudsman Complaints	Compliments
Kimberley Leisure Centre	0	0	0	0
Bramcote Leisure Centre	0	0	0	0
Chilwell Leisure Centre	0	0	0	0
Total	0	0	0	0

STAGE 1 - FORMAL COMPLAINTS TO THE SERVICE DEPARTMENT**Time taken to acknowledge receipt of stage one complaints:**

	Total	Chief Executive	Deputy Chief Executive	Executive Director	Monitoring Officer	Liberty Leisure
Time taken to acknowledge complaints – 1 to 5 days	163	109	14	40	0	0
Time taken to acknowledge complaints - more than 5 days	0	0	0	0	0	0

Time taken to respond to stage one complaints:

	Total	Chief Executives	Deputy Chief Executive	Executive Director	Monitoring Officer	Liberty Leisure Ltd
Less than 10 working days	153	99	14	40	0	0
Over 10 working days	10	10	0	0	0	0

Directorate / Section	Chief Executive	
	Number responded to outside of 10 working days	Number of complaints where an extension was sought
Housing Operations	10	10
TOTAL	10	10

Appendix 2

Stage 2 - Formal Complaints

25 formal complaints have been responded to in the first quarter; all of which were acknowledged within the 5 working day timescale, and 95% were responded to within the 20 working day timescale. The complainant was notified that the initial 20 working day deadline could not be met. An extension was required to a stage 2 complaint due to conflicting information and records on the Housing Repairs system.

Reasons for the delays include:

- Further information being required from the complainant.
- Further information being required from the department complained about.
- Complexity of the complaint including in-depth research required.
- Resource issues.

Time taken to respond to stage two complaints:

	Total	Chief Executives	Deputy Chief Executive	Executive Director	Monitoring Officer	Liberty Leisure Ltd
Less than 20 working days	25	24	0	1	0	0
Over 20 working days	0	0	0	0	0	0

Planning**1. Complaint against Planning**

Response – 20 working days

Complaint not upheld

Complaint

The complainant contacted the Council and complained that the Planning Team were incorrectly calculating the number of Houses in Multiple Occupation in a certain area and incorrectly provided this information to the Planning Inspectorate.

Council's response

It was determined that an appropriate level of service was provided as the Planning Team have provided the necessary information to the Planning Inspectorate when required. The Planning Inspectorate had ultimately made a judgement based on their interpretation of this information.

The Planning Team correctly used the Supplementary Planning Document (SPD) to calculate Houses in Multiple Occupation (HMO) density.

Assistant Director Comments

The Planning Team had correctly assessed the number of HMOs in the area based on the SPD. This was provided to the Planning Inspectorate when required.

2. Complaint against Planning

Response – 20 working days

Complaint not upheld

Complaint

The complainant contacted the Council and complained that the Planning Team incorrectly approved a change in a planning application under Section 73 and 96a of the Town and Country Planning Act.

Council's response

It was determined that an appropriate level of service was provided as the Planning Team had appropriately considered the revised application in line with Section 73 and 96a of the Town and Country Planning Act.

The revised application and changes to construction materials were correctly regularised by the amended applications.

The Planning Committee further reviewed this amended application and determined that it was appropriate. This was subsequently formally approved by the Committee.

Assistant Director Comments

The Planning Team had correctly assessed the application. This was ultimately approved by the Council's Planning Committee.

Housing Repairs**1. Complaint against Housing Repairs**

Response – 20 working days

Complaint upheld

Complaint

The complainant contacted the Council and complained that the Housing Repairs Team did not correctly notify them, as a leaseholder, of the works that were required to a block of flats and that access was required to their garden. Additionally, the complainant's complaint was not escalated correctly by the Housing Repairs Team.

Council's response

It was determined that an appropriate level of service was not provided as the Housing Repairs Team did not inform the complainant of the necessity to access their garden to complete works for a Council Tenant.

The Housing Repairs Contractor entered the garden, without permission or notification, to install a drain on the communal land to prevent a damp issue at a Council property. The Housing Repairs Team did not comply with Clause 3 (g) of the complainant's leasehold to provide them with three days' notice before the works were undertaken.

The Council also recognises that the complainant's stage 2 complaint request was not correctly progressed by the Housing Repairs Team. Due to an administrative error, the complaint was not correctly passed to the Complaint Team which resulted in a 6-month delay in the complaint being escalated.

An apology and £500 compensation was offered and accepted.

Assistant Director Comments

It is recognised that the Housing Repairs Team did not correctly comply with the clauses of the Leaseholders lease. Furthermore, the Housing Repairs Team did not escalate the complainant's complaint correctly.

Complaint Team Recommendations/actions

- The Housing Repairs Team has been reminded of their responsibility to notify Leaseholders as per the Clauses set out in their leases.
- The Housing Repairs Team has been reminded of their responsibility to affectively communicate with Leaseholders where access and works are required.
- The Housing Repairs Team has been reminded of the importance of escalating complaints in a timely manner and to avoid delays in line with the Complaints Policy and Complaint Code.

2. Complaint against Housing Repairs

Response – 20 working days

Complaint not upheld

Complaint

The complainant contacted the Council and complained that the Housing Repairs Team have not dealt with a damp and mould issue which had left them unable to reside at their property.

Council's response

It was determined that an appropriate level of service was provided as the Housing Repairs Team had appropriately provided remedies to the issues identified relating to the damp and mould during previous complaint investigations.

Furthermore, there was no evidence that suggested that the complainant had been unable to live at their property. While works had been undertaken at the property, these works did not require the complainant to move out.

Assistant Director Comments

All works to remove the damp and mould had been completed. There has been no further reports of this returning and no evidence that suggested that they were unable to live at the property.

3. Complaint against Housing Repairs

Response – 20 working days

Complaint upheldComplaint

The complainant contacted the Council and complained that the Housing Repairs Team did not deal with a damp and mould issue at their property, which included repairing the loft space.

Council's response

It was determined that an appropriate level of service was not provided as the Housing Repairs Team did not proactively monitor the requirement for the loft works to be rescheduled.

Furthermore, the Housing Repairs Team used incorrect information in the response of the stage 1 complaint by stating that delays occurred in the damp inspection due to access issues.

The Council records highlight that the works to remove the damp and mould from the bathroom have been undertaken in a timely manner.

The Council had appropriately removed the mould from the complainant's bathroom when reported. When it was indicated that this had returned, a full damp inspection was performed by the Council's specialist damp and mould contract. It had been reported that condensation is causing the mould to grow in your bathroom.

The Housing Repairs appropriately inspected the roof and undertook the necessary repairs. However, they were unable to check the loft space as recommended by the specialist damp and mould contractor as the complainant had to leave the property.

A additional inspection was not booked by the Housing Repairs Team which caused delays. The remaining works were booked and undertaken by the Housing Repairs Team.

An apology and £250 compensation was offered and accepted.

Assistant Director Comments

The Council recognises the inconvenience caused by not correctly monitoring the necessity to rebook the loft works.

Complaint Team Recommendations/actions

- The Housing Repairs Team has been reminded of their responsibility to proactively book repairs that cannot be completed on the same day and to monitor these actions until their completion.
- The Housing Repairs Team has been reminded of their responsibility to ensure that they are using accurate information when compiling complaint responses.

4. Complaint against Housing Repairs

Response – 20 working days

Complaint upheld

Complaint

The complainant contacted the Council and complained that the Housing Repairs Team did not deal with an issue of water hammer in timely manner.

Council's response

It was determined that an appropriate level of service was not provided as the Housing Repairs Team did not proactively book an inspection to review the water hammer when this was registered as part of the stage 1 complaint.

Furthermore, the Council's record keeping has been substandard as there is an instance in which the records do not indicate that an inspection took place.

An apology and £750 compensation was offered and accepted. All further works to the water hammer were booked and undertaken.

Assistant Director Comments

The Council recognises the inconvenience caused by not correctly monitoring the necessity to review the water hammer.

Complaint Team Recommendations/actions

- The Housing Repairs Team has been reminded of their responsibility to resolve repairs in the first visit. Where this cannot be undertaken, the Housing Repairs Team have been reminded of their responsibility to proactively book and track the repairs until their completion.

5. Complaint against Housing Repairs

Response – 20 working days

Complaint upheld

Complaint

The complainant contacted the Council and complained that the Housing Repairs Team did not deal with an issue of damp and mould at their property by removing their loft vents. Additionally, a damp survey was undertaken at the property but the results were not shared with the complainant.

Council's response

It was determined that an appropriate level of service was not provided as the Housing Repairs Team had not recorded the reason for the complainant's loft vents being removed in the first instance.

As these vents had been removed, this may have been affecting the damp and mould at the property. These vents were correctly reinstalled. Furthermore, the Council recognises that by not providing the complainant with the outcomes of the damp surveys the complainant was unable to make an informed decision regarding the condensation at the property and how to treat this.

An apology and £2,000 compensation was offered and accepted.

Assistant Director Comments

The Council recognises the inconvenience caused by not sharing the results of the damp surveys and not recording the reasoning for initially removing the vents at the property.

Complaint Team Recommendations/actions

- The Housing Repairs Team has been reminded of their responsibility to provide individuals with the outcome of damp surveys to ensure that they are fully informed of issues identified. This would allow individuals to make informed decisions on how damp and mould can be maintained.

6. Complaint against Housing Repairs

Response – 20 working days

Complaint upheld

Complaint

The complainant contacted the Council and complained that the Housing Repairs Team did not deal with a faulty hot water system in timely manner.

Council's response

It was determined that an appropriate level of service was not provided as there had been protracted delays in Housing Repairs Team repairing the issue with the heating and hot water.

While works had been undertaken to the heating and hot water, these works had failed, and the operatives did not fully repair the issue for a 3-month period. Furthermore, the Housing Repairs Team did not proactively book or monitor the works required to the heating and hot water which further exacerbated the delays in the full repair being undertaken.

The Council recognises that by not repairing the issues in the first instance, this caused significant delays in the heating and hot water working correctly.

An apology and £1,500 compensation was offered and accepted.

Assistant Director Comments

The Council recognises the inconvenience caused by not repairing the hot water system in the first instance.

Complaint Team Recommendations/actions

- The Housing Repairs Team has been reminded of their responsibility to:
- Resolve repairs in the first visit. Where this cannot be undertaken, the Housing Repairs Team have been reminded of their responsibility to proactively book and track the repairs until their completion.
- Ensure that works are booked in a timely manner to ensure that these are completed promptly.

7. Complaint against Housing Repairs

Response – 20 working days

Complaint not upheld

Complaint

The complainant contacted the Council and complained that the Housing Repairs Team did not repair the window locks at their property in a timely manner.

Council's response

This complaint could not be investigated as the complainant had an active disrepair claim open regarding the same issue. The Council's Complaints Policy states:

"A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:

- The issue giving rise to the complaint occurred over twelve months ago.
- Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.
- Matters that have previously been considered under the complaints policy."

Assistant Director Comments

N/A

8. Complaint against Housing Repairs

Response – 20 working days

Complaint not upheld

Complaint

The complainant contacted the Council and complained that the Housing Repairs Team did not deal with a returning leak in timely manner.

Council's response

It was determined that an appropriate level of service was provided as the Housing Repairs Team had attended the complainant's property and neighbour's property in a timely manner to repair the leaks.

There was no evidence to suggest that the Housing Repairs Team had acted inappropriately when responding to the leaks. The leaks had been repaired on the same day or the following day of reporting and remedial works had been undertaken in a timely manner.

While the Council had taken action to work with the tenant regarding the leaks and the issues had been referred to the relevant safeguarding teams, the Council were unable to provide the exact works or outcomes of these actions due to data protection with the complainant.

Assistant Director Comments

The Housing Repairs Team act promptly when the repairs were reported. Additional support was being provided to the tenant and their property where the leaks occurred.

9. Complaint against Housing Repairs

Response – 20 working days

Complaint upheld

Complaint

The complainant contacted the Council and complained that the Housing Repairs Team did not deal with an issue of damp and mould at their property correctly. Furthermore, the decant property offered to them while the damp works were undertaken was not appropriate.

Council's response

It was determined that an appropriate level of service was not provided as the Housing Repairs Team did not offer the complainant an appropriate decant property.

Furthermore, the Housing Repairs Team only offered one option for the decant property despite it not being suitable for the complainant's needs and no further action was taken. This caused the complainant to obtain an alternative arrangement.

The Council recognised that the issue of damp and mould has been persisting at the property for a number of years and it had taken an extended time to resolve this.

While works had been undertaken, follow up actions were required to fully resolve the issues.

An apology and £2,500 compensation was offered and accepted.

Assistant Director Comments

The Council recognises the inconvenience caused by not offering an appropriate decant property in the first instance. Furthermore, the damp and mould issue should not have been delayed in its repair.

Complaint Team Recommendations/actions

- The Housing Repairs Team has been reminded of their responsibility to offer appropriate temporary accommodation in the first instance. Where this cannot be met, the Housing Repairs Team have been reminded to proactively look for alternative arrangements.

10. Complaint against Housing Repairs

Response – 20 working days

Complaint upheld

Complaint

The complainant contacted the Council and complained that the Housing Repairs Team escalated their gas safety checks to the Legal Department following several access issues.

Council's response

It was determined that an appropriate level of service was not provided as the Housing Repairs Teams did not correctly explain the legal letter that was issued to the complainant due to requiring access to their property to ensure it was compliant with gas safety.

While the Council were obligated to issue the letter to ensure that the property was compliant with gas safety, the process and the legal letter could have been explained more clearly by the Housing Repairs Team.

An apology was offered.

Assistant Director Comments

The Council recognises the inconvenience caused by correctly explaining the legal process and the distress this may have caused.

Complaint Team Recommendations/actions

N/A

Housing Income

1. Complaint against Housing Income

Response – 20 working days

Withdrawn

Complaint

The complainant contacted the Council and complained that the Housing Income Team were inappropriately contacting them about their rent account.

Council's response

This complaint was withdrawn during the course of the investigation.

Assistant Director Comments

N/A

Housing Operations

1. Complaint against Housing Operations

Response – 20 working days

Complaint not upheld

Complaint

The complainant contacted the Council and complained that the Housing Operations Team did not correctly investigate their complaints of Anti-Social Behaviour and opened cases against them.

Council's response

It was determined that an appropriate level of service was provided as the Housing Operations Team are obligated to investigate issues of Anti-Social Behaviour when they are raised.

On the occasion that complaints had been raised against the complainant, the Council were required to investigate these issues. There was no evidence to suggest the Housing Operations Team have acted inappropriately when opening Anti-Social Behaviour cases against the complainant.

The issues the complainant had raised had been appropriately investigated. However, due to the lack of evidence, these issues could not be progressed.

Assistant Director Comments

The Council had acted appropriately and inline with Policies to investigate the Anti-Social Behaviour reports.

2. Complaint against Housing Operations

Response – 20 working days

Complaint not upheld

Complaint

The complainant contacted the Council and complained that the Housing Operations Team did not correctly consult them on their Independent Living accommodation transferring to General Needs. Furthermore, the Housing Operations Team had not correctly recorded their medical issues.

Council's response

It was determined that an appropriate level of service was provided as the Council had appropriately consulted on the redesignation of their property from Independent Living to General Needs in 2022.

During the consultation process, the Housing Department offered the complainant alternative accommodation in an Independent Living Scheme. However, the complainant chose to stay at their current property.

The Council had requested applicants to submit new applications on the Homechoice system in order for the most up to date information to be registered and used when determining the new applications.

In this instance, the complainant's application was not updated until April 2025, the Council was unable to use their most up to date information to determine their housing band.

Furthermore, the information that had been submitted did not support that their banding requires increasing.

Assistant Director Comments

The Council had acted appropriately when consulting with the individual.

3. Complaint against Housing Operations

Response – 20 working days

Withdrawn

Complaint

The complainant contacted the Council and complained that the Housing Operations Team had not investigated an issue of cats causing a mess in a communal area.

Council's response

This complaint was withdrawn during the course of the investigation.

Assistant Director Comments

N/A

4. Complaint against Housing Operations

Response – 20 working days

Complaint upheld

Complaint

The complainant contacted the Council and complained that the Housing Operations Team incorrectly removed items from a communal area before the expiry of a formal Notice.

Council's response

It was determined that an appropriate level of service was not provided as the Tenancy Services Team removed items from a communal area before the prescribed deadline had expired.

While the Tenancy Services Team had provided the correct notices, it was not appropriate for the Tenancy Services Team to remove the items before the expiry of the Notice.

An apology was offered.

Assistant Director Comments

The Council recognises the inconvenience and distress caused by removing the items from the communal area before the expiry of the Notice.

Complaint Team Recommendations/actions

- The Tenancy Services Team have changed the process of hand delivering Notices to all residents to ensure that individuals are given the full amount of time of the Notice.
- The Tenancy Services Team have changed the process of removing items stored in the communal areas. Items will now be removed and stored, without being disposed of, until the full amount of time given in the Notice has expired. The Tenancy Services Team will notify residents of where these items have been stored and how to collect them, should they wish to.

5. Complaint against Housing Operations

Response – 20 working days

Complaint upheld**Complaint**

The complainant contacted the Council and complained that the Housing Operations Team delayed a decision as to whether they were able to retain their XL Bully dog at their property.

Council's response

It was determined that an appropriate level of service was not provided as there had been delays in the Council providing the complainant with clarity in the decision made as to whether they were able to keep their XL Bully dog at the property.

The delays to the decision as to whether they were able to keep the dog at the property occurred due to the change in law which did not match the Council's Pet Policy at the time.

The Tenancy Services Team used their discretion to allow the complainant to move into a property and retain the dog.

Furthermore, there was a delay in the Tenancy Options Team registering the complaint.

An apology was offered.

Assistant Director Comments

The Council recognises the inconvenience and distress caused by delay the decision as to whether the complainant's dog could be kept.

Complaint Team Recommendations/actions

- The Tenancy Services Team has been reminded of the importance of escalating complaints in a timely manner and to avoid delays in line with the Complaints Policy and Complaint Code.
- The Tenancy Services Team has been reminded of their responsibility to provide advise regarding tenancy issues in a timely manner.

6. Complaint against Housing Operations

Response – 20 working days

Complaint upheld**Complaint**

The complainant contacted the Council and complained that the Housing Operations Team did not correctly assess their homelessness application.

Council's response

It was determined that an appropriate level of service was provided as the Housing Options Team considered the application in line with the evidence that had been provided.

The evidence provided through Citizens Advice demonstrated that the complainant did not have a local connection with the Council and therefore were not in priority need of housing.

Furthermore, the evidence provided highlighted that the complainant had a local connection with Milton Keynes Council as they had previously resided there for 6 of the last 12 months.

The information provided through Citizens Advice demonstrated that the complainant had a local connection with Milton Keynes Council and they were subsequently referred to them.

Assistant Director Comments

The Council had correctly assessed the complainant's homelessness application in line with Legislation and internal Policies.

7. Complaint against Housing Operations

Response – 20 working days

Complaint upheldComplaint

The complainant contacted the Council and complained that the Housing Operations Team did not correctly assess their housing application.

Council's response

It was determined that an appropriate level of service was not provided as the Housing Allocations Team had not provided the complainant with the appropriate communication surrounding their housing application.

Furthermore, the Housing Allocations Team closed the complainant's application inappropriately due to a misunderstanding surrounding their employment and how it would affect their local connection.

The Housing Allocations Team did not proactively contact the complainant to resolve the confusion surrounding their local connection.

The Council recognised that the application had been delayed due to the Housing Allocations Team not reviewing the application with the updated information for the complainant's local connection.

An apology and £500 compensation was offered and accepted. The housing application was reopened.

Assistant Director Comments

The Council recognises the inconvenience and distress caused by not proactively checking the information provided by the complainant.

Complaint Team Recommendations/actions

- The Housing Allocations Team have been reminded to communicate effectively with individuals.
- The Housing Allocations Team have been reminded to proactively investigate and contact individuals on the Homechoice system where the evidence remains unclear.
- The Housing Allocations Team have been reminded of their responsibility to review applications on the Homechoice system to avoid unnecessary delays.

8. Complaint against Housing Operations

Response – 20 working days

Complaint not upheldComplaint

The complainant contacted the Council and complained that the Housing Operations Team were harassing them by asking them to remove rubbish from their garden, asking them to remove a doorbell camera and wanting to discuss the language used against Council employees.

Council's response

It was determined that an appropriate level of service was provided as the Tenancy Services Team had contacted the complainant for issues relating to their tenancy.

The Tenancy Services Team are obligated to investigate issues when concerns are raised.

As the issue of the doorbell camera, language used to the Housing Repairs Team and the items/rubbish in the complainant's garden were reported, these required investigation by the Tenancy Services Team.

There was no evidence to suggest that the Tenancy Services Team had treated the complainant unfairly or had acted inappropriately when investigating these issues.

Assistant Director Comments

The Council had acted appropriately and in line with Policies to investigate the Anti-Social Behaviour reports.

9. Complaint against Housing Operations

Response – 20 working days

Complaint upheld

Complaint

The complainant contacted the Council and complained that the Housing Operations Team had requested that they stop parking their car on a communal pathway leading to a block of flats. Additionally, the stage 1 complaint response accused them of laying slabs near the pathway to extend it to a driveway.

Council's response

It was determined that an appropriate level of service was not provided as the Housing Department had included factually incorrect information in the stage 1 complaint response.

The Housing Department, as part of the stage 1 complaint response, stated that the complainant had install additional slabs to create a driveway out of the existing pathway. However, these slabs were in place before the start of the complainant's tenancy.

As the slabs were in place before the complainant's tenancy, the Council recognises that this information has given them the impression of being falsely accused of undertaking this action.

There was not evidence to suggest that the Tenancy Services Team have acted inappropriately when requesting that the complainant does not park on the pathway.

The pathway is the communal entrance to the block flats. It has been reported to the Tenancy Services Team that this is causing an obstruction to other residents. As this has been formally reported, the Tenancy Services Team were obligated to investigate this issue.

The Tenancy Services Team had concluded that by parking on the footpath, this is causing an obstruction to the other residents and a request was made that the complainant does not continue to do this.

Assistant Director Comments

The Council had acted appropriately and in line with Policies to request that the complainant does not park on the communal pathway. However, it is recognised that distress was caused by accusing the complainant of creating the driveway in the first instance.

Complaint Team Recommendations/actions

- The Housing Department has been reminded to only include factual information in the responses to complaints.

Environmental Health

1. Complaint against Environmental Health

Response – 20 working days

Complaint not upheld

Complaint

The complainant contacted the Council and complained that the Private Sector Housing Team inappropriately served them with an Improvement Notice due to the condition of the property they rented as a landlord.

Council's response

It was determined that an appropriate level of service was provided as the Private Sector Housing Team have appropriately contacted the complainant following concerns raised by their tenants.

The correspondence between the Private Sector Housing Team and the complainant had been polite and factual and there was no evidence to suggest that any of the correspondence had been inappropriate.

The Private Sector Housing Team used the relevant information, including site visits, information provided by the complainant's tenant and the complainant to form their conclusion.

The Private Sector Housing Team deemed it to be necessary to issue the complainant with an Improvement Notice due to the condition of your property.

The Private Sector Housing Team had issued the complainant with the necessary guidance in order to improve the condition of their property and how to comply with the Improvement Notice.

Assistant Director Comments

The Council had acted appropriately and in line with Policies to investigate the condition of the property.

2. Complaint against Environmental Health

Response – 20 working days

Complaint upheld

Complaint

The complainant contacted the Council and complained that the Environmental Health Team had not investigated their complaints of Anti-Social Behaviour correctly.

Council's response

It was determined that an appropriate level of service was not provided as the Environmental Health Team had not appropriately managed the complainant's expectations in relation to actions that could be undertaken as part of their Anti-Social Behaviour (ASB) case.

Furthermore, there was a delay in the Environmental Health Team issuing a Community Protection Warning (CPW) and Community Protection Notice (CPN) which led to additional delays in the preventative action being undertaken.

Additionally, the Environmental Health and Communities Teams inappropriately passed the responsibility of the case between themselves instead of collaborating more effectively in jointly resolving the issues. This resulted in complainant having to contact multiple different departments which further led to their distress and confusion.

As two teams of the Council, it was a reasonable expectation that one team (albeit a Team that required collaboration from other Council departments) would need to be contacted in order to progress any issues with the ASB case.

An apology and £3,000 compensation was offered and accepted.

Assistant Director Comments

The Council recognises that the appropriate action was not undertaken correctly which led to delays and distress of the complainant.

Complaint Team Recommendations/actions

- The Environmental Health and Communities Teams have been reminded of their responsibility to appropriately communicate with individuals.
- The Environmental Health and Communities Teams have been reminded to appropriately manage an individual's expectations.
- The Environmental Health and Communities Teams have been reminded to appropriately collaborate to ensure that individuals are supported throughout the ASB process.
- The Environmental Health and Communities Teams have been reminded to issue Notices in a timely manner where clear breaches have been identified and informal approaches to resolve matters have failed.
- The Environmental Health and Communities Teams have been reminded of their responsibilities to identify vulnerability as a potential factor in ASB cases. Where vulnerabilities have been identified the Environmental Health and Communities Teams should look to take these into account in expediting any actions in accordance with the Council's policies.

Information Governance

1. Complaint against Information Governance

Response – 20 working days

Complaint upheld

Complaint

The complainant contacted the Council and complained that the Information Governance Team had not released the requested data as part of a Freedom of Information request.

Council's response

It was determined that an appropriate level of service was not provided as the Information Governance Team had incorrectly identified the requested information relating to the outcomes of complaints/accusations made against the Council's Senior Management Team as being exempt due to it containing personal data.

Furthermore, the Information Governance Team did provide the complainant with the correct Decision Notice for this refusal as required by the Freedom of Information Act.

The data was subsequently release as part of the stage 2 complaint response.

An apology was offered to the complainant.

Assistant Director Comments

The Council recognises that the information was incorrectly withheld in the first instance and the correct Decision Notice was not provided which led to confusion.

Complaint Team Recommendations/actions

N/A

Appendix 3

**STAGE 3 – COMPLAINTS TO THE LOCAL GOVERNMENT OMBUDSMAN (LGO)
/HOUSING OMBUDSMAN (HO)****Stage 3 - Ombudsman Complaint****1. Complaint against Communities (complaint concluded in 2024/25)****Complaint not Upheld.**Complaint

The concern raised was that the Council issued a Community Protection Warning, followed by a further warning of a Community Protection Notice, without any evidence against the complainant.

Ombudsman's conclusion

The LGO found that a Community Protection Notice was issued, which could have appealed in court. Based on this evidence, the LGO have discontinued the investigation.

2. Complaint against Bereavement Services (complaint concluded in 2024/25)**Complaint not Upheld.**Complaint

The concern raised was that the complainant's memorial garden on their father's grave needed to be removed.

Ombudsman's conclusion

The LGO found that there was insufficient evidence of fault by the Council to warrant an investigation.

3. Complaint against Housing Repairs (complaint concluded in 2024/25)**Complaint Upheld.**Complaint

The concern raised was the Housing Repairs Team handling of reports of a drain blockage.

Ombudsman's conclusion

The HO found that while the Council's repair responses were mostly timely, its failure to follow up a repair following access issues caused distress and inconvenience to the resident. It also failed to consider an escalated response given the repeated issue and the

resident's vulnerabilities. Finally, it failed to address the resident's concerns about communication and the safety of their property.
The HO ordered the Council to undertake a £300 compensation payment which has been completed.

Report of the Deputy Chief Executive

Work Programme

1. Purpose of Report

To consider items for inclusion in the Work Programme for future meetings.

2. Recommendation

The Committee is asked to consider the Work Programme and RESOLVE accordingly.

3. Detail

Items which have already been suggested for inclusion in the Work Programme of future meetings are given below. Members are asked to consider any additional items that they may wish to see in the Programme.

17 November 2025	<ul style="list-style-type: none">• Annual Audit Letter – External Auditors Report on the Statement of Account 2024/25• Internal Audit Progress Report• Review of Strategic Risk Register• Complaints Report Quarter 2• Annual Constitution Review• Code of Conduct Review
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4. Financial Implications

The comments from the Head of Finance Services were as follows:

There are no financial implications as a result of this report.

5. Legal Implications

The comments from the Monitoring Officer / Head of Legal Services were as follows:

The terms of reference are set out in the Council's constitution. It is good practice to include a work programme to help the Council manage the portfolios.

6. Human Resources Implications

The comments from the Human Resources Manager were as follows:

Not applicable.

7. Union Comments

The Union comments were as follows:

Not applicable.

8. Climate Change Implications

The climate change implications are contained within the report.

9. Data Protection Compliance Implications

This report does not contain any OFFICIAL(SENSITIVE) information and there are no Data Protection issues in relation to this report.

10. Equality Impact Assessment

As this is not a change to policy and no Equality Impact Assessment is required.

11. Background Papers

Nil.

Document is Restricted

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