



Friday, 4 March 2022

Dear Sir/Madam

A meeting of the Governance, Audit and Standards Committee will be held on Monday, 14 March 2022 in the Council Chamber, Council Offices, Foster Avenue, Beeston NG9 1AB, commencing at 7.00 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: E Williamson (Chair)
S A Bagshaw (Vice-Chair)
E Cubley
M Handley
H G Khaled MBE
J M Owen
J C Patrick

J P T Parker
M Radulovic MBE
H E Skinner
P D Simpson
I L Tyler
D K Watts

A G E N D A

1. APOLOGIES

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

2. DECLARATIONS OF INTEREST

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 5 - 8)

The Committee is asked to confirm as a correct record the minutes of the meeting held on 29 November 2021.

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

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4. REVIEW OF PARLIAMENTARY CONSTITUENCIES (Pages 9 - 50)

To inform the Committee on the progress of the review of parliamentary constituency boundaries being carried out by the Boundary Commission for England.
5. REVIEW OF THE CODE OF CONDUCT AND ARRANGEMENTS FOR DEALING WITH CODE OF CONDUCT COMPLAINTS (Pages 51 - 110)

To seek approval for the amendments to the Code of Conduct and Arrangements for dealing with Code of Conduct complaints, prior to recommending to Council for adoption.
6. STATEMENT OF ACCOUNTS 2021/22 - ACCOUNTING POLICIES (Pages 111 - 132)

To provide Members with any updates made to the Council's accounting policies in relation to the production of the 2021/22 financial statements.
7. STATEMENT OF ACCOUNTS 2021/22 - UNDERLYING PENSION ASSUMPTIONS (Pages 133 - 136)

To provide Members with information regarding the assumptions made by the pension fund actuary in calculating the IAS19 figures to be reported in the 2021/22 Statement of Accounts.
8. REVIEW OF STRATEGIC RISK REGISTER (Pages 137 - 146)

To approve the amendments to the Strategic Risk Register and the action plans identified to mitigate risks.
9. INTERNAL AUDIT PLAN 2022-23 (Pages 147 - 154)

To approve the Internal Audit Plan for 2022/23
10. INTERNAL AUDIT PROGRESS REPORT (Pages 155 - 170)

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

11. REPORT OF THE MONITORING OFFICER (Pages 171 - 182)

The Housing Ombudsman has made a finding of injustice in respect of a lack of repairs undertaken to a complainant's property.

12. WORK PROGRAMME (Pages 183 - 184)

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

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GOVERNANCE, AUDIT AND STANDARDS COMMITTEE

MONDAY, 29 NOVEMBER 2021

Councillors: S J Carr (Substitute)
E Cubley
M Handley
J M Owen
J C Patrick
P J Owen (Substitute)
J P T Parker
M Radulovic MBE
H E Skinner
P D Simpson
C M Tideswell (Substitute)
I L Tyler
D K Watts

Apologies for absence were received from Councillors E Williamson, S A Bagshaw and H G Khaled MBE.

25 APPOINTMENT OF CHAIR

RESOLVED that H Skinner be appointed chair for the meeting.

26 DECLARATIONS OF INTEREST

Councillor M Handley declared a non-pecuniary interest in agenda item due to living in one of the areas suggested for change. Minute number 28 refers.

27 MINUTES

The minutes of the meeting held on 20 September 2021 were confirmed and signed as a correct record.

28 COMMUNITY GOVERNANCE REVIEW

The Committee considered the draft recommendations to be put forward for consultation as part of the Community Governance Review (CGR) which started in June 2021.

It was noted, there would be a 3 month consultation period on the draft recommendations from 1 December 2021 to 28 February 2022, after which there would be 2 months for the Council to consider the comments received and prepare and publish the final recommendations. The final recommendations would be considered by Council and a decision made on arrangements with a resolution to make a Reorganisation Order in May 2022.

RESOLVED that the draft recommendations put forward by the Task and Finish Group be approved.

29 AUDIT OF ACCOUNTS 2020/21 AND ASSOCIATED MATTERS

The Committee noted the letter of representation of the Statement of Accounts for 2020/21 and considered the Audit Completion Report from the Council's external auditors.

It was noted that the auditors had yet to complete their work in respect of the Value for Money conclusion for the year ended 31 March 2021. At the time of preparing their report, Mazars had not identified any significant weaknesses in the Council's arrangements that require it to make a recommendation.

RESOLVED that:

- (i) the Statement of Accounts 2020/21 and the letter of representation as circulated with this agenda be approved; and**
- (ii) delegation be given to the Deputy Chief Executive and Section 151 Officer along with the Chair of this Committee to approve any minor changes required to the Statement of Accounts 2020/21, with any substantial changes being reported back to Committee.**

30 GOING CONCERN STATEMENT

Members noted the assessment by the designed Section 151 Officer of the Council's Going Concern status. The concept of a 'going concern' assumes that an authority, its functions and services would continue in operational existence for the foreseeable future. This assumption underpins the accounts drawn up under the Local Authority Code of Accounting Practice and was 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).

31 INTERNAL AUDIT PROGRESS REPORT

The Committee noted the recent work completed by Internal Audit. Internal Audit had reviewed progress made by management in implementing agreed actions within six months of the completion of the respective audits.

It was noted that there is flexibility within audit planning arrangements to allow for audits to be deferred.

RESOLVED that the revisions to the Internal Audit Plan for 2021/22, as set out, in appendix 2 be approved.

32 GOVERNANCE ARRANGEMENTS FOR THE BEESTON TOWN CENTRE DEVELOPMENT PROJECT

A report was provided to members on the governance arrangements for the Beeston Town Centre Development project. Internal Audit had completed a review of the governance arrangements which have operated through the life of the Beeston Town Centre Development project.

33 REVIEW OF STRATEGIC RISK REGISTER

Members received an update on the Strategic Risk Register and the action plans identified to mitigate risks.

The Risk Management Strategy, as revised in December 2018, aims to improve the effectiveness of risk management across the Council. Effective risk management would 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.

RESOLVED that the amendments to the Strategic Risk Register and the actions to mitigate risks as set out in appendix 2 be approved.

34 REPORT OF THE MONITORING OFFICER

Members noted the Housing Ombudsman recommendations in relation to a finding of injustice in respect of a lack of repairs undertaken to a complainant's shower. It was noted that all the recommendations had been completed.

35 WORK PROGRAMME

Members considered the Work Programme.

RESOLVED that the Work Programme be approved.

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Report of the Executive Director

REVIEW OF PARLIAMENTARY CONSTITUENCIES

1. Purpose of report

To inform the Committee on the progress of the review of parliamentary constituency boundaries being carried out by the Boundary Commission for England (BCE).

2. Background

At its meeting on 19 July 2021 the Committee considered the arrangements for the review of parliamentary constituency boundaries currently taking place and a response to the BCE's proposals relating to Broxtowe. The comments submitted on behalf of Broxtowe Council are set out in Appendix 1. Other representations received during the first consultation period relating to the proposed Broxtowe Constituency are set out in Appendix 2. Full details are available at <https://www.bcereviews.org.uk/search/comments>. There is now a further six-week consultation period from 22 February to 4 April 2022 during which time comments can be submitted on the representations submitted.

Recommendation

That the Committee CONSIDERS whether to support any of the representations received by the Boundary Commission during the first stage consultation as set out in Appendix 2 and RESOLVE accordingly.

Background papers: Nil

Comments submitted to the Boundary Commission during the first stage consultation

Broxtowe Borough Council wishes to make the following comments in respect of the proposed boundary for the Broxtowe Constituency:

1. Broxtowe is a distinct community and not simply an extension of Nottingham.
2. Broxtowe has never been one constituency for parliamentary purposes since the constituencies were redrawn in the 1970s.

The Council believes that:

1. each of Nuthall, Kimberley and Beeston are distinct communities in their own right, and that the boundaries of these are well understood.
2. residents in Beeston do not see themselves simply as a part of Nottingham, but rather as residents of Beeston.
3. as the whole of Broxtowe cannot form one Parliamentary Constituency it is preferable for entire communities to be in the same constituency.

The Council notes that the MP for Broxtowe has proposed an alternative arrangement whereby Kimberley and Nuthall are retained in the Broxtowe Constituency and that parts of Beeston are placed into the Nottingham South constituency.

Broxtowe Borough Council regrets that the rules on constituency size mean that it is unavoidable that part of Broxtowe Borough will not be in the Broxtowe Constituency.

The Council therefore supports in principle the proposed changes to the Broxtowe Constituency boundaries which have been proposed by the Boundary Commission and opposes any alternative proposal which would result in Beeston being split into two for parliamentary purposes.

Comments received during the stage 1 consultation

I strongly believe Beeston should be in Nottingham South. Broxtowe is longer and thinner, and the areas of awsworth, greasley have similar needs, whereas Beeston is a university town and has similar more urban needs to parts of Nottingham South.

Would like to see the ten or so houses at the bottom of [RD:13] be moved in line with the rest of the Vale. As a resident here I do not feel the current boundary means my councillors are representing what is important to me. Similarly, we have spent years battling computer systems that think our postcode is City rather than Broxtowe so reporting a missed bin collection (happens quite frequently as these houses have a different collection day and service to the rest of the Vale), applying for schools, registering for the refuse site, etc is a nightmare and always requires multiple phone calls and escalations/exceptions... we have recently got this changed on Broxtowe Council's website although ironically your system is saying NG8[RD:3] is part of Nottingham South but the boundary actually cuts before it. Surely it would be more efficient for this to be part of City - aligned bin collections, highways maintenance (the other side of the road and the central verge gets mowed and leaves collected more frequently as a City area than the verge in front of my house which is Broxtowe). Happy to provide further input as part of any consultation.

Much of Beeston is heavily urbanised unlike Eastwood. Its population like city south (Lenton & clifton) is made up of a mix of students& local residents. key local issues are similar such as rising house prices & rent in relation to the number of student HMO. Much like city demand for working age council housing in beeston far outstrips demand compared to other parts of broxtowe. In beeston much of the buses are run NCT. Im not a resident of Eastwood but like Kimberly and Much of the northern Derbyshire/Nottinghamshire borderland is far more rural. It lacks investment and services. There is a mix of deprivation and land owners. A lack of transport. In a first past the post system grouping similar areas to improve representation and push local issues is surely key?

From a representation stand point it makes far more sense for Beeston to become part of city south constituency My health services are that of city south constituency. I walk my dog mostly in city.I use a city based social care agency. I living on the border & I say I live in Nottingham. Although city council mismanaged its finances, Nottingham City is underboundaried leading to reduced revenue from council tax. Beeston and places like West Bridgeford massively still use city council services. I'm sure others have left comments that are more facts driven.

Combining Beeston, as a fast developing urban area with strong transport links to the city, with some rural areas like Eastwood located remotely to the north with a very different population and environment is unacceptable. This forms a constituency for which it would be impossible to represent with a single representative, due to the fundamental differences and in the areas covered.

The current Broxtowe boundary does little to support the residents in the north of Broxtowe as it sits both far south and far north of the city of Nottingham. Far better to split Broxtowe geographically at the A610 with Eastwood, Giltbrook, Newthorpe, Watnall and Nuthall together for border change.

I am absolutely appalled at the proposed reorganisation. Kimberley and Nuthall are very much part of Nottinghamshire and have no link to places in Nottingham City like Bestwood and Aspley. It is ridiculous to try and combine these areas, as part of the Broxtowe constituency we have done quite nicely, I fail to see how lumping is in with some labour voting parts of the city would be a positive or remotely necessary move.

The proposed 'Nottingham North and Kimberley' is an artificial grouping of two parts of Nottinghamshire - in separate local authorities - which have little relation to each other, bar being adjacent. The neighbourhoods consisting of the City of Nottingham's northwest have more things to set them apart from the portions of Broxtowe with whom it may share an MP, than what unites them, especially regarding sociological, economic and transportation issues. Indeed, it is difficult for some parts of the constituency to even reach each other via public transport; areas like Bulwell, Top Valley and Bestwood require taking a convoluted route (via the city centre, in a reconstituted Nottingham East) to even get to Nuthall and Kimberley, and that can take upwards of an hour. Issues regarding the greenbelt and giant housing developments are far more likely to concern Kimberley and (Old) Nuthall residents than those of Aspley and Basford, for instance. Sociologically, those from Kimberley and Nuthall may identify as being from 'Nottingham', but they are obviously not, and only do it for convenience, especially for those not from Nottinghamshire.

Considering the inherent urban-suburban mixture of issues, it will also be harder for one MP to represent both parts of the proposed constituency well. For instance, issues such as transportation, housing, schools, retail and recreation manifest themselves dramatically differently in urban areas and their commuter towns. Kimberley and Nuthall are also considerably wealthier than their deprived Nottingham counterparts.

One must also note that the constituencies of 'Nottingham East' and 'Nottingham South' do not gain neighbourhoods from the surrounding Gedling, Rushcliffe, and Broxtowe local authorities, and are therefore solely within the City of Nottingham's boundaries, unlike the contrived 'Nottingham North and Kimberley'. It would be much better to alter the existing Nottingham constituencies more finely to apportion the city's population equally; the ensuring boundaries may have slightly lower populations than the surrounding ones covering Nottinghamshire (i.e. the status quo), but would adhere far more to residents' perception of what constitutes 'Nottingham'.

Unless the House of Commons adopts proportional representation via the single transferable vote (as used for the Northern Ireland Assembly and local councils in Northern Ireland and Scotland) or the additional member system (as used for the Scottish Parliament, Welsh Parliament, and London Assembly), there will always be a significant risk of gerrymandering and malapportionment. Using first-past-the-post perpetuates voter frustration (especially in areas where the winning MP can have significantly less than 50% of the vote) and results in massively disproportionate results - the UK is a significant outlier within the continent of Europe for this. Stop changing boundaries. If it ain't broke don't fix it. We don't pay people to sit in offices all day thinking up stupid ideas.

With regards to the constituency of Broxtowe, where i am a resident the proposed changes are completely unfair. The area we would be gaining to the north are smaller villages with an older and more well off population, and a population the historically votes right (including a bnp mp a few elections ago) and the areas were losing are formed of many lower income areas formed of large council estates that generally vote left. In doing this, the voting of the area is almost definitely going to skew further right towards the conservatives, which is wholly unfair and, in my opinion, bordering on gerrymandering.

I oppose changes to constituency boundaries. Moving Kimberley into Nottingham North would change a Labour seat held by a bright and progressive MP into a marginal. That feels deliberate to me. Changes to boundaries without serious electoral reform is nothing more than gerrymandering!

I object to this amended to the boundaries. Broxtowe Borough currently provides excellent services unlike Nottingham City council which has appalling services and charge higher council tax for an inferior service. This is not political its about Nottingham City wanting to develop more land and gain more income at our expense.

Moving the boundary for the Watnall area to include it as part of Nottingham city will reduce the level of service provided and devalue the properties overall. The current providers Broxtowe Council are much better placed to support this community. Nottingham City is already too large and as a unitary authority fails to provide for the current population it covers. It makes no sense to increase its boundaries just to even out political spread. It would be better to increase Broxtowe's boundaries and reduce the cities. I do not support this proposal at all. It's short-sighted and obviously politically driven. It will dramatically effect service level for all residents.

I believe that creating a new constituency of Nottingham North and Kimberley will cause unnecessary confusion regarding multi authority responsibilities ie city/unitary split, county and borough & unitary services in same parliamentary Constituency

Kimberley and Nuthall should not be moved out of Broxtowe. It is part of the identity of the area. Kimberley and Bramcote leisure centres are linked which means my membership allows me to use both because they are in Broxtowe. Even though I live in Kimberley my son goes to swimming lessons at the Bramcote centre. Being in Broxtowe feels like the suburbs of Nottingham as we are on the outskirts but moving into Nottingham North worries me as it brings us into the city. I worry what more development this will bring to where I live. We are in a beautiful green area but with good transport links to Nottingham and are already being invaded by HS2. I don't want to live in the city of Nottingham. I want to live in the outskirts with all of the perks this brings. My partner has volunteered in Broxtowe and we have enjoyed becoming part of the wider community. A change of boundary isn't just about geography but it will break up established communities who are supporting many people.

Would this change School holiday term dates? This will affect many families as many people choose Kimberley for their home due to the proximity to the M1 and travel to different counties who maintain the more traditional school holiday dates than Nottingham do.

I think this is a potential sneaky political move for certain political parties to gain more seats and therefore gain more power.

The existing boundaries for Broxtowe should be preserved, to maintain community and constituency ties between Kimberley, Nuthall, and Wathall with Bolsover, and since Broxtowe is already within the statutory electorate range - there is no need to change the boundaries.

The new division of areas appear to be geographically haphazard. They show no consideration for natural locationally grouped areas. Surely the numbers of voters can be achieved for an area without ridiculous elongated wards or random spikes encompassing a small group of houses.

I have some concern about the proposals for Broxtowe. Broxtowe has for some time, geographically, been a long thin North to South constituency which, in Nottingham, is problematic. There are more ex-mining areas in the North with villages around them supporting older residents (see Awsworth, Eastwood) - far different from the needs of Beeston - with direct links to London, young professionals, and students. Indeed, an MP for Broxtowe has to essentially balance two very different sets of needs. While this has been the case, the one positive of the previous boundary was that this split was relatively even. The inclusion of residents living near Kimberley and Eastwood ensured, to some degree, that the needs of constituents in the North did not fall away to the needs of those in the South. However, I worry that the new boundary fails to protect this dynamic. The northern section of Broxtowe would become a meagre strip of land that looks like an afterthought, included only to boost the numbers to the needed level. Being outnumbered will no doubt mean the residents of Awsworth and surrounding villages will have their voice stripped away; they become the tail being wagged by the Beeston based dog. I feel strongly a much wiser split, more in keeping with the different populations and needs, would be to ensure Awsworth is linked closely with Eastwood and Kimberley - which is exactly the case in daily life. Our buses connect Eastwood, Kimberley and Awsworth (not Beeston), our jobs and facilities are between Kimberley, Eastwood and Awsworth (see Giltbrook retail park; Beeston), our families for generations are across these mining areas. The constituency has never been ideal in this regard, but these changes leave Awsworth isolated and vulnerable, beholden to the views of a more transient population with very constraining opportunities, jobs, wealth, housing options and services. Please consider

demographic indicators, social deprivation indicators, the needs of the population, and reconsider these proposals.

I just cannot see how the Eastwood area and Beeston are connected. It would make much more sense to enlarge the Beeston council towards the city centre, Dunkirk & some of Lenton and spread the Notts North Borough to encompass Eastwood. Or include Long Eaton with Beeston and let Ilkeston, Eastwood and Trowel be in the same council.

Really can't see how this is going to work. There are so many diverse areas in this proposed "new" constituency. How can a fairly rural area like this part of Broxtowe (constituency now) be put in with a small town like Bulwell which is in the City of Nottingham? No sense at all!

I have lived at my current address in Nuthall for 40 years and have not had any issues with the services I get from Broxtowe Borough Council. A move into the Nottingham City boundary would be a backward step in my opinion. Nottingham City has never been run well and the recent fiasco with Robin Hood Energy was the last straw. In my opinion, moving the boundary to encompass Nuthall, Kimberley and Watnall is purely for political reasons and totally unnecessary. It will probably affect my insurance premiums, Council Tax and services in an adverse way. I will certainly consider moving out of the village if this change goes ahead.

Broxtowe CC: I am concerned by the Commission's proposals to include the wards of Kimberley, Nuthall East and Strelley and Watnall and Nuthall West into the Nottingham North Constituency. Kimberley is a market town separated from the Nottingham City conurbation by green fields and likewise Nuthall is rural in character and would not fit easily into an urban constituency. By contrast, parts of Beeston are seen much more as a continuation of Nottingham City having strong links to the University and key businesses meaning it is often difficult to distinguish where one ends and the other begins. I would therefore propose a Broxtowe constituency that instead excludes the three Beeston wards of Beeston Central, Beeston North and Beeston Rylands. Broxtowe would therefore comprise of the following wards: Attenborough and Chilwell East, Awsworth Cossall and Trowell, Beeston West, Bramcote, Brinsley, Chilwell West, Eastwood Hall, Eastwood Hilltop, Eastwood St Mary's, Greasley, Kimberley, Nuthall East and Strelley, Stapleford North, Stapleford South East, Stapleford South West, Toton and Chilwell Meadows, Watnall and Nuthall West. This would give Broxtowe CC an electorate of 73,378

Ilkeston and Long Eaton CC: No objections to the proposed boundaries however I believe the name change is not necessary. The name Erewash has been in use since 1983 as the constituency comprises the majority of the Borough Council area. The name Ilkeston and Long Eaton would also likely exclude the other towns and villages in the constituency I believe that the name Erewash CC should be retained for this proposed constituency.

Nottingham East BC: would suggest a slightly altered Nottingham East constituency to comprise of the wards of Berridge, Castle, Dales, Hyson Green, Mapperley, Sherwood and St Ann's. This would give Nottingham East BC and electorate of 75,327

Nottingham North BC: In contrast to the commission's proposals, I would propose a Nottingham North constituency to be contained entirely within the City of Nottingham and comprise of the following wards: Aspley, Basford, Bestwood, Bilborough, Bulwell, Bulwell Forest and Leen Valley. This would give Nottingham North BC and electorate of 73,415

Nottingham South BC: Due to the exclusion of the 3 Beeston wards from Broxtowe CC, I would suggest they instead be included with the proposed Nottingham South BC. Beeston, in contrast to Kimberley and Nuthall is much more urban in character and although a town in its own right, it much more a part of the Nottingham City conurbation due to strong transport links and the nearby university. I would propose that this constituency comprise of the following wards: Clifton East, Clifton West, Lenton and Wollaton East, Meadows, Radford and Wollaton West from the City of Nottingham and the wards of Beeston Central, Beeston North and Beeston Rylands from Broxtowe Borough. This would give Nottingham South BC and electorate of 76,259.

It seems strange to have such a long thin North-South constituency. Many people in Chilwell and Beeston work within the Nottingham City boundary and therefore have much more in common with the City residents than they do with the north of the proposed constituency. Even those who do not work in the City will use it for shopping or recreation. I would suggest that a "short, broad" constituency extending eastwards into Lenton and/or Radford would be more consistent. If the Commission considers that constituency boundaries should align with local Government areas, then perhaps it is time to reconsider the latter as well.

I am the Nottinghamshire County Councillor for Nuthall and Kimberley and the Broxtowe Borough Councillor for Nuthall East and Strelley. I wish to strongly object to your proposals to include Nuthall, Kimberley and Strelley into the Nottingham City parliamentary seat which you propose to call Nottingham North and Kimberley. This is clearly all to do with numbers and nothing to do with community of interest considerations. Even in the proposed name you separate Kimberley from Nuthall both of which have almost identical populations and are communities within themselves. Nuthall, Kimberley and Strelley have nothing in common with the City of Nottingham. Indeed many residents tell me that they have moved into Nuthall or Kimberley to get away from any influence or association with the City. Based purely on a numbers scenario you wish to push them back against their wishes. Both Nuthall and Kimberley are historical communities based on well established parish councils. Strelley has a regular parish meeting rather than a parish council. No such arrangement exists in the City and these locally based councils act as cohesive cement ensuring that the communities they represent are well represented. An MP covering these areas is unlikely to have any great interest in these communities since the overwhelming components of the constituency will be formed from Nottingham City which as a unitary authority operates in a different way. The only thing that connects Nuthall and Kimberley to the rest of the proposed constituency is the A610. There is a clear demarcation, not only physically between these two communities and the City but, also in outlook aspiration and achievement. The issues of my two communities are far different from those of the City and I have no doubt they would be forgotten as being peripheral to the rest of the proposed constituency.

If parts of Broxtowe were to be included in any City based constituency there are other more logical places, such as Beeston which has a large student population that looks obviously to Nottingham University and the City for its requirements. This is in sharp contrast to Nuthall and Kimberley who look away from the City for their facilities. Children attend local primary schools in Nuthall and Kimberley, the vast majority of secondary pupils attend the Kimberley Academy. Leisure activities are provided by the Kimberley Leisure Centre and the community hubs/parish halls provide appropriate venues for many other activities that occur within the two communities. Residents look to the Kimberley shopping centre for most of their everyday needs and for other items they will go to the Giltbrook retail park which is just down the road but well outside of the City. There is a vibrant night life in Kimberley and restaurants in Nuthall which cater for the local population. Your proposals would obliterate the identities of the three communities that I represent as they would simply become part of greater Nottingham. That is not what people want. At the moment within the current Broxtowe constituency they are part of a collection of individual communities supported by long standing parish councils. This has been recognised quite easily by the various members of parliament because each community within the Broxtowe constituency is on an equal footing i.e. first among equals. Your proposals would bring that to an end and destroy what has been in place for over 100 years, thriving individual communities, which whilst having grown and developed, have managed to retain that village and community way of life. The communities of Nuthall, Kimberley and Strelley have never been part of the City or part of a parliamentary seat including Nottingham. They do not want to be part of such a constituency going forward. They are separate independent communities with a pedigree going back for many years. Please rethink this ludicrous proposal that you have put in front of us. To assist the Commission I append a suggested alteration to the Commission's proposals that will enable to suggestions that I have made to be implemented.

Broxtowe - TOTAL 73378

Bramcote 5838 Broxtowe
Attenborough and Chilwell East 5711 Broxtowe
Awsorth, Cossall and Trowell 4151 Broxtowe
Beeston West 4154 Broxtowe
Chilwell West 5783 Broxtowe
Greasley 5449 Broxtowe
Kimberley 5299 Broxtowe
Nuthall East and Strelley 4082 Broxtowe
Stapleford North 3557 Broxtowe
Stapleford South East 3968 Broxtowe
Stapleford South West 4035 Broxtowe
Toton and Chilwell Meadows 6349 Broxtowe
Watnall and Nuthall West 3660 Broxtowe
Eastwood Hilltop 3967 Ashfield
Eastwood St Mary's 3494 Ashfield
Eastwood Hall 1972 Ashfield
Brinsley 1909 Ashfield

Nottingham South - TOTAL 6259

Wollaton West 11153 Nottingham South
Lenton and Wollaton East 16041 Nottingham South
Meadows 6485 Nottingham South
Clifton East 12225 Nottingham South
Clifton West 7899 Nottingham South
Radford 10332 Nottingham South
Beeston Rylands 3538 Broxtowe
Beeston Central 4271 Broxtowe
Beeston North 4315 Broxtowe

Nottingham East - TOTAL 75327

Mapperley 10767 Nottingham East
Hyson Green and Arboretum 13302 Nottingham East
St Ann's 12264 Nottingham East
Sherwood 11074 Nottingham East
Berridge 10115 Nottingham East
Dales 10720 Nottingham East
Castle 7085 Nottingham South

Nottingham North
Bilborough 11941 Nottingham North
Aspley 10759 Nottingham North
Basford 11200 Nottingham North
Bestwood 11554 Nottingham

RE: proposals for ASHFIELD, NOTTINGHAM NORTH, BROXTOWE, GEDLING.

I believe that the initial proposals for these Nottinghamshire constituencies can be improved on, in order to keep the Kimberley ward in a fully shire constituency and to put the Bestwood & St Alban's ward with territory with which it has closer ties on account of schools whose intakes are mainly from the city of Nottingham. My solution is as follows:

1) The proposed ASHFIELD (71,703), but retaining the ward of Brinsley (1,909), giving a total electorate of 73,612.

2) With Brinsley removed, reducing BROXTOWE to 70,552, the Kimberley ward can be added (5,299) to produce a total BROXTOWE electorate of 75,851.

This causes less disruption to the current BROXTOWE constituency.

3) Without the Kimberley ward, the proposed NOTTINGHAM NORTH needs an alternative extra ward to meet the quota, being down at 69,216. This can be easily achieved by adding on the Bestwood St Albans ward (3,967) which contains residential areas continuous with the north-eastern corner of the current seat, and contains schools, not least a secondary school, with a predominantly City as opposed to county intake. Adding this ward gives us a NOTTINGHAM NORTH with an electorate of 73,183.

4) GEDLING is still within the quota range without the Bestwood St Albans ward, which has closer links with the north side of Nottingham than with suburbs to its east. Its proposed electorate is reduced to a perfectly acceptable 71,828.

I submit the above for your consideration.

PARLIAMENTARY BOUNDARY CHANGE FOR NUTHALL, STRELLEY, WATNALL AND KIMBERLEY

I am a Broxtowe Borough Councillor for Nuthall West and Watnall. The proposals to include Nuthall and Watnall into the Nottingham City Parliamentary seat is proposed to be called Nottingham North and Kimberley. This is clearly all to do with numbers and nothing to do with community of interest considerations. Even in the proposed name Kimberley is separated from Nuthall both of which have almost identical populations and are communities within themselves. Nuthall and Watnall have nothing in common with the City of Nottingham. Indeed many residents say that they have moved into Nuthall or Watnall to get away from any influence or association with the City. Based purely on a numbers scenario it is intended to push them back against their wishes. These areas are historical communities based on well established Parish Councils. No such arrangement exists in the City and these locally based councils act as cohesive cement ensuring that the communities they represent are well represented. An MP covering these areas is unlikely to have any great interest in these communities since the overwhelming components of the constituency will be formed from Nottingham City which as a unitary authority operates in a different way. The only thing that connects Nuthall and Kimberley to the rest of the proposed constituency is the A610. There is a clear demarcation, not only physically between these two communities and the City but, also in outlook aspiration and achievement. The issues of these two communities are far different from those of the City and I have no doubt they would be forgotten as being peripheral to the rest of the proposed constituency.

If parts of Broxtowe were to be included in any City based constituency there are other more logical places, such as Beeston which has a large student population that looks obviously to Nottingham University and the City for its requirements. This is in sharp contrast to Nuthall and Kimberley who look away from the City for their facilities. Children attend local primary schools in Nuthall and Kimberley; the vast majority of secondary pupils attend the Kimberley Academy. Leisure activities are provided by the Kimberley Leisure Centre and the community hubs/parish halls provide appropriate venues for many other activities that occur within the two communities. Residents look to the Kimberley shopping centre for most of their everyday needs and for other items they will go to the Giltbrook retail park which is just down the road but well outside of the City. There is a vibrant night life in Kimberley and restaurants in Nuthall which cater for the local population.

Your proposals would obliterate the identities of the three communities that I represent as they would simply become part of greater Nottingham. That is not what people want. At the moment within the current Broxtowe constituency they are part of a collection of individual communities supported by long standing parish councils. This has been recognised quite easily by the various members of parliament because each community within the Broxtowe constituency is on an equal footing i.e. first among equals. Your proposals would bring that to an end and destroy what has been in place for over 100 years, thriving individual communities, which whilst having grown and developed, have managed to retain that village and community way of life. The communities of Nuthall and Watnall have never been part of the City or part of a parliamentary seat including Nottingham. They do not want to be part of such a constituency going forward. They are separate independent communities with a pedigree going back for many years. Please rethink this ludicrous proposal that you have put in front of us.

I am fully supportive of the need to change the constituency areas in accordance with numbers. Breaking us away from Broxtowe - I do not have a problem with. However, we moved from the city to the county in order to have the same school holidays as my children. (I work in Nottinghamshire as a teacher) we paid a premium price in order to move to the county. I am appalled. Are we going to have to continue moving every few years every time you decide to review! Equally the cost of insurances in the city is higher and I have no doubt there will be a negative affect on our house prices. Surely Nuthall (a village) Watnall and Kimberley could be encompassed with another boundary in the COUNTY. How can a Village be in a city? It is non sensical.

The proposals to include Nuthall, Strelley, Watnall and Kimberley into the Nottingham City Parliamentary seat is proposed to be called Nottingham North and Kimberley. This is clearly all to do with numbers and nothing to do with community or interest considerations. Even in the proposed name Kimberley is separated from Nuthall both of which have almost identical populations and are communities within themselves. Nuthall, Kimberley Strelley and Watnall have nothing in common with the City of Nottingham. Indeed many residents say that they have moved into these areas to get away from any influence or association with the City. Based purely on a numbers scenario it is intended to push them back against their wishes. Nuthall, Kimberley and Watnall are historical communities based on well established Parish Councils. Strelley has a regular Parish Meeting rather than a Parish Council. No such arrangement exists in the City and these locally based councils act as cohesive cement ensuring that the communities they represent are well represented. An MP covering these areas is unlikely to have any great interest in these communities since the overwhelming components of the constituency will be formed from Nottingham City which as a unitary authority operates in a different way. The only thing that connects Nuthall, Kimberley, Strelley and Watnall to the rest of the proposed constituency is the A610. There is a clear demarcation, not only physically between these communities and the City but, also in outlook aspiration and achievement. The issues of these communities are far different from those of the City and there is no doubt they would be forgotten as being peripheral to the rest of the proposed constituency. If parts of Broxtowe were to be included in any City based constituency there are other more logical places, such as Beeston which has a large student population that looks obviously to Nottingham University and the City for its requirements. This is in sharp contrast to Nuthall, Strelley, Kimberley and Watnall who look away from the City for their facilities. Children attend local primary schools in Nuthall and Kimberley; the vast majority of secondary pupils attend the Kimberley Academy. Leisure activities are provided by the Kimberley Leisure Centre and the community hubs/parish halls provide appropriate venues for many other activities that occur within the communities. Residents look to the Kimberley shopping Centre for most of their everyday needs and for other items they will go to the Giltbrook Retail Park which is just down the road but well outside of the City. There is a vibrant night life in the area which caters for the local population. The proposals would obliterate the identities of these communities as they would simply become part of greater Nottingham. At the moment within the current Broxtowe constituency they are

part of a collection of individual communities supported by long standing Parish Councils. This has been recognised quite easily by the various members of Parliament because each community within the Broxtowe constituency is on an equal footing ie first among equals. The proposals would bring that to an end and destroy what has been in place for over 100 years, thriving individual communities, which whilst having grown and developed, have managed to retain that village and community way of life. The communities of Nuthall, Kimberley, Strelley and Watnall have never been part of the City or part of a parliamentary seat including Nottingham. They do not want to be part of such a constituency going forward. They are separate independent communities with a pedigree going back for many years.

In common with both my Parish and Borough councils I am totally against the proposed changes to the parliamentary boundaries which take Nuthall, Strelley, Watnall and Kimberley into the Parliamentary seat of the city of Nottingham. These areas are not part the city of Nottingham, they fall under the purview of Broxtowe Borough Council and are represented by an MP who whose constituency covers roughly the same area. I cannot help but believe the true needs and interests of these (what would become) "outlier" areas would be subservient to the general interests of the wider city area covered by the new constituency.

My thoughts reflect the consensus of both the Borough and Parish Councillors elected by the community to represent them in all matters such as these. I trust the Boundary Commission will take the views of our elected representatives seriously and not press ahead with changes that quite frankly make no sense. If parts of Broxtowe have to be included in any City based constituency there are other more logical places, such as Beeston which has a large student population that looks obviously to Nottingham University and the City for its requirements. This is in sharp contrast to Nuthall, Strelley, Kimberley and Watnall who look away from the City for their facilities. Children attend local primary schools in Nuthall and Kimberley; the vast majority of secondary pupils attend the Kimberley Academy. Leisure activities are provided by the Kimberley Leisure Centre and the community hubs/parish halls provide appropriate venues for many other activities that occur within the communities. I believe these proposals would obliterate the identities of the communities of Nuthall, Strelley, Watnall and Kimberley as they would simply be subsumed into a "greater" Nottingham, something Nottingham City Council have been pushing for some time now and something the vast majority of people living in these communities do not want.

As a resident of Nuthall and part of the Broxtowe Constituency I am concerned about the changes to the proposed constituencies. I and my family believe ourselves to live in the County and do not feel to belong to the City. Our community is strong and vibrant and we use other areas of Broxtowe for shopping and recreation, such as Kimberley, Beeston and Eastwood. Currently I feel that the constituency reflects our local council and do not see how putting us with parts of the city keeps the integrity of our community. It feels like the city will encompass most of the outlying villages and small towns and this is being done by the back door via constituency changes.

I couldn't have put it better than my local councillors, and agree wholeheartedly:

Dear Resident

You may probably be aware of changes to the parliamentary boundaries which take Nuthall, Strelley, Watnall and Kimberley into the Parliamentary seat of the city of Nottingham. Nuthall Parish Council and your Borough Councillors are against these proposals for the following reasons.

PARLIAMENTARY BOUNDARY CHANGE FOR NUTHALL, STRELLEY, WATNALL AND KIMBERLEY

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An MP covering these areas is unlikely to have any great interest in these communities since the overwhelming components of the constituency will be formed from Nottingham City which as a unitary authority operates in a different way. The only thing that connects Nuthall, Kimberley, Strelley and Watnall to the rest of the proposed constituency is the A610. There is a clear demarcation, not only physically between these communities and the City but, also in outlook aspiration and achievement. The issues of these communities are far different from those of the City and there is no doubt they would be forgotten as being peripheral to the rest of the proposed constituency. If parts of Broxtowe were to be included in any City based constituency there are other more logical places, such as Beeston which has a large student population that looks obviously to Nottingham University and the City for its requirements. This is in sharp contrast to Nuthall, Strelley, Kimberley and Watnall who look away from the City for their facilities. Children attend local primary schools in Nuthall and Kimberley; the vast majority of secondary pupils attend the Kimberley Academy. Leisure activities are provided by the Kimberley Leisure Centre and the community hubs/parish halls provide appropriate venues for many other activities that occur within the communities. Residents look to the Kimberley shopping Centre for most of their everyday needs and for other items they will go to the Giltbrook Retail Park which is just down the road but well outside of the City. There is a vibrant night life in the area which caters for the local population.

The proposals would obliterate the identities of these communities as they would simply become part of greater Nottingham. At the moment within the current Broxtowe constituency they are part of a collection of individual communities supported by long standing Parish Councils. This has been recognised quite easily by the various members of Parliament because each community within the Broxtowe constituency is on an equal footing ie first among equals. The proposals would bring that to an end and destroy what has been in place for over 100 years, thriving individual communities, which whilst having grown and developed, have managed to retain that village and community way of life. The communities of Nuthall, Kimberley, Strelley and Watnall have never been part of the City or part of a parliamentary seat including Nottingham. They do not want to be part of such a constituency going forward. They are separate independent communities with a pedigree going back for many years.

I think this is a perfectly logical and sensible boundary change. Kimberley and Nuthall are a self contained community and it would be easy to move them into a new constituency without having any negative impact, whereas attempting to move other parts of the constituency, for example,

parts of Beeston would cut communities in half. This is the best choice in my opinion.

As a resident of Nuthall I agree with the proposal boundary change to include Nuthall Watnall Kimberley and Strelley in the new North Nottingham and Kimberley constituency. These places are established settlements on the edge of the existing Nottingham North constituency, whose residents have close connections with Nottingham. These connections are through employment with many resident's working in the City; learning as the FE and HE provision residents attend is in the city; culture and leisure. for entertainment, hospitality and retail; and healthcare for many primary and secondary care treatment including 2 major hospitals. These places are all symbiotic with Nottingham North with all arterial routes from these places directed through Nottingham North into the City Centre.

I am horrified at the prospect of Kimberley joining Nottingham City. I hope we can stay as we are, or the whole area will be ruined.

I support the proposal to include Kimberley etc with North Nottingham in a reshaped constituency. Some part of Broxtowe Borough must be left out of that constituency and this is the correct part. People living here have much closer links with North Nottingham than with Beeston and the South of the borough. We work there, shop there and spend leisure time there. We also pass through it to enjoy the benefits of the the rest of the city. It would be helpful to have an MP familiar with, and involved in, issues affecting both a city area and a county area.

This seems a crazy change and will mix area that all under city and county councils and will cause all sorts of pain as to who is responsible. It is bad enough trying to get ownership on some items now! I do not feel that this is in the interests of the residents.

I do not agree with the proposal to extend the Broxtowe further north to an area north of Eastwood. You state "As far as possible, we try to have regard to local ties, geographic factors" i believe that constituents in the densely populated south of the current constituency had far stronger 'local ties' and there are stronger 'geographical factors' to link Broxtowe with parts of Wollaton and/or Long Eaton. Please consider revising your proposal to create a constituency of geographically and local linked constituents (as per your stated aims)

How dare my local MP say my ward feels part of the city. I definitely do not feel part of Nottingham South! For a start Nottingham South is south of the River Trent I live North of the Trent and NOT in the city. I smell a rat, is being proposed because we have local Labour councillors? I am not a Labour voter and will not be pulled in with them. We are part of Broxtowe and will never feel part of the city of Nottingham

I strongly object to Beeston or Beeston Roland's becoming part of the city as suggested by our 'MP' who clearly has no sense of our community as he doesn't live here! I am not part of the City and do not want to be part of the city, he is quite clearly wanting to do this as both Beeston Central and Beeston Roland's are Labour voters and he is wanting us out of the equation so he can keep his seat, this is an illegal practice and I believe it even has its own name. I am not part of the City and will not be made to be part of the City!

It's illogical to add Nuthall into Nottingham City area. Surely adding beeston with its connections to Nottingham Uni would make more sense. We are not city people more community and country. Broxtowe is part of our identity

Having reflected on the proposed boundary changes and talking to some people of kimberley I realise that changing the constancy boundaries will make little difference as both the other authorities of Broxtowe Borough council and Notts county council will remain Our MP Darren Henry is touting that Kimberley stays in Broxtowe constituency and split Beeston in two. This will ruin there community if a town is split in two and realistically we have as much in common to Nottingham North as we do to Broxtowe south ie Beeston

Revert name to Nottingham North. The seat now takes in Nuthall and Kimberley but both are dormer villages for the city, and also it would be unfair to elevate one above the other.

I do not wish Kimberley to be moved from its current location as part of Broxtowe. I have lived in Kimberley for 40 years and been happy with 'the town and particularly its political representation, and this would certainly change were we to be moved. As such my views would definitely not be represented..

We are in support of the proposed change to review the boundary of Stapleford & Trowell. Currently our property sits in the boundary of Stapleford, but cannot be accessed directly. The proposal is to move properties beyond the boundary brook on Trowell Park Drive into the Parish of Trowell. We support this move.

I fully agree to the commission's view that Nuthall and Kimberley should be removed from the Broxtowe constituency and become part of Nottingham North constituency. We have much more in common with Nottingham than Broxtowe. Nuthall and Kimberley is a part of Broxtowe that lags behind in investment. The southern part of the constituency attracts all the investment. My wife and I go to Nottingham for the cinema, theatre and shopping. I have been campaigning for the tram to be extended to Nuthall and Kimberley for over 10 years without success as we are outside the city boundary.

It concerns me that our area is being linked up with the city, we have a lovely community here with our own parish councils, members of which are really beginning to engage with members of the public on local matters. I fear this work between residents and council members would then take a massive plummet and be affected. Please don't change our set up just when residents are starting to feel heard and understood

My husband and I both work in Notts County Council schools. We chose to live in Nuthall because our children would attend county council schools so we all have the same holiday dates. Making Nuthall part of the city would be disastrous for us because we could potentially have different holidays from our children.

I believe that Beeston has a lot more in common with the City of Nottingham than the rest of Broxtowe and it should be part of Nottingham South instead. It is an urban area with a unique character.

I object in the strongest possible terms to being forced to become a part of Nottingham City, whether it is for constituency boundaries or otherwise. I am happy to remain in Nottinghamshire under the control of Broxtowe Borough Council and Kimberley Town Council. As the old saying goes, "if it ain't broke, don't fix it".

Nuthall, Kimberley, Strelley and Watnall have nothing in common with the City of Nottingham. We moved into this area to get away from any association with the City. We are historical communities based on well established Parish Councils. We look away from the City for our facilities whereas areas such as Beeston which has a large student population looks to the City for its requirements so this would make more sense to include areas such as this. These proposals would obliterate the identities of our communities as we would become part of greater Nottingham which we strongly object to. We are separate independent communities going back over 100 years and do not wish to be a part of this new constituency going forward. Any future MP covering these areas is unlikely to have any great interest in our communities and would only be interested in what is good for the City which is not necessarily beneficial to us. There is no logical reason to extend the City boundaries any further than they are now. We refuse to lose our individual identities and this is clearly a number crunching exercise and nothing to do with preserving our communities. It could also threaten our Green Belt land which keeps our communities separate.

I support the current proposal. I live in Kimberley and it doesn't make much difference where the boundary is drawn, but I do support a better balance of constituents in our constituency.

I have used the Erewash Canal for over 40 years and particularly value the Industrial Heritage of this area - it is unique and has a great community spirit to match.

I am sure that the proposal to change the name of the Parliamentary Constituency from Erewash to something else would have a detrimental effect on the community here, and I see no reason for making such a change.

The houses on [RD:8] have also historically been associated with Greasley Ward. This makes little sense however as the main road and dwellings all identify with Kimberley. We get no election material for the correct ward and moving forwards if the parliamentary boundary were to move too I fear we would be missed from issues relevant to us. These houses identify with Kimberley and should be part of the new Kimberley North constituency. Leaving a spur of houses in Broxtowe makes very little sense.

Please see attached document that outlines the views of Nuthall Parish Council.

I received an email from my MP on the boundary changes. I understand the sense in Eastwood being represented as part of the same constituency as the local council, however, I do not think Broxtowe is a sensible constituency and as a consequence I would prefer it and it's local council be removed altogether. Since the new Government took charge, our MP, Lee Anderson has been very successful in procuring central government funds for Sutton-in-Ashfield and Darren Henry has done similarly well for Stapleford in Broxtowe. Once again, Eastwood is left until last. Putting Eastwood back in the Broxtowe constituency will not change this. The ridiculous geographical shape of the constituency results in the disinterest of Government at all levels in the very poor area of Eastwood. It is understandable as I am sure Beeston, Bramcote, Chilwell, Attenborough and the soon to be regenerated Stapleford, all in the south of your proposed constituency, are home to the overwhelming majority of constituents. Consequently, if you want to get re-elected, Eastwood is not at all important. We will never be "levelled-up" on this basis. While I understand your drive for a reasonable proportion of constituents to MPs, might I suggest a different approach. Instead of defined constituencies, it would be better to have super groups defined by sensible geographic boundaries with more than one representative. This area could then elect a number of MP's proportional to it's population. Parties could field more than one candidate if they wished (and risk splitting their votes) yet I would keep a first past the post system which is easy to understand for the electorate. If Broxtowe, Erewash and the two adjacent Nottingham constituencies elected 4 members in this manner, it is likely we would have MP's of more than one colour who would then be forced to work together for the benefit of their constituents. This would mean that because there is no definite population centre for any one MP, voices in smaller more remote areas are more likely to be heard. It might also reduce the divisiveness of our politics if MP's of different colours are made to realise their ideologies are secondary to the needs of their constituents. Anyway, Broxtowe isn't a real place and it shouldn't be a constituency. It is a geographical anomaly wedged between Nottinghamshire and Derbyshire that nobody knows what to do with

I fully support the boundary change which will create the new constituency of North Nottingham and Kimberley. It is more logical than our current constituency of Broxtowe as we are closer to North Nottingham. Also, people in this area rarely go to the south of Broxtowe whereas they often go into Nottingham City. I have heard claims that we would be destroyed as a community. This is, quite frankly, ridiculous scaremongering. It won't have a detrimental effect on the Kimberley/Nuthall/Watnall area - we will retain our identity whatever the parliamentary boundaries are.

Really don't want to be in the Nottinghamshire city boundaries or council. We are a small community and wish to remain so and if 'd have wanted to be included in the greater Nottingham council I would have lived there. We moved to nuthall to get away from that council and are very happy with Broxtowe. We don't want this change. We have local parish councils who are our voice we don't want to lose our identity. Why should MPs dictate. A very irate member off the public

Here in Nuthall, we are separated from the City, with shopping and leisure facilities best suited to the smaller communities in this area of Broxtowe. Broxtowe Borough Council can look after our needs quite adequately, and are not shackled by the financial burdens which Nottingham City face. I believe the intention to expand the City boundaries has only one clear aim, and that is to increase the number of households within the City's grasp who will then be forced to pay Council taxes to the City in an attempt to bail out the City Council. I also believe these additional funds will therefore not be used for the benefit of the former residents of Broxtowe who will have

been subsumed into the larger City conglomeration.

i have been living in nuthall for best part of 25 years plus as have always regarded as part of the county. i dont think there is any similarity in demographics with the city boundary and i totally oppose to nuthall being classed as part of nottingham city in the proposed changes.

i am also opposed to the whole way of work of nottingham city council with its blatant spend on pet projects which has driven the council to be virtually bankrupt. i therefore do not want any part of this and prefer nuthall to remain in broxtowe constituency anf within notthngsm county council. also there is very little if any commonality with the city with regards to health and social care, deprivation, and most resource we tend to use are in the county and not the city region. communities in nuthal. watnall, kimberley have different needs to the ones in city and the new proposal would simply destroy this.we would like to maintain our communities and not be merged into a largely unaccountable unitary authority as the city council.

Watnall has never been part of Nottingham City and should not be included in the proposed Nottingham North and Kimberley Parliamentary Constituency. Watnall comes under Greasley Parish Council, which was formed in 1894 and is one of the largest parishes in Nottinghamshire. It encompasses the villages of Giltbrook, Greasley, Moorgreen, Newthorpe and Watnall. The boundary change proposed would split Watnall from these other areas. In Watnall we see no strong links with Nottingham. However, Watnall has very strong historical links with Greasley, Newthorpe and Moorgreen. These areas are joined by the open fields between them, the proximity of Greasley Church, the extensive footpath links that connect the residential areas, the D.H. Lawrence associations, the historical buildings and landscape that surrounds the demolished Watnall Hall and a history of coal mining, brewing and railways. For this reason I wish to object to the proposed boundary change and would like to see Watnall kept with Greasley and its associated historical Parish Council.

This is a ridiculous idea in my opinion and a total waste of money. Everyone knows this area as Erewash, why change it?

I object to the proposed alteration of the boundaries, which would result in Nuthall becoming part of the City of Nottingham and the formation of Nottingham North. I would prefer things to stay as they are. I feel we could loose our individuality and community.

I have no desire to become part of Nottingham City with all its own issues our local ones are enough to deal with

I object to Watnall being moved into Nottingham North. The A610 is very much a city boundary. Moving into Nuthall, Kimberley, Watnall, Underwood, moorgreen, the landscape becomes more rural and the are has a community feel, brought together by the primary schools and Kimberley Academy. Many people have moved to the area to escape the city boundaries. This area still has its farmland, small cafes, farm shop,local produce sold at the village pub, grown on allotments. The area joins together for several unique activities, that are not found elsewhere, charity cricket matches, summer jam (street music) outdoor theatre, we use the parks for children's events. We enjoy the level of service that Broxtowe council provides, if we were to be included with Nottingham city, the whole feel would begin to change and I'm afraid people would think about moving away. Beeston would be the obvious area to be moved into city boundary, but I suppose because the people current offices are there, that hasn't been considered.

I object to this proposed change which links Watnall with Nottingham city. It is plainly obvious to anyone with any local knowledge this is a grosly negligent proposal. We already suffer from neglect as part of a Broxtowe constituent dominated by Beeston. Beeston has clear links with Nottingham City and it is there that should form part of an enlarged Nottingham City constituency. In many respects it is already a suburb of Nottingham and it makes sense to incorporate Beeston into the city constituency.The communities of Nuthall, Kimberley, Strelley and Watnall are unique and this should be recognised and these proposals urgently reconsidered. In effect they will destroy any sense of identity and make our votes meaningless in a Nottingham City dominated constituency.

I AGREE with the proposed change that includes Kimberley, Watnall etc in a constituency that shares an MP with Nottingham North. It will have no effect on my relationship with Parish, Borough and County Councils but will create a constituency that requires its MP to consider the circumstances of people who live both inside and outside a city's boundary. That should result in a more balanced response to both local and national issues.

The communities of Nuthall, Kimberley, Strelley and Watnall have never been part of the City and don't want to be. They are separate independent communities and wish to remain so.

I don't agree with this proposed boundary change. Living in Watnall, our links are not with Nottingham City but more with the local towns that surround us. Our communities have a more rural base and so our needs and priorities differ to those of the city and suburbs. Given the relative size of population, our voice will be lost and I believe this will lead to the destruction of green space between us and the city as it expands into its new territory, destroying our identity in the process.

I am part of Broxtowe borough council and Nuthall parish, as a family we have been part of this council/parish for 40 years. I would be very unhappy to have to change to the city council which mean that an historical and well loved parish would disappear. I'm probably not the only resident that feels this way and I'm sure many residents in the borough would definitely not want to become part of the city council. Our area is very well established and run as a borough and don't see how we would benefit being part of a larger council area especially because we aren't actually connected only via a bypass. I hope this does not happen and feel that as residents of this parish our views and feelings are took into consideration.

I totally oppose the proposed changes to incorporate Watnall, Kimberley and Nuthall into a new constituency with Nottingham City. We are totally different in terms of demographic and needs and should remain outside of the City as we are at present. I believe our needs would be overlooked by incorporating us into the City. We are well supported and served by our Parish Councils, and wish to retain our village and community way of life. We are part of separate, independent communities with a pedigree going back over 100 years. Please do not destroy that.

Kimberley is an integral town in Broxtowe Borough. It is a sister town to Eastwood and Giltbrook and has a lot in common with them being a small semi-rural town. For instance people from Kimberley do their shopping in Eastwood and use the facilities there, but have never even been to Nottingham North districts like Bulwell. Kimberley has no connections with Nottingham city, being separated by the M1 and fields, and has very different issues to urban built-up deprived areas like Bulwell and Top Valley. I believe the proposed boundary will mean Kimberley will get forgotten by the MP who will have to focus on the many issues facing the deprived urban city area of the constituency. Kimberley voters will feel their views are not being represented, feel disengaged from politics, and removed from the borough that they are proud to be a part of currently. It appears that Kimberley is being moved to Nottingham North just to make up the numbers of constituents, rather than having any connection to it. I would much rather be in a larger Broxtowe constituency than an adequately sized Nottingham North.

While I think everyone acknowledges that Broxtowe is not an ideal constituency due to the wide range of communities included within it's boundaries, my comment relates to keeping communities together. Beeston is one of the largest towns in the constituency and for community cohesion it's incredibly important that Beeston remains within the same parliamentary constituency. If it is split there is a real danger of disenfranchising parts of the town.

While I think everyone acknowledges that Broxtowe is not an ideal constituency due to the wide range of communities included within it's boundaries, my comment relates to keeping communities together. Beeston is one of the largest towns in the constituency and for community cohesion it's incredibly important that Beeston remains within the same parliamentary constituency - therefore I agree with the proposal here. If it is split there is a real danger of disenfranchising parts of the town which should be avoided at all costs. We should at all cost keep community's together, not split them for political gain.

I would like to protest vehemently against the proposed boundary changes. Watnall has little or no relationship with Nottingham City whatsoever. It is a well defined individual community populated by people who want to get away from city living. Unlike Beeston for example, with its tram link and proximity to the University, Watnall looks away from the city for its amenities. If we want to walk, we don't use Wollaton Park or The Arboretum, we use our surrounding countryside or nearby Derbyshire. If we want food we have Morrisons at Eastwood or Asda and Lidl at Langley Mill. If we want shopping we have Giltbrook Retail Park and other retail parks at Ilkeston and Junction 28. Our area is also well served with high quality pubs, cafes and restaurants. Why would we go into Nottingham for a coffee when we can go to Beauvale Priors Tea Room? Watnall Has never been part of the city and would never wish to be.

I strongly approve of these proposals. They solve the problems of constituency populations being skewed without breaking up towns. Broxtowe has always been an area of two distinct halves (north and south) so therefore moving the Kimberley and Nuthall area into the Nottingham North constituency does not change the feel of Broxtowe at all. The proposals make perfect sense and I hope that they are carried out.

Having read this proposal I cannot find any advantage to myself, my family or to my fellow Watnall occupants. We would be just swallowed up into the Nottingham city for their good and not ours. Watnall and the other named places have survived for many a year without belonging to Nottingham and will continue to survive without this change.

I am currently moving in to the area and the appeal of being in a small village type parish council was part of my reason for buying here. I do not want to be part of Nottingham city council. The rulings that would be put in place by the city council will not reflect the needs of my new neighbours and myself.

My wife and I moved into this area 2 years ago to get away from a City Parliamentary seat as where we previously lived was. We felt that in that small village community the City Seat was not looking after our best interests and we felt marginalised and forgotten about. We moved into this area because of the strong Parish Council element which means that community elements are strong and every person has a voice. If this area is moved into Nottingham City I feel that again we will have no say in how our community is used or functions. I think it is an abhorrent suggestion from parliament that these small villages and parish councils are so unimportant that they should be forced to become a number and not people.

I object to the proposed boundary changes for Nottingham north and Kimberley. Nuthall is not part of the city and should not be grouped as such.

I work in retail in the City of Nottingham and commute from Nuthall. Having seen the vast change in our customer profile over the last few years within the city I feel it bears no relation to our community of Nuthall and Kimberley. Beeston and its Student population would have a greater similarity in resident profiles. I feel Nottingham City Council has not got a great track record and its focus will be on the city centre rather than outer town suburbs. You only have to drive on the A610 into the city to see the amount of potholes and delays to the ring road roadworks that should have been completed at the beginning of June. I DO NOT wish the City Council to move its boundaries to include Nuthall and Kimberley.

Strongly oppose to the boundary change in my area. I live in a semi-rural area and feel that I would not be properly represented by being aligned to a city area with their different issues. The proposal to include Nuthall in a new constituency of North Nottingham and Kimberley is ludicrous. Everyone I know in Nuthall considers themselves a part of Nuthall and Nottinghamshire. Not a part of the city. And to strip our name from the constituency indicates that we are irrelevant. I do not consider the City of Nottingham to be a place to be proud of. Their MPs have no credibility in the county. We have nothing in common with the City and will never have anything in common with them. It is also illogical to have a part of the County administration under the City Council, a completely different authority.

We moved here 12 years ago to get away from the City influence, my view is that the proposals is all to do with the numbers and not our local identity with Nuthall, Kimberley, Watnall and Strelley. Our areas have nothing in common with the proposed City areas and our socio economic base is completely different, we look towards Kimbeley and Eastwood not Bulwill, Rise Park and Aspley. We would be the smaller player in this large Parliamentary Boundary and an MP serving the proposed area would probably have greater interest in the City and not the County/Broxtowe BC areas. We look away from the City for our services and facilities and I would suggest that this proposal is the beginning of a process to create a Greater City of Nottingham conurbation, one which residents would reject as we wish to remain part of the County and Broxtowe BC. Our community identity would be gone and the value of our properties would lower, we are separate communities and wish to remain so and not be part of a City of Nottingham seat. I hope that all submissions will be considered and we remain part of a Nuthall, Kimberley, Watnall and Strelley constituency.

Totally opposed to being tied with Nottingham City Council. Nuthall and Watnall have historically been small villages enjoying a rich shared history amid rural locations with distinct boundaries between them and Nottingham. Indeed Nottingham is a place to be avoided with its traffic and parking problems/policies, every effort being made to use local shire facilities at Kimberley, Giltbrook and Eastwood for shopping, leisure and medical facilities. More logical areas are available which make more sense to be included in the Nottingham City, Beeston for one, where the boundary between it and the City is very indistinct, being on the doorstep to Nottingham university and hosting a sizeable student population thereof. Some people choose an urban lifestyle while others prefer a more rural setting, the vast majority of people I know in this area are here due to its rural nature and wouldn't want it to change; Beeston, on the other hand, is already what I would describe as urban therefore a much more suitable candidate to be included within the city.

I would like to register my support for the proposed parliamentary boundary changes for North Nottingham Kimberley and Nuthall. Nuthall and Kimberley residents when asked on holiday 'where do you come from' are most likely to say Nottingham. Nuthall is adjacent to the current Nottingham North boundary and Kimberley is coterminous with Nuthall. One of Nottingham's main arterial routes, the A610, links residents and business from Kimberley and Nuthall into Nottingham City Centre through the Nottingham North constituency. Nottingham City tram route terminates at Nuthall and the local bus service (Rainbow One) travels along the A610 corridor. However there is more than just a geographical connection between Nuthall / Kimberley and Nottingham, there is a significant economic and social connection too. Bringing the areas together in line with the Boundary Commission proposal makes sense as it reflects a geographical area that reflect everyday life for Nuthall and Kimberley residents for jobs, learning, healthcare, retail, leisure and culture. Nottingham is an unbounded city and therefore its conurbation area isn't within the City boundary. Compared to other cities such as Sheffield, Liverpool, Leeds and Newcastle, Nuthall and Kimberley would already be located in the city area. Nottingham is the primary destination for Nuthall and Kimberley residents for work. Nuthall and Kimberley are within the official Nottingham travel to work area as well as the Greater Nottingham Housing Market area. 52% of the Nottingham City workforce aren't City residents with majority of these workers living in the conurbation. This is reflected in the commuting patterns of Nuthall and Kimberley residents. Similarly local Further Education provision for Nuthall and Kimberley residents is in Nottingham including the Nottingham City College campus located in the current Nottingham North constituency. Residents attending local Higher Education provision will travel into the City to attend either the University of Nottingham and Nottingham Trent University. While residents use various GPs surgeries for the primary healthcare care all secondary healthcare for residents is provided through hospitals in the Nottingham University Hospitals NHS Trust. These are the Queens Medical Centre and Nottingham City Hospital located in Nottingham North constituency. Nottingham is the main destination for retail and leisure for Nuthall and Kimberley residents, as highlighted by local retail and leisure studies. All national store chains as well as a breadth of independent shops are located in the City Centre. The night time economy of Nottingham is the key destination for

residents where 4 cinema complexes alongside a plethora of restaurants and bars are located. Nottingham is the number one destination for cultural experiences for Nuthall and Kimberley residents. Proportionately twice as many residents (1 in 10) from the conurbation use Nottingham Theatre Royal and Concert Hall compared to city residents (1 in 20). Likewise the Nottingham Motorpoint Arena is the top venue for concerts and entertainment for residents. I am aware that my local Parish Council based in Nuthall has objected to the proposed changes. However it should be noted that their response is not representative as they have failed to survey or consulted residents. The council in their response claim Nuthall and Kimberley have nothing in common with Nottingham, Clearly they have failed to consider the evidence outlined above which demonstrate a very clear connections between the areas. They also argue that because Nuthall and Kimberley are historical communities they are different to communities in Nottingham, this is untrue. Areas in North Nottingham including Bulwell, Basford, Aspley and Bilborough all have there own historical identity and are supported by Area based committees akin to the Parish and Town Councils in Nuthall and Kimberley.

The economic growth in conurbation areas as well as market towns surrounding cities is dependent on strong cities that attract investment. An MP that represents an area that is connected economically and socially should work with communities that ensures the benefits are realise across the area. Amalgamating Nuthall and Kimberley with the Nottingham North constituency therefore makes a compelling case for a future parliamentary constituency.

I am concerned about plans to split Beeston up into different constituencies. I do not believe that comments made by current MP that residents of Beeston consider themselves part of Nottingham City are true or reflective of actual public opinion. As a long term resident of Beeston I do not feel that we are part of the city and feel much more connection to areas currently in our constituency than the city. Beeston Rylands itself does not have a city feel and I definitely do not feel that separating up a smallish town would serve its residents well.

I do not wish for nuthall to become part of the Nottingham city constituency and wish it to remain as it is.

I am opposed to these boundary changes incorporating Nuthall into Nottingham North constituency. Nottingham City is a unitary authority served by 3 MP's and as Nuthall is outside of the City (and in the County) this does not make sense. I am not convinced any MP would be interested in our area in addition to the existing constituency and certainly wouldn't work across two local authority areas.

Unpaid carers have tremendous difficulty accessing support as it is without changing which council supports them. The support offer from city council is hugely different to the county.

I am not very happy that this proposal puts me in with the city of Nottingham. Nuthall and its surrounding village of Watnall and Kimberley are separate communities with different needs and values from the city of Nottingham. We have better services than Nottingham City. We have our own history going back many years. We are villages not a city. To be honest I do not want to be with Aspley, Bulwell, etc. If we have to be with someone Beeston is a better option as at least they are in Broxtowe and have similar values.

I strongly object to the proposed changes to my local area. The only thing linking our local areas to the city is the bus route and the A610. Nuthall has no links with the other areas you are proposing to join us up with and small outskirts towns and villages such as Nuthall, Kimberley etc would lose their identity and history by being lumped together in this way. I do not feel that any consideration has gone into trying to have regard to local ties, geographic factors, local government boundaries (as they were known at 1 December 2020), existing constituencies, and minimising disruption caused by proposed change as you state. Other areas such as Beeston would seem a better fit due to the proximity to the city and the University.

I strongly oppose the parliamentary boundary change for Nuthall, Strelley, Watnall & Kimberley. My reasons being:

1. This will be costly and guess who will be paying, the residents.
2. I have been under the Nottingham City Council in the past and moved to the County Council because I was unhappy with the way the City Council worked. This apparently has not changed as I have a friend who moved there two years ago and hates it.
3. I understand this is purely for the numbers, but the City does not have a Parish Council and therefore our local communities will not be represented as they are now as the MP covering these areas will have no great interest in them. They are only interested in votes and numbers. They do not live in the area so they do not understand.
4. This will bring to an end and destroy what has been in place for over 100 years, thriving individual communities, which whilst having grown and developed, have managed to retain that village and community way of life.
5. I think that the boundary proposal people have no idea about the communities and do not realise how aggrieved the local community will be. Surely this will be no benefit to anyone except the MPs and Councilors who will be looking at votes.

Peoples health and state of minds should come before politics.

I object strongly to the proposals to take Nuthall, Strelley, Watnall and Kimberley into the parliamentary seat of Nottingham. The labour controlled council are reckless in their spending and would relish having a huge chunk of our council tax to squander, what a disaster for us. We all have local parish councils that listen to our needs and have our best interests at heart whereas Nottingham City is a unitary authority and operates in an entirely different way, Our children attend local primary schools in Nuthall and Kimberley and the majority of secondary pupils attend Kimberley Academy. We have Kimberley Leisure Centre along with various parish halls for lots of other activities - we do not venture into the City for these activities, they are local to us. We have a great shopping centre in Kimberley for the majority of our everyday needs and also on our doorstep is Giltbrook Retail Park with M&S Food Hall plus many other businesses that we frequent regularly - not going into the city except occasionally to shop at John Lewis. Our nightlife is excellent. Beeston would be a more logical choice having a large student population more in touch with Nottingham University and looking more towards the City for its requirements. Leave us out of the equation. our issues are greatly different from those of the City and we would be forgotten as being peripheral to the rest of the proposed constituency. We do not want to become part of this proposed change, we would be swallowed up completely and lose our identity. NO THANK YOU

I support the Boundary Commission's Initial proposals as they affect Eastwood, Ashfield and Broxtowe, as the best arrangement that can be achieved on balance

I live in Giltbrook in the new Broxtowe ward and my son's school, and our local shops are all in the new Nottingham North. Having researched I believe that including Beeston or Hucknall in the city area would make more sense than Kimberley. Beeston has more links to the Nottingham city area than Kimberley who has more links with the Broxtowe area. Equally Hucknall has more in common with the suburbs of Nottingham North. An MP should represent the views of the people. Kimberley has very different needs compared to the areas of Aspley and Bulwell who are also in the Nottingham north area. In Aspley and Bulwell there are high levels of deprivation. They have different transport and local level needs. Kimberley would be forgotten as the MP would need to put my re energy in to city work. An MP needs to be representative of the views of the people. The views in general in the Kimberley area do not align with those of the people in Aspley and Bulwell. Evidence of this can be seen in voting patters in recent years.

We are totally opposed to including Watnall into the proposed Nottingham City Parliamentary seat (Nottingham North and Kimberley). Including us in a large area like this would leave us fearing that the requirements of Watnall would be completely overlooked. We also fear that funds earmarked for this area would be diverted to other city projects, leaving us underfunded. The communities in this area have specific needs and requirements. There is a good infrastructure in place in Nuthall, Strelley, Watnall & Kimberley which is supported by local people who use these services (schools, libraries, playing fields, leisure centres, and shopping centres). There is a real sense of community in these areas which would be lost by placing us on the outskirts of a large constituency which would struggle to cater for the needs of such large area. Watnall and their surrounding areas are village communities which are very different to Nottingham city and its suburbs. (Chalk and Cheese!) We feel these proposals have been made by drawing lines on a map and without any thought or consideration to the communities involved.

I am not sure that being part of Nottingham City Council would be in the best interests of Nuthall and Kimberley constituents. The area is quite rural. My experience of being part of city run councils would suggest they have an outlook that is to protect the interests of the city, they do not generally appreciate the more rural areas and what works for the city doesn't necessarily work in rural areas (and vice versa). A prime example would be the attitude to parking and parking spaces at work, where in the city they are sparse and can command a premium, but out in Strelley, Kimberley and Nuthall there are places aplenty yet a workforce can still have to pay for parking at work. Another example would be trials of these schemes like electric scooters which are now littering the pavements around the city causing all sorts of issues, they are just not required in the more rural areas and cause even more issues and to join us up to schemes like this with councils that don't seem to understand that cities and rural areas are different and have different requirements seems very unfair. The Government seem to have realised this and are devolving power, they seem to be appreciating that what is good for London is not necessarily good for the rest of the country, what is good for Nottingham city is not good for rural areas outside of Nottingham.

I love Broxtowe as it is but if it has to change I agree that the proposal is a good one and am happy to support it. Living in Beeston I understand how close a community we are and know that any plan to split Beeston or Chilwell would be worse. I also feel that with the Broxtowe council offices being in Beeston there would be too much confusion if Beeston were to be moved out of the Broxtowe constituency as many people don't understand the differences between the different boundaries and this would just add to the confusion.

I think the proposals for Broxtowe do not make much sense. The changes elongate the constituency to such an extent that it looks like one of those strange American gerrymandered counties. I disagree with the proposal

In response to a proposal to merge the county area into the city area. I can confirm that I am AGAINST this and ask that my opinion be given serious consideration. This is also the opinion of my wife. Some years ago my wife and I made a choice to live in a county area for a better, more relaxed (less stressful) way of life. So, I/we have absolutely NO desire to be part of the city of Nottingham.

I would like to explain why I do not support the current proposal that Nuthall will be moved into Nottingham North and Kimberley. I have been a resident of Nuthall for 40 years and I do not believe the change in this boundary will benefit our community. As a historical community we have many differences to the main area of Nottingham City. The main facilities we access are around the Nuthall and Kimberley areas and we do not use the city for these. The area is more of a village community which would be lost becoming part Nottingham City. There is no clear benefit shown to becoming part of the city boundary. We also have people that work to develop our local community and care for this area and put this area first - listening to the local people and acting on their feedback which in turn helps to improve the quality of the area - this would be lost if moving into the city.

I have lived at the attached address since 1973. Having considered all available info. I cannot find any good reason for this aspect of the proposed boundary changes.

Nuthall is by nature a historic village with its own long established Parish Council. It has little in common with Nottingham city. We and others moved here to live in a more rural environment separate from the city and would prefer this to be preserved. Nuthall has much more in common with surrounding communities such as Kimberley and Watnall than with Nottingham, which understandably has a quite different outlook. It would seem more logical to include say Beeston, which has more in common with a city culture, than Nottingham in any change of boundary. This would be a much better way to achieve any numerical population requirement that the Boundary Commission has to meet.

Whilst your proposals initially looked fairly balanced I'm afraid on close inspection several of the constituencies could well become one party ones. A fairer approach in my view would be to try to create marginal constituencies. I wonder too as to why you are still proposing Broxtowe as the name of the western constituency when the area of Nottingham called Broxtowe is in fact in another constituency. May I suggest a name change to one which would better reflect the location of the constituency eg Nottinghamshire West or perhaps to Trentwood (or Trentwoods) given that Eastwood lies in the north of the constituency and the River Trent along the southern border.

Nuthall is a small Community that is not apart of the city of Nottingham in relation to its amenities. As a resident of Nuthall we have our own parish council and decisions are made based on being a small community outside of the larger city. The decisions are based around the needs of the local community. The proposed reason to consider moving to another council do not make sense and would take away the local voice of the residents.

I do not wish to move my constituency from Ashfield to Broxtowe. [RD:11] Lee Anderson to be my MP and do not wish to lose him. You are taking away my legal right for [RD:10] him, and surely this is against the law. Lee Anderson is the best MP we have ever had, and Broxtowe does absolutely nothing for Eastwood. I am absolutely AGAINST this change. You are not taking into consideration the rights of the people of Eastwood

I would like to express my support for the proposed boundary changes as they affect my own area of Watnall. I wouldn't normally express a view on this sort of thing but in this case the reason for responding is because a strong negative campaign is being carried out by a neighbouring Parish (Nuthall). This campaign:

- a) misrepresents the view of the local area - no canvassing has taken place in our area/parish
- b) is actively leafletting neighbouring areas in a manner similar to a political election campaign
- c) is approaching people, unsolicited, at community events (e.g. outdoor theatre) in neighbouring areas to promote objections, and get people to sign petitions against the boundary changes.

The negative campaigning from Nuthall Parish is based on upon

1. The idea that the area north of the M1 (Watnall, Nuthall, Greasley) has little in common with Nottingham
2. The local MP would have no great interest in this area this is insulting to the future MP, and is no different to the current situation where Watnall, Nuthall, Greasley are outpost of the Beeston/Stapleford area
3. The idea that people in Nuthall moved there to get away from Nottingham. This is ridiculous, and borders on plain prejudice rather than reason.
4. It would be better to carve Beeston in two rather than include Watnall, Nuthall, Greasley in Nottingham North as a former Beeston resident I can't believe this makes sense to anyone. Beeston is a coherent community.

I feel that this sort of active negative campaigning is against the spirit of the process, and may even be against the rules. If so, please advise who this should be referred to. My positive support for the boundary changes are based on the fact that Watnall/Nuthall/Kimberley have their own strong identity but are very much connected to Nottingham, and look to it as their regional centre, much more so than Beeston/Stapleford in the current constituency so the proposed changes seem perfectly reasonable to me.

We refer your proposal to incorporate one of our parish wards into a new parliamentary constituency entitled Nottingham North and Kimberley. Greasley Parish Council has resolved to oppose this proposal and our detailed comments together with an alternative arrangement that we are prepared to support is attached herewith as a separate document

Broxtowe is a curious construct to start with, and the removal of a chunk of its middle to form the new constituency does nothing to help. The south of the constituency has much more in common with territory immediately to the west, and the north of the constituency similarly has more in common with territory to its immediate west.

I appreciate that this would involve crossing county boundaries, but would not redesigning constituency boundaries to reflect the natural associations of localities lead to better representation?

Response to boundary change - Historically, Kimberley and Nuthall have been linked to Eastwood through school catchment areas, local services and general community interaction, as well as having the same local council of Broxtowe Borough Council and Nottinghamshire County Council. The local newspaper also reflects this, being called the Eastwood and Kimberley advertiser. Nottingham North area is controlled by Nottingham City Council, which would see an MP having to juggle different councils areas and services. Nottingham North and Nuthall / Kimberley is divided by the M1, which has acted and remains, as a barrier to community cohesion. The proposed boundary change would see Kimberley losing local connections and being isolated from the remaining services, which are controlled by a different council. The proposed change shows no local knowledge in the administration of the changes, and appears to mangle together the required headcount not taking into account of the local areas and how the change would impact in the future. A better solution would see Nuthall, Kimberley and Eastwood as a parliamentary boundary having the same local councils and retaining the community spirit.

I refer to your proposal to incorporate my Broxtowe Borough Council Ward into a new parliamentary constituency entitled Nottingham North and Kimberly to which I am opposed. Please find my detailed comments attached herewith (three pages)

I wish to comment and object to the currently published plan to include Kimberley and Watnall within the new proposed 'Nottingham North and Kimberley' parliamentary constituency on the following grounds.

1. Kimberley and Watnall are geographically separated from the city (and thus from Nottingham North) by the M1 motorway, which is a significant boundary, and which also creates a focus away from the city and westwards into the Broxtowe areas towards Eastwood. Travel from Nottingham city to Nuthall/Watnall/Kimberley is not continuous through a built up area and this emphasises that this is a geographically separate area. Travel from Nuthall (west of the M1) to Eastwood is through an almost continuous built-up area, emphasising the connection and integration with the other 'settlements' of Giltbrook, Newthorpe, and Eastwood.
2. The social and demographic make-up of the two areas is totally different, and thus the focus and work of an MP representing the combined area is different. Nottingham North has substantially different demographic profile from Nuthall/Watnall/Kimberley in all areas of measurement - housing, occupations, ethnic composition, etc, etc [Boundaries Commission website] - and thus Nuthall/Watnall/Kimberley does not fit the same profile as Nottingham North. Many parts of the Nuthall/Watnall/Kimberley have a rural aspect, with farming countryside and green belt being issues, these being almost unheard of in Nottingham North. This mismatch of Nuthall/Watnall/Kimberley with Nottingham North will mean that the overwhelming work and areas of challenge for the MP are likely to be with Nottingham City, to the likely disadvantage of those in the peripheral area of Nuthall/Watnall/Kimberley.

3. Nuthall/Watnall/Kimberley have strong community ties within the current North Broxtowe area and away from the built-up area of the city. Within the north Broxtowe area there are strong ties between Nuthall/Watnall/Kimberley and Giltbrook/Newthorpe/Eastwood, those six 'settlements' forming a very strong community. Travel is focussed east-west through these towns and villages, and shopping is in either Kimberley, Giltbrook (a large shopping centre), or Eastwood, all on the east-west axis within Broxtowe Borough. Leisure facilities for all these areas are focussed at Kimberley Leisure Centre. One indicator of the cohesion of the area is the local newspaper which is the Eastwood & Kimberley Advertiser and which covers the whole of the area from Nuthall through to Eastwood. To draw an arbitrary line is to pull these linked communities apart.

4. There is a danger that the strong local identity of Nuthall/Watnall/Kimberley would be lost, and that eventually plans would be raised to absorb the area into Nottingham City, which is not wanted by residents, who have chosen to live in an area outside the city. These areas have a strong historical connection.

SUGGESTED ALTERNATIVE PLANS

A. Move Beeston (or part of it) into the Nottingham constituency. Beeston shares many of the characteristics of the city in terms of housing and other demographic measures [Boundaries Commission website], has a large student population from Nottingham University (which is in the city) and is a substantial part of the Nottingham Tram network, giving a strong link to the city. Travel to Beeston from Nottingham is entirely through the built-up area with no obvious geographical boundaries - the casual visitor would not notice the change from Nottingham to Beeston. Residents of Broxtowe would undoubtedly see this as the most logical fit with Nottingham city. The number of voters required (roughly 13,000) could easily be achieved from the wards in the Beeston area.

B. Move part of Hucknall Town into Nottingham North constituency.

Hucknall (currently in Ashfield) shares many of the characteristics of the city in terms of housing and demographics, and is a part of the Nottingham Tram network. It is part of the continuous built-up area to the North of the city, and would fit well into Nottingham North. The number of voters required (roughly 13,000) could easily be achieved from a combination of the wards in the Hucknall area.

I have no wish to change constituencies. Everyone I know who is in the current one are quite happy with it and do not want to be taken into the City. We have no connection to the city and prefer our local communities. I believe the new proposal would not take into account any of our wishes as we would be on the periphery. Definitely do not want to change.

Having lived in the ancient peaceful village of Nuthall for many years & being fully satisfied with the amenities provided, I would not wish for any boundary changes. Nuthall has a wonderful community spirit which could be lost if it were amalgamated with parts of Nottingham. I think that it would be better for the Commission to include only Beeston rather than Nuthall & surrounding villages in any Boundary change, since Beeston has far more in common with the city. We

Nuthall, strelley, kimberley and watnall are functioning well as they are. Their identities would be swallowed up and disappear or be very largely destroyed if they were included in the vast greater Nottingham area. These smaller local areas have grown into the thriving areas they are gradually, naturally, smoothly, over time. They work very well for the people, in all aspects, from schools, leisure centres, shopping, night life etc etc and their parish councils without being too large. It would be dreadfully wrong to disrupt what has been put together with thought and experience over very many years. They adamantly do not want the proposed change of being joined with the City.

I and my wife do not want to become part of Nottingham North. We use the local facilities for all our needs and do not look to the city. We used to live within the city and deliberately moved away from it 22 years ago. We do not want to go backwards. We feel part of a community which we did not feel previously and enjoy living in a village and being part of a parish. We also feel that an MP for this 'new area' would have little interest in our village and would have no reason

to fight for what would be a minority in the constituency.

As Member of Parliament for the Broxtowe Constituency, I write to comment on the Commission's draft proposals for my constituency. I welcome the Commission's request for views on its initial proposals and thank it for its work. I acknowledge that there must be a link between Broxtowe and Nottingham City to prevent unnecessary disruption elsewhere. However, I believe that there is a better solution to where there is a Nottingham/Broxtowe link. I note that at the previous review the Commission accepted the overwhelming arguments made between the City and Beeston. However, it has chosen not to do so again at this review, which I think is a missed opportunity. I outline below my thoughts and attach details of a suggested alternative that addresses the concerns outlined below.

1. I welcome the addition of the Broxtowe Borough wards that are currently located in the Ashfield constituency, as this unites communities in and around Eastwood at the northern end of the Borough council area that share common community and historical ties.
2. The Commission's proposed link with the City of Nottingham at the northern end of the Borough of Broxtowe (its proposed Nottingham North and Kimberley seat) sadly then breaks these community links by removing Kimberley, Nuthall, Strelley and Watnall from Broxtowe. All these areas look north to Eastwood and its environs for services and community links.
3. The Commission's proposals split the Parish of Greasley by placing Watnall in the Nottingham North and Kimberley seat.
4. The M1 is a strong boundary, which affectively splits the Commission's proposed Nottingham North and Kimberley seat into two.
5. The Broxtowe wards added to this constituency would see the creation of a semi-rural and urban constituency including areas of inner city Nottingham and more peripheral market towns such as Kimberley. If Broxtowe Borough is to be linked with the City, then a southern link would produce a more homogeneous urban cross-linked constituency.
6. There are poor transport links from the northern end of Broxtowe Borough into the City, as contrasted with the Borough's southern end. Whilst the Nottingham tram extends out of the City into Beeston, there is no link into Kimberley and the surrounding area. And local bus routes provide quick access into Eastwood, rather than the City.

A proposed Nottingham South and Beeston Constituency - This is what the Commission effectively proposed at the last review. The subsequent public hearings then confirmed that this had strong local support from both residents and from all political parties. This could be achieved again, by placing the following Broxtowe wards into a Nottingham South seat: Beeston North, Beeston Central and Beeston Rylands.

Although it would be desirable to also place the Beeston West ward into the Nottingham South seat, this isn't possible to do within the accepted range. However, removal from the rest of Beeston is justifiable as it is more suburban than the other wards, with links to Chilwell to its West. For example, Park Road, Grove Avenue and Cumberland Avenue were all in Chilwell until the last local boundary review placed them in Beeston West ward.

These changes would then allow the Bilborough ward to be retained in Nottingham North, alongside the Leen Valley ward, which would bring Nottingham North within the accepted range. It is worth noting that at the previous review there was substantial opposition to ending Bilborough's link with Nottingham North. Like the Commission's proposal, this proposal also places the Castle ward in the Nottingham East constituency. The advantage of these changes is that they work to keep existing links in place, whilst being less disruptive than the Commission's initial proposal, moving 1 fewer ward. It would mean that there would be no need for an exchange of wards between Nottingham North and Nottingham South (i.e. the Bilborough ward is retained in Nottingham North).

Comments on the links between Beeston and Nottingham

1. There is a natural merging of residential streets between Beeston and Nottingham. Unlike the areas in the northern end of the Borough, Beeston is not parished. The historic Beeston Parish contained areas which currently lie within the City.
2. There is a regular bus service into the City and the Nottingham tram extends into Beeston.

The City Centre is only 3.4 miles away.

3. Beeston is home to many University of Nottingham students including 254 halls of residence and 427 other accommodation occupied by students. With the University based just across the border, the Eastern edge of Beeston adjoins the University of Nottingham's main campus. The Broadgate Park Halls of residents is split between Nottingham and Beeston and would be united in one constituency under a Beeston/Nottingham South proposal.

4. The opening of a new road between Beeston and Lenton, which was needed due to the growing links between the two. The road goes through part of the Nottingham Enterprise Zone and links Humber Road in Beeston to Thane Road in Lenton. It is seen by the City Council as key to unlocking the full potential of the Enterprise Zone.

5. Boots is a major employer. Its site is currently divided between two constituencies. There is representative advantage to the whole site being represented by a single Member of Parliament.

Summary - The above counter proposal would be less disruptive for communities than the original Commission proposal, as it would not split a parish and moves 1 fewer wards within the City. Thus, allowing Billborough to retail its links with Nottingham North. It also avoids having a Nottingham/Broxtowe constituency that is split in half by the M1. It also establishes a more natural link with the City, building on Beeston's strong connections with the University of Nottingham and associated business and cultural links.

Appendix

Broxtowe

Bramcote 5838 Broxtowe

Attenborough and Chilwell East 5711 Broxtowe

Awsworth, Cossall and Trowell 4151 Broxtowe

Beeston West 4154 Broxtowe

Chilwell West 5783 Broxtowe

Greasley 5449 Broxtowe

Kimberley 5299 Broxtowe

Nuthall East and Strelley 4082 Broxtowe

Stapleford North 3557 Broxtowe

Stapleford South East 3968 Broxtowe

Stapleford South West 4035 Broxtowe

Toton and Chilwell Meadows 6349 Broxtowe

Watnall and Nuthall West 3660 Broxtowe

Eastwood Hilltop 3967 Ashfield

Eastwood St Mary's 3494 Ashfield

Eastwood Hall 1972 Ashfield

Brinsley 1909 Ashfield

TOTAL 73378

Nottingham South

Wollaton West 11153 Nottingham South

Lenton and Wollaton East 16041 Nottingham South

Meadows 6485 Nottingham South

Clifton East 12225 Nottingham South

Clifton West 7899 Nottingham South

Radford 10332 Nottingham South

Beeston Rylands 3538 Broxtowe

Beeston Central 4271 Broxtowe

Beeston North 4315 Broxtowe

76259

Nottingham East

Mapperley 10767 Nottingham East
Hyson Green and Arboretum 13302 Nottingham East
St Ann's 12264 Nottingham East
Sherwood 11074 Nottingham East
Berridge 10115 Nottingham East
Dales 10720 Nottingham East
Castle 7085 Nottingham South
75327

Nottingham North
Bilborough 11941 Nottingham North
Aspley 10759 Nottingham North
Basford 11200 Nottingham North
Bestwood 11554 Nottingham North
Bulwell 11106 Nottingham North
Bulwell Forest 10329 Nottingham North
Leen Valley 6526 Nottingham South
73415

I wish to record my objection to the proposed boundary change to include Nuthall, Strelley, Watnall and Kimberley into the Nottingham City Parliamentary seat.

I believe that moving Beeston/Broxtowe with Nottingham would be detrimental to all residents in my area. Enlarging the City boundaries we would lose our identity and become another piece of the already mismanaged City Council, it would be expected that the residents of Beeston/Broxtowe would be required to pay, by increased council tax and other revenue grabs to cover debts which have been run up in hair brained such as Robin Hood Power 52 million pounds, the folly which is called NET trams, losing more than 1 million pounds per week and countless other debts that have been accrued by the mismanagement run up over years of Criminal activities. Beeston/Broxtowe council has been sensibly managed for countless years and this should be allowed to continue as the Broxtowe Borough Council.

The name of Broxtowe CC has always been a little odd. No places in the constituency are called Broxtowe. In the local area-Nottingham City you have a "Broxtowe Estate" This area is a large suburban housing estate that sits outside Broxtowe CC. It causes confusion to people. A new name for Broxtowe should be thought about to reduce the confusion

I don't understand why the constituency in which I live is named Broxtowe. As far as I am aware Broxtowe is the name of a Nottingham City council estate.

I am writing in total support of the upcoming boundary review recommendations for the Parliamentary seats of Ashfield and Broxtowe. I believe geographically it does make more sense as Eastwood is in the Broxtowe region so the proposal to move Eastwood back to Broxtowe Parliamentary Constituency is a good decision. The two Mansfield wards of Brick Kiln and Grange farm should be assigned to the Ashfield Constituency again they share a similar demographic and form a seamless continuation from Ashfield District Council wards of Skegness and Harlow wood. I hope my support for the move can be discussed and taken into consideration.

I do not support nuthall and Kimberley being brought together either Nottingham. They are not similar and in different local authority areas

Nuthall is a community with its own parish council wi and many more local groups shops schools and parks. If it becomes swallowed up in Nottingham north and Kimberley it will surely lose its identity as a separate community and will become too big for any MP to be able to do their job to their or their constituents satisfaction. People move to these areas because of their individuality which they will certainly lose if they become part of a city boundary

Eastwood and surrounding urban developments have much more to with Kimberley and North Nottingham than with Broxtowe Beeston and Chilwell.

I support the proposed changes to the Broxtowe constituency by the Boundary Commission. I am also aware of alternative proposals by my local MP Darren Henry. These proposals would split Beeston in two, which is completely illogical and would harm representation in the area. He has proposed this alternative purely for political reasons, in an attempt to remove an area that often votes Labour. I would encourage the Boundary Commission to reject these alternative proposal.

Firstly my postcode appears in a square white box which i assume should contain an area name - but doesn't? Secondly it would be useful to be able to see the current boundaries with the new ones superimposed over the top - so that we can see how the proposed changes impact us.

I have reviewed the proposed boundary change and wish to object to Nuthall being placed within the Nottingham North and Kimberley constituency. Nuthall, along with Kimberley and Watnall are not part of the city Nottingham and I feel that these areas would not be represented well if the boundary is changed. These areas have very different needs to the city and I feel would be neglected as priority would be given to the more inner city areas. I feel we are served well in the current Broxtowe constituency and would not like this to change.

We do not wish to be part of Nottingham City council for our rates and services as this would create to big an area as we are quite rural .

Looking at your proposals I feel the boundaries have been set to meet your prerequisites with no thought to the type of areas you are amalgamating. Your proposal has created corridors across the area and splits communities. It strikes me it is very much a political move with no thought to the community in the areas. Creating extra areas only increases the cost to the general public of supporting paid officials and creates more bureaucracy.

Broxtowe is an amalgamation of several, bland, small dormitory districts surrounding the City of Nottingham. It does not really have an identity of its own. Residents are concerned that the Boundary Commission may, under pressure from Nottingham City, be persuaded to incorporate Broxtowe into Nottingham to satisfy their demand for expansion and raise additional funds to pay off its £1billion debt incurred as a result of mismanagement. The Borough does not command any loyalty. It is recognised that about £30m pa could be saved if Broxtowe lost its identity and was absorbed into Nottinghamshire County Council. How this could be achieved I do not know but feel it would be a far better option from the residents viewpoint.

I understand that it is proposed to include Nuthall into the Nottingham City Parliamentary seat. I object to this in the strongest possible terms. I believe that the proposed change is just about numbers and has absolutely nothing to do with community or interest considerations. I, personally, have no desire to be considered a resident of Nottingham City. Nuthall has never been part of the City or part of a parliamentary seat including Nottingham and I would like to remain in the Broxtowe constituency. No changes please!!!!

As I now reside in a rural area and being totally satisfied with the present situation I see no need for any sort of reorganisation just to enlarge a city .

I am against the proposals for the new Broxtowe constituency because of the artificial separation of Kimberley, Nuthall, Watnall and Strelley from the rest of the Broxtowe Borough. It is an especially poor decision given that the transport links between Kimberley and Nottingham North is almost non-existent with only the Rainbow One bus going to Nottingham and even that, does not pass through Bulwell and Basford. Thus, the focus of any MP representing Nottingham North and Kimberley would be towards the Nottingham City part leaving many residents without a voice. For Broxtowe, if Kimberley is removed then the north of the constituency becomes much more weaker with only Eastwood being the main settlement of the north unlike Stapleford, Chilwell and Beeston in the south leaving Broxtowe to be an unbalanced constituency. This would leave north Broxtowe inevitably underrepresented by any MP. For a counterproposal, Beeston should be added to Nottingham South due to their better transport links with the City of Nottingham with the Tram and also a large student population residing in Beeston. Also, there are poor transport links from even Stapleford and Trowell to Beeston leaving Beeston isolated from the rest of Broxtowe. To get this new constituency to the required minimal electorate, the ward of Underwood should be added alongside all of Eastwood from Ashfield to Broxtowe alongside keeping the Kimberley, Watnall and Nuthall West and Nuthall East and Strelley wards

in Broxtowe. Underwood is just north of Eastwood and relies on the town so it would make sense to add Underwood to Broxtowe as well. If this suggestion is rejected, to make the Nottingham constituencies more even-sized, either add Hucknall to Nottingham North, West Bridgford to Nottingham South/East or add the west side of Gedling (Arnold and Carlton) to Nottingham East.

I am utterly opposed to the proposal to incorporate the parishes of Watnall, Strelley, Nuthall and Kimberley into the Nottingham City Council area. Our area is well served by the Borough council, and separate parish councils, which have a real interest in the locality. We are semi-rural parishes, looking more to Eastwood and Hucknall for shopping and facilities than to Nottingham, and we have nothing in common with the very urban areas of Aspley, Broxtowe Estate, and Bulwell. If this swathe of northern Broxtowe District is removed to the City, it will leave the remaining part of northern Broxtowe (Eastwood, Awsworth etc.) as a mere satellite to Beeston. We do not consider our area as being part of Greater Nottingham, as for instance Arnold or Beeston might be regarded. We are county/country communities, with a separate history and identity, and wish to remain so, and not be engulfed into a massive city council which will not serve our interests.

I live in the Nuthall Parish Council which comes under the authority of Broxtowe Borough Council. The proposal by parliament is to move Nuthall Parish Council to come under Nottingham City Council. In Nuthall we do not feel we are part of Nottingham city but an independent borough. We have a strong Parish council who represent the parish strongly regards policy decisions affecting the parish, a process that has been in place for over 100 years. If Nuthall was to be swallowed up into Nottingham City council, we would lose the identity and independence we have. We would simply be seen as greater Nottingham and become a forgotten element to the Nottingham City and as a such, lose the excellent standards that are in place to support the Parish. Please take this communication as an objection against the proposal to move Nuthall Parish Council within Nottingham City Council. Nuthall Parish council should stay as it is and under Broxtowe Borough Council.

The Broxtowe constituency is already quite varied going from Attenborough in the South up to Greasley in the North. The current proposal would stretch this northern border even further, making the constituency population even more diverse than most of current constituencies. The elected MP would have even more difficulties to represent the full gamut of view and expectations both for the local area as well as for regional/national debates. A redraw making sure the population of the constituency grouped around a couple of town rather than many smaller town and villages would help in that aspect.

This long narrow constituency means that the Southern and the Northern Wards DO NOT have ANY meaningful areas of joint contact/interest - especially as some of the Northern Wards have a long very troubled Coal Mining history .

I am against the current proposals to incorporate Kimberley Nuthall and Watnall into the city of Nottingham. I am not concerned about the political impact on voting but in the potential loss of our Parish Councils. At present Nuthall Parish Council does a wonderful job developing and supporting the community from a base of real knowledge and concern for the area. This would be lost and have a dreadful impact on the historical, and cultural identity of this area. Incorporating Beeston into the city instead would be more practical as it is already has an identity as a city area.

I approve of Eastwood going onto Broxtowe Constituency. Eastwood is currently within Broxtowe Borough Council for local government purposes, but within Ashfield for parliamentary purposes. This causes various problems at a political level and your proposal would resolve these problems.

I support the proposals for Broxtowe as I feel it is vital to keep the town of Beeston in one constituency, together with Chilwell and other neighbouring areas.

I have received a leaflet from Nuthall parish council regarding the changes which would put nuthall (along with other areas) into Nottingham North and Kimberley parliamentary seat. I object to this and entirely agree with the comments made by our parish council. We reside within the county boundary and not the city of Nottingham. Our interests and concerns also

include Kimberley watnall and greasley and these are the areas we frequent and use the facilities there. To reiterate myself and my family entirely agree with the Nuthall Parish council's views and wish to remain as we currently are.

I agree with the position taken by Broxtowe Borough Council, which has indicated to the Boundary Commission its support in principle for the changes to the Broxtowe Constituency boundaries they have proposed, and its strong opposition to any alternative proposal which would result in Beeston being split into two for parliamentary purposes. I moved into Beeston several years ago because of its distinctive character, its long history as a settlement, and its strong sense of local community. Attaching parts of it to Nottingham City or anywhere else would be show sad unawareness of local history and tradition, and flagrant disregard for the pride and affection Beestonians feel for their community. I strongly oppose any suggestion that Beeston should be split.

Nuthall is part of Broxtowe Borough Council and should remain so. We have no wish to become members of Nottingham City Council seat with its record of poor administration. Our local parish council is active on our behalf along with excellent schools and information facilities. Nuthall and Kimberly area have never been part of Nottingham City and value the benefits of Broxtowe Borough Council. If it is required to meet with a numbers requirement, then geographically other alternatives would appear to meet the requirements

Everyone we speak to, considers this proposal as mindless destruction of a community. We have a strong sense of place and are proud to be a separate entity in all its characteristics from the City.

I strongly oppose the proposal to move Kimberley and watnall into the Nottingham boundary. I have lived in the Kimberley ward over 60 years .I admit it has grown over the years but it still as a independent small community feel about it and doesn't feel connected to the City at all. We do not rely on Nottingham for most services having our own Doctors, dentists, solicitors, banks etc, As for shopping we have Kimberley Eastwood and Ilkeston all on our doorstep and 3 shopping Malls.I personally have not been to Nottingham (other than the hospital) in over 25 years. This area still as a strong farming link with 5 farms in the Kimberly ward and another in Watnall with a great farm shop.The area is rural and most residents have a rural outlook and dislike Cities so why would we want to become part of one, There as been a lot of new houses built in this area over the years and working in a local surgery i met a lot of new residents and i can say a lot of them moved here to get away from city life. Beeston with its high student population and being closer to the City would be a better option than our area.

I am not happy about the proposal to link the area I live in with Nottingham City and I can see no benefit to residents to do so. We intentionally moved away from the City environment a number of years ago for a reason. We are now in a rural area and our current councils are geared towards a rural way of life. There appears to be no explanation as to why your proposal was felt to be the most appropriate way forward. I feel there is no valid reason for your proposal as all you would need to do to meet the legal requirements of between 69,724 and 77,062 Parliamentary electors is to slightly adjust the boundaries between the 3 existing Nottingham City BC constituencies, e.g. reduce Nottingham South by 6500 and assign 3500 to Nottingham East and 3000 to Nottingham North. I appreciate this may be a simplistic view but sometimes, its best to not overcomplicate things and instead look for ways to reduce concerns and minimise disruption and impact on lives.

You propose a new constituency which combines Nuthall, Kimberley and Watnall (currently part of Broxtowe constituency) with part of north Nottingham. Like many local residents my immediate family have formed a close affinity with the two biggest towns in Broxtowe, namely Beeston and Eastwood. We have our banks and building societies in these towns and also do much of our shopping in them. We have no affinity with the area of north Nottingham which you propose to link us with. I also fear that the constituency that you are proposing would ultimately aid Nottingham City Council's desire to see its boundaries expanded to include part if not all of Nuthall. I would wish to see this resisted at all cost in view of the way in which that Council has run its services in recent years.

On behalf of the Nottinghamshire County Council Conservative Group, I submit for your consideration our agreed observations on the Boundary Commission for England's initial proposals for Parliamentary boundaries in the Nottinghamshire area of the East Midlands region. We support the Commission's proposals for most of the Nottinghamshire constituencies, but we object to the proposed boundary for the Broxtowe Constituency and to the creation of Nottingham North & Kimberley Borough Constituency. We also suggest alternative, more appropriate names for the proposed Sherwood and Worksop & Retford constituencies. As this is a submission on behalf of the Nottinghamshire County Conservative Group as a whole, the comments below are broad observations reflecting our thoughts on the characteristics of each of these areas of the County. We believe these are accurate reflections of local opinion as reported by our members, but we defer to individual councillors and residents to offer more specific and detailed observations relating to particular parts of these constituencies as they see fit.

Ashfield Constituency

We support the Boundary Commission's proposal for the Ashfield Constituency. We believe this will continue to reflect the identity of this part of Nottinghamshire.

Broxtowe Constituency & the Nottingham North & Kimberley Borough Constituency

We do not support the Commission's proposal to remove Kimberley, Nuthall, Strelley and Watnall from the existing Broxtowe constituency and incorporate them into a Nottingham North & Kimberley Borough Constituency. This would break long-standing community links where residents of these areas look north to Eastwood and its environs for their services and historic community identity. To do so would negate the Commission's welcome proposal to return Eastwood to the Broxtowe constituency where it is coterminous with the borough.

We believe the Commission's proposals are unwise to split the Parish of Greasley by placing Watnall in the Nottingham North & Kimberley Borough seat. The M1 motorway is a strong boundary which would effectively split the proposed Nottingham North & Kimberley Borough seat into two, creating an unnatural semi-rural and urban constituency with inconsistent characteristics. If any part of Broxtowe Borough must be linked with the City in order to preserve electoral equality, then a southern link would produce a more homogeneous cross-linked constituency. At the southern end of Broxtowe Borough, train and tram services out of the City travel through the centre of Beeston, while bus services between Nottingham and the Beeston area are more numerous than in the north, meaning there are far stronger business and community links with the City. A part of Beeston and Lenton Abbey north-east of Boundary Road is already contained within the current Nottingham South constituency. There are however comparatively poor transport and community links between the City and northern part of the borough, where more limited local bus routes prioritise access into Eastwood.

Here in Greasley we are very much akin to Kimberley, Watnall and Nuthall.

We are rural areas. And use doctors, schools, shops within all of these. All are easily accessible to us and should NOT be moved from Broxtowe.

We have no allegiance to Beston Central, Beeston North, Beeston Ryland, Beeston West. They are neither accessible to us, and are so close to city living, with the tram and students

I hope you will take this into consideration

I am writing to object to the proposed parliamentary boundary changes that would move Kimberley, Nuthall, and Watnall from the constituency of Broxtowe to the newly created Nottingham North and Kimberley constituency. I note that the The proposed boundary changes include Strelley, but as my residence lies in the Kimberley/ Nuthall/Watnall part of the area, I will limit my comments to the part which affects my household and community specifically. Watnall, Nuthall, and Kimberley are not Nottingham. Nottingham might as well be half a world away as far as many of the residents are concerned. And indeed on the west side of the M1 (where all of Kimberley and Watnall and much of Nuthall lie), with no natural connecting urban sprawl, the distance feels even greater. The naming of the constituency (Nottingham North and Kimberley) is telling, as if the area of Kimberley was clearly part of Nottingham, it would not require its own name in the title. Likewise, the hammerhead pattern of the new boundary gives a clear visual

demonstration of its inappropriateness. I am concerned that the disparate communities of Kimberley, Nuthall, and Watnall would be rendered voiceless by being swallowed up by the larger (and demographically different) Nottingham city population. For example, ONS data suggests the average age of a Broxtowe resident is more than 10 years older than a Nottingham City resident. With investigation, I am sure you would find that residents of this area rarely need or want to travel even to the other side of the M1 (let alone all the way to the city), despite it being very close, as all the facilities (healthcare, shopping, schools) used lie very much within the local area. If the Kimberley area was truly a part of greater Nottingham, it would have been included in the tram network and e-scooter scheme. The exclusion suggests that it isn't considered a part of the city, and/or that the layout, facilities, habits, and population of the areas are completely different to the urban area of Nottingham.

If changes need to be made to the parliamentary boundary, there are more compelling areas in Nottinghamshire to consider, both for demographic and geographic reasons. Places such as Beeston may be more suitable. I accept that old boundaries *may* need updating, and I am very invested in ensuring parliamentary seats are fairly distributed, but community and history should not be eschewed in favour of a simple mathematical split. Furthermore, I am sceptical of the reasons for these specific proposed changes.

So where is the justification for the proposal? If the Boundary Commission has conducted an analysis, then they must have solid logical reasons for the changes. It should be incumbent upon the Boundary Commission to write to every (affected) household and explain what they propose to change and why, given that it will affect elections and day-to-day matters.

Relying on the public to discover the proposals and then making them available only online with interactive maps raises many accessibility issues. Indeed, using the search function on the website to find the relevant area does not actually show the user what is being changed (as you will be aware, this is done by selecting various filters on the map labels). If the changes are not to the benefit of the local population (which they would not be in this case), then what are they for? Several sources calculate that, overall, the Conservative party will gain approximately 10 extra seats from these changes. Gerrymandering (clearly demonstrated here by the hammerhead) is a completely unacceptable practice, and must have no place in modern democracies. No boundary changes should be done with the aim or result of increasing the power of the current administration. Again, if the Boundary Commission thinks this is *not* what they have done, I invite you to provide evidence - to the public - to the contrary.

If the goal here is parliamentary fairness, then a fairer thing to do would be to introduce proportional representation into our electoral system. May I suggest the Boundary Commission takes that back to the government as a more sensible suggestion?

Greasley Parish within the Broxtowe Boundary

Eastwood Kimberley, Watnall and Nuthall, are in the same area, which we use for shopping, schools, doctors etc We are all rural area's. All are easily accessible to us and should NOT be moved from Broxtowe. Beston Central, Beeston North, Beeston Ryland, Beeston West, should be within the city boundary as they are closely aligned. They are neither easily accessible to us, and are so close to city living, with the tram and students I hope you will take this into consideration

I would like to register my views to agree with my local parish council proposal 2

The Commission's proposed link with the City of Nottingham at the northern end of the Borough of Broxtowe (the Nottingham North and Kimberley seat) sadly then breaks these community links by removing Kimberley, Nuthall, Strelley and Watnall from Broxtowe. These areas look north to Eastwood and its environs for services and community links. The Commissions proposals split the Parish of Greasley by placing Watnall in the Nottingham North and Kimberley seat. The M1 is a strong boundary, which affectively splits the Commission's proposed Nottingham North and Kimberley seat into two. It would be more appropriate to add the seats in the south of the Borough to Nottingham South, ie. Beeston North, Beeston Central, Beeston West and Beeston Rylands who all have a much closer link to Nottingham, with the University on our doorstep. There is a very large number of Halls of Residence on the edge of Beeston

and a much better bus service to Nottingham than could be found in the North of the Borough. There are poor transport links from the northern end of the Borough into the City, as contrasted with that of the southern end which has a good tram service from Nottingham City.

I do not wish the changes of the parliamentary boundary of Watnall to be changed into the seat of the city of Nottingham. Watnall has nothing in common with the city of Nottingham. We moved away into this area to escape the influence with the City. Watnall is a historical community based on well established Parish Council which act as cohesive cement ensuring that the community they represent is well represented. An MP covering this area is unlikely to have any great interest in this community as the overwhelming components for the constituency will be formed from Nottingham City. The issues of our community is far different from those of the City and we would be forgotten as being peripheral to the rest of the proposed constituency. There are more logical places such as Beeston which has a large student population that looks obviously to Nottingham University and the City for its requirements. This is in sharp contract to Watnall who look away from the City for its facilities. The proposals would obliterate the identities of our local communities as they would simply become part of great Nottingham. We have never been part of the City and do not wish to be.

I think the proposal is good. Combining the two areas will facilitate growth in the area.

Pleased to see that the southern part of Broxtowe is kept as at present. In particular, Beeston (inc Rylands)/Chilwell/Toton/Attenborough has a strong local identity and it would be a mistake to try and split Beeston. The suggestion from the previous review which would have put my address (Chilwell, despite the postal address of Beeston) in a different constituency to Beeston was a ridiculously arbitrary division, as is the suggestion current in some quarters that some wards of Beeston should move to a city constituency. It's also good to see that the suggestion made in a previous review of combining this area with parts of Rushcliffe e.g. East Leake seems no longer on the table: while demographically similar, the river Trent divides these areas and means there is little contact between them. In the north of Broxtowe, keeping as closely as possible to the borough council boundary is sensible. However the constituency is already long and narrow and my feeling is that it makes the northern parts feel a little cut off from the main focus of the council and MP which tends to be in Beeston/Stapleford. Stretching the constituency even more doesn't seem helpful in this respect.

I am concerned to hear that the Council proposes merging such distinct, separate areas together, for no real benefit to any of those areas. Nuthall, Kimberley and Watnall are separate, distinct towns with their own personalities and priorities, I believe these proposed changes are for the benefit and convenience of local administrators, and not the benefit of the greater population.

Having read the information regarding re-imagining of boundaries I was surprised and concerned to find us within Nottingham City control rather than the County Council. I believe that the areas proposed are disparate entities with differing needs. I worry that the needs of the individual areas will be overlooked or over-powered by those with most need. It seems that the areas have been drawn up solely for the purpose of 'evening up numbers' rather than the needs of the communities. I would ask that these are re-visited before this proceeds further.

Myself,wife and family are completely against the inclusion of the area within the City boundaries.We chose to live in the county as it has a different outlook to life than the City and agree with all the comments already given by our local councils. Question - has any changes been proposed to other areas to the south, north and east of the City i.e.Beeston, Attenborough, Edwalton,Papplewick, Newstead etc.? This manoeuvre is not in the interest of the local people or area and would appear to have been put together and proposed by persons who have no knowledge of the people or local area. What benefit has being in and part of the city, got to offer the residents that could improve their way of life ?

I am giving my support to the proposals for Broxtowe Borough which includes removing Kimberley and Nuthall from the Borough and putting in a new City Ward. I also support Eastwood moving from Ashfield to Broxtowe as well.

My family are completely against including the area within the City boundaries. We chose to live in the county as it has a different outlook to life than the City and agree with all the reasons already given by our local councils. This manoeuvre is not in the local people's interest and has been proposed by people who have no knowledge of the people or the local area

I do not wish my village of Watnall to become part of Nottingham City. The local villages of Nuthall, Watnall and Kimberley have well established Parish Councils with Strelley having regular Parish meetings. We have excellent relationships with them representing our communities in a very approachable way. We have excellent local schools and shopping areas with the Kimberley Leisure Centre on our doorstep providing wonderful local facilities. Our Parish Halls provide great focal points for community based activities and the Kimberley Library is an amazing place for books, information, Internet use and a meeting place for children's groups. These proposals would be very detrimental to our village life, breaking down our individual communities which have been in place for over 100 years. We do not want to be part of the huge Nottingham City Parliamentary seat, we need to keep our independent communities and retain our village and community life.

Myself,wife and family are completely against the inclusion of this area within the City boundaries. We chose to live in the county as it has a different outlook to life than the city and agree with all the reasons already given by our local councils. Question - have any changes been proposed in other areas to the south, north and east of the city ie. Beeston, Attenborough, Edwalton, Papplewick , Newstead etc.? This manoeuvre is not in the local people's interest and has been proposed by persons who have no knowledge of the people or our local area.

I do not wish for Nuthall to become part of the city council.

I do not wish for Kimberley to become part of Nottingham city council

I object strongly to the Parliamentary Boundary encompassing Kimberley and becoming part of Nottingham City. Kimberley is a rural community and has no association with a city environment.

I live in the village of Watnall. This is a semi rural community which with Nuthall west has about 4,500 residents. The constituency you are planning to put us in consists of council estates in Aspley, Bestwood and Bulwell. These areas have nothing in common with the village I live in. As we will be in the minority, how are our interests going to be served by an MP who will (and rightly) have to concentrate on the densely populated suburbs of Nottingham? Suburbs such as Aspley have their own issues (does it still have the highest teenage pregnancy rate in Europe?) which do not resemble those of the towns and villages the other side of Cinderhill island (Nuthall, Kimberley and Watnall). We are often forgotten in the North of Broxtowe as the Mp focuses on the more densely populated area around Beaton and we would certainly be forgotten in this new constituency. The review might be intended to even up the number of constituents in each area but it does not even up the number of issues? Do you have statistics on how many cases the current MP for Nottingham North and Broxtowe deal with? Surely this is a better way of dividing up constituencies? Finally, given all the local children in Awsworth, Kimberley, Nuthall and Watnall go to the Kimberley school, why divide Awsworth out from the rest? These seem to be political manoeuvrings at their best and will only be to the detriment of the people of Kimberley, Nuthall and Watnall who pay their taxes to support this system and will have little voice going forward.

I strongly object to the proposed new boundaries. I left Nottingham City area to live within an independent community, as Broxtowe has been for many years. I see absolutely no reason for change. Nottingham City have wasted millions of pounds over the years under an unfit for purpose Labour team. Labour councillors have totally mis-managed public funds, ie the Nottingham City utility provider, Broadmarsh Shopping Centre to name a few. A council should spend the valuable funds from Government and our Council Tax to improve the living conditions of the local people, there is more chance of that happening outside the Nottingham City control. Do not change the boundaries.

I have lived in the constituency of Broxtowe for approximately 30 years. I recognise that the job of the Boundary Commission is a difficult but essential one. Assuming that for the foreseeable future we will continue with the badly flawed FPTP system, then I am content with the job you have done. In some ways elements of the north and south of the constituency do not form a coherent whole, however, I personally would be unhappy to find I had moved into a nearby constituency. I am particularly concerned at concerted efforts by one political party locally to muster support for an alternative outcome. I am sure that you will recognise this organised campaign and that, conversely, those like myself who are content with the changes will not comment. Please do not be browbeaten!

Here are my comments on the plan to include Kimberley and Watnall within the new proposed 'Nottingham North and Kimberley' parliamentary constituency:

COMMENTS ON CURRENT PLAN

1. Kimberley and Watnall are geographically separated from the city of Nottingham by the M1 motorway, which is a major boundary, and which also creates a focus of the community away from the city and westwards into Broxtowe and towards Eastwood. Travel from Nottingham city to Nuthall/Watnall/Kimberley is not through a continuous built up area, which demonstrates the geographical separation. Travel from Nuthall (west of the M1) to Eastwood is through an almost continuous built-up area, emphasising the connection and integration with the other parts of Broxtowe, particularly Giltbrook, Newthorpe, and Eastwood.
2. The social make-up of the two areas is totally different, and so work of an MP representing the combined area is different. According to the Boundaries Commission website, Nottingham North has a very different profile from Nuthall/Watnall/Kimberley in terms of housing, employment, industry, ethnic composition, etc, etc. Many parts of the Nuthall/Watnall/Kimberley are rural or semi-rural aspect, with farming countryside and green belt issues being high on the agenda, whereas these are not issues in Nottingham North. This mismatch of Nuthall/Watnall/Kimberley with Nottingham North will mean that the overwhelming work and areas of challenge for the MP are likely to be with Nottingham City, meaning that the peripheral area of Nuthall/Watnall/Kimberley will receive less attention.
3. Nuthall/Watnall/Kimberley have strong community ties within the current north Broxtowe area. Within the north Broxtowe area there are strong ties between Nuthall/Watnall/Kimberley and Giltbrook/Newthorpe/Eastwood, those six 'settlements' forming a very strong community with common interests and a strong historical linkage. Travel is generally east-west through these towns and villages, and shopping is in either Kimberley, Giltbrook (a large shopping centre), or Eastwood, all on the east-west axis within Broxtowe Borough and not into the Nottingham North area at all. Leisure facilities for the whole of the area are provided at Kimberley Leisure Centre. One indicator of the cohesion of the area is the local newspaper which is the Eastwood & Kimberley Advertiser and which covers the whole of the area from Nuthall through to Eastwood. The Nottingham Post is not the newspaper of choice here. If an arbitrary line is drawn to including the Nuthall/Kimberley/Watnall area in with the city. it will fragment what are currently and historically areas with strong connections and a shared local identity.
4. There is a danger that eventually plans would be raised to absorb the area into Nottingham City, which is not wanted by residents, who have chosen to live in an area outside the city, and benefit from living in the rural area outside the city.

SUGGESTED ALTERNATIVE PLANS

A. Move Beeston (or part of it) into the Nottingham constituency. Beeston shares many of the characteristics of the city in terms of housing and other measures, has a large student population from Nottingham University (which is in the city) and is a substantial part of the Nottingham Tram network, giving a strong travel links to the city. Travel to Beeston from Nottingham is entirely through the built-up area with no obvious geographical boundaries - the casual visitor would not notice the change from Nottingham to Beeston. Residents of Broxtowe would undoubtedly see moving part (or all) of Beeston into the proposed constituency as the most logical fit with Nottingham city. The number of voters required (roughly 13,000) could

easily be achieved from the wards in the Beeston area.

B. Move part of Hucknall Town into Nottingham North constituency. Hucknall (currently in Ashfield) shares many of the characteristics of the city in terms of housing and demographics, and is a connected part of the Nottingham Tram network. It is part of the continuous built-up area to the North of the city, and would fit very well into Nottingham North. The number of voters required (roughly 13,000) could easily be achieved from a combination of the wards in the Hucknall area.

As a resident of Kimberley I do not wish to be part of the city of Nottingham. Please leave the boundary as it is.

We understand this is the Parliamentary boundary only, not Nottinghamshire County Council, Broxtowe Council or Nuthall Parish Council boundaries. The proposal is to transfer the four villages of Kimberley, Watnall, Nuthall and Strelley from the Broxtowe constituency to a new expanded North Nottingham and Kimberley constituency.

We object to the proposal because of the following reasons:

1. Not enough notice has been given to electors to consider and research the proposal. We heard from a neighbour about 15 July 2021 who was informed by a Nuthall Parish Councillor. We received a letter on 19 July 2021 from Nuthall Parish Council. The response deadline is 2 August 2021, which is far too short and extension should be granted to give a better response.
2. Nuthall Parish Council is against the proposals and we agree with the them, together with their reasons, we have added our own below.
3. The present Broxtowe Parliamentary Area is a long length of land that is shorter in width than its length is to the west of Nottingham centre following the M1 Motorway, with its centre about four miles from Nottingham centre. The existing Nottingham North parliamentary area is east of Broxtowe and north of Nottingham City Centre. The proposed new enlarged area of Nottingham North would arc around and cut into the old Broxtowe area like an outcrop. This would cause a number of difficulties not least public transport access to MP meetings. This odd size of the transferred four villages would be totally un-natural and out of place in the new constituency. No consideration has been made of this or local ties such as cultural and sport club membership and social and family catchment ties.
4. Our counter-proposal is that Broxtowe parliamentary constituency should be reduced on the western or southern boundaries instead, near Ilkeston or Chilwell.
5. It is unclear to us as electors from the maps online, if the existing parliamentary ward boundaries have been split in the new proposed area. Surely some explanatory text should accompany the maps to better understand if wards have been split, a complex situation? Also, explanatory text should be provided which parts of the Nottinghamshire County council, Broxtowe council and Nottingham City Council are to be altered the BCE proposal to enable us electors have a clearer picture of what is happening.
6. Our present area is Broxtowe both for Broxtowe Council and the present Parliamentary area. Should the proposal come into effect, we would have one of the three Nottingham City MP areas (Nottingham North and Kimberley) together with Broxtowe Council, a cause for great confusion. Keeping to existing local authority boundaries has not been adhered to, some latitude would have been acceptable but this is excessive.
7. The Parliamentary and Local Government Areas would become more mixed and complicated. Most of Nottinghamshire Local Government is made of two or three council providing services to the population, except Nottingham City Council which is a unitary council providing all services, meaning the new area MP would deal with a mixture of a unitary council and the County, Broxtowe and a parish council in Nuthall. This would not be an optimum situation.
8. The four villages are rural whereas appending them onto proposed existing predominantly urban Nottingham North would result in having a mixed minority rural and major urban constituency of Nottingham North and Kimberley. The present MP's for the two affected constituencies are used to the features of their areas. With the new area the numbers may be optimised but the problems and workload would increase for the new incumbent. Most of the time attention would be given to the urban inner-city areas leaving the new rural areas mostly

overlooked.

9. At the 2019 election the electorate in the two proposed affected parliamentary areas voted for two different parties, the new proposal means the transferred electorate would be outnumbered. BCE say they will not impact future election results, this proposal will impose a different party on the four displaced villages.

10. The new parliamentary area would cross Broxtowe Council and Nottingham City Council Borders which we believe it had not done before. Also, there is a combination of a unitary authority and non-unitary authority for the parliament area to straddle and cause unforeseen problems. This will cause much confusion, which should be avoided.

11. It is not clear if the affected wards of councils would also be transferred or not to the new parliamentary area or remain as they are? More clarity would be appreciated, please!

12. Bus, train and tram links at the moment radiate from Nottingham Centre outwards to the suburbs. The proposed new area is not served directly by public transport except expensive taxis between the four villages without traveling via the city centre, making for long duration's to meet our MP at surgeries. Electors with Bus passes would be priced out of attending surgeries or have to make long journeys into town and back out again.

13. For the past seven years the four village residents have been engaged in disputes with HS2 Limited to tunnel and other issues with the new railway line that runs adjacent to the four villages, Anna Soubery MP and then Darren Henry MP have spent much of their time taking up problems on electors' behalf. To change to a new MP would mean a new learning curve to be gone through losing much valuable time, at a time when new reports and decisions are being made, leaving no time for a new MP to prepare.

14. Major problems in Nottingham City Council are related to the financial problems of their energy supply company which are involving the three Nottingham MP's and taking up a lot of their time. The local press has referred to the near bankruptcy of the council (<https://www.nottinghampost.com/news/local-news/nottingham-city-council-verge-bankruptcy-4774551>). This is unrelated to our four villages and would leave the proposed new MP with little time to attend to our problems.

15. The maps showing the existing and proposed constituencies are difficult to understand and see what is going on, especially overlaying them.

16. No data is shown on how the decision was reached on the proposals. Data such as links, public transport routes, unifying rural and urban areas. Altering the parliamentary boundary without electors having the opportunity of examining the reasons for these changes and other options were considered and how the conclusions were reached.

As a resident of Nuthall I feel that we should not be included within Nottingham City. We understand the need to create constituencies of equal sizes but feel that Beeston area has more in common and is already more closely aligned with the city of Nottingham than Nuthall. As such that would be a more appropriate change. Thank you.

I support the boundary commission's proposal to move Eastwood from Ashfield constituency to Broxtowe constituency. I believe the commission's proposed constituency of Broxtowe including Eastwood is the best that can be achieved as it keeps communities together. I acknowledge the work the commission has done to keep communities together and avoid spiriting communities between different constituencies. Pairing Kimberley, Watnall and Nuthall with Nottingham North keeps those communities together as a whole, the alternative proposals but forward to divide Beeston would involve splitting the town and dividing communities. I would suggest that the commission use the community governance review of parish boundaries currently being undertaken by Broxtowe Borough Council. This is due to complete in June next year and if adopted a reorganisation order would be made and the ward boundaries changed ahead of local elections in 2023. Community Governance Review : Broxtowe Borough Council
The community governance review proposals would produce a better boundary between Broxtowe and Nottingham North and Kimberley with the boundary between the two constituencies running along the A610 before turning south around Swingate then running down the M1 motorway, (attached maps uploaded as files). The areas shown in green would move from Broxtowe to Nottingham North and the areas in orange would remain in Broxtowe. The

overall number of changes would be minor with around a dozen properties on Gilt Hill moving into Kimberley parish from Greasley and therefore into the proposed Nottingham North and Kimberley Constituency. Similarly the hamlet of Babbington containing around 30 properties, which is currently proposed to move into Nottingham North and Kimberley, would instead remain in Broxtowe as its only road link is via Awsworth and has no direct road links (beyond minor farm tracks) to Kimberley and therefore the proposed Nottingham North and Kimberley constituency.

With regards to the proposed Ashfield constituency I note the commission have proposed to include two wards from Mansfield into Ashfield but have sought alternative views to be put forward. One option would be for Brinsley ward to remain in Ashfield instead of moving onto Broxtowe constituency. Although Brinsley is part of Broxtowe district it has close links with the neighbouring villages of Underwood and Jacksdale which are part of Ashfield district. Keeping Brinsley would allow one of the Mansfield wards to remain in Mansfield however this would not be enough as the electorate for Ashfield constituency without the two Mansfield wards but including Brinsley would be 68,999 which is around 750 short of the minimum number of 69,724 voters.

If possible one option would be to split the ward of Newstead (part of Gedling District and Sherwood constituency). The actual village of Newstead is just over the district boundary from Ashfield but it has no road links to the wider Gedling district or Sherwood Constituency (attached map). If the boundary between Sherwood and Ashfield constituencies was moved East to follow the Robin Hood rail line south to the current Ashfield/Gedling boundary on the B6011 road north of Hucknall then Newstead village along with new houses that have been built between the A611, B6011 and the Robin Hood railway line would become part of the proposed Ashfield constituency which may bring in enough voters to hit the minimum threshold. There are also plans to build another 800 houses in this area which would allow the voter base in Ashfield to grow. If the above is not possible then I do not see any other option that does not involve splitting Mansfield or Hucknall.

The Boundary Commission is to be commended for the proposals they have formulated in relation to Broxtowe and the surrounding constituencies, particularly in respect of the following points

1 the territorial integrity of Nottinghamshire county has been protected in this Review. and the proposed constituency covers one Borough Council and belongs to one County Council

2 Broxtowe is in reality south west Nottinghamshire constituency: whatever constitutes the best formula for allocating sufficient voters to it should be paramount- in this case swapping (and bringing in) the less populous Eastwood/Brinsley for Nuthall/Kimberley makes numeric sense in making up the quota in the most practical way

3 beyond their being in Broxtowe Council there is little relationship between the main Borough areas of Beeston/Chilwell, Stapleford, Nuthall/Kimberley, and Eastwood/Brinsley: but each of these does constitute an organic community and should be packaged in to the same constituency

I am opposed to the changes. The proposals would merge very different communities and demographics. Changing the boundaries would also break up some of those existing communities. The existing boundaries cater for those variances - which have very different needs, both in terms of the service priorities, dependancies and budgetary needs. There are no similarities between Watnall/Kimberley/Nuthall and inner city Bulwell/Strelley/Broxtowe which in the revised would be merged. Having lived in both areas, I do not see the benefit of merging a mainly rural district with that which is mainly inner city. Indeed I was careful when choosing the area move to get away from The City and their very different budget priorities and waste. I would very much see this as a dilution of the focus and services provided for this area.

Living in Watnall we have no affiliation to the areas within the city of Nottingham boundary. Incorporating our area into the city will be of no benefit to us, our community needs would be lost amongst the wider needs of the city areas. We have always considered Watnall to be a

county area with links to Kimberley and Nuthall. We are against the proposed changes and wish to remain in the Broxtowe constituency.

I do not agree with the proposed boundary move which would include Nuthall in the Nottingham City Parliamentary seat. Nuthall has nothing in common with the City of Nottingham. Nuthall has a well established Parish Council as do Kimberley and Watnall, (Strelley has regular Parish meetings). I feel that this move is not considering communities but just concerns numbers. The issues in our communities are very different to those of the City.

Having been made aware by my local Parish and Borough Councillors of the proposed parliamentary boundary changes I can confirm that I do not support them. Having been born, bred and lived in Nottingham all my life I have, during that time, been a resident in both the city and Broxtowe boroughs and know that they are not one and the same. For the last 21 years I have lived in Watnall and have felt part of the local community along with the surrounding areas of Nuthall, Strelley and Kimberley. Although I am very proud to come from Nottingham and Nottinghamshire, I no longer feel part of the City of Nottingham given where I live and would not wish to move back within its boundary. Therefore the proposal to incorporate my area within the city boundary feels totally wrong. Looking at the proposed changes it would make far greater sense to include an area like Beeston within the new boundary which is closer by distance and has far greater ties with the city such as through the high proportion of students who go to the various universities. I would ask, therefore, that you reconsider the proposed changes to reflect mine and I am sure other similar opinions from residents in my area.

As the primary purpose of the BC is to maintain the number of electors in a constituency to be in the range 69,724 to 77,062 as well as maintaining the cohesion of constituencies and to support 'local areas' I cannot support the creation of Nottingham North and Kimberley. The proposed areas to be added to Nottingham City are NOT urban areas. They are well catered for by the Broxtowe constituency. The work of an MP is difficult enough without increasing the variety of needs, concerns and expectations of electors by trying to represent both urban and rural areas. As Nottingham South has 79,684 electors at the last count, it is outside the accepted range. I would suggest that the boundary be changed to take the areas around Aspley into Nottingham North - this would bring both constituencies into the required range and also keep the cohesion of both city constituencies without adding a rural area into the mix. Let Broxtowe keep its villages and small towns and let Nottingham keep its sections of the city.

Having become aware of the changes intended to the parliamentary boundaries to include Nuthall, Strelley, Watnall and Kimberley into the Parliamentary seat of Nottingham, as residents of Nuthall we would express our views on this proposal as follows:

We very strongly do not wish to become part of a Nottingham based parliamentary seat under a new name of Nottingham North and Kimberley. We feel the proposal does not take into account the requirements of the people living within the areas of Nuthall, Strelley, Watnall and Kimberley but is in fact merely an exercise to increase the number of eligible voters in a new Nottingham parliamentary seat. We strongly feel this should not be allowed to happen, especially when there are other areas close to Nottingham that would appear to be more suitable given their demographic make up and proximity to the City eg:: Beeston, with its large student population and proximity to high quality post compulsory education facilities. In our opinion Nuthall, Strelley, Watnall and Kimberley have nothing in common with Nottingham. We have our own well established communities encompassing all age ranges, we have a good choice of local shopping facilities and retail parks that cover our everyday needs with the choice of travelling into the City if necessary and we also have strong, well established local Parish Councils that ensure the communities they serve are well represented. In our opinion these communities have nothing in common with Nottingham city and our community issues are totally different. We feel N/S/W&K would be on the periphery of interest to an MP for a new constituency of Nottingham North and Kimberley and feel the identity of our communities would become submerged and lost within the proposed new Parliamentary constituency with the centre of interest being Nottingham itself. To conclude, we have never been part of the City of Nottingham or part of its parliamentary representation and we do not wish to become so now.

Why I do not support the proposed changes for Kimberley:-

Most Kimberley residents use health services in Eastwood. The proposals will break those ties. This makes no practical sense. Kimberley children generally do not attend schools outside of Kimberley, Nuthall and Watnall. The Kimberley School also serves the local areas of Awsworth and Giltbrook. It therefore makes no sense to lump Kimberley in with what would be a city constituency. The Nuthall roundabout is a clear boundary mark that divides the communities of Kimberley, Watnall and Nuthall from the city. Those living in these communities look to Kimberley as its town centre and not to the city centre of Nottingham. This is a thriving community in its own right. Kimberley, Nuthall and Watnall retain large swathes of green belt that link these communities and link them together with other parts of Broxtowe e.g. Cossall and Trowell. It again makes no practical sense to sever these community links. Kimberley is steeped in its own heritage as a former coal mining and brewing town. This is part of its identity and if it is swallowed up into a city constituency it will lose its individual identity.

Why I do not support the proposed changes for Kimberley:-

Many people, myself included, have moved out of the city and chosen Kimberley because it is not linked with the city areas. Kimberley is its own community with its own Town Council, own secondary school and own town centre. It doesn't look to the city for its services. It would make no sense to place it in to a constituency with which it doesn't share natural boundaries or key services e.g. education, health and recreation. The Nuthall roundabout defines the boundary of the communities of Kimberley, Watnall and Nuthall from the city. There are currently no public transport options that enable you to travel directly from Kimberley to the areas with which it is proposed it is now placed into a constituency with. This serves to demonstrate the lack of a common sense approach to this proposal. Kimberley, Nuthall and Watnall link naturally through their greenbelt and green corridors with other parts of the Broxtowe constituency e.g. Cossall, Trowell through to Stapleford. It again makes no practical sense to sever these ties, particularly at a time when Broxtowe Borough Council are looking to increase the use of these green corridors. Kimberley would be at serious risk of losing its identity under the proposed changes and as a town with significant heritage this could impact on the long term sustainability of its town centre. Parts of Beeston could much more practically move in to a new constituency. Many students at Nottingham University are already housed in the neighbouring city areas of Lenton and Wollaton. Beeston is already serviced by city transport links.

I do not agree with the new boundaries. Please leave them as they are.

Nuthall is a village community that has already been split during the construction of the M1 motorway to; recover its community spirit and has been serviced very well by Broxtowe Borough Council. If we, the village, is swallowed up into the City Council we will lose this and our independent voice to be heard in the Houses of Parliament. The housing, school and services are something we are proud of and we do not want to lose this village identity. Nuthall, Watnall & Kimberley use the local facilities supported very well through Broxtowe BC. Families attend the local schools, shop within Nuthall & Kimberley and support the local public houses and restaurants. Beeston with the large student population would be a better fit as these are the public that use the city facilities. Nuthall, Kimberley & Watnall should keep their individual community voice within Broxtowe BC. Being part of this borough council we continue to thrive, grow & develop whilst retaining the community and village way of life that residents take pride in. Many of the residents have lived in these areas for generations and some who have specifically moved from the city areas because of the village and community way of life. We do not want to be part of the city or part of a parliamentary seat that includes Nottingham. We are and should remain separate independent communities, who are looked after by our Parish Councils and Borough Council. We have our voice and want to ensure that our local services are provided by and are for the support of our communities.

Kimberley should remain in Broxtowe BC. Nottingham City Council are desperate to amalgamate Broxtowe South into Greater Nottingham and the residents of Broxtowe South are determined to prevent this happening.

I am strongly opposed to the proposed change in Parliamentary boundary for Nuthall, Strelley, Watnall and Kimberley.

The proposed change would involve these Parishes becoming part of a Nottingham City seat with which they have nothing in common. I fail to see how any MP would have any significant interest in the above areas which would be relegated to becoming an appendage of the City. As a resident of Nuthall, I do not consider myself a city resident. The facilities I use are predominantly within the local community and the change would inevitably result in the loss of identity of this community. The proposal is simply an easy way to balance the numbers of Parliamentary electors, which, at a stroke, would wipe out these separate communities.

I have in favour of the proposed recommendations for Broxtowe CC. I believe to comply with the Boundary Commission rules on the size of constituencies this is the best way to form such a constituency. As a resident of Beeston I am pleased that all Beeston will be kept together, there is a real community feel to the area and we are all very much part of Broxtowe rather than the city.

We object very strongly and want Watnall to remain a village will you please make our wishes known.

Report of the Monitoring Officer

REVIEW OF THE CODE OF CONDUCT AND ARRANGEMENTS FOR DEALING WITH CODE OF CONDUCT COMPLAINTS

1. Purpose of report

To seek approval for the amendments to the Code of Conduct and Arrangements for dealing with Code of Conduct complaints, prior to recommending to Council for adoption.

2. Detail

The Localism Act 2011 section 27, places the Council under a duty to promote and maintain high standards of conduct. In discharging this duty, the Council is required to adopt a Code dealing with the conduct that is expected of its Members and Co-opted Members. Section 28(6) of the Act also requires the Council to have in place arrangements under which allegations can be investigated and decisions on allegations can be made.

The Council's Code of Conduct (the Code) and arrangements were last reviewed and adopted by Full Council on 11 July 2012. This review's objectives were to update the Code and arrangements to ensure they are fit for purpose, provide clarity on expected behaviours and process, to manage and reflect public expectation.

Following consultation during 2020, the Local Government Association's (LGA) published the final version of the model Code in January 2021. The model Code, and best practice recommendations made by the Committee on Standards in Public Life (CSPL) can be found on the link in the background papers. The LGA describes the model Code as 'designed to protect our democratic role, encourage good conduct and safeguard the public's trust in local government'. The expectation is that all Councils should adopt it as a minimum but provision for additional local variations is permitted. Further background detail is provided at Appendix 1.

The established Member Task and Finish Group, in consultation with the Monitoring Officer and Deputy Monitoring Officers have put forward recommendations to adopt the model Code, in part with local amendments (Appendix 2), to amend and update the arrangements in line with the CSPL best practice recommendations at Appendix 3, A summary of main changes can be found at Appendix 4.

A comprehensive training programme will be developed to ensure Members and Parish Councils are aware of any approved changes.

Recommendation

The Committee is asked to RECOMMEND the locally amended Code of Conduct at Appendix 2 and arrangements at Appendix 3, for adoption to Full Council, to be implemented from 11 May 2022.

3. Background papers

- 3.1 Members Code of Conduct as approved at Council on 11 July 2012:
<https://www.broxtowe.gov.uk/media/1467/document-no-5a-the-code-of-conduct-of-broxtowe-borough-council.pdf>
- 3.2 The Councils arrangements for dealing with Code of Conduct complaints adopted on 11 July 2012.
<https://www.broxtowe.gov.uk/media/8242/arrangements-for-dealing-with-complaints-2020.pdf>
- 3.3 Standards Committee Report – 19 October 2020 CSPL Review of Ethical Standards in Local Government and list of Recommendations and list of Best Practice Report, January 2019:
<https://www.gov.uk/government/publications/localgovernment-ethical-standards-report>
- 3.4 Local Government Association Model Councillor Code of Conduct:
<https://www.local.gov.uk/publications/local-government-association-model-councillor-code-conduct-2020>
- 3.5 Guidance on Local Government Association Model Councillor Code of Conduct:
<https://www.local.gov.uk/publications/guidance-local-government-association-model-councillor-code-conduct>

APPENDIX 1Background:**Code of Conduct**

The Localism Act 2011 abolished the previous national model Code and instead imposed a simple requirement that each Council put in place a Code dealing with conduct that is expected of Members & Co-opted Members, when they act in that capacity (s27(2)). Each Code must, when viewed as a whole, be consistent with the 7 Nolan Principles of Public Life and must contain “appropriate provisions” for the registration and disclosure of disclosable pecuniary interests and ‘other’ interests.

During 2018 the Committee on Standards in Public Life (“CSPL”) undertook a review of local government ethical standards to establish how effective the current arrangements were in light of the changes made by the Localism Act 2011. Also in response to rising local government concern about the increasing incidence of public, Member to-Member and officer/Member intimidation and abuse and overall behavioural standards and expectations in public debate, decision making and engagement.

The CSPL found there was considerable variation in the length, quality, and clarity of codes of conduct across Councils.

One of the main recommendations of the CSPL was that the Local Government Association (LGA) should create an updated, non-mandatory, model Code of Conduct, which Councils could then consider either adopting in full or adapting according to their local circumstances.

The LGA aimed to develop a code that benchmarks a standard for all public office and for those engaged in public discourse and debate. It aimed to set out the duties and expectations of persons in public office as well as their rights, particularly their right to be protected from abuse and intimidation resulting from their undertaking of public office.

The LGA has now developed a model Member Code of Conduct, which was published in January 2021, in association with key partners and after extensive consultation with the sector, as part of its work on supporting all tiers of local government to continue to aspire to high standards of leadership and performance. It is a template for Councils to adopt in whole and/or with local amendments.

The model Code, has changed slightly from the version that was consulted upon in the summer of 2020. Most significantly, the requirement of “civility” which was in the original draft has now been replaced with “respect” and additional guidance has now been published with the model Code.

There is currently no mandatory statutory requirement to adopt the model Code. Whilst the CSPL report indicated there “*would*” be a model Code, it is unclear whether the intention was that this would be a statutory code which would require adoption through amendment to the Localism Act 2011 (“the Act”). It is always going to be a challenge to find a model that suits all, arguably only through mandatory adoption is there likely to be unity by Councils in relation to a Code of Conduct.

Lawyers in Local Government undertook a survey of Monitoring Officers earlier in the year to gauge how many had chosen to adopt the model Code following its publication in January 2021. A total of 82 responses were received from Monitoring Officers or Deputy Monitoring Officers. Of those who responded:

- 20% indicated they would be adopting the model Code in full.
- 20% indicated they would be adopting part of the Code.
- 55% indicated they would not be adopting the Code.
- 5% indicated they were undecided at this time.

The survey responses further revealed from the 55% not adopting the Code.

- 25% will not be adopting the model Code or changing their own Code.
- 30% not adopting the model Code in whole or part but were looking to make changes to their own Code.

This Committee is responsible for standards functions as set out in the constitution and for advising the Council on the adoption or revision of the Members’ Code of Conduct. The Localism Act provides that any adoption, replacement or revision of a Code must be undertaken by Council. The Council last updated and adopted its Member Code of Conduct in 11 July 2012.

The Task and Finish Group, in consultation with the Monitoring Officer and Deputy Monitoring Officers, have considered both the Best Practice Recommendations produced by the CSPL and the model Code and compare it to the Council’s existing Code of Conduct, with a view to bringing forward recommendations, as to whether the Model Code should be adopted by the Council in full, or in part with local amendments.

The Task and Finish Group recommend adopting the Model Code in part with local amendments and by removing the guidance notes. The Task and Finish Group, felt that the guidance contained within the Model Code was helpful, but ambiguous in parts. The guidance also made the Model Code too lengthy and would if adopted in full dilute the clear message of the Council’s Code.

Arrangement for dealing with Member Code of Conduct complaints.

Section 28(6) of the Act also requires the Council to have in place arrangements under which allegations can be investigated and decisions on allegations can be made.

CSPL report put forward the following Best Practice Recommendations be implemented by Councils to improve the Code of Conduct complaint handling process:

Best practice 6: Councils should publish a clear and straightforward public interest test against which allegations are filtered.

Best practice 7: Local authorities should have access to at least two Independent Persons.

Best practice 8: An Independent Person should be consulted as to whether to undertake a formal investigation on an allegation, and should be given the option to review and comment on allegations which the responsible officer is minded to dismiss as being without merit, vexatious, or trivial.

Best practice 9: Where a local authority makes a decision on an allegation of misconduct following a formal investigation, a decision notice should be published as soon as possible on its website, including a brief statement of facts, the provisions of the code engaged by the allegations, the view of the Independent Person, the reasoning of the decision-maker, and any sanction applied.

Best practice 10: A local authority should have straightforward and accessible guidance on its website on how to make a complaint under the code of conduct, the process for handling complaints, and estimated timescales for investigations and outcomes.

Best practice 11: Formal standards complaints about the conduct of a parish councillor towards a clerk should be made by the chair or by the parish council, rather than the clerk in all but exceptional circumstances.

Best practice 13: A local authority should have procedures in place to address any conflicts of interest when undertaking a standards investigation. Possible steps should include asking the Monitoring Officer from a different authority to undertake the investigation.

The Task and Finish Group in consultation with the Monitoring Officer and Deputy Monitoring Officers reviewed the Council's current arrangement in detail over several meetings in 2021. The Council's existing arrangements were also compared with other Council's arrangement and Independent Person and external experts were consulted on the proposed amendments.

The proposed amendments recommended by the Task and Finish Group implement the Best Practice Recommendations detailed above, and have proposed further revisions to the Arrangements (as set out in Appendix 3) to ensure the complaints process is fair and

effective in dealing with complaints for both the complainant and the Member being investigated.

The Council has recruited two new Independent Persons in line with Best Practice Recommendations to ensure the appropriate check and challenge is in place and to support the effective and timely handling of Code of Conduct complaints.

The assessment criteria and complaints form for dealing with Code of Conduct complaints, have also been amended (attached at Appendix 3), to help Complainants provide the necessary information required to process complaints and to reduce delays in requesting further information.

APPENDIX 2

Code of Conduct of Broxtowe Borough Council

Part 1: General Provisions

Introduction

This section sets out general interpretation and background to the Code of Conduct, including definitions used within the Code, the purpose of the Code, the principles the Code is based on and when the Code applies. It does not form part of the Code of Conduct itself and consequently does not contain any obligations for you to follow, as these are contained in the 'Code of Conduct' section below.

All Councils are required to have a local Member Code of Conduct.

Definition

For the purposes of this Code of Conduct, a "Member" means a Member or Co-opted Member of Broxtowe Borough Council ('the Council').

A "Co-opted Member" is defined in the Localism Act 2011 Section 27(4) as "a person who is not a Member of the Council but who

- a) is a Member of any committee or sub-committee of the Council, or;
- b) is a Member of, and represents the Council on, any joint committee or joint sub-committee of the Council;

and who is entitled to vote on any question that falls to be decided at any meeting of that committee or sub-committee".

Purpose of the Code of Conduct

The purpose of this Code of Conduct is to assist you, as a Member, in modelling the behaviour that is expected of you, to provide a personal check and balance, and to set out the type of conduct that could lead to action being taken against you. It is also to protect you, the public, fellow Members, Council officers and the reputation of the Council and local government. It sets out general principles of conduct expected of all Members and your specific obligations in relation to standards of conduct. The fundamental aim of the Code is to create and maintain public confidence in the role of Member and local government.

You are Member or Co-opted Member of the Council and you have a responsibility to represent the community and work constructively with our staff and partner organisations to secure better social, economic and environmental outcomes for all.

Application of the Code of Conduct

The Code of Conduct has been adopted by the Council under Section 27 of the Localism Act 2011.

This Code of Conduct applies to you as soon as you sign your declaration of acceptance of the office or attend your first meeting as Member or Co-opted Member and continues to apply until you cease to be a Member.

The Code of Conduct applies to you when you are acting in your capacity as a Member or Co-opted Member of the Council and conduct the business of the Council (which, in this Code includes the business of the office to which you are elected or appointed).

Where you act as a representative of the Council on another Council, you must, when acting for that other Council, comply with that other Council's Code of Conduct.

When you act as a representative of the Council on any other body, you must, when acting for that other body, comply with this Code of Conduct, except and insofar as it conflicts with any other lawful obligations to which that other body may be subject.

The Code applies to all forms of communication and interaction, including:

- at face-to-face meetings
- at online or telephone meetings
- in written communication
- in verbal communication
- in non-verbal communication
- in electronic and social media communication, posts, statements and comments.

You are expected to uphold high standards of conduct and show leadership at all times when acting as a Member.

Your Monitoring Officer has statutory responsibility for the implementation of the Code of Conduct. It is your responsibility to comply with the provisions of this Code and to ensure all its obligations are met. You are encouraged to seek advice from the Monitoring Officer on any matters that may relate to the Code of Conduct, which you are unsure of. Town and Parish Members are encouraged to seek advice from their Clerk (who may refer matters to the Monitoring Officer).

General principles of Member conduct

In accordance with the Localism Act provisions, when acting in this capacity you are committed to behaving in a manner that is consistent with the following Seven Principles of Public Life also known as the Nolan Principles set out below: These general principles underpin the obligations in the Code of Conduct that follows and aim to achieve best value for our residents and maintain public confidence in this Council:

SEVEN PRINCIPLES OF PUBLIC LIFE:

1. **SELFLESSNESS:** Holders of public office should act solely in terms of the public interest.
2. **INTEGRITY:** Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must disclose and resolve any interests and relationships.
3. **OBJECTIVITY:** Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.
4. **ACCOUNTABILITY:** Holders of public office are accountable for your decisions and you must co-operate fully with whatever scrutiny is appropriate to your office internally and externally, including by local residents.
5. **OPENNESS:** Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.
6. **HONESTY:** Holders of public office should be truthful.
7. **LEADERSHIP:** Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

Part 2 – Member Code of Conduct

General Obligations:

This section sets out your obligations, which are the minimum standards of conduct required of you as a Councillor. Should your conduct fall short of these standards, a complaint may be made against you, which may result in action being taken.

1. Respect

- 1.1 You must always treat all others with respect, including the organisations, staff and public you engage with and those you work alongside.
- 1.2 You must value colleagues and staff and engage with them in an appropriate manner

and one that underpins the mutual respect between you that is essential to good local government.

2. Bullying, harassment and discrimination

2.1 You must not do anything which may cause the Council to breach any of the equality enactments.

- a) bully any person;
- b) harass any person;
- c) behave in an improper or offensive manner;
- d) discriminate unlawfully against any person due to their race, age, religion, gender, sexual orientation or disability and will promote equalities.

3. Impartiality of officer of the Council

3.1 You must not do anything which compromises or is likely to compromise the impartiality of those who work for, or on behalf of, the Council.

3.2 You must deal with representations or enquiries from residents, members of our communities and visitors fairly, appropriately and impartially.

4. Confidentiality and access to information

4.1 You must not disclose information:

- a) given to you in confidence by anyone, or
- b) acquired by you which you believe, or ought reasonably to be aware, is of a confidential nature, unless:
 - i) you have the consent of a person authorised to give it;
 - ii) you are required by law to do so;
 - iii) the disclosure is made to a third party for the purpose of obtaining professional legal advice provided that the third party agrees not to disclose the information to any other person; or
 - iv) the disclosure is:
 - 1. reasonable and in the public interest; and
 - 2. made in good faith and in compliance with the reasonable requirements

of the Council.

3. you have consulted the Monitoring Officer [or Clerk] prior to its release.

- 4.2 You must not improperly use knowledge gained solely as a result of your role as a Councillor for the advancement of yourself, your friends, your family members, your employer or your business interests.
- 4.3 You must not prevent another person from gaining access to information to which that person is entitled by law.

5. Disrepute

- 5.1 You must not conduct yourself in a manner which could reasonably be regarded as bringing your office or the Council into disrepute.

6. Use of your position

- 6.1 You must not use or attempt to use your position as a Member improperly to confer on or secure for yourself or any other person, an advantage or disadvantage.
- 6.2 You will not place yourself under a financial or other obligation to outside individuals or organisations that might seek to influence you in the performance of your official duties.

7. Use of local authority resources and facilities

- 7.1 You must not misuse Council resources;
- 7.2 You must, when using or authorising the use by others of the resource of the Council act in accordance with the Council's reasonable requirements;
- 7.2 You must ensure that such resources are not used improperly, including use for political and party political purposes unless that use could reasonably be regarded as likely to facilitate, or be conducive to, the discharge of the functions of the Council or of the office to which you have been elected or appointed.

8. Decision making

- 8.1 When reaching decisions on any matter you must have regard to any relevant advice provided to you by officers of the Council acting pursuant to their statutory responsibilities (including a proper officer designated by the Council), or other professional officers of the Council, taking all relevant information into consideration, remaining objective and making decisions on merit
- 8.2 You must give reasons for all decisions in accordance with any statutory requirements and any reasonable additional requirements imposed.

- 8.3 You must behave in accordance with all the Council's legal obligations, alongside any requirements contained within this Council's policies, protocols and procedures.
- 8.4 You must not allow other pressures to unreasonably deter you from pursuing constituents' casework, the interests of the Council's area or the good governance of the Council in a proper manner.

9. Complying with the Code of Conduct

- 9.1 You will undertake Code of Conduct training provided by your Council.
- 9.2 You will fully cooperate with any Code of Conduct investigation and/or determination.
- 9.3 You will not intimidate or attempt to intimidate any person who is likely to be involved with the administration of any investigation or proceedings; in relation to an allegation that a Member (including yourself) has failed to comply with his or her Council's Code of Conduct;
- 9.4 You will comply with any sanction imposed on you following a finding that you have breached the Code of Conduct.

Protecting your reputation and the reputation of the Council

10. Interests

- 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, is a criminal offence under the Localism Act 2011.

11. Gifts and hospitality

- 11.1 You will not accept gifts or hospitality, irrespective of estimated value, which could give rise to real or substantive personal gain or a reasonable suspicion of influence on my part to show favour from persons seeking to acquire, develop or do business with the Council or from persons who may apply to the Council for any permission, licence or other significant advantage.

- 11.2 You will register with the Monitoring Officer any gift or hospitality with an estimated value of at least £25 within 28 days of its receipt.
- 11.3 You will register with the Monitoring Officer any significant gift or hospitality with an estimated value of at least £25 that you have been offered but have refused to accept

12. Dispensations

- 12.1 You may request a dispensation from the Monitoring Officer for one meeting only.
- 12.2 You must make the request in writing detailing what my interest is, why the dispensation is required and for what meeting.
- 12.3 You must make any request 5 days prior to the meeting at which the Dispensation is required.
- 12.4 You must make any further requests for dispensation to the Standards Sub Hearing Committee.
- 12.5 You will only be granted a Dispensation where there are reasonable grounds for doing so and where such grounds are in the public interest.

Appendix A sets out the situations where a Member's personal interest in a matter may prevent them from participating in the decision-making process. In certain circumstances, however, there may be reasonable grounds to allow a Member to participate in decision-making on that matter where it would be in the public interest to do so. Where you consider that there may be good grounds for you to continue to participate you should request a dispensation from the Monitoring Officer.

APPENDIX A**Disclosable Pecuniary Interests****1. Definitions**

“Disclosable Pecuniary Interest” means any interest described as such in the Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012 and includes an interest of yourself, or of your Partner (if you are aware of your Partner's interest) that falls within the descriptions set out in the following table. A Disclosable Pecuniary Interest is a Registerable Interest.

“Partner” means a spouse or civil partner, or a person with whom you are living as husband or wife, or a person with whom you are living as if you are civil partners.

Table of Disclosable Pecuniary Interests

Subject	Prescribed description
Employment, office, trade, profession or vocation	Any employment, office, trade, profession or vocation carried on for profit or gain, which you, your spouse or civil partner, undertakes. {any unpaid directorship}
Sponsorship	Any payment or provision of any other financial benefit (other than from your Council) made or provided within the previous 12 month period in respect of any expenses incurred by you in carrying out duties as a Member, or towards your election expenses. This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.
Any contracts	Any contract which is made between you, your spouse or your civil partner or person with whom you are living with as spouse or civil partner (or a body in which you, or your spouse or your civil partner, has a beneficial interest) and the Council under which a) goods or services are to be provided or works are to be

	<p>executed; and b) which has not been fully discharged.</p> <p><i>For this purpose “body in which you or they have a beneficial interest” means a firm which the relevant person is a partner or a body corporate of which the relevant person is a partner or a body corporate of which the relevant person is a director, or in the securities of which the relevant person has a beneficial interest. “Director” includes a Member of the committee of management of an industrial and provident society.</i></p>
Land	<p>Any beneficial interest in which you, or your spouse or your civil partner, have and which is within the area of the Council.</p> <p><i>For this purpose “ Land” excludes an easement, servitude, interest or right in or over land which does not carry with it a right for you, your spouse, civil partner (alone or jointly with another) to occupy the land or to receive income.</i></p>
Licences	<p>Any licences (alone or jointly with others) which you, or your spouse or your civil partner, holds to occupy land in the area of the Council for a month or longer.</p>
Corporate tenancies	<p>Any tenancy where (to your knowledge) a) the landlord is the Council; and b) the tenant is a body in which you, or your spouse or your civil partner or the person with whom the Member is living with, as if they were spouse/civil partners is a partner of or a director of or has a beneficial interest in the securities of.</p>
Securities	<p>Any beneficial interest in securities of a body where: (a) that body (to your knowledge) has a place of business or land in the area of the relevant Council; and (b) either: (i) the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body; or (ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the</p>

	<p>Member, or his/her spouse or civil partner or the person with whom the Member is living as if they were spouse/civil partners have a beneficial interest exceeds one hundredth of the total issued share capital of that class.</p> <p><i>For this purpose, “securities” mean shares, debentures, debenture stock, loan stock, bonds, units of a collective investment scheme within the meaning of the Financial Services and Markets Act 2000 and other securities of any description, other than money deposited with a building society.</i></p>
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Note - Failure to declare a Disclosable Pecuniary Interest and to take part in any discussion in or vote on any matter in which the Member has a pecuniary interest is a criminal offence, which is punishable by a fine of up to £5,000 and disqualification.

“Registrable Interests” are interests that you are required to register in accordance with this Code of Conduct and include both Disclosable Pecuniary Interests and Other Registerable Interests.

“Other Registerable Interests” are a personal interest in any business of your Council which relates to or is likely to affect:

- a) any unpaid directorships
- b) any body of which you are in general control or management and to which you are nominated or appointed by your Council; or
- c) any body
 - (i) exercising functions of a public nature
 - (ii) any body 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.

“Non-Registrable Interests” are interests that you are not required to register but need to be disclosed in accordance with section 3.3.

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 this 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.

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.

2. Registering Interests

- 2.1 You must, within 28 days of this Code being adopted by the Council, or taking office as a Member or appointed as a Co-opted Member, register all details of Disclosable Pecuniary Interest and Other Registerable Interests, with the Monitoring Officer.
- 2.2 You must upon your re-election as a Member or your re-appointment as a Co-opted Member, within 28 days re-register all details of Disclosable Pecuniary Interest and Other Registrable Interests, with the Monitoring Officer.
- 2.3 You must register any change to a Disclosable Pecuniary Interest or new interest within 28 days of becoming aware of it.
- 2.4 You must notify the Monitoring Officer where you have a Sensitive Interest, with the reasons why you believe it is a Sensitive Interest. If the Monitoring Officer agrees they will withhold the interest from the public register.
- 2.5 You must observe the restrictions the Council places on your involvement in matters where you have a Disclosable Pecuniary Interest or Other Registerable Interest, as defined by the Council.

3. Declaration at and Participation in Meetings

If you are present at a meeting and you have either a Registerable or Non-Registerable Interest in any matter to be considered or being considered, and the interest is not a Sensitive Interest, you must disclose that interest to the meeting (whether or not it is registered).

To determine whether your interest affects your ability to participate in a meeting, you must first determine what type of interest you have and, if necessary, go on to apply the tests as set out below.

3.1 Disclosable Pecuniary Interests

3.1.1 Where a matter arises at a meeting which **directly relates** to one of your Disclosable Pecuniary Interests:

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.

3.2 Other Registerable Interests

3.2.1 Where a matter arises at a meeting which **directly relates** to the financial interest or wellbeing of one of your Other Registerable Interests:

Action to be taken

Where a matter arises at any business of the Council, of its executive or any committee of the executive, or any committee, joint committee, or joint sub-committee of the Council and you have a Disclosable Pecuniary Interest relating to any business that is or will be considered at the meeting:

- **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.

3.2.2. The provisions of paragraph 3.1.1 and 3.2.1 shall be applied in such a manner as to recognise that this Code should not obstruct a Member's service on more than one Council. For the avoidance of doubt, participation in discussion and decision making at one Council will not by itself normally prevent you from taking part in discussion and decision making on the same matter at another Council. This is on the basis that a reasonable member of the public will see no objection in principle to such service or regard it as prejudicing a Member's judgement of the public interest and will only regard a matter as giving rise to a Personal Interest which might lead to bias in exceptional circumstances.

3.3 Non-Registerable Interests

3.3.1 Where a matter arises at a meeting which **directly relates** to a financial interest or the well-being of yourself or of a friend, relative or close associate (and is not a Registerable Interest):

Action to be taken

- **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.

3.3.2. Where a matter arises at a meeting which does not directly relate to but **affects**

- a) a financial interest or the well-being of yourself or of a friend, relative or close associate; or
- b) a financial interest or wellbeing of a body included in those you need to disclose under Other Registerable Interests

Action to be taken

- **you must disclose the interest** and extent of your interest including enough detail to allow a member of the public to understand its nature, at the commencement of that consideration, or when the interest becomes apparent.

In order to determine whether you can remain in the meeting after disclosing your interest the following test in paragraphs 3.3.3 and 3.3.4 should be applied.

3.3.3. Where a matter under paragraph 3.3.2 **affects** the financial interest or well-being or body:

- a) to a greater extent than it affects the financial interests or wellbeing of the majority of inhabitants of the ward affected by the decision; and
- b) a reasonable member of the public knowing all the facts would believe that it would affect your view of the wider public interest.

Action to be taken

- **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; and
- **you must withdraw from the room** unless you have been granted a Dispensation.

3.3.4. Where a matter under paragraph 3.3.2 **does not affect** the financial interest or well-being or body:

- a) to a greater extent than it affects the financial interests or wellbeing of the majority of inhabitants of the ward affected by the decision; and/or
- b) a reasonable member of the public knowing all the facts would not believe that it would affect your view of the wider public interest

Action to be taken

- **you may remain in the room,**
- **you may speak** if you wish to and take part in any discussion or
- **you may vote** on the matter, provided you have disclosed your interest under paragraph 3.3.2.

4. Single-Member-Decision-Making

4.1. In the event that you are making a decision as a single Member the following section applies in relation to any interests you may have.

4.1.1. Where you have a personal interest on a matter to be considered or is being considered by you as a Cabinet Member in exercise of your executive function (i.e., single-Member-decision-making) and the interest is:

- a) A Registrable Interest; or
- b) A Non-Registrable Interest that falls under paragraph 3.3.3 above

Action to be taken

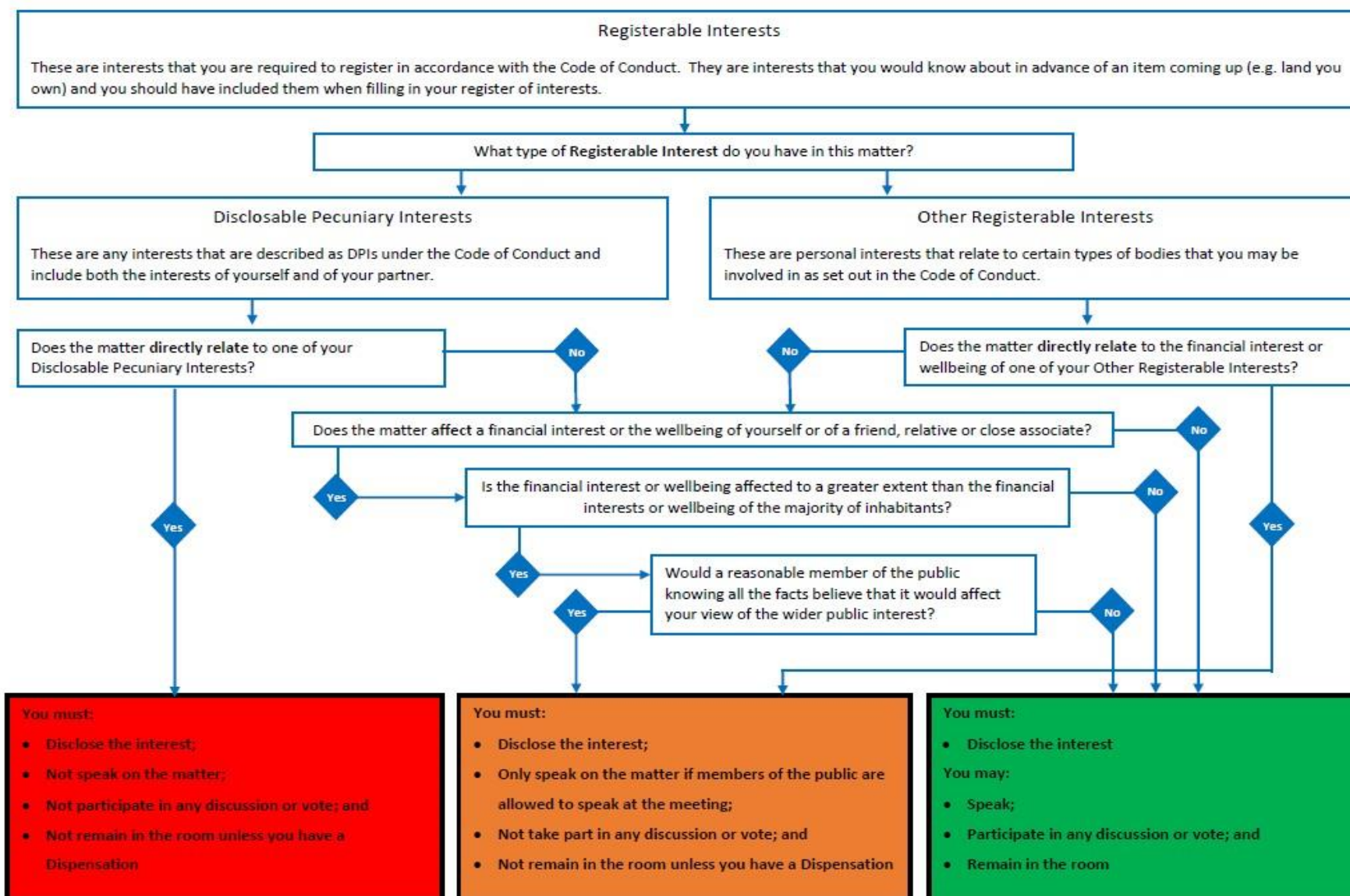
- **you must notify** the Monitoring Officer of the interest and

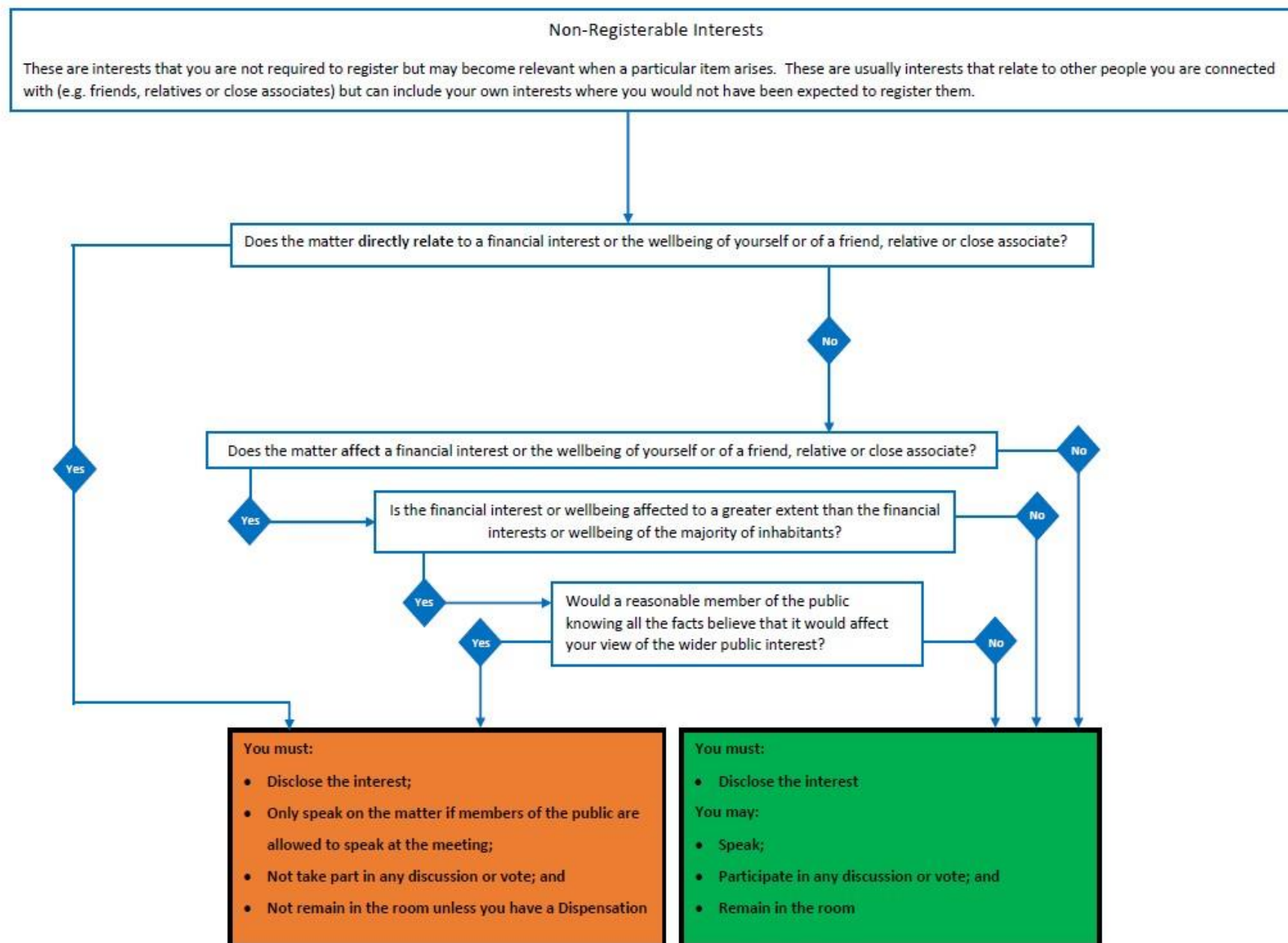
- **you must not** take any steps or further steps in the matter apart from arranging for someone else to deal with it.

4.1.2. Where you have a personal interest on a matter to be considered or is being considered by you as a Cabinet Member in exercise of your executive function (i.e. single-Member-decision-making) and the interest is a Non-Registrable Interest that falls under paragraph 3.3.4,

Action to be taken

- **you must** make sure that any written statement of that decision records the existence and nature of your interest.





APPENDIX 3

Broxtowe Borough Council
Arrangements for dealing with Code of Conduct complaints
under the Localism Act 2011

1. Introduction

These “Arrangements” set out how to make a complaint that an elected or Co-opted Member of Broxtowe Borough Council (“the Council”), or of a Town or Parish Council within the Borough of Broxtowe, has failed to comply with the Council’s Code of Conduct, and sets out how the Council will deal with allegations of a failure to comply with that Code of Conduct.

Under Section 28(6) and (7) of the Localism Act 2011, the Council must have in place “arrangements” under which allegations that a Member or Co-opted Member of the Council, or of a Town or Parish Council within the Borough of Broxtowe, or of a Committee or Sub-Committee of the Council, has failed to comply with that Council’s Code of Conduct can be investigated and decisions made on such allegations.

The statutory arrangements provide for the Council to appoint at least one Independent Person, whose views must be sought by the Council before it takes a decision on an allegation which it has decided shall be investigated, and whose views can be sought by the Council at any other stage, or by a Member or Co-opted Member of a Town or Parish Council within the Borough of Broxtowe, against whom an allegation has been made.

The Council takes seriously all Code of Conduct complaints. The investigation of complaints will be dealt with fairly for both the Complainant and the Member of the complaint.

These arrangements came into effect from (date to be inserted when adopted by Council) and were adopted by a meeting of full Council on (date to be inserted when adopted by Council).

2. The Code of Conduct

The Council has adopted a Code of Conduct for its Members, which is attached as Appendix C to these arrangements and available for inspection on the Council's website and on request from Reception at the Council Offices.

Each Town and Parish Council is also required to adopt a Code of Conduct. This is a matter for each individual Council to consider. If anyone wishes to inspect a Town or Parish Council's Code of Conduct, they should visit any website operated by the Town or Parish Council or request the Town or Parish Clerk to allow inspection of the relevant Code of Conduct, as the Town and Parish Council's may have adopted a different Code of Conduct than Broxtowe Borough Council

3. Definitions

The following definitions are used throughout these arrangements:

Complainant	The person who has raised the complaint. This might be a member of the public, an officer or another Member.
Member(s) being investigated	The Member against whom the complaint has been made.
Independent Person	The person appointed by the Council whose views must be sought by the Council before making a decision on an allegation, which is within the jurisdiction of the arrangements for dealing with Code of Conduct complaints.
Monitoring Officer	A senior officer of the Council who has responsibility for maintaining the register of Members' interests and who is responsible for administering the system in respect of complaints of Member misconduct and is the Council's Proper Officer for such matters.

Member	Councillor of Broxtowe Borough Council or of a Town or Parish Council within Broxtowe or a dual hatted Councillor.
Co-opted Member	A person who is not a Member of the Council but who is a Member of any committee or sub-committee of the Council, or is a Member of, and represents the Council on, any joint committee or joint sub-committee of the Council, and who is entitled to vote on any question that falls to be decided at any meeting of that committee or sub-committee.
Sanctions	The range of actions that can be taken against a Member where it is concluded that they have failed to comply with the Code of Conduct.
Informal Resolution	Informal resolution may involve the Member being investigated accepting that their conduct was unacceptable and offering an apology, or other remedial action proposed by the Monitoring Officer.

4. Making a complaint

If you wish to make a complaint, please write to:

The Monitoring Officer
Broxtowe Borough Council
Council Offices
Foster Avenue
Beeston
Nottingham
NG9 1AB

or email: membercomplaints@broxtowe.gov.uk

In order to ensure that the Monitoring Officer has all the information which is needed to be able to process a complaint, the correct Member Code of Conduct complaint form (Appendix B) should be completed. The form can be downloaded from the Council's website www.broxtowe.gov.uk under [Member complaints](#) and is available

on request from reception at the Council Offices or from the Monitoring Officer. If you decide not to use the Member complaint form, you must still provide all of the information requested within it, otherwise we will not be able to progress your complaint until this information is provided.

Help to complete the form or to make a written Member complaint is available by contacting the Monitoring Officer on 0115 917 3221 or by emailing membercomplaints@broxtowe.gov.uk.

Under the Equality Act 2010, we can make reasonable adjustments to assist you if you have a disability that prevents you from making your complaint. We can also help you if English is not your first language.

Parish and Town Councils as employers should have processes in place to ensure the fair and proper treatment of staff. Complaints about the conduct of a Parish or Town Members towards a Clerk should be made by the chair or by the Parish or Town Council as a whole, rather than the Clerk in all but exceptional circumstances.

A Complainant will be required to provide their name, a contact address and where possible, an email address, so that the complaint can be acknowledged and the Complainant kept informed of progress.

The Monitoring Officer will acknowledge receipt of a complaint within 3 working days of receiving it and the Complainant will be kept informed of the progress of the complaint.

5. Complaints against ‘Dual Hatted’ Members

A ‘dual hatted’ Member is a Member of a Council and who is also a Member of another Council within the County. The Member could be a serving County Councillor, Fire Authority Councillor, District Councillor and Town or Parish Councillor.

Complaints against Members are received by the Monitoring Officer for and on behalf of the Council. The Monitoring Officer will consider whether:

- The complaint relates to a ‘dual hatted’ Member;
- The complaint clearly relates to incidents or circumstances which have occurred solely in that Member’s capacity as a Councillor of the Council;

- That no other countywide Council is involved; and
- That the conduct or actions complained of relate to possible failure to comply with the Member Code of Conduct.

If so, the complaint shall be processed by the Monitoring Officer in accordance with these adopted arrangements for dealing with Member complaints.

Where the complaint relates to:

- A 'dual hatted' Member;
- In the view of the Monitoring Officer the complaint may impact on the capacity of the Member as a Member of another Council;
- The complaint may relate to incidents or circumstances which have occurred in the Member's capacity as a Councillor of the Council and of another Council;
- The conduct or actions complained of relate to a possible failure to comply with the Member Code of Conduct; and / or
- The complaint or a similar complaint may also have been received by another Council, the Monitoring Officer shall refer the Complainant to any additional Council that could process the complaint and continue to deal with the relevant aspects of the case to be dealt with under the arrangements adopted by the Council.

6. Confidentiality

As a matter of fairness and natural justice, the Member being investigated should be told who has complained about them. There may be occasions where the Complainant requests that their identity is withheld. Such a request may be granted only in circumstances that the Monitoring Officer considers to be exceptional, for example:

- a) The Complainant suffers from a serious health condition, which may be adversely affected if their identity is disclosed.
- b) The Complainant has reasonable grounds for believing that they will be at risk of intimidation, victimisation or physical harm if their identity is disclosed.
- c) The Complainant is an officer who works closely with the Member being investigated and they are afraid of the consequences to their employment if their identity is disclosed.

This is not intended to be an exhaustive list.

If the Monitoring Officer decides to refuse a request by the Complainant for confidentiality, they will offer the Complainant the option to withdraw the complaint, rather than proceed with disclosure of the Complainant's identity. If the Complainant withdraws the complaint their identity and the nature of the complaint will not be shared with the Member being investigated.

If, however the Monitoring Officer considers that disclosure of details of the complaint to the Member being investigated might prejudice the investigation, the Monitoring Officer can agree to delay notifying the Member being investigated until consideration of the complaint has progressed sufficiently. Any such decision to withhold details of the complaint should be taken only where the Monitoring Officer considers that exceptional grounds exist which make this necessary.

The Council will not normally investigate anonymous complaints, unless there is a clear public interest in doing so.

7. Conflict of Interest

Where the Monitoring Officer considers they may have a conflict of interest, for example, as a result of a close professional relationship with the Member being investigated, the Monitoring Officer will pass the complaint to the Deputy Monitoring Officer to deal with. Where the Deputy Monitoring Officer similarly has a conflict of interest, arrangements may be made for a Monitoring Officer from another local Council in Nottinghamshire to oversee and manage the complaint.

8. What will happen to the complaint?

There are 4 stages to dealing with complaints that are received as detailed below.

Opportunities are provided throughout these arrangements to enable informal resolution between the Complainant and the Member being investigated.

The Complainant can at any time request to withdraw a complaint, however the Monitoring Officer may decide that it remains in the public interest to continue to pursue the complaint through the process.

Stage 1 – Initial Intake Test and Initial consideration of complaint

The Monitoring Officer will review every complaint received against the assessment criteria attached at Appendix A. If the complaint fails one or more of the initial intake tests (set out in the assessment criteria) the complaint will not be progressed. The Complainant will be informed that the complaint has been rejected and No Further Action will be taken, with the exception of complaints which fall under 7 and 8 above, which may be progressed for assessment after the date the other process has been completed or after the election.

If the complaint passes the initial intake test the Monitoring Officer will normally inform the Member being investigated (unless the exceptions set out in section 6 above apply) of the complaint within 5 working days of receiving the fully completed complaint form, or if the complaint form is not used, on receiving all the information requested within the complaint form in writing.

The Member being investigated will be invited to send their written comments within 7 working days (or such longer or shorter period as the Monitoring Officer may agree) and the Member being investigated will be notified of their right to consult the Independent Person. At the same time the Monitoring Officer will write to the Independent Person with details of the allegations so that they may be aware of the nature of the complaint in case the Monitoring Officer or the Member being investigated wishes to consult the Independent Person at this stage. The written representations from the Member being investigated will be taken into account when deciding how the complaint will be dealt with.

Subject to the exception set out in the next paragraph, the Monitoring Officer will always seek informal resolution in the first instance. If this resolves the matter, the Monitoring Officer will formally write to the Complainant and the Member being investigated.

If the complaint identifies criminal conduct or breach of other regulation by any person, the Monitoring Officer has the power to call in the Police and other regulatory agencies. If the complaint refers to failure to comply with the requirement to register a disclosable pecuniary interest, then the matter will be referred direct to the Police (Localism Act, Chapter 20 Part 1, Chapter 7, Section 34 – Offences).

When the Member being investigated is provided with details of the complaint they should keep this matter confidential, save that:

- a) They may disclose all or any part of the complaint to their group Leader
- b) They may disclose all or any part of the complaint to their professional association for the purposes of obtaining advice
- c) They may disclose all or any part of the complaint to their solicitors for the purposes of obtaining legal advice
- d) The group leader may nominate another Councillor to act as support for the Member being investigated, and any or all details of the complaint may be disclosed to that Councillor. Any Councillor who is appointed as a supporter by their group Leader should keep the material they receive confidential.

Complainants are asked to treat the complaint confidential whilst the matter is being investigated.

Stage 2 – Formal consideration of complaint
--

If informal resolution is not achieved, or not considered appropriate, the Monitoring Officer will consult with the Independent Person before progressing with the complaint.

The Monitoring Officer will then take a decision as to whether the complaint merits investigation.

This decision will normally be taken within 10 working days of the conclusion of stage one. When the Monitoring Officer has taken a decision, they will inform the Complainant and the Member being investigated in writing of their decision and the reasons for that decision.

Where the Monitoring Officer requires additional information in order to come to a decision, they may go back to the Complainant for such information, and may request information from the Member being investigated. Where the complaint relates to a Town or Parish Councillor, the Monitoring Officer may also seek the views of the Town or Parish Council before deciding whether the complaint merits formal investigation.

In circumstances where the provision of this information leads to the time period for the compliance with this stage being extended the Monitoring Officer should, notify the Complainant and the Member being investigated of the period required to make a decision on this stage.

The Monitoring Officer may again seek to resolve by informal resolution, without the need for a formal investigation. If this resolves the matter, the Monitoring Officer will formally write to the Complainant and the Member being investigated to confirm that the matter is closed.

Where the Member being investigated makes a reasonable offer of informal resolution, the Complainant will be asked for their views but if they are not willing to accept the informal resolution offered, the final decision will be the Monitoring Officer's, in consultation with the Independent Person, who will take account of this in deciding whether the complaint merits formal investigation.

In reaching their decisions on the complaint at Stages 1 and 2 the Monitoring Officer and the Independent Person will need to consider the assessment criteria outlined at Appendix A.

Stage 3 - Investigation

The following procedure will be used for the investigation of misconduct complaints.

Investigating Officer

If the Monitoring Officer, in consultation with the Independent Person, decides that a complaint merits formal investigation, the Monitoring Officer will appoint an Investigating Officer, who may be another senior officer of the Council, an officer of another Council or an external investigator. The Monitoring Officer may also write to the Town or Parish Council and ask them to produce a statement report providing supporting evidence, statements, information and copies of relevant documentation. The Investigating Officer should normally be appointed within 7 working days of the decision being taken that the complaint merits investigation at this stage. The identity of the Investigating Officer should be notified to the Complainant and the Member being investigated in writing as soon as they are appointed.

The investigation process

The Investigating Officer will decide whether they need to meet or speak to the Complainant to understand the nature of the complaint, to gain an understanding of events, to decide what additional documents need to be seen, and who else needs to be interviewed.

The Investigating Officer will write to the Member being investigated again and (unless the exception in section 6 still applies) provide them with a copy of the complaint, and ask the Member to provide their explanation of events, to identify what documents the Investigating Officer needs to see and who they need to interview.

In exceptional cases, where it is appropriate to keep the Complainant's identity confidential or disclosure of details of the complaint to the Member might prejudice the investigation, the Monitoring Officer may delete their name and address from the papers given to the Member being investigated, or delay notifying the Member until the investigation has progressed sufficiently.

The Investigating Officer should complete their investigation as soon as possible and where possible within 20 working days. If the Investigating Officer is not able to complete their investigation within that time they should write to both the Complainant and the Member being investigated to explain the reason for the delay and to give them a new target date for the completion of the investigation.

The investigation report

At the end of their investigation and within 10 working days thereafter, the Investigating Officer will produce a draft report and will send copies of that draft report, in confidence, to the Complainant and to the Member being investigated, to give both an opportunity to identify any matter in that draft report which they disagree with or which they consider requires more consideration. The Complainant and Member being investigated should respond within 7 working days. The Investigating Officer should within 7 working days of having received and taken account of any comments which they may make on the draft report, will send their final report to the Monitoring Officer.

The Monitoring Officer will review the Investigating Officer's report and, if they are satisfied that the Investigating Officer's report is sufficient, the Monitoring Officer will write to the Complainant and the Member being investigated and give all a copy of the Investigating Officer's final report within 7 working days. If the Monitoring Officer is not satisfied that the investigation has been conducted properly, they may ask the Investigating Officer to reconsider their report within 10 working days. If an extension to this time is required throughout the investigation process, the Complainant and Member being investigated will be informed.

Conclusion – no failure to comply

If the report concludes that there is insufficient evidence to make a finding for a failure to comply with the Code of Conduct, and the Monitoring Officer is satisfied with the content of the report, then all relevant parties (the Complainant, Member being investigated and the Independent Person) will be notified in writing and the matter will be closed.

Conclusion – failure to comply

If the report concludes that there is sufficient evidence to make a finding that there has been a failure to comply with the Code of Conduct, the Monitoring Officer will review the Investigating Officer's report and will then consult with the Independent Person. The Monitoring Officer will again seek informal resolution, however if this does not resolve the matter, the complaint will be listed for a hearing before the Standards Hearing Sub Committee.

Informal Resolution

The Monitoring Officer may consider that the matter can reasonably be resolved without the need for a hearing. In such a case, the Monitoring Officer will consult with the Independent Person, the Complainant and with the Member being investigated and seek agreement on what is considered to be a fair resolution which also helps to ensure higher standards of conduct for the future. Such resolution may include the Member accepting that their conduct was unacceptable and offering an apology, and/or other remedial action considered appropriate by the Monitoring Officer or the Standards Hearing Sub Committee. If the Member complies with the suggested resolution, the Monitoring Officer will take no further action. The Monitoring Officer's decision is final.

Stage 4 –Standards Hearing Sub Committee

If the report concludes that there has been a failure to comply and the Monitoring Officer considers that informal resolution is not appropriate or that informal resolution has failed to resolve the matter the Monitoring Officer in consultation with the Chair (in their absence Vice Chair) of the Governance, Audit and Standards Committee will convene a Standards Hearing Sub Committee. The Monitoring Officer will report the Investigating Officer's report to the Standard Hearing Sub Committee, which will conduct a local hearing before deciding whether the Member being investigated has

failed to comply with the Code of Conduct and, if so, whether to take any action in respect of the breach.

The Standards Hearing Sub Committee

The Standards Hearing Sub Committee will comprise of 5 elected Members . The Standards Hearing Sub Committee should, at all times, be advised by the Monitoring Officer or their representative. The Standard Hearing Sub Committee meeting should be convened as soon as possible and where possible within 20 working days of the Monitoring Officer announcing their decision that such a meeting is necessary.

The Independent Person is invited to attend all hearings by the Standards Hearing Sub Committee and their views are sought and taken into consideration before the Standards Hearing Sub Committee takes any decision on whether the Member's conduct constitutes a failure to comply with the Code of Conduct and as to any recommended action to be taken following a finding of failure to comply with the Code of Conduct.

Hearings will usually be held in public, unless there are exceptional reasons for it not being, in accordance with section 6 above.

Procedures for Hearings

At least 5 working days prior to the meeting of the Standards Hearing Sub Committee the Monitoring Officer will ask the Member being investigated to identify in writing what aspects of the Investigating Officers report are accepted and what are in dispute. The purpose of this is to identify what is likely to be agreed and what is likely to be in contention at the hearing. In addition, the Chair (or in their absence the Vice Chair) of the Standards Hearing Sub Committee may issue directions as to the manner in which the hearing will be conducted, but before doing so will give the Member being investigated the opportunity to make representations on any proposed directions. Any directions given will be for the purpose of ensuring a fair and effective hearing.

At the hearing, the Investigating Officer will present their report, call such witnesses, as they consider necessary and make representations to substantiate their conclusion that there is evidence that the Member being investigated has failed to comply with the Code of Conduct. For this purpose, the Investigating Officer may ask the Complainant to attend and give evidence to the Standards Hearing Sub Committee. The Member being investigated will then have an opportunity to give their evidence,

to call witnesses and to make representations to the Standards Hearing Sub Committee, as to why they consider that they did not fail to comply with the Code of Conduct. The Member being investigated, the Investigating Officer, the Monitoring Officer (or their representative(s) directly through the Chair of the Standards Hearing Sub Committee will have the opportunity to ask questions of any witness called by the other party. The Standards Hearing Sub Committee can also question witnesses.

Although, the meeting will be in public unless exceptional circumstances arise the discussion of the Standards Hearing Sub Committee, as to what conclusion they reach will be in private. The Standards Hearing Sub Committee may be assisted by an administrative officer (usually the Monitoring Officer and the Independent Person) but the Investigating Officer and the Member being investigated must not be present during those discussions.

In reaching a decision the Standards Hearing Sub Committee will reach a decision by majority vote, with the material being evaluated on the balance of probabilities.

Conclusion – no failure to comply

The Standards Hearing Sub Committee, with the benefit of any advice from the Monitoring Officer and the Independent Person, may conclude that the Member being investigated did not fail to comply with the Code of Conduct, and so dismiss the complaint.

Conclusion – failure to comply

If the Standards Hearing Sub Committee, concludes that the Member being investigated did fail to comply with the Code of Conduct, the Chair will inform the Member being investigated of this finding and Standards Hearing Sub Committee will then consider what action, if any, it should take or recommend as a result of the Member's failure to comply with the Code of Conduct.

In doing this, the Standards Hearing Sub Committee will give the Member being investigated an opportunity to make representations and will consult the Independent Person, but will then decide what action, if any, to take in respect of the matter.

The announcement of the conclusion reached by the Standards Hearing Sub Committee must be in public, as will the opportunity for the Member being investigated

to make any representations, if necessary. However, the decision as to what sanction to recommend must be in private. Neither the Investigating Officer nor the Member being investigated must be present during those discussions.

At the end of the hearing, the Chair will state the decision of the Standards Hearing Sub Committee, as to whether the Member being investigated failed to comply with the Code of Conduct and as to any actions which the Standards Hearing Sub Committee resolves to take or recommend. As soon as reasonably practicable thereafter, the Monitoring Officer shall prepare a formal decision notice in consultation with the Chair of the Standards Hearing Sub Committee, and send a copy to the Complainant, to the Member being investigated and to the Town or Parish Council where applicable. The Decision Notice will be made available for public inspection through the Council website.

9. Sanctions

The Council has delegated to the Monitoring Officer and to the Standards Hearing Sub Committee, such of its powers to recommend action in respect of individual Members as may be necessary to promote and maintain high standards of conduct. Accordingly, the Monitoring Officer and Standards Hearing Sub Committee may:

1. Publish its findings in respect of the conduct of the Member being investigated;
2. Report its findings to the relevant Town or Parish Council, if appropriate;
3. Report its findings to Council for information;
4. Recommend to Council that the Member being investigated be censured for the breach of the Code of Conduct;
5. Recommend to the group Leader that the Member being investigated be removed from any or all Committees or Sub-Committees of the Council;
6. Recommend to the Leader that the Member being investigated be removed from Cabinet, or removed from particular Portfolio responsibilities;
7. Recommend to Council that the Member being investigated be removed or any Chair or Vice-Chair that he or she holds;
8. Recommend to Council that the Leader or Deputy Leader be removed from Cabinet or removed from particular Portfolio responsibilities;

9. Instruct the Monitoring Officer to [or recommend that the Town or Parish Council] arrange training for the Member being investigated;
10. Recommend to Council to remove [or recommend to the Town or Parish Council that the Member being investigated be removed] the Member being investigated from any or all outside appointments to which they have been appointed or nominated by the Council [or by the Town or Parish Council].
11. Remove [or recommend to the Parish or Town Council concerned that it removes] the Member being investigated from the Council's Offices or other premises with the exception of meeting rooms, as necessary for attending Council, Cabinet, Committee and Sub-Committee Meetings; at the discretion of the Standards Hearing Sub Committee for a maximum of 12 months.

NB. There is no power to suspend or disqualify the Member or to withdraw a Member's basic or special responsibilities allowance. Although, basic or special responsibility allowance will not be paid if the Member is no longer entitled, as a result of being removed from the Cabinet, portfolio responsibilities, committee, Chair or Vice Chair position.

10. Who is the Independent Person?

The Independent Person is a person who has applied for the post following advertisement, and is then appointed by a positive vote from a majority of all the Members of Council. The Localism Act 2011 sets a number of criteria for the recruitment of the Independent Person and these can be found on Part 1, Chapter 7, Section 28.

Any changes to the appointment of the Independent Person must be in line with the recruitment processes outlined in the Localism Act 2011 and agreed by a positive majority of full Council.

11. Failure to co-operate with the complaint process

Failure by the Complainant or Member being investigated or witnesses to take part in the complaint process will be taken into consideration throughout the assessment and investigation stages. If the Complainant, Member being investigated or witnesses fails to respond to requests for information throughout the process, one reminder will be sent in the interest of fairness to allow for this information to be provided. If there is still no response the complaint will be progressed without any further delay.

The Monitoring Officer or their representative and or investigation may exercise their discretion to allow a further opportunity to respond, if they consider exceptional circumstances apply.

12. Revision of these arrangements

The Chair of the Standards Hearing Sub Committee may, following consultation with the Monitoring Officer and Independent Person, depart from the procedures detailed herein where he/she considers it is necessary to do so in order to secure the effective and fair consideration of any matter.

The Council may by resolution agree to amend these arrangements.

13. Appeals

There is no right of appeal either as the Complainant or the Member being investigated against a decision of the Monitoring Officer or their representative or of the decision of the Standards Hearing Sub Committee.

If it is felt that the Council has failed to deal with the complaint properly, you may make a complaint to the Local Government Ombudsman (www.lgo.org.uk).

14. “In Writing”

Any requirement in these arrangements that information is provided in writing may be satisfied by that information being provided electronically, unless there is an Equality Act reason for the information to be in a physical form.

APPENDIX AASSESSMENT CRITERIA

In reaching their decisions on the complaint at Stage 1 and 2 the Monitoring Officer (or substitute decision makers specified under section 7 'conflict of interest' provisions) and the Independent Person will need to consider the following assessment criteria:

Stage One: Initial Intake Test:

The Monitoring Officer must be satisfied that the complaint meets the following requirements: -

1. The complaint is against one or more named Member or Co-opted Member of the Council or a Parish or Town Council within their jurisdiction;
2. The named Member or Members were in Office at the time of the alleged conduct and the Code of Conduct was in force at the time; and
3. The named Member or Members were acting in their official capacity when the alleged conduct took place.
4. The Complainant has given their name and contact details (unless the Monitoring Officer considers there is a clear public interest in proceeding with the anonymous complaint)
5. The complaint is an allegation under the Code of Conduct rather than dissatisfaction of a Council's service, decision or a statement of policy disagreement.
6. The complaint is about events that occurred within the last 3 months unless the Monitoring Officer considers there are exceptional grounds for the delay presented by the Complainant when submitting the complaint.
7. The complaint is not being dealt with by the police, Ombudsman or another complaint process (in this case the complaint will not be assessed until after the other process has been completed).

8. The complaint is not being made about the Member or Co-opted Member within 6 weeks prior to an election day (if the complaint is within the 6 week period the complaint will not be assessed until after the election outcome has been announced).

If the complaint fails one or more of these tests it will not be progressed and the Complainant will be informed that the complaint has been rejected and No Further Action will be taken, with the exception of complaints which fall under 7 or 8 above, which may be progressed for assessment after the date the other process has been completed or after the election.

The Member being complained of will normally be informed of the complaint, subject to the Complainant providing consent to share their complaint.

Onward referrals:

The Monitoring Officer will advise the Complainant if their complaint needs to be referred elsewhere eg when:

- a) The complaint is alleging conduct relating to election/political campaigning activities as these are outside the remit of the Members Code of Conduct and will not be assessed for further action. Potential election offences should be reported to the Police or the Electoral Commission.
- b) Complaints allege that Members may have committed a criminal offence in breaching the “disclosable pecuniary interest” provisions under Section 34 of the Localism Act 2011, will be referred by the Monitoring Officer to Nottinghamshire Police for consideration.
- c) Complainants will be redirected to the whistling blowing policy where considered necessary.

This list is not exhaustive.

STAGE 1 and STAGE 2 considerations:

The Monitoring Officer and Independent Person (or substitute decision makers specified under section 7 'conflict of interest' provisions) will consider the following when considering what action to take in respect of the complaint:

1. The extent to which the Member being investigated is alleged to have failed to treat others with respect;
2. Whether the allegations relates to bullying, harassment, intimidating or attempting to intimidate a person involved in an allegation against a Member being investigated;
3. Whether in disclosing confidential information the Member being investigated failed to take or to heed advice;
4. The implications for the public perception or the reputation of the Council;
5. Whether the continuing pattern of behaviour being complained about is likely to bring the Council into disrepute, and or significantly and unreasonably disrupts the business of the Council, and there is no appropriate alternative informal resolution other than to investigate.
6. The implications of the misconduct on staff relations and other Members;
7. The seniority or position of influence of the Member being investigated and public trust or confidence;
8. The extent to which the Member being investigated is alleged to have acted in a way that may cause the Council to breach an equality enactment;
9. The consequences or the likely consequences of the Members being investigated alleged actions;
10. The extent to which the Member being investigated is alleged to have used his or her position as a Member improperly to confer or secure an advantage or disadvantage;
11. The extent to which the Member being investigated is alleged to have misused or abused the resources of the Council;
12. The detriment caused by acting against advice when reaching decisions;
13. The extent to which a failure to register or to declare interests resulted from a failure or refusal to seek or to follow advice;

14. Whether the matter of the complaint has already been the subject of a previous investigation or of an investigation by another regulator, e.g. the Local Government Ombudsman or the District Auditor, or the subject of proceedings in court;

A DECISION TO TAKE NO FURTHER ACTION

Reasons for taking No Further Action include:

1. That the subject matter of the allegation is outside the jurisdiction of the Standards Hearing Sub Committee; eg the complaint is an allegation about dissatisfaction of a Council's service, decision or a statement of policy disagreement or breach of the standing orders etc.
2. That the allegation does not appear to disclose a failure by the Member to comply with the Member's Code of Conduct when acting in that capacity;
3. Whether the complaint is about something that happened so long ago that there would be little public benefit in taking action now. The Monitoring Officer will normally reject a complaint where the last event complained of took place more than 3 months prior to the date of the complaint or where those involved are unlikely to remember the event/s or incident/s clearly enough to provide credible evidence.
4. The matter of complaint or a substantially similar allegation has already been the subject of a previous investigation or of an investigation by another regulator or the subject of proceedings in court and there is nothing more to be gained by a further action being taken.
5. Whether the complaint appears to be simply malicious, vexatious, politically motivated, relatively minor, too trivial, insufficiently serious or tit-for-tat to warrant further action.
6. Where the resources needed to investigate are wholly disproportionate to the allegations and or there is no overriding public interest in carrying out an investigation. Public interest is regarded as 'something which is of serious concern and benefit to the public'.
7. Whether there is enough information currently available to justify a decision to refer the matter for investigation or to seek an informal resolution;
8. The information submitted by the Complainant is insufficient to enable the Monitoring Officer and the Independent Person to come to a firm conclusion on the matter and as such it is unlikely that an investigation will be able to come to a firm conclusion on the matter and or where independent evidence is likely to be difficult or impossible to obtain.

9. It is considered that the Member being investigated has offered a satisfactory remedy to the Complainant (for example by apologising).
10. Whether the Monitoring Officer considers the matter is suitable for informal resolution and the Member being investigated is amenable to such an approach.
11. The complaint is about someone who has died, resigned, is seriously ill or is no longer a Member of the Council concerned and therefore it is not in the public interest to pursue.
12. The complaint is anonymous; The Monitoring Officer will not usually investigate anonymous complaints unless there is a clear public interest in doing so.

APPENDIX B

MEMBER CODE OF CONDUCT COMPLAINT FORM

To: The Monitoring Officer
Broxtowe Borough Council
Foster Avenue,
Beeston,
Nottingham
NG9 1AB

Your details

1. Please provide us with your name and contact details:

Title:	
First name:	
Last name:	
Address:	
Daytime telephone:	
Evening telephone:	
Mobile telephone:	
Email address:	
Date Complaint submitted	

Your address and contact details will not usually be released unless necessary or to deal with your complaint.

However, we will tell the following people that you have made this complaint:

- the Member(s) you are complaining about
- the Monitoring Officer of the Council
- the Council's Independent Person
- officers involved in investigation or informal resolution (if applicable)

We will tell them your name and give them a summary of your complaint. We will give them full details of your complaint where necessary or appropriate to be able to deal with it. If you have serious concerns about your name and a summary, or details of your complaint being released, please complete section 7 of this form to request your details are treated as 'Confidential'.

2. Please tell us which Complainant type best describes you:

- ☐ Member of the public
- ☐ An elected or co-opted Member a Council, Town or Parish Council,
please specify which Council
- ☐ Local Council Monitoring Officer
- ☐ Other Council officer or Council employee
- ☐ Other, please specify

Equality Monitoring

The Council's Equality Monitoring Questionnaire is attached at the end of the form. The completion of this form is voluntary and any information will be treated as confidential, and will not be disclosed when your complaint is considered.

Making your complaint – Initial Intake test

3. The Assessment Criteria (in the local arrangements for dealing with Code of Conduct complaints) sets out an initial intake test that is applied to Member and Co-opted Member complaints. Please answer the questions below so your complaint can be checked against the initial intake test, which requires your complaint to meet the following requirements:

1. Is the complaint against one or more named Member or Co-opted Member of the Council or a Parish or Town Council within their jurisdiction?

☐ Yes, please provide necessary detail below;
☐ No

☐ Not sure

2. The named Member or Members were in Office at the time of the alleged conduct and the Code of Conduct was in force at the time;

☐ Yes
☐ No

☐ Not sure

3. The named Member or Members were acting in their official capacity when the alleged conduct took place.

☐ Yes
☐ No

☐ Not sure

4. Have you given your name and contact details at the top of the form.

☐ Yes
☐ No, if not please complete the request for confidentiality under section 7

An exception not to disclose your identity must be applied for (further details on requests for 'Confidentially' can be found under section 6 of the arrangements for dealing with Code of Conduct complaints) under section 7 of this form, if you are not providing your details.

Please note, the Council will not normally investigate anonymous complaints, unless there is a clear public interest in doing so.

5. Is the complaint is an allegation under the Code of Conduct rather than dissatisfaction of a Council's service, decision or a statement of policy disagreement.

☐ Yes
☐ No

6. Is the complaint about events that occurred within the last 3 months?

☐ Yes
☐ No

If you have any exceptional reasons why you were not able to make this complaint earlier, please provide details in the box below:

--

7. Is the complaint being dealt with by the police, Ombudsman or another complaint process (in this case the complaint will not be assessed until after the other process has been completed)?

☐ Yes the complaint is being dealt with by another process
☐ No

If you answered yes above, please provide detail in the table below of which other organisation is dealing with the issues complained of and a contact name and number of the person progressing this matter, if know, and the stage the matter has progressed to:

--

8. Is the complaint being made about the Member within 6 weeks prior to an election day (if the complaint is within the 6 week period the complaint will not be assessed until after the election outcome has been announced).

<input type="checkbox"/>	Yes
<input type="checkbox"/>	No

If you answered yes above please provide detail in the table below:

--

N.B Please note, if the complaint fails one or more of these tests it will not be progressed and the Complainant will be informed that the complaint has been rejected and No Further Action will be taken, with the exception of complaints which fall under 7 and 8 above, which may be progressed for assessment after the date the other process has been completed or after the election outcome.

The Member being complained of will normally be informed of the of the nature of the complaint and your details unless an exception under the confidentiality section has been agreed.

4. **Please provide us with the name of the Member(s) or Co-opted Member(s) you believe have breached the Code of Conduct and the name of their Council:**

Title	First name	Last name	Council name

5. Please explain in this section (or on separate sheets) what the Member has done that you believe breaches the Code of Conduct. If you are complaining about more than one Member you should clearly explain what each individual person (preferably on separate complaint forms for each Member or Co-opted Member) has done and how you believe this breaches the Code of Conduct.

It is important that you provide with this complaint form, **all the information** you wish to have taken into consideration and for a decision to be made on whether to take any action on your complaint. For example:

- You should be specific, wherever possible, about exactly what you are alleging the Member said or did and **what part of the Code you say they failed to comply with**. For instance, instead of writing that the Member insulted you, you should state what it was they said.
- You should provide the dates of the alleged incidents wherever possible. If you cannot provide exact dates it is important to give a general timeframe.
- You should confirm whether there are any witnesses to the alleged conduct and provide their names and contact details if possible.
- You should provide any relevant background information and include copies of any documents, photographs or other records you are relying on.

Please provide us with details of your complaint. Continue on a separate sheet if there is not enough space on this form.

6. Please indicate which paragraphs of the Code of Conduct you consider the Member(s) or Co-opted Member to have breached by ticking the appropriate box(es).

Code of Conduct Obligation	Tick if you consider this obligation was breached	How did the Member breach this obligation
1. Respect		
2. Bullying, harassment and discrimination		
3. Impartiality of officers of the Council		
4. Confidentiality and access to information		
5. Disrepute		
6. Use of position		
7. Use of Council resources and facilities		.
8. Making decisions		
9. Complying with the Code of Conduct		
10. Interests		
11. Gifts and hospitality		
12. Dispensations		

The Code of Conduct is available on the Council's website in Chapter 5a of the Council's Constitution www.broxtowe.gov.uk/constitution or online in the local arrangements for dealing with Member Code of Conduct complaints under the complaints section under Member complaints or from the Monitoring Officer at the above address.

7. Confidentiality

Only complete this next section if you are requesting that your identity is kept confidential.

In the interests of fairness and natural justice, we believe Members who are complained about have a right to know who has made the complaint. We also believe they have a right to be provided with a summary of the complaint. We are unlikely to withhold your identity or the details of your complaint unless you provide us with an explanation of the exceptional reason why you think your details and/or identity should be kept confidential. More details of what may be considered to be exceptional circumstances are set out in our arrangement for Code of Conduct complaints, which can be found on the Council website under Councillor

Complaints.

A request for confidentiality should be made when submitting this complaint form, to allow time for proper consideration of this request.

Please note that requests for confidentiality or requests for suppression of complaint details will not automatically be granted. If your request for confidentiality is not granted, we will usually allow you the option of withdrawing your complaint.

However, it is important to understand that in certain exceptional circumstances where the matter complained about is very serious, we can proceed with an investigation or other action and disclose your name even if you have expressly asked us not to.

Please mark an X in the boxes below to confirm that you consent to disclosure of your identity and details of your complaint being shared with the Member being complained of and with those identified in section 1 above (if applicable):

1. I agree to my identity being disclosed

<input type="checkbox"/>	Yes
<input type="checkbox"/>	No

2. I agree to the detail of my complaint being disclosed

<input type="checkbox"/>	Yes
<input type="checkbox"/>	No

If you have answered **No** to either or both of the above questions:

Please provide us with details of why you believe we should withhold your name and/or the details of your complaint:

8. Informal Resolution

It is often possible to resolve complaints without recourse to formal investigation and hearing. In such cases it is important that appropriate action to seek to achieve informal resolution of the matter is undertaken without delay.

To assist us in doing this it would be helpful if you could describe what remedy you are seeking/what action you think would be appropriate to resolve your complaint.

Please provide us with details of what remedy you are seeking/what action you think might provide a satisfactory resolution to your complaint.

9. Additional Help

Complaints must be submitted in writing. This includes electronic submissions. However, in line with the requirements of the Disability Discrimination Act 2000, we

can make reasonable adjustments to assist you if you have a disability that prevents you from making your complaint in writing.

The Council has access to a language line and can assist you to complete this form if English is not your first language. If you require any assistance, please contact Sach Khosa, Monitoring Officer on 01159173221.

Please note, we will not be able to progress your complaint without receiving all the requested information, so it is important that you seek assistance to complete this form or provide this information, if necessary.

Complainants are asked to treat the complaint confidential whilst the matter is being investigated.

Please sign below to confirm that you have provided **all the information** requested in the complaint form and the content of this information is true to the best of your knowledge and belief.

Signed..... Date.....

Equality monitoring

The completion of the Council's Equality Monitoring is voluntary and any information will be treated as confidential, and will not be disclosed when your complaint is considered.

Ethnicity Monitoring Categories

How would you class yourself? Please tick

White	Asian or Asian British
<input type="checkbox"/> British	<input type="checkbox"/> Indian
<input type="checkbox"/> Irish	<input type="checkbox"/> Pakistani
<input type="checkbox"/> Any other White background	<input type="checkbox"/> Bangladeshi
	<input type="checkbox"/> Any other Asian background
Black or Black British	Other Ethnic Groups
<input type="checkbox"/> Caribbean	<input type="checkbox"/> Chinese
<input type="checkbox"/> African	<input type="checkbox"/> Any other Ethnic group
<input type="checkbox"/> Any other Black background	<input type="checkbox"/> Not stated
Mixed	
<input type="checkbox"/> White and Black Caribbean	<input type="checkbox"/> Male
<input type="checkbox"/> White and Black African	<input type="checkbox"/> Female
<input type="checkbox"/> White and Asian	<input type="checkbox"/>
<input type="checkbox"/> Not stated	
<input type="checkbox"/> Any other Mixed background	

Disability Monitoring Question

Do you consider yourself as disabled or have any long term health problem that limits daily activity?

☐ Yes ☐ No

Age Monitoring Categories

Which of the following age groups do you belong to?

- | | |
|---|--------------------------------|
| <input type="checkbox"/> 17 years and under | <input type="checkbox"/> 18-24 |
| <input type="checkbox"/> 25-29 | <input type="checkbox"/> 30-44 |
| <input type="checkbox"/> 45-59 | <input type="checkbox"/> 60-64 |
| <input type="checkbox"/> 65+ | |

APPENDIX 4

Summary of main changes to the Code of Conduct

Revised Code of Conduct	Recommendation
Part 1. General Provision <ul style="list-style-type: none"> Added new introduction setting out legal requirement for the Code of Conduct Added new section on Definitions for clarification Added new section on the purpose of the Code of Conduct to ensure Members have a clear understanding for importance of Code Added new section on the application of the Code, so Members have clarity on when the Code applies to them Formatted the existing Codes principles under the relevant headings of the Nolan Principles 	LGA Model Code
Part 2. General Obligations <ul style="list-style-type: none"> Formatted the existed obligations within the Code under the relevant headings for clarification Added new obligations for bullying, harassment and discrimination Added new obligations on confidentiality and access to information, which expands on the wording of the existing Code Added new obligation not to bring my Council into disrepute Added new obligation to comply with the Code and to undertake relevant training Added new section on gifts and hospitality Added new section on dispensation 	LGA Model Code
Appendix A - Interest	LGA Model Code

Summary of main changes to the Arrangements

Revised Arrangements	Recommendation
1. Introduction <ul style="list-style-type: none"> Title revised to Arrangements for dealing with standards allegations to Arrangements for dealing with Code of Conduct complaints Replaced Authority to read Council throughout the arrangements. Added reference to the process will be fair to both the complainant and the Member being complained about. 	<p>Amended and updated to reflect Localism Act wording by Monitoring Officer</p> <p>Amended to have consistency throughout the document by Monitoring Officer</p> <p>Task and Finish Groups & MO recommendation</p>
3. Definitions <ul style="list-style-type: none"> New definition added for Subject Member amended to Member being investigated New definition added for Co-opted Member to provide necessary clarity. Definition for Local Resolution changed to Informal Resolution. 	<p>Task and Finish Groups & MO recommendation.</p> <p>Considered useful and necessary to provide clarify by Task and Finish Group and MO</p>
4. Make a complaint <ul style="list-style-type: none"> Revised complaint form to ensure we guide the complainant to provide the necessary information that will be required to assess the complaint. Added section to highlight support can be provided to complete the complaint form as required under the Equality Act 2010 provisions. Added section that Parish Council as a whole should if necessary submit a complaint concerning a Parish Councillors conduct towards a Clerk, in line with best practice recommendations. 	<p>Implementing CSPL best practice recommendation 10.</p> <p>Implementing CSPL best practice recommendation 10.</p> <p>Implementing CSPL best practice recommendation 11.</p>
6. Confidentiality <ul style="list-style-type: none"> Added if the Complainant withdraws the complaint their identity and nature of the complaint of the complaint will not be shared with the Member being investigated. 	<p>Necessary clarification made by Monitoring Officer</p>

<ul style="list-style-type: none"> Added any decision to withhold details about a complaint should be taken only where the Monitoring Officer considers that exceptional grounds exist. 	Task and Finish Groups recommendation & MO
7 Conflict of Interest. <ul style="list-style-type: none"> Added new conflict of interest section to ensure there are arrangements in place to progress complaints where conflict of interests arise. 	Implementing CSPL best practice recommendation 13.
8. What will happen with the complaint <ul style="list-style-type: none"> New assessment criteria and initial intake test add to ensure clear straightforward public interest test against which allegations can be filtered is included in the arrangements. Timescales for handling complaints, investigations, hearing and outcome have been specified. New section under stage 1 has been added to clarify who the Member being investigated can share the complaint with. Added requirement for the Complainant to keep the complaint confidential whilst the complaint is being investigated. Amended reference to Governance, Standards and Audit Panel Hearing to Standards Hearing Sub Committee and added further direction requirements under stage 4, procedure for the hearing, to clarify the process for all involved. 	<p>Implementing CSPL best practice recommendation 6 & 8.</p> <p>Implementing CSPL best practice recommendation 10 and considered necessary by Task and Finish Group</p> <p>Task and Finish Groups & MO</p> <p>Task and Finish Groups & MO</p>
8. Sanction <ul style="list-style-type: none"> Revised and added the full range of sanctions available to the Standards Hearing Sub Committee to impose. 	Task and Finish Groups & MO recommendation

Report of the Deputy Chief Executive

STATEMENT OF ACCOUNTS 2021/22 - ACCOUNTING POLICIES

1. Purpose of report

To provide Members with any updates made to the Council's accounting policies in relation to the production of the 2021/22 financial statements.

2 Introduction

Prior to the completion of the Statement of Accounts 2021/22, it is considered good practice that Members are given the opportunity to discuss and comment on the accounting policies to be used in the production of the financial statements. These policies will be applied to the treatment of all transactions that make up the Statement of Accounts to ensure the accounts present a true and fair view of the financial position of the Council as at 31 March 2022.

The 2021/2022 Statement of Accounts will be prepared in accordance with the Code of Practice on Local Authority Accounting in the United Kingdom 2021/22 (the Code), based upon International Financial Reporting Standards (IFRS).

3 Updates to the Statement

The 2021/22 Code introduces amendments to the following, which do not impact on any of the Council's policies:

- IFRS 3 Business Combinations
- Interest rate benchmark reforms to:
 - IFRS 9 Financial Instruments
 - IAS 39 Financial Instruments: Recognition and Measurement
 - IFRS 7 Financial Instruments: Disclosures
 - IFRS 4 Insurance Contracts
 - IFRS 16 Leases

The proposed Accounting Policies for 2021/22 are set out in the appendix.

4 Financial Implications

There are no direct financial costs associated with the accounting policy updates.

Recommendation

The Committee is asked to RESOLVE that the Accounting Policies for 2021/22 be approved.

Background papers: Nil

APPENDIX**Accounting Policies****(i) General Principles**

The Statement of Accounts summarises the authority's transactions for the 2021/22 financial year and its position at the year end of 31 March 2022. The authority is required to prepare an annual Statement of Accounts by the Accounts and Audit (England) Regulations 2015 in accordance with proper accounting practices. These practices primarily comprise the Code of Practice on Local Authority Accounting 2021/22 supported by International Financial Reporting Standards (IFRS), International Accounting Standards and statutory guidance issued under section 12 of the Local Government Act 2003.

The accounting convention adopted in the Statement of Accounts is principally historical cost, modified by the revaluation of certain categories of non-current assets and financial instruments.

The Statement of Accounts has been prepared on a going concern basis. As required by IAS 1, it has been assumed that the Council will continue in operation for the foreseeable future.

(ii) Accruals of Income and Expenditure

Activity is accounted for in the year that it takes place, not simply when cash payments are made or received. In particular:

- Revenue from contracts with service recipients, whether for services or the provision of goods, is recognised when (or as) the goods or services are transferred to the service recipient in accordance with the performance obligations in the contract.
- Supplies are recorded as expenditure when they are consumed – where there is a gap between the date supplies are received and their consumption they are carried as inventories on the Balance Sheet.
- Expenses in relation to services received (including services provided by employees) are recorded as expenditure when the services are received rather than when payments are made.
- Interest receivable on investments and payable on borrowings is accounted for respectively as income and expenditure on the basis of the effective interest rate for the relevant financial instrument rather than the cash flows fixed or determined by the contract.
- Where revenue and expenditure have been recognised but cash has not been received or paid, a debtor or creditor for the relevant amount is recorded in the Balance Sheet. Where debts may not be settled, the balance of debtors is written down and a charge made to revenue for the income that might not be collected.

An exception to the above relates to electricity and other similar quarterly payments which are charged at the date of meter reading rather than being apportioned

between financial years. This policy is consistently applied each year and therefore does not have a material effect on the year's accounts.

As regards private sector housing benefits, payments can relate to periods partly in advance and partly in arrears. The cut-off date applied to such payments is as near to the year end as possible and ensures consistency with the figures used to calculate government subsidy received on such payments.

Council housing rents become chargeable on the Monday of each week for the week ahead. Rent income is accounted for up to and including the last Monday in the financial year. This can therefore include an element relating to the following year for which no adjustment is made.

(iii) Cash and Cash Equivalents

Cash is represented by cash in hand and deposits with financial institutions repayable without penalty on notice of not more than 24 hours. Cash equivalents are investments that mature in three months or less from the date of acquisition and that are readily convertible to known amounts of cash with insignificant risk of change in value.

In the Cash Flow Statement, cash and cash equivalents are shown net of bank overdrafts that are repayable on demand and form an integral part of the Council's cash management.

(iv) Exceptional Items

When items of income and expense are material, their nature and amounts is disclosed separately, either on the face of the Comprehensive Income and Expenditure Statement or in the notes to the accounts, depending on how significant the items are to an understanding of the Council's financial performance.

(v) Prior Year Adjustments, Changes in Accounting Policies and Estimates and Errors

Prior period adjustments may arise as a result of a change in accounting policies or to correct a material error. Changes in accounting estimates are accounted for prospectively, i.e. in the current and future years affected by the change, and do not give rise to a prior period adjustment.

Changes in accounting policies are only made when required by proper accounting practices or the change provides more reliable or relevant information about the effects of transactions, other events and conditions on the Council's financial position or financial performance. Where a change is made, it is applied retrospectively (unless stated otherwise) by adjusting opening balances and comparative amounts for the prior period as if the new policy had always been applied. See note 2 for more details.

Material errors discovered in prior period figures are corrected retrospectively by amending opening balances and comparative amounts for the prior period. See note 6 for more details.

(vi) Charges to Revenue for Non-Current Assets

Services, support services and trading accounts are debited with the following amounts to record the cost of holding fixed assets during the year:

- Depreciation attributable to the assets used by the relevant service
- Revaluation and impairment losses on assets used by the service where there are no accumulated gains in the Revaluation Reserve against which the losses can be written off
- Amortisation of intangible fixed assets attributable to the service

With the exception of works vehicles, depreciation is calculated on a straight line basis over the estimated useful life of the asset. The following useful lives have been used in the calculation of depreciation:

- Council Dwellings (Non Components) – 80 years
- Council Dwellings (Components) – 15 to 40 years
- Other Land and Buildings:
 - Council Offices – 60 years
 - Pavilions – 30 years
 - Cemetery Chapels – 30 years
 - Other – 40 years
- Vehicles, Plant, Furniture and Equipment – 5 years
- Infrastructure – 40 years

Any significant components identified in the revaluation of an asset are depreciated separately over their estimated useful life.

Works vehicles are depreciated over their estimated useful lives but with a greater depreciation charge in the early years to reflect the use and diminishing value of these assets.

Where an impairment loss is charged to the Comprehensive Income and Expenditure Statement, but there were accumulated revaluation gains in the Revaluation Reserve for that particular asset, an amount up to the value of that loss is transferred from the Revaluation Reserve to the Capital Adjustment Account.

The Council is not required to raise council tax or council housing rents to fund depreciation, revaluation and impairment losses or amortisations. However, it is required to make an annual contribution from revenue towards the reduction in its overall borrowing requirement equal to an amount calculated on a prudent basis determined by the authority in accordance with statutory guidance. This is known as the Minimum Revenue Provision (MRP).

Depreciation, revaluation and impairment losses and amortisations are therefore reversed out of the General Fund (and Housing Revenue Account (HRA)) and replaced by the MRP. This is completed with an adjusting transaction with the Capital Adjustment Account within the Movement in Reserves Statement for the difference between the two. This ensures that depreciation, revaluation and impairment losses and amortisations have no overall effect on council tax or housing rent levels.

The Local Authorities (Capital Finance and Accounting) (England) (Amendment) Regulations 2008, require local authorities to approve an MRP policy at the beginning of each financial year on setting aside a sum of money from revenue for the repayment of principal on outstanding debt. From 2012/13 onwards the Council has approved a policy such that, for capital expenditure incurred before 1 April 2008, the MRP is based on 4% of the authority's Capital Financing Requirement for the General Fund. For General Fund capital expenditure incurred after 1 April 2008, the MRP is based upon the estimated life of those assets where the financing was provided by borrowing. The Council has also decided that no voluntary provision for the repayment of debt relating to the HRA should be made in 2021/22.

(vii) Employee Benefits

Benefits Payable During Employment

Short term employee benefits are those due to be settled within 12 months of the year-end. They include such benefits as salaries, paid annual leave and sick leave and are recognised as an expense for service in the year in which employees render service to the Council.

Termination Benefits

Termination benefits are amounts payable as a result of a decision by the Council to terminate an officer's employment before the normal retirement date or an officer's decision to accept voluntary redundancy and are charged on an accruals basis to the appropriate service line in the Comprehensive Income and Expenditure Statement when the Council is demonstrably committed to the termination of the employment of an officer or making an offer to encourage voluntary redundancy.

Where termination benefits involve the enhancement of pensions, statutory provisions require the General Fund or Housing Revenue Account balance to be charged with the amount payable by the Council to the pension fund or pensioner in the year, not the amount calculated according to the relevant accounting standards. In the Movement in Reserves Statement, appropriations are required to and from the Pensions Reserve to remove the notional debits and credits for pension enhancement termination benefits and replace them with debits for the cash paid to the pension fund and pensioners and any such amounts payable but unpaid at the year-end.

Post-Employment Benefits

Employees of the Council are members of the Local Government Pension Scheme, administered by Nottinghamshire County Council. The scheme is a defined benefit

scheme in that it provides defined benefits to members (retirement lump sums and pensions), earned as employees worked for the Council.

The Local Government Pension Scheme

The Local Government Pension Scheme is accounted for as a defined benefits scheme:

- The liabilities of the Nottinghamshire County Council pension fund attributable to the Council are included in the Balance Sheet on an actuarial basis using the projected unit method – i.e. an assessment of the future payments that will be made in relation to retirement benefits earned to date by employees based on assumptions about mortality rates, employee turnover rates, etc. and projections of projected earnings for current employees.
- Liabilities are discounted to their value at current prices using a discount rate that reflects the time value of money and the characteristics of the liability.
- The assets of the Nottinghamshire County Council pension fund attributable to the Council are included in the Balance Sheet at their fair value:
 - Quoted securities – current bid price
 - Unquoted securities – professional estimate
 - Unitised securities – current bid price
 - Property – market value

The change in the net pension's liability is analysed into the following components:

- Service cost comprising:
 - Current service cost – the increase in liabilities as a result of years of service earned this year (allocated in the Comprehensive Income and Expenditure Statement to the services for which the employees worked).
 - Past service cost – the increase in liabilities as a result of a scheme amendment or curtailment whose effect relates to years of service earned in earlier years (debited to the Surplus or Deficit on the Provision of Services in the Comprehensive Income and Expenditure Statement as part of Resources).
 - Net interest on the net defined benefit liability or asset (i.e. the net interest expense for the Council) – the change during the period in the net defined liability or asset that arises from the passage of time charged to the Financing and Investment Income and Expenditure line in the Comprehensive Income and Expenditure Statement). This is calculated by applying the discount rate used to measure the defined benefit obligation at the beginning of the period to the net defined benefit liability or asset at the beginning of the period after taking into account any changes in the net defined benefit liability or asset during the period as a result of contribution and benefit payments.
- Re-measurements comprising:
 - The return on plan assets (excluding amounts included in net interest on the net defined benefit liability or asset) charged to the Pensions Reserve as Other Comprehensive Income and Expenditure.

- Actuarial gains and losses (changes in the net pensions liability that arise because events have not coincided with assumptions made at the last actuarial valuation or because the actuaries have updated their assumptions) charged to the Pensions Reserve as Other Comprehensive Income and Expenditure.
- Contributions paid to the Nottinghamshire County Council pension fund – cash paid as employer's contributions to the pension fund in settlement of liabilities (not accounted for as an expense).

In relation to retirement benefits, statutory provisions require the General Fund and Housing Revenue Account balance to be charged with the amount payable by the Council to the pension fund in the year, not the amount calculated according to the relevant accounting standards. In the Movement in Reserves Statement, this means that there are appropriations to and from the Pensions Reserve to remove the notional debits and credits for retirement benefits and replace them with debits for the cash paid to the pension fund and any amounts payable but unpaid at the year end. The negative balance that arises on the Pensions Reserve thereby measures the beneficial impact to the General Fund and Housing Revenue Account of being required to account for retirement benefits on the basis of cash flows rather than as benefits are earned by employees.

Discretionary Benefits

The authority also has restricted powers to make discretionary awards of retirement benefits in the event of early retirements. Any liabilities estimated to arise as a result of an award to any member of staff are accrued in the year of the decision to make the award and accounted for using the same policies as are applied to the Local Government Pension Scheme.

(viii) Events after the Balance Sheet Date

Events after the Balance Sheet date are those events, both favourable and unfavourable, that occur between the end of the reporting period and the date when the Statement of Accounts is authorised for issue. Two types of events can be identified:

- Those that provide evidence of conditions that existed at the end of the reporting period – the Statement of Accounts is adjusted to reflect such events.
- Those that are indicative of conditions that arose after the reporting period – the Statement of Accounts is not adjusted to reflect such events but, where a category of events would have a material effect, disclosure is made in the notes of the nature of the events and their estimated financial effect.

Events taking place after the date of authorisation for issue are not reflected in the Statement of Accounts.

(ix) Financial Instruments

Financial Liabilities

Financial liabilities are recognised on the Balance Sheet when the authority becomes a party to the contractual provisions of a financial instrument, and are initially assessed at fair value and are carried at amortised cost. Annual charges to the Financing and Investment income and expenditure line in the Comprehensive Income and Expenditure Statement for interest payable are based on the carrying amount of the liability multiplied by the effective rate of interest for the instrument. The effective interest rate is the rate that exactly discounts estimated future cash payments over the life of the instrument to the amount at which it was originally recognised.

All borrowings shown in the Balance Sheet consist of the outstanding principal repayable plus accrued interest. Annual interest is charged to the Comprehensive Income and Expenditure Statement in accordance with the loan agreement.

Gains and losses on the repurchase or early settlement of borrowing are credited and debited to the Financing and Investment income and expenditure line in the Comprehensive Income and Expenditure Statement in the year of repurchase/settlement. However, where repurchase has taken place as part of a restructuring of the loan portfolio that involves the modification or exchange of existing instruments, the premium or discount is respectively deducted from or added to the amortised cost of the new or modified loan and the write down to the Comprehensive Income and Expenditure Statement is spread over the life of the loan by an adjustment to the effective interest rate.

Where premiums and discounts have been charged to the Comprehensive Income and Expenditure Statement or the Housing Revenue Account, regulations allow the impact on the General Fund and Housing Revenue Account Balance respectively to be spread over future years. The Council has a policy of spreading the gain or loss over the term that was remaining on the loan against which the premium was payable or discount receivable when it was repaid. The reconciliation of amounts charged to the Comprehensive Income and Expenditure Statement or the Housing Revenue Account to the net charge required against the General Fund or Housing Revenue Account Balance is managed by a transfer to or from the Financial Instruments Adjustment Account in the Movement in Reserves Statement.

Financial Assets

Certain reserves are kept to manage the accounting processes for non-current fixed assets and retirement benefits and do not represent usable resources for the Council - these reserves are explained in the relevant policies below.

Financial assets are classified based on a classification and measurement approach that reflects the business model for holding the financial assets and their cashflow characteristics. There are three main classes of financial assets measured at:

- amortised cost
- fair value through profit or loss
- fair value through other comprehensive income

The Council's business model is to hold investments to collect contractual cash flows. Financial assets are therefore classified as amortised cost, except for those whose contractual payments are not solely payment of principal and interest.

Financial Assets measured at Amortised Cost

Financial assets measured at amortised cost are recognised on the Balance Sheet when the Council becomes a party to the contractual provisions of a financial instrument and are initially measured at fair value. They are subsequently measured at their amortised cost. Annual credits to the Financing and Investment Income and Expenditure line in the Comprehensive Income and Expenditure Statement for interest receivable are based on the carrying amount of the asset multiplied by the effective rate of interest for the instrument.

All such assets held on the Balance Sheet consist of the outstanding principal receivable plus accrued interest. Annual interest is credited to the Comprehensive Income and Expenditure Statement in accordance with the loan agreement.

The Council has provided a number of "soft loans" to employees at less than market rates for the purchase of motor vehicles. These should be correctly shown in the Balance Sheet at fair value. However, the value of these loans is not considered to be material. Accordingly, the value as shown in the Balance Sheet represents the value of any loans made less any repayments that have been received.

Any gains or losses that arise on the derecognition of an asset are credited or debited to the Financing and Investment income and expenditure line in the Comprehensive Income and Expenditure Statement.

Expected Credit Loss Model

The Council recognises expected credit losses on all of its financial assets held at amortised cost either on a 12 month or lifetime basis. The expected credit loss model also applies to lease receivables and contract assets. Only lifetime losses are recognised for trade receivables held by the Council.

Impairment losses are calculated to reflect the expectation that the future cash flows might not take place because the borrower could default on their obligations. Credit risk plays a crucial part in assessing losses. Where risk has increased significantly since an instrument was initially recognised, losses are assessed on a lifetime basis. Where risk has not increased significantly, or remains low, losses are assessed on the basis of 12 month expected losses.

Financial Assets measured at Fair Value through Profit or Loss

Financial assets measured at fair value through profit or loss are recognised on the balance sheet when the Council becomes a party to the contractual provisions of a financial instrument and are initially measured and carried at fair value. Fair value gains and losses are recognised as they occur in the Surplus or Deficit on the Provision of Services in the Comprehensive Income and Expenditure Statement.

The fair value measurements of the financial assets are based on the following techniques:

- Instruments with quoted market prices – the market price.
- Other instruments with fixed and determinable payments – discounted cash flow analysis.

The inputs to the measurement technique are categorised in accordance with the following:

- Level 1 inputs – quoted prices (unadjusted) in active markets for identical assets that the Council can access at the measurement date.
- Level 2 inputs – inputs other than quoted prices included within level 1 that are observable for the asset, either directly or indirectly.
- Level 3 inputs – unobservable inputs for the asset.

Any gains or losses that arise on the derecognition of the asset are credited or debited to the Financing and Investment Income and Expenditure line in the Comprehensive Income and Expenditure Statement.

Financial Assets measured at Fair Value through Other Comprehensive Income

Financial assets measured at fair value through other comprehensive income are recognised on the balance sheet when the authority becomes a party to the contractual provisions of a financial instrument and are initially measured and carried at fair value. Annual income received from the financial instrument is credited to the Financing and Investment Income and Expenditure line in the Comprehensive Income and Expenditure Statement when it becomes receivable by the authority.

The fair value measurements of the financial assets are based on the following techniques:

- Instruments with quoted market prices – the market price.
- Other instruments with fixed and determinable payments – discounted cash flow analysis.

The inputs to the measurement technique are categorised in accordance with the following:

- Level 1 inputs – quoted prices (unadjusted) in active markets for identical assets that the Council can access at the measurement date.
- Level 2 inputs – inputs other than quoted prices included within level 1 that are observable for the asset, either directly or indirectly.
- Level 3 inputs – unobservable inputs for the asset.

The Council can elect to classify certain instruments as Fair Value through Other Comprehensive Income, dependent on the contractual arrangements for the instrument.

For an elected financial asset fair value gains and losses are recognised as they occur in Other Comprehensive Income within the Comprehensive Income and Expenditure Statement but are balanced by an entry in the Financial Instrument Revaluation Reserve. In all other circumstances the gain or loss is recognised in the Financing and Investment Income and Expenditure line on the Comprehensive Income and Expenditure Statement before being transferred to the Financial Instrument Revaluation Reserve via the Movement in Reserve Statement.

On derecognition of an elected financial asset the balance on the Financial Instrument Revaluation Reserve is transferred to the General Fund via the Movement in Reserves Statement. In all other circumstances the balance on the Financial Instrument Revaluation Reserve is transferred to the Financing and Investment Income and Expenditure line within the Comprehensive Income and Expenditure Statement.

(x) Government Grants and Contributions

Whether paid on account, by instalments or in arrears, government grants and third party contributions and donations are recognised as due to the Council when there is reasonable assurance that:

- the Council will comply with the conditions attached to the payments, and
- the grants or contributions will be received.

Amounts recognised as due to the Council are not credited to the Comprehensive Income and Expenditure Statement until conditions attached to the grant or contribution have been satisfied. Conditions are stipulations that specify that the future economic benefits or service potential embodied in the asset acquired by using the grant or contribution are required to be consumed by the recipient as specified, or future economic benefits or service potential must be returned to the transferor.

Monies advanced as grants and contributions for which conditions have not been satisfied are carried in the Balance Sheet as creditors. When conditions are satisfied, the grant or contribution is credited to the relevant service line (attributable revenue grants and contributions) or Taxation and Non-specific Grant Income (non-ring fenced revenue grants and all capital grants) in the Comprehensive Income and Expenditure Statement.

Where capital grants are credited to the Comprehensive Income and Expenditure Statement, they are reversed out of the General Fund Balance in the Movement in Reserves Statement. Where the grant has yet to be used to finance capital expenditure, it is posted to the Capital Grants Unapplied Reserve. Where it has been applied, it is posted to the Capital Adjustment Account. Amounts in the Capital Grants Unapplied Reserve are transferred to the Capital Adjustment Account once they have been applied to fund capital expenditure.

(xi) Heritage Assets

The Council's Heritage Assets consist of the DH Lawrence Birthplace Museum building and a painting by Dr Ala Bashir, a respected sculptor and painter, of DH Lawrence which is linked to his most famous novel, Lady Chatterley's Lover. The museum building is held for its historical and artistic significance and to promote knowledge and culture. The DH Lawrence Birthplace Museum is recognised and measured (including the treatment of depreciation and revaluation gains and losses) in accordance with the Authority's accounting rules on property, plant and equipment. The painting was donated to the Council in 2008.

The carrying amounts of heritage assets are reviewed where there is evidence of impairment. For example, this may be where the asset has suffered physical deterioration or breakage or where doubts arise as to its authenticity. Any impairment is recognised and measured in accordance with the Council's general policies on impairment.

(xii) Intangible Assets

Expenditure on non-monetary assets that do not have physical substance but are controlled by the authority as a result of past events (e.g. software licences) is capitalised when it is expected that future economic benefits or service potential will flow from the intangible asset to the Council.

Internally generated assets are capitalised where it is demonstrable that the project is technically feasible and is intended to be completed (with adequate resources being available) and the Council will be able to generate future economic benefits or deliver service potential by being able to sell or use the asset. Expenditure is capitalised where it can be measured reliably as attributable to the asset and is restricted to that incurred during the development phase. Research expenditure cannot be capitalised.

Expenditure on the development of websites is not capitalised if the website is solely or primarily intended to promote or advertise the Council's goods or services.

Intangible assets are measured initially at cost. Amounts are only re-valued where the fair value of the assets held by the Council can be determined by reference to an active market. In practice, no intangible asset held by the Council meets this criterion and they are therefore carried at amortised cost. The depreciable amount of an intangible asset is amortised over its useful life to the relevant service line(s) in the Comprehensive Income and Expenditure Statement.

An asset is tested for impairment whenever there is an indication that the asset might be impaired. Any losses recognised are posted to the relevant service line(s) in the Comprehensive Income and Expenditure Statement. Any gain or loss arising on the disposal or abandonment of an intangible asset is posted to the Other Operating Expenditure line in the Comprehensive Income and Expenditure Statement.

Where expenditure on intangible assets qualifies as capital expenditure for statutory purposes, amortisation, impairment losses and disposal gains and losses are not permitted to have an impact on the General Fund Balance. The gains and losses are therefore reversed out of the General Fund Balance in the Movement in Reserves Statement and posted to the Capital Adjustment Account and (for any sales proceeds greater than £10,000) the Capital Receipts Reserve.

(xiii) Interests in Companies and Other Entities

The authority has material interests in companies and other entities that have the nature of subsidiaries, associates and jointly controlled entities and require it to prepare group accounts. Liberty Leisure Ltd is a wholly owned subsidiary of the authority which manages the provision of leisure and culture services and its accounts are consolidated with the authority's in accordance with IAS 27. See also policy xvi below.

(xiv) Inventories and Long Term Contracts

Inventories are included in the Balance Sheet at cost. Whilst the Code of Practice on Local Authority Accounting 2021/22 requires inventories to be shown at the lower of cost and net realisable value, a departure from this is permitted under IFRS due to:

- the value of inventories not being considered to be material.
- the cost of analysing inventories between cost and net realisable value outweighing the value to the user of the accounts.

Long term contracts are accounted for on the basis of charging the Surplus or Deficit on the Provision of Services with the value of works and services received under the contract during the financial year

(xv) Investment Property

Investment properties are those that are used solely to earn rentals and/or for capital appreciation. The definition is not met if the property is used in any way to facilitate the delivery of services or production of goods or is held for sale.

Investment properties are measured initially at cost and subsequently at fair value, based on the amount at which the asset could be exchanged between knowledgeable parties at arm's-length. Properties are not depreciated but are re-valued annually according to market conditions at the year-end. Gains and losses on revaluation are posted to the Financing and Investment income and expenditure line in the Comprehensive Income and Expenditure Statement. The same treatment is applied to gains and losses on disposal.

Rentals received in relation to investment properties are credited to the Financing and Investment income and expenditure line in the Comprehensive Income and Expenditure Statement and result in a gain for the General Fund Balance. However, revaluation and disposal gains and losses are not permitted by statutory

arrangements to have an impact on the General Fund Balance. The gains and losses are therefore reversed out of the General Fund Balance in the Movement in Reserves Statement and posted to the Capital Adjustment Account and (for any sale proceeds greater than £10,000) the Capital Receipts Reserve.

The Council does not currently have any investment properties.

(xvi) Jointly Controlled Operations and Jointly Controlled Assets

Jointly controlled operations are activities undertaken by the Council in conjunction with other venturers that involve the use of assets and resources of the venturers rather than the establishment of a separate entity. The Council recognises on its Balance Sheet the assets that it controls and the liabilities that it incurs and debits and credits the Comprehensive Income and Expenditure Statement with the expenditure it incurs and the share of income it earns from the activity.

Jointly controlled assets are items of property, plant and equipment that are jointly controlled by the Council and other venturers, with the assets being used to obtain benefits for the venturers. The joint venture does not involve the establishment of a separate entity. The Council accounts for only its share of the jointly controlled assets, the liabilities and expenses that it incurs on its own behalf or jointly with others in respect of its interest in the joint venture and income that it earns from the venture.

Whilst the Council does not strictly have any jointly controlled operations and jointly controlled assets in line with the definitions above, the Council has a 50% interest in the Bramcote Bereavement Services Joint Committee with the other 50% relating to Erewash Borough Council. Whilst the Bramcote Bereavement Services Joint Committee is a separate entity in its own right, its decision making and operational arrangements fulfil many of features associated with a jointly controlled operation. Therefore, the Council recognises 50% of the assets and liabilities of the Joint Committee on its Balance Sheet and debits and credits the Comprehensive Income and Expenditure Statement with 50% of the expenditure and income of the Joint Committee. This is also recognised in the Movement in Reserves Statement and the Cash Flow Statement as appropriate.

(xvii) Leases

Leases are classified as finance leases where the terms of the lease transfer substantially all the risks and rewards incidental to ownership of the property, plant or equipment from the lessor to the lessee. All other leases are classified as operating leases.

Where a lease covers both land and buildings, the land and buildings elements are considered separately for classification.

Arrangements that do not have the legal status of a lease but convey a right to use an asset in return for payment are accounted for under this policy where fulfilment of the arrangement is dependent upon the use of specific assets.

The Council as Lessee

Finance Leases: Property, plant and equipment held under finance leases is recognised on the Balance Sheet at the commencement of the lease at its fair value measured at the lease's inception. The asset recognised is matched by a liability for the obligation to pay the lessor. Contingent rents are charged as expenses in the periods in which they are incurred. All assets acquired through finance leases have been fully written down at the Balance Sheet date.

Operating Leases: Rentals paid under operating leases are charged to the Comprehensive Income and Expenditure Statement as an expense of the services benefitting from use of the leased property, plant or equipment. Charges are made on a straight-line basis over the life of the lease.

The Council as Lessor

Finance Leases: Where the Council grants a finance lease over a property or an item of plant or equipment, the relevant asset is written out of the Balance Sheet as a disposal.

Operating Leases: Where the Council grants an operating lease over a property or an item of plant or equipment, the asset is retained in the Balance Sheet. Rental income is credited to the Other Operating Expenditure line in the Comprehensive Income and Expenditure Statement. Credits are made on a straight-line basis over the life of the lease.

New standards in respect to leasing come into effect from 1 April 2022 which will change the accounting treatment of finance and operating leases. The Council is assessing the implications but considering the low number of leases the Council currently holds as lessee the impact is not considered to be material.

(xviii) Overhead and Support Services

The costs of overheads and support services are charged to those that benefit from the supply or service in accordance with the costing principles of the CIPFA Service Reporting Code of Practice (SerCOP). The total absorption costing principle is used – the full cost of overheads and support services are shared between users in proportion to the benefits received, with the exception of:

- Corporate and Democratic Core – costs relating to the authority's status as a multi-functional, democratic organisation
- Non Distributed Costs – the cost of discretionary benefits awarded to employees retiring early.

These two cost categories are defined in the Service Reporting Code of Practice but are accounted for under Resources in the Comprehensive Income and Expenditure Statement.

(xix) Property, Plant and Equipment

Assets that have physical substance and are held for use in the production or supply of goods or services, for rental to others, or for administrative purposes and that are expected to be used during more than one financial year are classified as Property, Plant and Equipment.

The Council operates a de minimis level in valuing assets. Any assets valued at less than £5,000 are excluded from Balance Sheet values.

Recognition

Expenditure on the acquisition, creation or enhancement of property, plant and equipment is capitalised on an accruals basis, provided that it is probable that the future economic benefits or service potential associated with the item will flow to the Council and the cost of the item can be measured reliably. Expenditure that maintains but does not add to an asset's potential to deliver future economic benefits or service potential (i.e. repairs and maintenance) is charged as an expense when it is incurred.

Measurement

Assets are initially measured at cost, comprising:

- the purchase price.
- any costs attributable to bringing the asset to the location and condition necessary for it to be capable of operating in the manner intended by management.

The Council does not capitalise borrowing costs incurred whilst assets are under construction.

The cost of assets acquired other than by purchase is deemed to be its fair value, unless the acquisition does not have commercial substance (i.e. it will not lead to a variation in the cash flows of the Council). In the latter case, where an asset is acquired via an exchange, the cost of the acquisition is the carrying amount of the asset given up by the Council.

Donated assets are measured initially at fair value. The difference between fair value and any consideration paid is credited to the Taxation and Non-Specific Grant Income line of the Comprehensive Income and Expenditure Statement, unless the donation has been made conditionally. Until conditions are satisfied, the gain is held in the Donated Assets Account. Where gains are credited to the Comprehensive Income and Expenditure Statement, they are reversed out of the General Fund Balance to the Capital Adjustment Account in the Movement in Reserves Statement.

Assets are then carried in the Balance Sheet using the following measurement bases:

- Infrastructure, community assets and assets under construction – depreciated historical cost
- Dwellings - fair value, determined using the basis of existing use value for social housing (EUV-SH)
- All other assets – fair value, determined as the amount that would be paid for the asset in its existing use (existing use value – EUV)

Where there is no market-based evidence of fair value because of the specialist nature of an asset, depreciated replacement cost (DRC) is used as an estimate of fair value.

Where non-property assets that have short useful lives or low values (or both) are involved, depreciated historical cost basis is used as a proxy for fair value.

Assets included in the Balance Sheet at fair value are revalued sufficiently regularly to ensure that their carrying amount is not materially different from their fair value at the year end, but as a minimum every five years. Increases in valuations are matched by credits to the Revaluation Reserve to recognise unrealised gains. (Exceptionally, gains might be credited to the Comprehensive Income and Expenditure Statement where they arise from a reversal of a loss previously charged to a service).

Where decreases in value are identified, they are accounted for by:

- Where there is a balance of revaluation gains for the asset in the Revaluation Reserve, the carrying amount of the asset is written down against that balance (up to the amount of the accumulated gains).
- Where there is no balance in the Revaluation Reserve or an insufficient balance, the carrying amount of the asset is written down against the relevant service line(s) in the Comprehensive Income and Expenditure Statement.

Impairment

Assets are assessed at each year-end as to whether there is any indication that an asset may be impaired. Where indications exist and any possible differences are estimated to be material, the recoverable amount of the asset is estimated and, where this is less than the carrying amount of the asset, an impairment loss is recognised for the shortfall.

Where impairment losses are identified, they are accounted for by:

- Where there is a balance of revaluation gains for the asset in the Revaluation Reserve, the carrying amount of the asset is written down against that balance (up to the amount of the accumulated gains).
- Where there is no balance in the Revaluation Reserve or an insufficient balance, the carrying amount of the asset is written down against the relevant service line(s) in the Comprehensive Income and Expenditure Statement.

Where an impairment loss is reversed subsequently, the reversal is credited to the relevant service line(s) in the Comprehensive Income and Expenditure Statement up

to the amount of the original loss, adjusted for depreciation that would have been charged if the loss had not been recognised.

Depreciation

Depreciation is provided on all property, plant and equipment assets held by the systematic allocation of their depreciable amounts over their useful lives. An exception is made for assets without a determinable finite useful life (i.e. freehold land and certain community assets) and assets that are not yet available for use (i.e. assets under construction).

Depreciation is calculated on the following bases:

- Dwellings and other buildings – straight line allocation over the useful life of the property.
- Vehicles, plant, furniture and equipment – straight line allocation over the useful life of the asset. New specialist vehicles may also have an additional depreciation provision made from the year following acquisition as advised by a suitably qualified officer.
- Infrastructure - straight line allocation over 40 years.

Where an item of Property, Plant and Equipment asset has major components whose cost is significant in relation to the total cost of the item, the components are depreciated separately. This applies particularly in respect of council house dwellings.

Revaluation gains are also depreciated, with an amount equal to the difference between current value depreciation charged on assets and the depreciation that would have been chargeable based on their historical cost being transferred each year from the Revaluation Reserve to the Capital Adjustment Account.

Disposals and Non-Current Assets Held for Sale

When it becomes probable that the carrying amount of an asset will be recovered principally through a sale transaction rather than through its continuing use, it is reclassified as an Asset Held for Sale. The asset is revalued immediately before reclassification and then carried at the lower of this amount and fair value less costs to sell. Where there is a subsequent decrease to fair value less costs to sell, the loss is posted to the Other Operating Expenditure line in the Comprehensive Income and Expenditure Statement. Gains in fair value are recognised only up to the amount of any previous losses recognised in the Surplus or Deficit on Provision of Services. Depreciation is not charged on Assets Held for Sale.

If assets no longer meet the criteria to be classified as Assets Held for Sale, they are reclassified back to non-current assets and valued at the lower of their carrying amount before they were classified as held for sale (adjusted for depreciation, amortisation or revaluations that would have been recognised had they not been classified as Held for Sale) and their recoverable amount at the date of the decision not to sell.

Assets that are to be abandoned or scrapped are not reclassified as Assets Held for Sale.

When an asset is disposed of or decommissioned, the carrying amount of the asset in the Balance Sheet (whether Property Plant and Equipment or Assets Held for Sale) is written off to the Other Operating Expenditure line in the Comprehensive Income and Expenditure Statement as part of the gain or loss on disposal. Receipts from disposals (if any) are credited to the same line in the Comprehensive Income and Expenditure Statement also as part of the gain or loss on disposal (i.e. netted off against the carrying value of the asset at the time of the disposal). Any revaluation gains accumulated for the asset in the Revaluation Reserve are transferred to the Capital Adjustment Account.

If part of an asset is replaced with a similar identifiable component, the carrying amount of the replaced or restored component is derecognised with the carrying amount of the new component being recognised. Any gain or loss arising from this process is credited or debited to the Comprehensive Income and Expenditure Statement as appropriate.

Amounts received for a disposal in excess of £10,000 are categorised as capital receipts. The Council has committed to a government scheme whereby, as from 2012/13, housing capital receipts from right to buy sales can only be used towards new affordable council housing, and within three years of their receipt, otherwise they become payable to the government. The balance of receipts held is required to be credited to the Capital Receipts Reserve and can then only be used for new capital investment on council housing or set aside to reduce the Council's underlying need to borrow (the Capital Financing Requirement). Receipts are appropriated to the Reserve from the General Fund Balance in the Movement in Reserves Statement.

The written off value of disposals is not a charge against council tax or housing rents, as the cost of fixed assets is fully provided for under separate arrangements for capital financing. Amounts are appropriated to the Capital Adjustment Account from the General Fund Balance in the Movement in Reserves Statement.

(xx) Provisions, Contingent Liabilities and Contingent Assets

Provisions

Provisions are made where an event has taken place that gives the Council a legal or constructive obligation that probably requires settlement by a transfer of economic benefits or service potential and a reliable estimate can be made of the amount of the obligation. For instance, the Council may be involved in a court case that could eventually result in the making of a settlement or the payment of compensation.

Provisions are charged as an expense to the appropriate service line in the Comprehensive Income and Expenditure Statement in the year that the Council becomes aware of the obligation and are measured as the best estimate at the Balance Sheet date of the expenditure required to settle the obligation, taking into account relevant risks and uncertainties. When payments are eventually made, they

are charged to the provision carried in the Balance Sheet. Estimated settlements are reviewed at the end of each financial year – where it becomes less than probable that a transfer of economic benefits will now be required (or a lower settlement than anticipated is made), the provision is reversed and credited back to the relevant service.

Where some or all of the payment required to settle a provision is expected to be recovered from another party (e.g. from an insurance claim), this is only recognised as income for the relevant service if it is virtually certain that reimbursement will be received if the Council settles the obligation.

A provision exists in relation to outstanding insurance claims, based upon information supplied by the Council's insurers. All insurance claims transactions during the course of the year are passed through the provision with the appropriate charge being made against the service lines within the Comprehensive Income and Expenditure Statement.

Contingent Liabilities

A contingent liability arises where an event has taken place that gives the Council a possible obligation whose existence will only be confirmed by the occurrence or otherwise of uncertain future events not wholly within the control of the Council. Contingent liabilities also arise in circumstances where a provision would otherwise be made but either it is not probable that an outflow of resources will be required or the amount of the obligation cannot be measured reliably.

Contingent liabilities are not recognised in the Balance Sheet but disclosed in a note to the accounts. Further details can be found in note 43 to the accounts.

Contingent Assets

A contingent asset arises where an event has taken place that gives the Council a possible asset whose existence will only be confirmed by the occurrence or otherwise of uncertain future events not wholly within the control of the authority.

Contingent assets are not recognised in the Balance Sheet but disclosed in a note to the accounts where it is probable that there will be an inflow of economic benefits or service potential. Further details can be found in note 44 to the accounts.

(xxi) Reserves

The Council sets aside specific amounts as reserves for future policy purposes or to cover contingencies. Reserves are created by appropriating amounts out of the General Fund or Housing Revenue Account balance in the Movement in Reserves Statement. When expenditure to be financed from a reserve is incurred, it is charged to the appropriate service in that year to score against the Surplus or Deficit on the Provision of Services in the Comprehensive Income and Expenditure Statement. The reserve is then appropriated back into the General Fund or Housing Revenue Account balance in the Movement in Reserves Statement so that there is no net charge against council tax or housing rents for the expenditure.

(xxii) Revenue Expenditure Funded from Capital under Statute

Expenditure incurred during the year that may be capitalised under statutory provisions but that does not result in the creation of a non-current asset has been charged as expenditure to the relevant service in the Comprehensive Income and Expenditure Statement in the year. Where the Council has determined to meet the cost of this expenditure from existing capital resources or by borrowing, a transfer in the Movement in Reserves Statement from the General Fund or Housing Revenue Account balance to the Capital Adjustment Account then reverses out the amounts charged so that there is no impact on the level of council tax or council house rents.

(xxiii) VAT

VAT payable is included as an expense only to the extent that it is not recoverable from Her Majesty's Revenue and Customs. VAT receivable is excluded from income.

(xxiv) Collection Fund

Billing authorities are required to maintain a separate fund for the collection and distribution of amounts due in respect of council tax and non-domestic rates. The Council acts as an agent, collecting and distributing council tax and business rates income on behalf of the major precepting authorities and central government as well as itself.

The difference between the income collected in the Comprehensive Income and Expenditure Statement and the amount by regulation to be credited to the General Fund is taken to the Collection Fund Adjustment Account and included as reconciling item in the Movement in Reserves Statement.

The Balance Sheet includes the Authority's share of year end balances in respect of Council Tax and Non Domestic Rates relating to arrears, impairment allowances for doubtful debts and overpayments and prepayments and appeals.

Non Domestic Rates amounts are collected on behalf of the other partners of Central Government, Nottinghamshire County Council and Nottinghamshire Fire Authority.

Council Tax amounts are collected on behalf of the other preceptors of Nottinghamshire County Council, Nottinghamshire Police Authority and Nottinghamshire Fire Authority.

As the Collection Fund is conducted on an agency basis, there is a debtor or creditor position between the Council and the major precepting authorities and central government.

Council Tax

The Local Council Tax Support Scheme is reviewed by the Finance and Resources Committee prior to the commencement of the financial year and any amendments are approved by full Council.

Report of the Deputy Chief Executive

STATEMENT OF ACCOUNTS 2021/22 - UNDERLYING PENSION ASSUMPTIONS

1. Purpose of Report

To provide Members with information regarding the assumptions made by the pension fund actuary in calculating the IAS19 figures to be reported in the 2021/22 Statement of Accounts.

2. Introduction

IAS19 (International Accounting Standard 19 - Employee Benefits) is one of the financial reporting standards with which the Council must comply when producing its annual Statement of Accounts. The basic requirement of IAS19 is that an organisation should account for retirement benefits when it is committed to give them, irrespective of when they are paid out.

In order to calculate the cost of earned benefits for inclusion in the Statement of Accounts, the scheme actuaries use certain assumptions to reflect expected future events which may affect the cost. The assumptions used should lead to the best estimate of the future cash flows that will arise under the scheme liabilities. Any assumptions that are affected by economic conditions should reflect market expectations at the balance sheet date. The proposed assumptions for 2021/22 are shown in the appendix.

The Council will use the calculated costs and the underlying assumptions based upon the advice of the actuary of the Nottinghamshire County Council Pension Fund, Barnett Waddingham and the administering authority (Nottinghamshire County Council) in preparing the annual Statement of Accounts. A formal actuarial valuation is carried out every three years, the last being as at 31 March 2019. The Actuary's final report for 2021/22 is due to be received on 25 April 2022. All of the figures relating to IAS19 are simply accounting adjustments made to comply with accounting standards and have no direct impact on resources. The amount charged to the General Fund Balance is the actual amount paid out in employers' contributions and not the charge calculated in accordance with IAS19. The liability shown in the balance sheet is an estimate based on assumptions and would only ever become payable if the Council ceased as a going concern.

Recommendation

The Committee is asked to NOTE the assumptions to be used in the calculation of pension figures for 2021/22.

Background Papers - Nil

APPENDIX

Proposed Financial Assumptions for 2021/22

The value of the Pension Fund's assets and liabilities are heavily dependent on the underpinning assumptions. The Employer is ultimately responsible for the assumptions used and this year's proposed assumptions are listed below:

- Corporate bond yields – This is used to derive the discount rate which is applied to the employer's liabilities to calculate their future values. The rates used are those that match the duration of the employer's liability.
- Expected Return on Assets – The actuaries anticipate that a typical local Government Pension Fund might achieve a positive return of 8% in the year to 31 March 2022 although this may vary depending on the individual funds investment strategy.
- Inflation Expectations – The levels of future Retail Prices Inflation (RPI) are assessed on the basis of the yields on fixed interest and index linked government securities over the period of the duration of the liabilities. The increases in pensions in the Local Government Pension are based on the Consumer Prices Index (CPI) which historically is lower than the Retail Prices Index. The Actuary has assessed the gap between RPI and CPI going forward to be a reduction of between 0.25% and 0.9% dependent on the duration of the employer's liabilities.
- Salary Increases – The actuaries have proposed that salary increases are in line with CPI plus 1%.

The overall impact of the assumptions for an average employer is set out below but it should be noted that individual employer's circumstances vary, in particular the average age of their overall liabilities and therefore the results for Broxtowe may be different from the assessment below.

Changes in Actuary's Assumptions upon Employer's Liability from 2020/21

Assumption	Duration of Individual Employee Liability (Years)			
	Less than 10 years	Between 0 to 15	Between 15 to 20	Greater than 20 years
Effect of change in discount rate on employer's liability	Decrease of 3%	Decrease of 4%	Decrease of 5%	Decrease of 5%
Change in inflation on employer's liability	Increase of 4%	Increase of 4%	Increase of 5%	Increase of 5%
Overall impact	No change	Increase of 1%	No change	No change

Impact of Covid-19 on mortality assumption

There are two main steps in setting the mortality assumption:

- Making a current assumption of members' mortality and
- Projecting these current mortality rates into the future

To project future mortality rates, a model prepared by the Continuous Mortality Investigation Bureau (CMI) is used. The CMI update their model on an annual basis incorporating the latest mortality data in the national population. CMI have made a material change to the 2020 model due to the impact of abnormal mortality data in 2020.

The approach of the Actuaries will be to continue with a roll forward approach in calculating liabilities rather than carry out a full valuation if member data. This means mortality experience is estimated through benefits paid to members. The difference between this estimate and the employer's actual mortality rate experience will then be incorporated once the next actuarial valuation of the fund is undertaken in 2022. For the assumptions as at March 2021 the CMI 2020 model will be adopted.

Supreme Court ruling in McCloud/Sargeant cases

Two employment tribunal cases were brought against the Government in relation to possible discrimination in the implementation of transitional protection following the introduction of the reformed 2015 public service pension schemes from 1 April 2015. The first case McCloud and the second case (Sargeant) were subsequently linked and in June 2019 the Court of Appeal ruled the reforms amounted to unlawful discrimination.

There are currently uncertainties in relation to Local Government Pension Schemes (LGPS) benefits due to the McCloud and Sargeant judgements. Remedial regulations are expected in 2022 and uncertainty over the benefit changes proposed for the LGPS will remain until these have been finalised.

Impact of Goodwin case

Following a case involving the Teachers' Pension scheme, known as the Goodwin case, differences between survivor benefits payable to members with same-sex or opposite-sex survivors have been identified within a number of public sector pension schemes. As a result, the Government have confirmed that a remedy is required in all affected public sector pension schemes, which includes the LGPS.

As this has just recently been announced, the Actuary does not yet have an accurate indication of the potential impact this may have on the value of employers' liabilities or the cost of the scheme. Any indication of cost at this stage will only be a rough estimate as in a lot of cases, funds will not have this information or data to hand. However, the Actuary believes the impact will very small and not material for the vast majority of employers.

Impact of Lloyds judgement

The Lloyds Banking Group court case involved a ruling that, in cases where a member exercised their right to a transfer value out of the scheme, the trustee had the duty to make a transfer payment that reflects the member's right to equalised benefits and remains liable if an inadequate transfer payment had been paid. It is not yet known if, or how, this will affect the LGPS.

Report of the Deputy Chief Executive

REVIEW OF STRATEGIC RISK REGISTER

1. Purpose of report

To approve the amendments to the Strategic Risk Register and the action plans identified to mitigate risks.

2. Detail

In accordance with the corporate Risk Management Strategy, the Strategic Risk Management Group met on 26 January 2022 to review the Strategic Risk Register. General Management Team (GMT) has since considered the proposals from 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 '5x5' 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 proposed amendments to the Strategic Risk Register and the actions resulting from the process are attached in appendix 2. The revised Strategic Risk Register incorporating the proposed amendments is available on the intranet. Further reviews of the Strategic Risk Register will be reported to future meetings of this Committee.

Recommendation

The Committee is asked to RESOLVE that the amendments to the Strategic Risk Register and the actions to mitigate risks as set out in appendix 2 be approved.

Background papers

Nil

APPENDIX 1**REVIEW OF STRATEGIC RISK REGISTER****Introduction**

The Risk Management Strategy, as revised in December 2018, 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

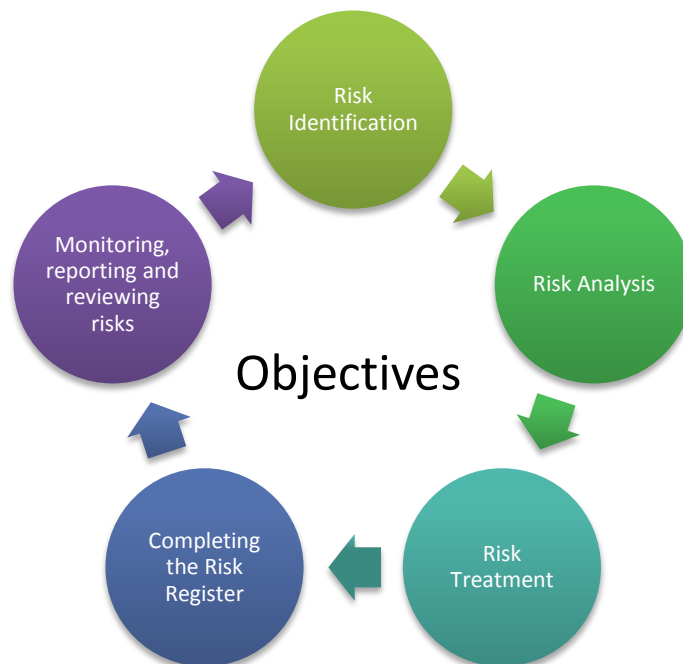
Risk management involves adopting a planned and systematic approach to the identification, evaluation and control of those risks which can threaten the objectives, assets, or financial wellbeing of the Council. It is a means of minimising the costs and disruption to the Council caused by undesired events.

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>The position with regards to this risk is unchanged from the previous meeting.</i></p>	20	<p>4</p>  <p>Green</p>	No changes were proposed to the key controls, risk indicators and action points for this strategic risk.
<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 improved.</i></p>	25	<p>16</p>  <p>Red</p>	<p>The action to adopt a new Energy Procurement Strategy was completed having been recently approved by Policy and Performance Committee.</p> <p>The action to negotiate final terms for the tram compensation claim against Nottingham City Council was updated to refer to seeking full recovery of the agreed compensation.</p> <p>The action to review the Bramcote Crematorium operating model given concern about the sustainability of the distribution of the surplus received by the Council was deleted as this action is no longer considered current.</p>
<p>3. Failure to deliver the Housing Revenue Account (HRA) Business Plan</p>	25	<p>6</p>  <p>Amber</p>	No changes were proposed to the key controls, risk indicators and action points for this strategic risk.
<p>4. Failure of strategic leisure initiatives</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>20</p>  <p>Red</p>	The action point to consider the TUPE implications for Liberty Leisure Limited employees following the termination of the joint-use agreement for Kimberley Leisure Centre was completed, with Kimberley School agreeing to the staff being transferred across to them from 1 September 2022.

Risk	Inherent Risk	Residual Risk	Changes
<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>16</p>  <p>Red</p>	<p>The action point to consider the TUPE implications for Liberty Leisure Limited employees following the termination of the joint-use agreement for Kimberley Leisure Centre was completed.</p> <p>The risk to the financial position of the company has improved with income from swimming almost at 100% of pre-pandemic levels and leisure memberships at around 70%.</p>
<p>6. Failure to complete the re-development of Beeston town centre</p> <p><i>The position with regards to this risk is unchanged.</i></p>	25	<p>8</p>  <p>Amber</p>	<p>No changes were proposed to the key controls, risk indicators and action points for this strategic risk.</p>
<p>7. Not complying with domestic or European 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>	25	<p>9</p>  <p>Amber</p>	<p>A new action was added to resolve any systems and procedures issues relating to the schedule of annual gas safety checks and to urgently clear any backlog of properties awaiting overdue annual gas safety tests.</p> <p>A new action was added for the Council to ensure compliance with the new Environment Act 2021 legislation.</p>
<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>8</p>  <p>Amber</p>	<p>No changes were proposed to the key controls, risk indicators and action points for this strategic risk.</p>
<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>12</p>  <p>Amber</p>	<p>The action point to develop a post-pandemic income recovery timetable for Council Tax and Business Rates was updated to monitor the post-pandemic income for Council Tax and Business Rates.</p>

Risk	Inherent Risk	Residual Risk	Changes
<p>10. Failure of key ICT systems</p> <p><i>The residual risk score has been revised after it was considered that the position with regards to this risk had worsened.</i></p>	25	<p>15</p> <p></p> <p>Red</p>	<p>There is a heightened risk of a cyber-attack. The potential disruption and recovery from an attack, including the direct/indirect costs of reconstructing loss of data, could be significant. The learning experiences of an authority that was significantly impacted by a cyber-attack will be shared with managers in due course.</p> <p>An independent audit review of the Council's cyber-risk arrangements and key controls was recently completed by an LGA specialist. An action point was added to address the matters raised by the review.</p> <p>As part of their departmental business continuity plans, all service managers should consider the potential impact and how it would respond to and recover from a cyber-attack.</p> <p>The action to present the review of the ICT Strategy to the Policy and Performance Committee will now be presented on 24 March 2022.</p> <p>Given the heightened risk and potential impact of a cyber-attack, it was agreed that the residual risk score be increased from 10 to 15.</p>
<p>11. Failure to implement Private Sector Housing Strategy in accordance with Government and Council expectations</p> <p><i>The position with regards to this risk is unchanged.</i></p>	20	<p>4</p> <p></p> <p>Green</p>	<p>No changes were proposed to the key controls, risk indicators and action points for this strategic risk.</p>
<p>12. Failure to engage with partners/community to implement the Broxtowe Borough Partnership Statement of Common Purpose</p> <p><i>The position with regards to this risk is unchanged</i></p>	15	<p>4</p> <p></p> <p>Green</p>	<p>No changes were proposed to the key controls, risk indicators and actions.</p>

Risk	Inherent Risk	Residual Risk	Changes
<p>13. Failure to contribute effectively to dealing with crime and disorder</p> <p><i>The position with regards to this risk is unchanged</i></p>	15	<p>3</p> <p> Green</p>	<p>CHANNEL Panel Meetings and Police Local Priority Setting Meetings were added as key controls.</p> <p>The action to seek to maximise joint working opportunities with Police, was extended to include partners.</p> <p>The action point to support the Nottinghamshire County Council 'Family Service' team was deleted.</p>
<p>14. Failure to provide housing in accordance with the Local Development Framework</p> <p><i>The position with regards to this risk is unchanged</i></p>	20	<p>12</p> <p> Amber</p>	<p>A new action point to consider the implications of the new Environment Act 2021, including Biodiversity Net Gain, in planning matters was added.</p> <p>The action point to join an investment partnership to be able to access and optimise Homes England funding was completed and replaced by an action to optimise the benefits of joining the investment partnership.</p> <p>An action was completed to develop baseline Business Rates data for the Toton and Chetwynd Barracks site.</p>
<p>15. Natural disaster or deliberate act, which affects major part of the Authority</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>	15	<p>12</p> <p> Amber</p>	<p>A new action to enhance the use of Resilience Direct to support emergency planning was added.</p> <p>The increased risk of a cyber-attack was noted. A new action for service managers to review their business continuity plans to consider the potential impact of a cyber-attack and how services would respond to and recover from an attack was added.</p>
<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>6</p> <p> Amber</p>	<p>No changes were proposed to the key controls, risk indicators and action points for this strategic risk.</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 changes were proposed to the key controls, risk indicators and action points for this strategic risk.</p>

Risk	Inherent Risk	Residual Risk	Changes
<p>18. Corporate and/or political leadership adversely impacting upon service delivery</p> <p><i>The position with regards to this risk is unchanged</i></p>	20	<p>8</p>  <p>Amber</p>	No changes were proposed to the key controls, risk indicators and action points for this strategic risk.
<p>19. High levels of sickness</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>	16	<p>6</p>  <p>Amber</p>	No changes were proposed to the key controls, risk indicators and action points for this strategic risk.
<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>12</p>  <p>Amber</p>	<p>The Job Evaluation/Re-evaluation of Posts Policy was added a key control.</p> <p>The action points to produce a new Job Evaluation/Re-evaluation of Posts Policy for presentation to Personnel Committee; to implement the action plan in response to the latest employee survey; and to promote the salary sacrifice car lease scheme were all completed.</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>6</p>  <p>Amber</p>	Broxtowe Learning Zone Training was added as a key control.
<p>22. Unauthorised access of data</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>6</p>  <p>Amber</p>	<p>The increased risk of a cyber-attack was also noted for this risk. The significant majority of data breaches are caused by human error so the regular training provided via Broxtowe Learning Zone is vital.</p> <p>An action to address the matters raised by the independent audit review of the Council's cyber-risk arrangements and key controls by an LGA specialist was added.</p> <p>An action for service managers to review their business continuity plans to consider the potential impact of a cyber-attack and how services would respond and recover was added.</p>

Risk	Inherent Risk	Residual Risk	Changes
23. High volumes of employee or client fraud <i>The position with regards to this risk is unchanged</i>	20	9  Amber	No changes were proposed to the key controls, risk indicators and action points for this strategic risk.

Report of the Interim Chief Audit and Control Officer

INTERNAL AUDIT PLAN 2022/23

1. Purpose of report

To approve the Internal Audit Plan for 2022/23.

2. Detail

The Public Sector Internal Audit Standards (the 'Standards') requires the Chief Audit and Control Officer, as the Council's designated 'chief audit executive', to prepare an annual risk based audit plan.

The Internal Audit Plan governs the activity for the year. An audit report is produced at the completion of each assignment with recommendations for improvement. Regular progress reports covering all internal audit activities are submitted to this Committee for scrutiny. The Committee can request further audit reviews to be undertaken and can request other Committees to investigate matters arising from any activities within their remit.

The proposed Internal Audit Plan for 2022/23 is included in the appendix for consideration. The plan has been prepared in accordance with the principles of the Internal Audit Charter. The plan has recognised the Council's priorities as outlined in the Corporate Plan and links closely to the corporate risk management and business planning processes having been prepared with due consideration to the identified strategic risks. The Interim Chief Audit and Control Officer has also considered the valuable input from individual members of the General Management Team and Heads of Service regarding key risks and sources of assurance.

Recommendation

The Committee is asked to RESOLVE that the Internal Audit Plan for 2022/23 be approved.

Background papers

Nil

APPENDIX

INTERNAL AUDIT PLAN 2022/23

1. INTRODUCTION

1.1 Background

The Internal Audit Plan sets out the proposed coverage for Internal Audit work in 2022/23. The mandate for the plan is derived from the Public Sector Internal Audit Standards ('the Standards') produced by the Chartered Institute of Public Finance and Accountancy (CIPFA) in collaboration with the Chartered Institute of Internal Auditors (IIA).

The Standards require the periodic preparation of a risk-based plan, which must be linked to a strategic high-level statement of how the service will be delivered and developed in accordance with the Internal Audit Charter and how this links to the Council's objectives and priorities.

The core work of Internal Audit is derived from the statutory responsibility in the Accounts and Audit Regulations 2015 that requires the Council to "undertake an effective internal audit to evaluate the effectiveness of its risk management, control and governance processes, taking into account public sector internal auditing standards or guidance'. The Standards and the Local Government Application Note constitute proper practices so as to satisfy the requirements for larger relevant bodies as set out in the Regulations.

The Governance, Audit and Standards Committee (the designated 'audit board') should review and assess the annual internal audit work plan, although the development of the risk-based plan remains the responsibility of the Chief Audit and Control Officer after consultation with senior management and the Committee.

1.2 Internal Audit Charter

The Standards require the purpose, authority and responsibility of internal audit activity to be formally documented in a charter document. The current Internal Audit Charter was approved by the Governance, Audit and Standards Committee on 29 November 2017.

Internal Audit will govern itself by adhering to the Standards, which are based upon the Institute of Internal Auditors' mandatory guidance including the *Definition of Internal Auditing*, the *Code of Ethics* and the *International Standards for the Professional Practice of Internal Auditing*. Supplementary guidance issued and endorsed by the relevant internal audit standard setters as applicable to local government will also be adhered to along with the Council's relevant policies and procedures and the internal audit manual. Non-conformance with the Standards shall be reported to the Deputy Chief Executive and the Governance, Audit and Standards Committee.

1.3 Aims of the Plan

Internal Audit activity is planned at all levels of operation in order to establish priorities, achieve objectives and ensure the efficient and effective use of audit resources. The Internal Audit Plan will support an opinion based on an assessment of the design and operation of the internal control environment and the adequacy and effectiveness of controls noted from risk-based audit assignments carried out during the year. The aim of the plan is to:

- Deliver a risk-based audit programme through a detailed risk assessment of systems and services across the Council
- Be proactive in looking at what risks the Council is facing and trying to minimise the impact of these risks through audit work
- Add value by providing practical, value-added recommendations in areas of significant risk and by working with senior management in attempting to save resources and enhance controls wherever possible
- Provide assurance to senior management and the Governance, Audit and Standards Committee.

1.4 Developing the Plan

The Internal Audit Plan is designed to support the Chief Audit and Control Officer's annual opinion on the overall adequacy and effectiveness of the control environment. The required basis for forming this opinion is:

- An assessment of the design and operation of the overall internal control environment, governance and risk management arrangements
- An assessment of the adequacy and effectiveness of controls, based upon the results of the risk-based audit assignments that are reported during the course of year.

It follows that an effective risk-based audit plan should focus resources into areas of principal risk. The plan has been prepared in accordance with the requirements of the Internal Audit Charter and has been informed by:

- A review of the risks contained within the Strategic Risk Register, Horizon Scanning Documents and Business Plans;
- Consideration of progress made with the action generated by the Annual Governance Statement process;
- Consultation with Chief Officers and other senior managers to identify key auditable areas based on an assessment of corporate priorities and current and anticipated future issues and risks; and
- An understanding of the challenges to the Council to deliver its objectives within legislation and the current environment.

The allocations set out in the plan for each review will include time spent on researching and preparing the audit programme, terms of reference, completing site work, testing and the drafting and reviewing of the audit report. The timings assume that the expected key controls are in place and working effectively. Further substantive testing may be required should an assessment of key controls provide limited assurance and additional time may be required to carry out such testing.

The Internal Audit Plan will be regularly reviewed. If additional risks are identified and/or there are changes to priorities during the year, the plan will be reconsidered in conjunction with the Deputy Chief Executive. Any significant changes to the plan will be reported back to the Governance, Audit and Standards Committee for approval.

1.5 Resourcing the Plan

The net resources available in 2022/23 are 355 audit days.

The amount of assurance work proposed is set at 280 days. This is at a similar level to the planned assurance work that was expected to be delivered in the current year (prior to revisions required due to the pandemic), with a full establishment being anticipated in 2022/23. The coverage in terms of the number of high risk assurance audits proposed to be delivered will be similar.

Following on from the previous audit of Procurement and Contract Management, in this financial year it is intended to commence a review of procurement arrangements within individual departments across the Council. Further, at the request of the Executive Director, similar review work will be performed in order to ascertain progress towards the 'Digital by Design' approach across the Council. A provision of 25 days has been made within the Audit Plan for these two specific review projects to be incorporated alongside regular planned audits.

A further 10 days will be provided to support the Council and its wholly owned leisure company, Liberty Leisure Limited, with assurance work primarily relating to the change in operations at Kimberley Leisure Centre. The plan currently includes provision for 34 days to be completed as part of the Internal Audit collaboration with Erewash Borough Council.

In addition, the plan includes 40 days for corporate fraud and corruption prevention activity. The Governance, Audit and Standards Committee approved the latest Fraud and Corruption Policy in March 2017. The Council's approach to fraud and corruption proposes that Internal Audit will take a prominent role in leading and co-ordinating anti-fraud and corruption activities. Internal Audit will be supported in this by engaging specialist fraud investigation services as necessary from local authority partners.

Finally, 25 days are allocated towards audit follow-up work and 'contingency' for special investigations, projects, value for money work and consultancy.

1.6 Reporting and Relationships

The Internal Audit Charter establishes the reporting and relationships, including the reporting arrangements for individual assignments and for the periodic reporting of activities to the Governance, Audit and Standards Committee. The relationships with elected Members; Chief Officers and Senior Management Team; the external auditors; and other assurance providers are also determined in the Charter.

In accordance with the Standards, the Chief Audit and Control Officer will deliver a formal assessment of the design and operation of the overall internal control environment, governance and risk management arrangements and an opinion on the adequacy and effectiveness of controls, based upon the results of the risk-based audit assignments reported during the year. This opinion will be formally recorded in the Internal Audit Annual Review Report to be presented to the Governance, Audit and Standards Committee.

Internal Audit will bring to the attention of the Deputy Chief Executive and the Committee any significant internal control issues that it feels should be declared in the Council's Annual Governance Statement.

1.7 Performance Monitoring

The work of Internal Audit is regularly reviewed to provide assurance that it complies with the Standards, conforms to other relevant professional standards and meets the requirements of the Internal Audit Charter.

Service delivery will be monitored as part of a quality assurance and improvement programme. This will include the regular reporting of progress to the Governance, Audit and Standards Committee, self-assessment and external quality assessment against the Standards, assessment of client feedback and production of performance indicators.

2. SUMMARY OF AUDIT DAY ALLOCATIONS

The following table summarises the allocation of days to each department.

	<u>Audit Days</u>
Chief Executive's Department	
- Corporate	13
- Housing	46
- Other Department	18
Deputy Chief Executive's Department	
- Corporate	18
- Revenues, Benefits and Customer Services	52
- Finance Services	14
- Other Department	20
Executive Director's Department	
- Corporate	26
- Environment	30
- Other Department	10
Monitoring Officer's Department	
- Legal Services	8
Procurement and Digital Strategy Reviews	25
Assurance Work	280
Trading Company – Liberty Leisure Limited	10
Corporate Counter Fraud Activities	40
Contingency (including Internal Audit Follow-up Work, Special Investigations, Projects, Value for Money and Consultancy)	25
Net Audit Days	355

3. DETAILED INTERNAL AUDIT PLAN

The following tables provide a detailed breakdown of the audits planned for 2022/23. These reviews have been categorised as follows:

- Category A, being the review of key financial systems, such as Council Tax, Rents and Benefits that are the Section 151 Officer's audit priority areas and which are reviewed annually.
- Category B, being high risk/profile areas that should be reviewed and followed-up on a yearly basis.
- Category C, being the audit of operational activities that have been identified as medium to high risk that should be reviewed on at least a cyclical basis.

CHIEF EXECUTIVE'S DEPARTMENT	Category	Days
Corporate		
Corporate Governance	B	8
Major Projects Dashboard	B	5
Housing		
Rents (including Welfare Reform and Evictions Protocol)	A	12
Former Council House Repurchasing	C	8
Right-to-Buy	C	8
Housing Management System	C	8
Choice Based Lettings	B	10
Public Protection and Human Resources		
Human Resources	B	8
Licensing	C	10
Total Chief Executive's Department		77

DEPUTY CHIEF EXECUTIVE'S DEPARTMENT	Category	Days
Corporate		
Financial Resilience	A	10
Local Authority Trading Company	C	8
Revenues, Benefits and Customers Services		
Benefits	A	12
Business Rates (NNDR)	A	12
Cash Receipting	A	8
Council Tax	A	12
Sundry Debtors	A	8

Finance Services		
Bank Reconciliation	A	2
Creditors and Purchasing	A	10
Key Reconciliations	A	2
Asset Management		
Gas Servicing and Maintenance	B	10
Electrical Testing	B	10
Total Deputy Chief Executive's Department		104

EXECUTIVE DIRECTOR'S DEPARTMENT	Category	Days
Corporate		
Climate Change	C	10
Business Support	B	8
Business Continuity	C	8
Payroll		
Payroll	A	10
Governance		
Information Management	B	10
Environment		
Operational Risk Management – Kimberley Depot	B	10
Waste Management (including Trade Waste)	B	10
Total Executive Director's Department		66

MONITORING OFFICER'S DEPARTMENT	Category	Days
Legal Services		
Legal Services	C	8
Total Monitoring Officer's Department		8

LIBERTY LEISURE LIMITED	Category	Days
Kimberley Leisure Centre	C	10
Total Liberty Leisure Limited		10

Report of the Interim 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. 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. 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 will be prepared for Members' consideration after the end of the financial year detailing the overall performance and productivity of Internal Audit for 2021/22.

Recommendation

The Committee is asked to NOTE the report.

Background papers

Nil.

APPENDIX 1

INTERNAL AUDIT REPORTS ISSUED SINCE APRIL 2021

No	Audit Title	Report Issued	Assurance Opinion	Actions - Significant	Actions - Merits Attention
25	Governance - Covid-19 Grants Schemes	20/04/21	Substantial	0	0
01	Erewash BC – Risk Management	20/04/21	n/a	-	-
02	Erewash BC – Cemeteries	12/05/21	n/a	-	-
26	Utilities (Energy and Water)	21/05/21	Reasonable	1	1
27	Housing Delivery Plan	08/06/21	Substantial	1	2
28	LLL – Kimberley Leisure Centre	10/06/21	Substantial	0	4
29	Corporate Governance Arrangements	18/06/21	Reasonable	-	-
30	Sundry Debtors	04/08/21	Reasonable	0	5
03	Disabled Facilities Grants	29/06/21	Substantial	0	0
04	Financial Appraisal – Mushroom Farm	06/07/21	n/a	-	-
05	Financial Appraisal – Mushroom Farm	06/07/21	n/a	-	-
06	Special – Cash/Valuables Recovered	03/08/21	n/a	-	-
07	Planning Enforcement	04/08/21	Reasonable	0	1
32	Cyber Risk and Security	05/08/21	Substantial	0	0
08	NNDR	23/08/21	Substantial	0	0
09	Financial Appraisal – Proposed Bistro	23/08/21	n/a	-	-
10	Erewash BC – Crematorium	31/08/21	n/a	-	-
11	Capital Works	24/09/21	Substantial	0	0
12	Human Resources	21/10/21	Substantial	0	1
13	Financial Appraisal – Changing Places	27/10/21	n/a	-	-
33	Housing Voids Management	09/11/21	Reasonable	0	2
14	Payroll	09/11/21	Substantial	0	0
15	Procurement and Commissioning	10/11/21	LIMITED	1	2
16	Financial Appraisal – Stapleford Hub	15/11/21	n/a	-	-
17	Creditors and Purchasing	18/11/21	Reasonable	0	7
18	Homelessness	02/12/21	Substantial	0	1
19	Transport and Fleet Management	09/12/21	Substantial	0	1
20	Public Buildings Maintenance	21/12/21	Substantial	0	0
21	Bank Reconciliation	11/01/22	Substantial	0	1
22	Garden Waste Collection	19/01/22	Substantial	0	1
23	Financial Appraisal – Stapleford Hub	01/03/22	n/a	-	-
24	Environmental Health	02/03/22	Reasonable	0	3
25	Customer Services	07/03/22	Reasonable	0	2
26	Bramcote Leisure Centre	11/03/22	Reasonable	0	3

REMAINING INTERNAL AUDIT PLAN

Audit Title	Progress
Treasury Management	In Progress (Nearing Completion)
Council Tax	In Progress (Nearing Completion)
Grounds Maintenance Services	In Progress (Nearing Completion)
Stapleford Town Fund (i.e. Major Projects)	In Progress
Corporate Governance	In Progress
Commercial/Industrial Properties	Expected to commence in Q4
Health and Safety	Expected to commence in Q4
D H Lawrence Birthplace Museum	Expected to commence in Q4
Housing Repairs	Expected to commence in Q4

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 adequacy of controls within the system to provide assurance that risks material to the achievement of objectives are adequately managed – the opinion being ranked as either ‘Substantial’, ‘Reasonable’, ‘Limited’ or ‘Little’ assurance;
- identify inadequately addressed risks and non-effective 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 risk assessed, with the agreed actions being categorised accordingly as follows:

- Fundamental – urgent action considered imperative to ensure that the Council is not exposed to high risks (breaches of legislation, policies or procedures)
- Significant – action considered necessary to avoid exposure to significant risk.
- Merits Attention (Necessary Control) – action considered necessary and should result in enhanced control or better value for money.
- Merits Attention – action considered desirable to achieve enhanced control or better value for money.

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

1. **Financial Appraisals – Stapleford Business Hub**

Internal Audit provided two financial appraisals of companies which had applied to become a tenant at the new Stapleford Business Hub in the former Stapleford Police Station. These reviews were requested by the Estates Officer, with management requiring consideration of the financial viability of the companies in order to assess the level of risk to the Council in awarding a tenancy.

The reviews were produced on the basis of information received from the applicants, reports obtained from 'Creditsafe' (a credit referencing agency), financial data retrieved from Companies House and other publicly available information. No specific cause for financial concern was noted in reference to either company. The findings were reported to senior management and the officer requesting the reports.

2. **Creditors and Purchasing**

Assurance Opinion – **Reasonable**

The specific audit objectives sought to confirm whether adequate management control exists to provide assurance that:

- Roles and responsibilities are clearly defined, including segregation of duties restricted by system access with up-to-date policies and procedures available to officers.
- The automated invoice processing system, Kofax, has been introduced and implemented to prevent duplicate payments and streamline the payments process.
- Payments are made only for goods and services which were the subject of authorised orders.
- Payments are made only for goods and services that are received.
- BACS processes are appropriate.
- All invoices are properly authorised and passed for payment and then paid in a timely manner in-line with the times defined in the Government "Prompt Payment Policy".
- Credit notes received are processed appropriately and controls are in place to ensure monies owed are refunded to the Council.
- Payments are made to valid creditors.

Internal Audit was pleased to report that the Council has an appropriate framework in place for the management and administration of operations in respect of Creditors and Purchasing.

The review identified areas for improvement with seven 'Merits Attention' actions being agreed in order to further enhance controls over:

- The implementation of the new Kofax system.
- Enhanced controls to prevent duplicate payments to suppliers.
- Improved efficiency of scanning of hard-copy invoices received.
- Authorisation permissions for sundry invoices.
- Recovery or utilisation of credit balances held by suppliers.
- Enhanced controls over changes to supplier bank account records.

3. **Homelessness**

Assurance Opinion – **Substantial**

The specific audit objectives sought to confirm whether adequate management control exists to provide assurance that:

- A Homelessness Prevention Policy, Strategy or similar overarching document has been appropriately drafted, approved and implemented.
- People presenting to the Council as homeless or who are identified as being at risk of homelessness are appropriately and consistently advised and/or assisted.
- Appropriate performance monitoring and reporting procedures are in place.

Internal Audit was pleased to report that the Council has an appropriate framework in place for the management and administration of operations in respect of Homelessness.

The review identified an area for improvement with one 'Merits Attention' action being agreed in order to further enhance consistency in administration during the application process.

4. **Transport and Fleet Management**

Assurance Opinion – **Substantial**

The specific audit objectives sought to confirm whether adequate management control exists to provide assurance that:

- Driver hours are accurately and adequately recorded, monitored and controlled.
- The provision of transport services to departments within the Council is accurately costed and recharged.

- Driver records (including licences and insurance) are maintained for all employees who drive as part of the Council's operations (includes Car User Database).
- Material acquisitions and disposals are appropriately authorised.
- Operator licence and vehicle maintenance records are adequately maintained.

Internal Audit was pleased to report that the Council has an appropriate framework in place for the management and administration of operations in respect of Transport and Fleet Management.

The review identified an area for improvement with one 'Merits Attention – Necessary Control' action being agreed in order to further enhance controls over the completeness of the declarations of additional driving required from employees for whom driving is a significant part of their role.

5. **Public Buildings Maintenance** Assurance Opinion – **Substantial**

The specific audit objectives sought to confirm whether adequate management control exists to provide assurance that:

- Key Maintenance processes, including legionella testing, gas safety, portable appliance testing, lift maintenance and compliance with the Construction (Design and Management) Regulations, are appropriately implemented.
- Agreements with third-party owners or operators of joint-use facilities are clear with adequate delineation of duties where appropriate.
- Contracts with third-party organisations for either ongoing or project-specific maintenance work are subject to proper procurement procedures.

Internal Audit was pleased to report that the Council has an appropriate framework in place for the management and administration of operations in respect of Public Buildings Maintenance.

No significant areas of concern were noted during the course of the audit. The findings arising from the review did not indicate any significant areas for improvement and, accordingly, a clearance report was issued on this occasion.

6. **Bank Reconciliation** Assurance Opinion – **Substantial**

The specific audit objectives sought to confirm whether adequate management control exists to provide assurance that:

- Council bank accounts are reconciled on a regular and timely basis.
- Reconciliations are subject to appropriate review.

- The methodology used for reconciliations is documented and robust to minimise errors and inconsistencies.

Internal Audit was pleased to report that the Council has an appropriate framework in place for the management and administration of operations in respect of the Bank Reconciliation process.

The review identified an area for improvement with one 'Merits Attention – Necessary Control' action being agreed in order to further enhance controls over the review of completed reconciliations.

7. **Garden Waste Collection** Assurance Opinion – **Substantial**

The specific audit objectives sought to confirm whether adequate management control exists to provide assurance that:

- The Garden Waste collection scheme is appropriately priced and charged to service users.
- Collections are only made at properties with an up-to-date account.
- Collection routes are calculated to ensure efficient use of Council assets and staff time.
- Adequate arrangements for the storage and transfer of Garden Waste are in place.
- Income reconciliations are completed in an accurate and timely manner.

Internal Audit was pleased to report that the Council has an appropriate framework in place for the management and administration of operations in respect of Garden Waste Collection.

The review identified an area for improvement with one 'Merits Attention – Necessary Control' action being agreed in order to ensure the timely completion of income reconciliations between the Waste Management system and the primary General Ledger.

8. **Environmental Health** Assurance Opinion – **Reasonable**

The specific audit objectives sought to confirm whether adequate management control exists to provide assurance that:

- Food hygiene ratings are issued appropriately and in accordance with the national criteria.
- Health licences (tattooing, piercing & electrolysis) are only granted when the appropriate requirements have been met.

- Food hygiene rating and health licence inspections are being completed and robust plans are in place to cover the backlog resulting from Covid-19.
- Advice and enforcement action in relation to Covid-19 restrictions is managed appropriately.

Internal Audit was pleased to report that the Council has an appropriate framework in place for the management and administration of operations in respect of Environmental Health.

The review identified areas for improvement with three 'Merits Attention' (including two 'Necessary Control') actions being agreed in order to ensure the timely update of records within the 'Idox' system, accurate filing of registration documentation and the completeness of food hygiene inspections.

9. Customer Services

Assurance Opinion – **Reasonable**

The specific audit objectives sought to confirm whether adequate management control exists to provide assurance that:

- Adequate procedures are in place to ensure calls are managed appropriately.
- Adequate performance monitoring systems are in place.
- Plans for future developments and improvements are robust.

Internal Audit was pleased to report that the Council has an appropriate framework in place for the management and administration of operations in respect of Customer Services.

The review identified areas for improvement with two 'Merits Attention (Necessary Control)' actions being agreed in order to ensure the timely update the Customer Services Strategy for 2022 and a review of the procedure documents used to guide the work of Customer Service Officers.

A further observation was made to note the current plans, in conjunction with ICT Services, to migrate the telephone system currently used by Customer Services onto the Microsoft Teams platform. It is further intended that, once fully developed and released by Microsoft, a 'bolt-on' software package for Teams will be installed in order to better meet and support the Council's performance reporting and statistical information needs. It is anticipated that the new system should become live during the 2022-23 financial year.

10. Bramcote Leisure CentreAssurance Opinion – **Reasonable**

The specific audit objectives sought to confirm whether adequate management control exists to provide assurance that:

- Amounts due for the hire of sporting facilities and similar services are efficiently collected.
- Lifeguards are appropriately qualified.
- Legionella testing procedures are carried out in the correct manner.
- Material assets owned and / or operated by the centre are adequately managed, with particular reference to inventories, valuations, maintenance and security.
- Confidential information and data is stored securely.
- Controls are in place to ensure cash and cheques are secured and banked appropriately.

Internal Audit was pleased to report that the Council and Liberty Leisure Limited have an appropriate framework in place for the management and administration of operations in respect of Bramcote Leisure Centre.

The review identified areas for improvement with three 'Merits Attention (Necessary Control)' actions being agreed in order to ensure the timely update of the asset management system records; the retention of financial records in line with regulatory requirements and guidance; and the enhancement of controls over the cash collection process.

Further reviews in respect of Treasury Management, Council Tax, the Stapleford Town Fund, Grounds Maintenance Services and Corporate Governance are ongoing and the reports have yet to be finalised.

Current Audit Performance

Overall, the current level of performance for 2021/22 in terms of audits completed and in progress is similar to what has been achieved at this stage in pre-pandemic years. The target of 90% completion of the Internal Audit Plan is expected to be achieved.

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 agreed actions for internal audit reports issued between June 2018 and September 2021 (excluding clearance reports). Those audits where all actions have previously been reported as completed have also been excluded from this list.

Audit Title	Report Issued	ORIGINAL Assurance Opinion	Number of Actions (Significant in brackets)	Progress
Cemeteries	25/06/18	Substantial	1	1 Outstanding
Legionella Prevention and Testing	11/09/18	Reasonable	5	Superseded
Bramcote Crematorium	21/10/19	Substantial	2 (1)	Completed
CCTV	30/10/19	Substantial	1	Superseded
Procurement and Contract Management	02/03/20	LIMITED	6 (1)	2 Outstanding
Cash Receipting (Payment Kiosk)	05/06/20	LIMITED	7 (2)	7 Outstanding
Financial Resilience	03/07/20	Reasonable	4	1 Outstanding
Local Authority Trading Company	06/07/20	Reasonable	3 (1)	2 Outstanding
Kimberley Depot and Security	04/09/20	Reasonable	4	Completed
Housing Repairs	07/09/20	LIMITED	5 (1)	Superseded
Garages	09/11/20	Substantial	2	Superseded
Utilities	21/05/21	Reasonable	2 (1)	Completed
Housing Delivery Plan	08/06/21	Substantial	3 (1)	2 Outstanding
Sundry Debtors	04/08/21	Reasonable	5	3 Outstanding

Note: The 'Original Assurance Opinion' listed refers to the individual opinions provided by Internal Audit at the date of concluding the audit. The summary details regarding the 'Limited' assurance opinion reports were presented to this Committee on 18 May 2020 for Procurement and Contract Management; 20 July 2020 for Cash Receipting (Payment Kiosk); and 27 September 2020 for Housing Repairs.

Further details of progress being made with 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. Cemeteries**

June 2018, Substantial Assurance, Actions – 1

1.1 Digitisation of Cemetery RecordsAgreed Action (Merits Attention – Necessary Control)

A timetable for developing an efficient solution for maintaining an effective and accurate electronic cemetery records will be produced. The progress made against the plan will be monitored by management and Bereavement Services Joint Committee. The replacement of the current software solution is considered to be a key part in this medium-term project.

Manager Responsible

Head of Environment

Bereavement Services Manager

Revised target date – 31 July 2022**Progress Report of the Bereavement Services Manager**

The new Bereavement Services Management Software is now operational. Work may now commence to complete the scanning of all Cemeteries (and other) remaining manual documentation.

2. Procurement/Contract Management

March 2020, Limited Assurance, Actions – 6

2.1 Structured Contract ManagementAgreed Action (Significant)

A Contract Management Strategy and Framework is being developed to expand upon the adopted Procurement and Commissioning Strategy. This will incorporate both strategic and operational contract management and a multi-layered approach for 'softer' elements of supplier management and monitoring. A proposal was presented to General Management Team in February 2020 and will now be developed further.

The strategy proposed a three-stage process: advising suppliers that the relevant Council's policies as listed in tender documentation will provide the minimum standards required for suppliers engaged by the Council; monitoring progress with suppliers providing reports on performance; and undertake annual strategic reviews for major contracts (by value and/or strategic importance) to consider all aspects of contract performance and compliance and to carry out value engineering where appropriate. The framework will require stakeholders to periodically meet with contractors to discuss contract performance, with appropriate records maintained. Any issues can then be escalated accordingly. The process will also include regular dashboard and exception reporting to GMT.

An action plan is being developed as part of the rollout of the framework.

Managers Responsible

Head of Finance Services

Interim Procurement and Contracts Officer

Revised Target Date: 31 March 2022**Progress Report of the Procurement and Contracts Officer**

An online presentation on the Contract Management Strategy is to be given to Heads of Service and other relevant Management. A recording of the presentation will be circulated / made available on the Council's network in order to ensure that those unable to attend the live presentation may access the content.

2.2 Procurement Training

Agreed Action (Merits Attention)

A procurement e-learning module will be developed to support the embedding of the Procurement and Commissioning Strategy. This will complement the existing support and guidance that is already available on the intranet and website.

Managers Responsible

Interim Procurement and Contracts Officer

Revised Target Date: 31 March 2022

Progress Report of the Procurement and Contracts Officer

Progress has been made in conjunction with the Learning and Development Officer to develop an e-learning course for the Broxtowe Learning Zone. It is intended to deliver this action by the revised target date.

3. Cash Receipting (Payment Kiosk)

3.1 Balancing and Reconciliation Differences

Agreed Action (Merits Attention – Necessary Control)

An Officer Working Group will be established, with representation from key stakeholders across the business, to consider, respond, track and resolve the issues raised in respect of the payment kiosk.

The procedure for processing discrepancies identified during cashing-up will be reviewed and updated to allow for any differences to be accounted for in an appropriate manner pending further investigation.

3.2 Accuracy of Transaction Recording

Agreed Action (Significant)

A review of the systems and the effectiveness of how they interact will be undertaken by the Officer Working Group to ensure the accuracy and integrity of the data and management information the systems are expected to produce.

3.3 Kiosk Receipts and Automated Reports

Agreed Action (Significant)

A review will be conducted by the Officer Working Group to identify improvements to the management information provided by the kiosk. Consideration will be given to skills and training needs to enable clear understanding of the data provided.

3.4 Contract Management – Reporting of Issues

Agreed Action (Merits Attention – Necessary Control)

Any concerns identified with the kiosk system will be escalated to GMT and the service provider as required.

3.5 Payment Details

Agreed Action (Merits Attention – Necessary Control)

Enquiries will be made with the service provider as to the options for enhancing the controls within the kiosk to make mandatory fields for the payee to enter their details and for the kiosk to only process payments when a correct payment reference has been entered.

3.6 Card Payments – Refunds Processing

Agreed Action (Merits Attention – Necessary Control)

The option to process card payment refunds (for duplicate or erroneous payments) onto the original payment card used will be considered in conjunction with the service provider.

3.7 Usage Reviews and Future Viability

Agreed Action (Merits Attention)

The statistics reports produced in relation to the kiosk will continue to be reviewed. Proactive work will continue to encourage customers to consider alternative cost effective payment channels such as Direct Debit and card payment via the website. This work will include direct contact at the kiosk and scrutiny of payments data (via reports analysed by fund) to identify customers who regularly use the kiosk.

The ongoing viability of the payment kiosk will be reviewed undertaken in terms of cost effectiveness and customer satisfaction, with comparison to alternative external solutions.

Managers Responsible

Head of Revenues, Benefits and Customer Services
Head of Administrative Services

Progress Report of the Head of Revenues, Benefits and Customer Services and Head of Administrative Services

The payment kiosk has been closed to the public since the first pandemic lockdown in March 2020 and has only been used on a few occasions by Support Services. At this stage, there has been little need to establish an Officer Working Group to manage and resolve the historical issues raised in respect of the payment kiosk.

Following the implementation of the new 'All Pay' facility, the ongoing viability of the payment kiosk will be further reviewed and if deemed necessary an Officer Working Group will review and consider all of the above points raised by Internal Audit.

4. Financial Resilience

4.1 CIPFA Financial Resilience Index

Agreed Action (Merits Attention 'Necessary Control')

It is anticipated that the CIPFA Financial Resilience Index will be refined post Covid-19 to ensure that it remains fit for purpose. The benefits of using this analytical tool to support good financial management and provide a common understanding amongst managers and members of the current financial position and potential risks are acknowledged. Further work in developing this for Broxtowe, at least in the short-term, will be dependent upon further updates from CIPFA.

Manager Responsible

Deputy Chief Executive

Revised Target Date: 30 April 2022

Progress Report of the Deputy Chief Executive

The 2022 update of the CIPFA Financial Resilience Index has only recently been published. As one of several key tools which assist the Council in understanding its overall financial position relative to comparable and neighbouring Authorities, the Index data will be reviewed and any insights considered and actioned as appropriate.

5. Local Authority Trading Company

5.1 Revision and Update of Service Management Agreement

Agreed Action (Significant)

The Council's new Leisure Facilities Strategy is currently being developed, although its full adoption and implementation will be a long-term project. In the meantime, it is anticipated that the proposed Strategy will have been developed by late summer 2020. At this stage, the Strategy will be used as the starting point for an initial review of the Service Management Agreement between the Council and the Company.

Managers Responsible

Deputy Chief Executive

Leisure Client Officer

Managing Director – Liberty Leisure Limited

Revised Target Date: 31 December 2022

Progress Report of the Deputy Chief Executive and Leisure Client Officer

At the present time the priority continues to be the finalisation of the new arrangements with Kimberley School for the continued operation of Kimberley Leisure Centre. Development of the Leisure Facilities Strategy has commenced in conjunction with external consultants with review of the Service Management Agreement anticipated to follow from March 2022.

5.2 Review of Joint-Use Agreement with Chilwell School

Agreed Action (Merits Attention 'Necessary Control')

The ongoing review and re-negotiation of the Joint-Use Agreement with Chilwell School will recommence, in conjunction with Legal Services, with a view to finalising the agreement.

Managers Responsible

Deputy Chief Executive

Leisure Client Officer

Revised Target Date: 31 December 2022

Progress Report of the Deputy Chief Executive and Leisure Client Officer

At the present time the priority continues to be the finalisation of the new arrangements with Kimberley School for the continued operation of Kimberley Leisure Centre. Review of the Joint-Use Agreement with Chilwell School and accompanying negotiations are anticipated to follow from March 2022.

6. Housing Delivery Plan

6.1 Revision and Update of the Housing Delivery Plan

Agreed Action (Merits Attention 'Necessary Control')

The Housing Delivery Plan will be refreshed and updated, in consultation with the Head of Housing, to fully reflect the current aspirations and potential of the project. An update report will be presented to the Housing Committee accordingly.

Managers Responsible

Head of Asset Management and Development

Housing Delivery Manager

Revised Target Date: 30 April 2022

Progress Report of the Housing Delivery Manager

An update for the Housing Delivery Plan is scheduled for the next meeting of the Housing Committee. A strategy for future development of the Housing Delivery Plan will be discussed at that meeting.

6.2 Risk Register**Agreed Action** (Merits Attention 'Necessary Control')

A standalone project-specific risk register for the Housing Delivery Plan will be developed and maintained.

Managers Responsible

Head of Asset Management and Development
Housing Delivery Manager

Revised Target Date: 30 April 2022

Progress Report of the Housing Delivery Manager

A risk register for the Housing Delivery Plan will be developed following the next meeting of the Housing Committee where a strategy for the future of the Housing Delivery Plan will be discussed.

7. Sundry Debtors**7.1 Production of Accounts****Agreed Action** (Merits Attention 'Necessary Control')

A periodic reminder will be sent to all system users regarding the need to appropriately record VAT. This will refer to the guidance offered through the VAT Manual; advice and support available from Accountancy; and the subsequent checking of significant debtor accounts to ensure the appropriate VAT treatment.

There will be further work to develop a common approach to raising sundry debtor accounts. This could include a 'sundry debtor request form' being completed for every account raised that will include links to supporting documents like agreements and rechargeable works invoices to assist in the production of accurate bills (including the appropriate VAT treatment) and the recovery of debt.

Managers Responsible

Head of Finance Services
Head of Revenues, Benefits and Customer Services
Quality and Control Manager

Revised Target Date: 30 June 2022

7.2 Timely Reconciliations**Agreed Action** (Merits Attention 'Necessary Control')

Key reconciliations relating to sundry debt income will be completed promptly in accordance with the timelines set out within the key reconciliations monitoring process to ensure that items of variance are investigated and resolved at the earliest opportunity.

Managers Responsible

Head of Finance Services
Chief Accountant

Revised Target Date: 30 June 2022

7.3 Access Permissions – Systems Access Requests

Agreed Action (Merits Attention 'Necessary Control')

System access permissions request forms for new users will be completed for each and every request and filed electronically for easy access and completeness of audit trail. An annual review of system users and access permissions will be conducted jointly with the Accountancy team and in conjunction with the respective Heads of Service.

Managers Responsible

Head of Finance Services

Head of Revenues, Benefits and Customer Services

Quality and Control Manager

Revised Target Date: 30 June 2022

Progress Report of the Head of Finance Services and Head of Revenues, Benefits and Customer Services

The Council has experienced a significant turnover of staff within the Finance Team during the previous 18 months. Now the team is almost back to previous staffing levels, the Council is in a position to fully consider the recommendations raised and apportion the responsibilities accordingly. The Head of Finance Services and the Head of Revenues, Benefits and Customer Services will work together to establish the responsibilities and progress each action in due course.

Report of the Monitoring Officer

REPORT OF THE MONITORING OFFICER

1. Purpose of report

The Housing Ombudsman (HO) has made a finding of injustice in respect of a lack of repairs undertaken to a complainant's property.

2. Detail

In summary, the complainant contacted the Council to raise issues with a roof leak, a cold working shower, a faulty immersion heater and mould and condensation.

During the stage 2 complaint process it was identified that there were significant failings in the Housing Repairs department to book and undertake the repair issues identified by the complainant. It was found that works were not being logged correctly, records of completion were not logged correctly and significant delays occurred in the repairing of all the identified issues.

The Council offered the complainant an apology and £350 compensation. The Housing Repairs Team were tasked with contacting the complainant to book works to repair their issues.

However, the complainant rejected the offer of compensation and contacted the HO.

The HO identified fault with the issues raised in line with the Council's previous findings. The HO recommended that the Council pay £850 compensation. This was broken down into, £375 for the delays in the repairs, £125 for the frustration caused and the £350 originally offered by the Council. Additionally, the HO requested that a review be undertaken into the complainant's issues and an action plan be created to identify any learnings or actions that could be undertaken by the Council.

The full HO report is attached as appendix 2.

3. Outcome

In line with the HO's recommendation, the Council has issued an apology to the complainant and issued £850 of compensation. The Council reviewed its internal functions and identified areas of improvement. The improvements are listed in appendix 1.

<u>Recommendation</u>

The Committee is asked to NOTE the report.

Background papers

Nil

APPENDIX 1

Issue	Action	Officer	Timescale	Status
Failure of repairs service	Review of the failings associated with the complaint	Interim Head of Asset Management, Housing Repairs and Compliance Manager	Implement immediately	Closed
	Improvement to recording of the results of inspection undertaken by SMO and any follow on works	Assistant Housing Repairs manager	Implement immediately	Closed
	Improve the level of information and record keeping of works completed by operative's	Assistant Housing Repairs manager	Implement immediately	Closed
	Review approach undertaken to reports of damp and mould	Housing Repairs and Compliance Manager	Implement immediately This will be reviewed in 3 months once new survey techniques have been in place and can be evaluated.	Closed

Housing

Ombudsman Service

REPORT

COMPLAINT 202105375

Broxtowe Borough Council

17 November 2021

Our approach

The Housing Ombudsman's approach to investigating and determining complaints is to decide what is fair in all the circumstances of the case. This is set out in the Housing Act 1996 and the Housing Ombudsman Scheme (the Scheme). The Ombudsman considers the evidence and looks to see if there has been any 'maladministration', for example whether the landlord has failed to keep to the law, followed proper procedure, followed good practice or behaved in a reasonable and competent manner.

Both the resident and the landlord have submitted information to the Ombudsman and this has been carefully considered. Their accounts of what has happened are summarised below. This report is not an exhaustive description of all the events that have occurred in relation to this case, but an outline of the key issues as a background to the investigation's findings.

The complaint

1. The complaint is about:
 - a. The landlord's handling of the resident's reports of a range of different repairs, including leaks, damp and mould.
 - b. The landlord's complaint handling.
 - c. The impact the condition of the resident's property had on her family's health.

Jurisdiction

2. What we can and cannot consider is called the Ombudsman's jurisdiction. This is governed by the Housing Ombudsman Scheme. When a complaint is brought to the Ombudsman, we must consider all the circumstances of the case as there are sometimes reasons why a complaint will not be investigated.
3. Under paragraph 39(i) of the Housing Ombudsman Scheme, the Ombudsman will not consider complaints which "concern matters where the Ombudsman considers it quicker, fairer, more reasonable or more effective to seek a remedy through the courts, a designated person, other tribunal or procedure".
4. The resident explained in her complaint to the landlord that the mould in her property impacted her family's health in multiple ways. Unfortunately, the Ombudsman cannot draw conclusions on the causation of, or liability for, impacts on health and wellbeing. This would be more usually dealt with as a personal injury claim through the courts. The courts can call on medical experts and make legally binding judgements. Nonetheless, consideration has been given to the

general distress and inconvenience which the situation may have caused the resident.

Background and summary of events

5. The resident is a tenant of the landlord.
6. The landlord explained in its stage two complaint response that it inspected the resident's property in June 2019 following her concerns with damp and mould. It carried out work in August 2019 (the nature of the work is unknown). On 18 November 2019 the resident reported a persistent roof leak (this is understood to relate to the damp and mould). On 10 November 2019 the landlord identified it needed to renew the cladding and guttering at the property to resolve the leak. It raised a work order on 22 May 2020. On 2 June 2020 it advised the resident that it would be in contact to arrange an appointment. The actual repair records are vague on what action the landlord specifically took.
7. The landlord's records show the resident reported that her shower was not working properly on 17 September 2020. The landlord attended on 25 September. It is unclear from its records what work was carried out.
8. The landlord's records show the resident reported mould and condensation on 6 October 2020. The landlord attended (it is unclear when) to inspect.
9. On 24 November 2020 the resident emailed the landlord. She said it had attended to inspect her shower and immersion heater, but had not contacted her since (it is unclear when she reported an issue with the immersion heater). She said it had inspected the mould and condensation, and told her it would arrange for the mould to be cleaned. She said it had not contacted her since, and that the mould was spreading. She said her windows were full of condensation which was also causing mould. She said the landlord investigated the leak "a few months back" but it had not contacted her since to say when it would complete the work.
10. The landlord's records show it attended on 30 November 2020 to clean the mould (on the resident's bedroom wall, and windows) and reseal the windows. The resident reported on 11 December that the mould persisted. The landlord attended on 11 February 2021 to inspect again.
11. The resident raised a formal complaint to the landlord on 3 February 2021. She listed the outstanding repairs (the leak, immersion heater, mould, condensation, and shower). She asked the landlord to resolve the leak in her living room. She said the landlord was aware that her shower only gave out cold water. She said her immersion heater would only work when she removed "the 'do not remove' covers to press a button to switch the fuse bit". She said she had "been shocked by the immersion heater twice", and that it was a breach of health and safety.

She reiterated that her windows had condensation which caused mould. She asked to be moved to another property in the same area.

12. The landlord issued its stage one complaint response on 15 February 2021 (it sent it to the resident's sister's address by mistake). It said its records did not show any recent requests for any of the repairs the resident referred to in her complaint. It said its records showed it had booked an inspection for 25 January (it is unclear what for) but did not gain access. It said it would attend to inspect on 25 February. It said it would investigate her concerns and book any necessary repairs. It said it had not upheld her complaint as it had no records of a request for repairs. It concluded by explaining how the resident could escalate her complaint if she remained dissatisfied.
13. The resident emailed the landlord on 18 February 2021 (it is understood that she had not received its stage one response at this point). She asked to be moved to a new home immediately. She said the landlord had not contacted her regarding the leak, immersion heater, shower or windows since her stage one complaint. She said it attended on 11 February to investigate the mould, but had not taken further action. She reiterated that she believed her immersion heater was a safety risk. She explained that the leak in her living room occurred when it rained, and that water would drip down the wall.
14. The resident escalated her complaint on 25 February 2021. She said the repairs in her property remained unresolved. She said the landlord had incorrectly sent its stage one response to her sister. She said it had breached her confidentiality, and demonstrated a poor level of service. She said she was unaware of an appointment arranged for 25 January. She said she called the landlord on 22 February and asked it to confirm what repairs she had reported. She said it seemed "not all of them [had been] logged". She provided a timeline (dating back to February 2018) as evidence that she had previously reported the repairs. She said she wanted to move properties as the repair work required would cause further stress.
15. The landlord issued a stage two complaint response on 21 April 2021. It explained:
 - a. the actions it had taken since the 2019 leak report. It acknowledged it had no record of work being completed to resolve it.
 - b. it inspected the windows on 29 October 2020, and resealed them on 30 November 2020. It said on 11 December 2020 the resident reported mould, and that the windows had condensation. It said it inspected on 8 April 2021. It said it raised a work order to renew the windows, but said it was unable to confirm whether this had been received by its repair team.

- c. the resident reported on 17 September 2020 that her shower only gave out cold water. It said it inspected on 25 September, but had no record to say the issue had been rectified.
 - d. the resident reported an issue with her immersion heater on 24 November 2020. It acknowledged it had no record of arranging an appointment to investigate.
16. The landlord acknowledged that the resident had not received an appropriate level of service, and apologised. It said it would contact her with dates for follow up work. It said it would attend to inspect her shower and immersion heater. It said it had reminded its staff of the necessity of recording and booking repair requests in a timely manner. It offered her £350 compensation in recognition of the service she had received. It concluded by explaining how she could refer her complaint to this Service if she remained dissatisfied.
17. The landlord emailed the resident on 28 May 2021. It confirmed that it had completed work to the immersion heater, shower, and for the mould and windows. It said it would complete the roof leak repair in June 2021. It said the works were not sufficient enough to warrant an offer of a home transfer.
18. The landlord advised this Service on 6 August 2021 that repair work to resolve the leak would be completed within 7-10 days. It is unknown whether this happened or not.

Assessment and findings

Handling of the repairs

19. The landlord's tenancy handbook says it will complete emergency repairs within one working day, and will prioritise all other repairs accordingly. The usual timeframe for non-emergency/urgent general reactive repairs across the social landlord sector is around 28 days.
20. The landlord has not provided evidence of a separate compensation policy for this investigation. However, its complaints policy states that it can consider compensation for certain complaints. It does not provide any further detail or guidance.
21. The resident reported mould and condensation on 6 October 2020. The landlord inspected (date unknown), then reattended on 30 November 2020 to clean the mould, and reseal the windows. The resident reported that the issue persisted on 11 December 2020, and the landlord reattended on 11 February 2021 to inspect. The landlord explained in its stage two response that it carried out another inspection on 8 April 2021, and raised a work order to replace the windows. It

advised the resident on 28 May 2021 that it had completed work for the mould and windows.

22. The landlord did attend to inspect, and carry out work to resolve the resident's concerns with mould. However, it delayed doing so. It failed to act in line with the generally accepted timeframe of 28 days for non-emergency repairs. No explanation for these delays were provided to the resident, and there is no evidence that the landlord provided updates to the resident, which basic good practice would have called for it to do.
23. The landlord acknowledged in its stage two complaint response that the resident had reported a persistent roof leak in November 2019, and that it identified a resolution in November 2019. It advised her in June 2020 that it would be in contact to arrange an appointment to resolve the leak. No evidence has been provided for this investigation to show the landlord contacted the resident, or took any action on the leak until its stage two complaint response in April 2021. During this period, the resident reported that the leak was ongoing. The landlord confirmed with this Service that it would complete the work to resolve the leak in August 2021. Nonetheless, despite it taking steps to resolve the leak, there was still an unreasonable delay over a considerable amount of time. It took six months to raise a work order, and a subsequent 15 months to begin repair work. These were significant delays which the landlord failed to justify or explain.
24. The landlord attended on 25 September 2020 in response to the resident's report (from 17 September) that her shower was not working correctly. The resident advised the landlord on 24 November that she was waiting for it to contact her regarding the issue. She told it three times in February 2021 that the issue persisted. The landlord confirmed with the resident that it had completed work in May 2021. Eight months after her first report. Although the landlord initially attended within a reasonable timeframe, there was a significant and unreasonable delay in it arranging follow up work, despite the resident chasing it.
25. The landlord acknowledged that the resident had reported problems with her immersion heater in November 2020, and that it had not subsequently taken any action to resolve it, despite her explaining her concerns about it posing a health and safety risk. It took action after her complaint, resolving the repair in May 2021, six months after it was reported, and obviously outside the landlord's repair timeframes, and with no updates to the resident.
26. The landlord did not respond to the resident's request to be rehoused until after the end of its complaints process. That was poor service, and is addressed below. Nonetheless, home transfers such as the resident was seeking are usually a matter of last resort in extreme circumstances, such as domestic or antisocial behaviour-related violence. Major repair work can sometimes be grounds for a management transfer, but only when the work is so extensive that a property

becomes wholly uninhabitable for a lengthy period of time. There is no evidence of such circumstances in this case, and so the landlord's decision not to offer a home transfer was reasonable.

27. In the landlord's stage two complaint response it offered the resident £350 compensation. As previously explained, the landlord has not provided a compensation policy for this investigation. It is therefore impossible to determine how it calculated this figure, especially given that it did not explain or break down its offer in its stage two complaint response.

28. Although the landlord took reasonable steps to remedy its shortcomings by apologising, and offering the resident compensation, the amount offered was disproportionately low when considering there were significant delays for multiple repair issues (particularly in relation to the leak), and no explanation for these delays, or updates to the resident in the intervening period. The landlord also said in its stage two response that in light of the resident's complaint, it had reminded its staff of the importance of booking and recording repair requests in a timely manner. Whilst this was a reasonable attempt to demonstrate learning from the complaint, the landlord did not provide evidence of how it intended to reduce the likelihood of such service failings from reoccurring. Ultimately, the landlord's remedies did not proportionately reflect the scale of the adverse impact, frustration, or inconvenience that will have been experienced by the resident, or the length of time some of the repairs took to be completed.

Complaint handling

29. The landlord sent its stage one complaint response to the resident's sister's home address. Although the resident and her sister have the same surname and lived on the same block, it was still a failing by the landlord. That was compounded by the landlord failing to acknowledge, or apologise for its error once the resident made it aware of what had happened. It appears that the landlord's confusion about the resident's identity may be why its stage two complaint response was noticeably more comprehensive than its stage one, which could not find that the resident had reported any repairs.

30. The resident requested to move properties in her stage one complaint on 3 February 2021. She reiterated her request on 18, and 25 February. No evidence has been provided for this investigation to show the landlord acknowledged, or responded to her request until May 2021 (after it completed its complaints procedure). The Ombudsman's Complaint Handling Code sets out that landlords are expected to consider all information and evidence carefully before issuing their response. The Code also explains that "landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic".

31. In this case, as the landlord failed to respond to the resident's request to move homes in its responses, it consequently failed to address her complaint in its entirety, or manage her expectations about the likelihood of a move. This, coupled with its failure to acknowledge the error with its stage one response, constitutes a service failure in the landlord's complaint handling.

Determination (decision)

32. In accordance with paragraph 54 of the Housing Ombudsman Scheme, there was maladministration in respect of the landlord's handling of the resident's reports of a wide range of repairs, including leaks, damp and mould.

33. In accordance with paragraph 54 of the Housing Ombudsman Scheme, there was service failure in respect of the landlord's complaint handling.

Reasons

34. Although the landlord took steps to remedy its shortcomings for its failings in handling the resident's repairs, its offer of compensation was insufficient given the circumstances. It also failed to address each aspect of her complaint.

Orders and recommendations

35. The landlord is ordered to:

- a. pay the resident £375 for the inconvenience and delay experienced as a result of the failings identified in its handling of the resident's repair reports.
- b. pay the resident £125 for the frustration experienced as a result of the service failure identified with the landlord's complaint handling.
- c. These payments are in addition to the compensation offered by the landlord during its complaints process, which it should now also pay if it has not already done so.

36. These payments should be made within four weeks of the date of this report. The landlord should update this Service when the payment has been made

37. The landlord is also ordered to review the circumstances of this complaint and the failings found in this investigation. The review should incorporate a report and action plan on both what it has done to improve its repair services (including its repairs record keeping), and what it will do to ensure the resident's experiences are not repeated. This review should be in line with the Code's guidance that:

“a landlord [should] learn from the issues that arise for residents and to take steps to improve the services it provides and its internal processes. Landlords should have a system in place to look at the complaints received, their outcome and proposed changes as part of its reporting and planning process. Landlords

should proactively use learning from complaints to revise policies and procedures, to train staff and contractors and to improve communication and record-keeping.”

38. This review should be completed and shared with the resident and this Service within 10 weeks from the date of this report.

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Report of the Executive Director

WORK PROGRAMME

1. Purpose of report

To consider items for inclusion in the Work Programme for future meetings. Dates to be approved at full Council.

2. Background

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.

	<ul style="list-style-type: none"> • Community Governance Review • Developing an Effective Annual Governance Statement • Corporate Governance Arrangements • Internal Audit Progress Report
	<ul style="list-style-type: none"> • Audit of Accounts 2021/22 and Associated Matters • Internal Audit Review 2021/22 • Internal Audit Progress Report • Review of Strategic Risk Register • Statement of Accounts 2021/22-Going Concern
	<ul style="list-style-type: none"> • Annual Audit Letter – External Auditors Report on the Statement of Account 2021/22 • Internal Audit Progress Report • Annual Counter Fraud Report 2021/22 • Governance Dashboard – Major Projects • Review of Strategic Risk Register
	<ul style="list-style-type: none"> • Internal Audit Progress Report • Review of Strategic Risk Register
	<ul style="list-style-type: none"> • External Audit Plan 2022/23 • Statement of Accounts 2022/23 – Accounting Policies • Statement of Accounts 2022/23 – Underlying Pension Assumptions • Statement of Accounts 2022/23 - Going Concern • Internal Audit Plan 2023/24 • Internal Audit Progress Report • Review of Strategic Risk Register

Recommendation

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

Background papers

Nil.

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