

# AGENDA



- Committee - **POLICY DEVELOPMENT PANEL**
- Date & Time - Tuesday, 3 February 2026 at 6.30 pm
- Venue - Meeting Room 1, Council Offices, Priory Road, Spalding

## **Membership of the Policy Development Panel:**

Councillors: D Ashby, P Barnes, A C Beal, L J Eldridge (Vice-Chairman), M Geaney, R A Gibson, M Hasan, J L Reynolds, M Le Sage, J Whitbourn and A R Woolf (Chairman)

**Substitute members on the Policy Development Panel may be appointed only from members who are not on the Cabinet. Substitutions apply for individual meetings.**

**Quorum: 4**

Persons attending the meeting are requested to turn mobile telephones to silent mode

Democratic Services  
Council Offices, Priory Road  
Spalding, Lincs PE11 2XE

Date: 26 January 2026

## AGENDA

1. Apologies for absence.
2. Minutes -  
To sign as a correct record the minutes of the following meetings:
  - a) Policy Development Panel - 25 November 2025 (Pages 5 - 26)
  - b) Special Policy Development Panel - 17 December 2025 (Pages 27 - 38)
3. Actions -  
To consider updates to actions that arose at the 25 November 2025 Policy Development Panel meeting and the tracking of outstanding actions (enclosed). (Pages 39 - 44)
4. Declaration of Interests. -  
Where a Councillor has a Disclosable Pecuniary Interest the Councillor must declare the interest to the meeting and leave the room without participating in any discussion or making a statement on the item, except where a councillor is permitted to remain as a result of a grant of dispensation.
5. Questions asked under Standing Order 6
6. Tracking of recommendations -  
To consider responses of the Cabinet to reports of the Panel.
7. Items referred from the Performance Monitoring Panel
8. Key Decision Plan - (Pages 45 - 52)  
To note the current Key Decision Plan (copy enclosed).
9. SHDC and S&ELCP Policy Registers - (Pages 53 - 60)  
To note the SHDC Policy Register and the S&ELCP Policy Register (enclosed).
10. Extension of the Housing Landlord Strategy - (Pages 61 - 110)  
To seek feedback on a one-year extension to the current Landlord Strategy timeline, aligning it with ongoing service transformation activity and enabling deeper tenant engagement in shaping the next strategy (report of the Assistant Director – Housing enclosed).
11. Data Protection Policy and Records Management Policy - (Pages 111 - 130)  
To review updated policies prior to Cabinet consideration (report of the Assistant Director – Governance enclosed).
12. SHDC Markets Policy Review - (Pages 131 - 184)  
To present for members consideration an update to the SHDC's existing Markets Policy and the introduction of a new SHDC Markets Severe Weather Policy (report of the Assistant Director – Leisure & Local Services Division enclosed).

- |     |   |                         |
|-----|---|-------------------------|
| 13. | Terms and Conditions alignment – Next Phase -<br><br>To consult Policy Development Panel on the policies prior to Full Council (report of the Head of HR & OD – PSPS enclosed).   | (Pages<br>185 -<br>202) |
| 14. | SHDC Housing Comments, Compliments, Complaints and Compensation Policy -<br>To approve amendments to SHDC Housing Comments, Compliments, Complaints and Compensation policy following an annual refresh with tenants (report of the Assistant Director – Housing enclosed)  | (Pages<br>203 -<br>238) |
| 15. | Consultation for Heritage documents - Spalding Conservation Area Appraisal and Management Plan including Spalding Shopfront Design Guide, Spalding Heritage Strategy, Holbeach Conservation Area Appraisal and Management Plan, SELCP Design Guide. -<br>To consult with PDP and provide feedback on the progress of public consultation (report of the Director – Economic Development enclosed) | (Pages<br>239 -<br>246) |
| 16. | Policy Development Panel Work Programme -<br>To set out the Work Programme of the Policy Development Panel (report of the Assistant Director – Governance enclosed).  | (Pages<br>247 -<br>254) |
| 17. | Any other items which the Chairman decides are urgent. -  |                         |

NOTE: No other business is permitted unless by reason of special circumstances, which shall be specified in the minutes, the Chairman is of the opinion that the item(s) should be considered as a matter of urgency.

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Minutes of a meeting of the **POLICY DEVELOPMENT PANEL** held in the Meeting Room 1, Council Offices, Priory Road, Spalding, on Tuesday, 25 November 2025 at 6.30 pm.

## PRESENT

A R Woolf (Chairman)  
L J Eldridge (Vice-Chairman)

D Ashby  
P Barnes  
A C Beal

M Geaney  
M Hasan  
J L Reynolds

M Le Sage  
J Whitbourn

In Attendance: The Business Intelligence and Change Manager, the Group Communications and Engagement Manager, the Group Manager, Safer Communities, the Assistant Director - Regulatory, the Environment and Sustainability Officers, and the Assistant Director - Wellbeing and Community Leadership

### 45. MINUTES

- 1) That the minutes of the Policy Development Panel meeting held on the 23 September 2025 be signed as a correct record by the Chairman.
- 2) That both the open minutes and the restricted minute (at agenda item 19) of the Special Joint Performance Monitoring Panel and Policy Development Panel held on the 21 October 2025, be signed by the Chairman as a correct record.

### 46. ACTIONS

Consideration was given to the update on actions which arose at the 23 September 2025 Policy Development Panel meeting and the tracking of outstanding actions.

#### **AGREED:**

That the update regarding actions be noted.

### 47. DECLARATION OF INTERESTS.

There were none.

### 48. QUESTIONS ASKED UNDER STANDING ORDER 6

There were none.

Action By

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**49. TRACKING OF RECOMMENDATIONS**

There were none.

**50. ITEMS REFERRED FROM THE PERFORMANCE MONITORING PANEL**

There were none.

**51. KEY DECISION PLAN**

Consideration was given to the Key Decision Plan dated 14 November 2025.

**AGREED:**

That the Key Decision Plan be noted.

**52. SHDC AND S&ELCP POLICY REGISTERS**

Consideration was given to the SHDC Policy Register and the S&ELCP Policy Register.

Members considered the SHDC Policy Register, and the S&ELCP Policy Register and made the following comments:

- Members noted that the majority of policies had scheduled review dates in place and the registers were considered to be in good order overall. Members were informed that there had been a slight delay in the review of the Data Protection Policy and the Records Management Policy, which had originally been expected in November but had been rescheduled for February due to last-minute changes.
- Policies relating to Whistleblowing, Capital and Corruption were confirmed as being within the remit of the Governance and Audit Committee rather than the Policy Development Panel.
- The Street Art Management Policy was scheduled for February 2026.
- It was highlighted that several of the policies marked in orange on the register were financial and ICT-related, which typically aligned with the budget-setting process.
- Members raised concerns regarding the delay in reviewing the Data Protection Policy, given its importance.
  - It was explained that the policy was being aligned across the three councils within the partnership, and

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feedback on the delay would be provided to the relevant officers.

**AGREED:**

That the SHDC Policy Register & the S&ELCP Policy Register be noted.

**53. ARTIFICIAL INTELLIGENCE (AI) POLICY**

Consideration was given to the presentation of the Business Change and Intelligence Manger who asked the members to review the Artificial Intelligence Policy one year from its adoption at Cabinet.

The Business Change and Intelligence Manger highlighted that:

- An AI Working Group had been established to oversee initiatives, share best practices, and ensure responsible deployment. Governance was supported by the ICT Strategy Board, which reviewed business cases for new AI applications.
- Regular briefings, workshops, and staff communications had been delivered to promote awareness and encourage the adoption of AI.
  - AI tools were being used to align policies across the partnership and to perform impact assessments more efficiently.
  - AI had assisted with triaging complaints, which in turn reduced delays and improved accuracy.
  - AI supported officers with sourcing data and evidence.
  - AI transcription and summarisation tools were being used to assist with the production of draft minutes and analyse trends.
- The Transformation Team was leading the partnerships AI adoption, ICT ensured secure deployment and integration; and Data Protection teams monitored compliance with GDPR.
- Further exploration of Microsoft Copilot would enable further development of methodologies to quantify efficiency gains and potential financial savings.

Members considered the update and made the following comments:

- Members asked how secure AI was when drafting policies

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- or processing sensitive information.
- The Business Change and Intelligence Manager clarified that Copilot operated within the Microsoft 365 environment, which was as secure as SHDC emails and document systems. Public AI tools such as ChatGPT and Google Gemini were blocked for officers;
    - The Business Change and Intelligence Manager would confirm if this applied to Members.
  - Members asked if Copilot could be automatically installed on members' devices.
    - The Business Change and Intelligence Manager agreed this would be ideal and would check with ICT and would report back to the members if this could be arranged.
  - Members questioned if it was safe to use ChatGPT on their Council iPads for tasks like risk assessments.
    - The Business Change and Intelligence Manager responded that members should avoid entering personal or sensitive data into ChatGPT. Copilot was recommended for work-related tasks as it was secure and integrated with Council systems.
      - The Business Change and Intelligence Manager would confirm the official position on ChatGPT access for members.
  - Members discussed how accuracy was ensured when AI produced outputs such as risk assessments or social media posts.
    - The Business Change and Intelligence Manager explained that AI was an assistant, not an autonomous decision-maker. All outputs must be reviewed and signed off by a human officer with subject expertise. SHDC was not currently using AI for automated decision-making.
  - Members suggested that if officers were required to check everything that AI produced, would this not duplicate work.
    - The Business Change and Intelligence Manager reiterated that AI would reduce background work and speed up processes, but human oversight would remain essential to maintain quality and compliance.
  - Members asked how we ensured transparency when AI-

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- generated content was published externally.
  - The Business Change and Intelligence Manager answered that disclaimers for AI-generated content were under consideration and would be implemented for any material published externally.
- It was suggested that members would like to receive training and a demonstration on AI tools like Copilot.
  - The Business Change and Intelligence Manager confirmed that ICT had delivered staff training sessions and would check whether similar training could be arranged for members.
- Members asked how AI use was being monitored across the partnership services.
  - The Business Change and Intelligence Manager confirmed that an AI Use Case Register was being maintained by the working group, which captured all areas where AI was currently deployed and ensured data protection impact assessments were completed where necessary.

**AGREED:**

That the Artificial Intelligence (AI) Policy update be noted.

**54. SOCIAL MEDIA POLICY**

Consideration was given to the report of the Assistant Director – Corporate which asked the members to consider the Social Media Policy prior to its presentation to Cabinet.

The Group Communications and Engagement Manager presented the report and highlighted that:

The Policy was structured around three key elements:

- Reviewing how and why communications were delivered on social media, improving consistency, and reducing the current haphazard presentation caused by high volumes of content.
- Ensuring respectful behaviour online and maintaining inclusive conversations through standardised house rules across all three councils.
- Addressing the volume of comments and queries received on social media in a timely and consistent manner.
  - An audit had shown that a substantial number of

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comments across social media platforms required a more structured response process.

Members considered the report and made the following comments:

- Members supported the need for a consistent approach and queried whether Artificial Intelligence (AI) could assist with managing social media content.
  - The Group Communications and Engagement Manager advised that AI could support research and certain tasks, but it was not a complete solution for strategic communications. Transparency was emphasised as essential when using AI-generated content, and any such content would need to be clearly identified to maintain trust with residents.
- A Member referred to page 69 of the report, noting that the policy stated that AI-generated content would not be used unless clearly attributed when shared from stakeholders.
  - The Group Communications and Engagement Manager confirmed this aligned with the outlined approach.
- Members queried demographic data, noting that most followers appeared to be female, and asked whether this was linked to the timing of bulletins.
  - The Group Communications and Engagement Manager confirmed that the split was approximately 60% female across all councils and suggested this may relate to early adoption patterns of Facebook and its social nature. Demographic insights would help with future targeting strategies.
- Members commented on the randomness of some posts and suggested a more structured approach, such as themed weekly summaries and improved website integration, allowing residents to easily find posts relevant to specific services. It was further suggested that AI could be useful for improving website navigation and content retrieval.
  - The Group Communications and Engagement Manager clarified that while AI could assist in website functionality, this was outside the scope of the Social Media Policy. AI implementation would require a well-structured and indexed website, which was currently under review as part of the wider transformation programme.

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- A member referred to the objectives section and queried the review of X (formerly Twitter) and BlueSky usage, noting that engagement on X had been minimal, with no comments in the last six months and the last post dating back to May.
  - The Group Communication and Engagement Manager explained that engagement on X had declined steadily over the past 18–24 months. Changes to X’s algorithms had negatively impacted public sector visibility, leading many organisations to reduce activity and explore alternative platforms. The partnership had paused activity on X pending further review.
  - The Group Communications and Engagement Manager added that BlueSky had not overtaken X in popularity and that Facebook remained the primary channel, with WhatsApp slowly developing as a managed platform. Nextdoor offered an initial advantage by granting access to a large user base; however, engagement levels had been low, and the platform had not met early expectations for hyper-local interaction.
  
- Members asked whether the Council intended to discontinue use of X.
  - The Group Communications and Engagement Manager responded that X had been retained for election-related communications due to high the engagement among politicians during that period. Outside of elections, engagement had been minimal, and continued use would be reviewed.
  
- Members observed that residents were more likely to visit the Council’s Facebook page than its website, except for transactional purposes. They noted that South Holland’s follower numbers were lower than Boston and East Lindsey.
  - The Group Communications and Engagement Manager explained that South Holland’s Facebook page had been restarted in 2018 due to issues with the previous page, which accounted for the discrepancy in follower numbers.
  
- A member referred to page 12 of the policy, which stated that social media accounts would be monitored from 9am to 5pm, Monday to Friday. They suggested amending the wording to “intermittently” to avoid implying constant

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monitoring. The member also questioned the commitment to respond to queries within three working days and asked whether this applied to comments, given the lack of a Direct Message facility on Facebook.

- The Group Communications and Engagement Manager confirmed that Messenger was used for direct contact and that PSPS handled service-related queries.
  - The Members agreed that three working days might be too long for residents to wait for a response.
    - The Group Communications and Engagement Manager agreed to check whether the Facebook page included a direct messaging link and would report back to the Panel.
- Members referred to the objectives section, which stated that social media house rules would be shared in the file section of the social media pages. They asked whether it was possible to request that users should agree to these rules when following the page and suggested including a clause requiring passwords to be changed when staff with access leave the organisation.
  - The Group Communications and Engagements Manager agreed that password changes were already standard practice but confirmed this would be explicitly referenced in the policy. It was agreed to review whether pre-populated agreement questions could be implemented for pages, noting that if this was not possible, compliance would be implied through interaction with posts.
- Members queried whether dormant or ghost accounts among followers could be affecting engagement figures.
  - The Group Communications and Engagement Manager confirmed this was likely and noted that cleansing follower lists and monitoring for bots would be considered as part of future security measures.

**AGREED:**

- 1) That following consideration from the Panel the comments and feedback be noted and the recommendation of the draft Social Media Policy to Cabinet be supported.
- 2) That an update be presented to the Panel one year from its

adoption at Cabinet.

## **55. HOUSING STANDARDS POLICIES**

Consideration was given to the report of the Assistant Director – Communities and Housing Services which asked that members to consider the update of the Housing Standards Policies prior to alignment of respective Policies across the Partnership.

The Group Manager, Safer Communities introduced the three draft Housing Standards Policies.

- Empty Homes Policy
- Houses in Multiple Occupation (HMO) Licensing Policy
- Enforcement Policy

The strategic objective of all 3 policies was to update and regularise existing policies across East Lindsey, South Holland, and Boston so that working practices and approaches were aligned.

These policies would be delivered within the partnerships existing resources.

The Group Manager, Safer Communities noted that the Councils current policies were fit for purpose and took into consideration the recently published “Private Sector Housing Strategy” previously discussed at PDP.

### Empty Homes Policy

- The Group Manager, Safer Communities explained that the Empty Homes Policy would introduce a scoring and rating matrix to prioritise the properties of greatest concern to the Council. The policy would enable each individual council to utilise the powers and tools available to them, without committing all 3 Councils to the same activity, certain activities, such as compulsory purchase, could require a large resource commitment.

### Houses in Multiple Occupation (HMO) Licensing Policy

- The Houses in Multiple Occupation (HMO) Licensing Policy would move away from a flat fee structure and would introduce a new fee structure separated in to 2 parts:
  - Part A for the application,
  - Part B would generate a fee per individual room.
- The policy would see the alignment of amenities and standard conditions and would introduce a risk rating for generating periodic inspections.
- The 3 appendices that accompanied this policy were:
  - License conditions

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- Amenity and space standards
- Fit and proper persons

**Enforcement Policy**

- The Enforcement Policy had been updated to reflect new schemes such as “Homes for Ukraine.”
- Accommodation inspections, along with the revision of fixed penalty amounts, would reflect the national model which was being steered by the Renters’ Rights Act that had just gained royal assent.
- The policy had revised the fee structure, by introducing a set fee for the service of a notice, followed by an additional fee for each hazard.
- The policy brought in an increase of fees attached to the service of Civil Penalty Notices which steered away from a matrix approach, by introducing set fees per offence this would align with the Justice for Tenants national model.

Members considered the report and made the following comments:

- Members expressed their frustration regarding the number of empty homes and the negative impact on neighbourhoods and stressed the importance of bringing those properties back into use to maximise the Councils housing stock.
  - The Group Manager, Safer Communities confirmed that the scoring matrix would prioritise properties causing the greatest concern or located in areas of high demand.
  - Properties that were likely to return to use naturally (e.g., probate cases) would not be prioritised.
  - Enforcement options would be considered where intervention was necessary.
- Members raised concerns about the size of this report (327 pages) and whether documents could be split or be provided earlier to allow sufficient time for review.
  - The Chairman acknowledged the concern and explained that the three policies were presented together for efficiency, as they were interlinked. Statutory publication requirements limited the flexibility on receiving agendas early.
    - Members emphasised that the issue was not the content but the short time frame for review. They requested that, where possible, future policies should be circulated earlier, or snapshots provided to assist preparation.

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- Members asked for confirmation that enforcement applied to private properties as well as rented accommodation as it was unclear in the report.
  - The Group Manager, Safer Communities confirmed that it would apply to both private and rented properties and agreed to review the wording in the report to make it clearer.
  
- Members asked if the council could purchase empty properties, particularly those in probate, to bring them into the housing stock.
  - The Group Manager, Safer Communities explained that such decisions would fall under the Housing Revenue Account (HRA) and strategic housing functions, which operated separately from enforcement. The suggestion would be fed back to the strategic housing lead.
  
- Members raised concerns about properties that were left empty for years and asked how residents could report those properties and what steps the Council could take to investigate ownership or occupancy.
  - The Group Manager, Safer Communities confirmed that once adopted, the policy would provide a clear route for reporting and investigation. The team could use tools such as Council Tax records and risk assessments to prioritise cases.
  - Options available ranged from advice and engagement through to compulsory purchase, depending on risk and feasibility.
    - Members stressed the importance of managing expectations for residents, noting that while powers such as Compulsory Purchase exist, they were rarely exercised due to financial and resource constraints. Members requested that the adopted policy clearly outlined what was realistically achievable and what enforcement options were available.
      - The Group Manager, Safer Communities explained that across the partnership, baseline data on empty homes was limited beyond headline figures. Initial work would focus on building a comprehensive dataset to inform prioritisation and future interventions.

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- Members commented that the policy should not only set standards but also ensure adequate resources to implement them.
  - The Group Manager, Safer Communities acknowledged this and confirmed that feedback would be provided to Cabinet regarding resource implications.
- Members noted that GDPR restricted the sharing of personal information and requested guidance on what could be disclosed to residents.
  - The Group Manager, Safer Communities would confirm GDPR compliance and what data could be shared with residents.
- Members expressed concern that while the policy was comprehensive, it might lack practical impact without sufficient resources. Members stressed the need for the Council to demonstrate tangible outcomes, such as bringing empty homes back into use, and requested that progress be reported after implementation.
  - The Group Manager, Safer Communities advised that baseline data should be compiled within three months, with prioritisation completed within six months.
    - Members offered to assist by providing details of empty properties in their wards to accelerate the process.
      - The Group Manager, Safer Communities welcomed this support.
- Members agreed that bringing empty homes back into use was preferable to building new homes and emphasised the need for Cabinet to consider resource implications to ensure the policy could be delivered effectively.

*Councillor J Reynolds left the meeting at 8.05pm*

**AGREED:**

- 1) That following consideration from the Panel that the recommendation of the Housing Standards Policies to Cabinet be approved.
- 2) That the Policy Development Panel be presented with an update on the Housing Standards Policies one year after adoption at Cabinet.

## **56. PARTNERSHIP ENVIRONMENT POLICY**

Consideration was given to the report of the Assistant Director – Regulatory which asked that members review the Partnership Environment Policy one year from its adoption.

The Assistant Director – Regulatory introduced the report and highlighted the following key points:

- The Partnership Environment Policy provided the overarching framework for delivering environmental priorities set out in the Partnership Sub-regional Strategy (2024–2029).
- The policy sought to balance sustainability with economic and social considerations and demonstrated the Council’s commitment to environmental leadership.
- Four key themes underpinned the policy:
  - Protecting and recovering the natural environment.
  - Mitigating and adapting to climate change.
  - Protecting and enhancing the built environment.
  - Ensuring sustainable waste and resource management.
- Since adoption, the policy had shaped several strategies and plans, including the Sustainable Products Policy, Tree and Hedgerow Strategy, and the Carbon Reduction Plans.
- A Climate Change and Environment Impact Assessment tool had been introduced to evaluate environmental impacts consistently as part of the decision-making.
- Performance monitoring was achieved through the Partnership’s Annual Delivery Plan and the South and East Lincolnshire Climate Action Network (SELCAN).
- The Assistant Director - Regulatory explained that the policy remained fit for purpose and proposed that the next review should take place in 2028/29 to align with the Sub-regional Strategy.

Members considered the report and made the following comments:

- Members asked if the partnership was achieving everything that the policy had set out.
  - The Assistant Director - Regulatory confirmed that the delivery of actions aligned with the policy’s principles and that progress was being made through associated strategies and plans.
- Members expressed concern that recycling waste rates

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- appeared to have fallen over the past year. How did this policy influence waste and recycling performance.
- The Assistant Director - Regulatory explained that recycling performance was largely driven by national policy, which the Council had limited influence over. However, local waste collection policies and service improvements were influenced by the Environment Policy. Planned changes, such as how food waste would be collected, would support improvements over time.
- Members noted that the policy had been in place for a year, yet recycling rates remained low. Did this mean that the policy was ineffective.
    - The Assistant Director - Regulatory noted that the policy had set long-term strategic goals, and changes to waste regimes required significant investment and time. The policy provided the framework for decisions, but measurable improvements in recycling would take time to materialise.
  - Members asked whether there was a risk that the policy was just a high-level document without real impact.
    - The Assistant Director - Regulatory acknowledged the concern but emphasised that the policy supported operational strategies and projects. It was not intended to deliver immediate results but to guide sustainable decision-making across all services.
  - Members asked why the next review was scheduled for 2028/29, and should the Policy be brought back to the Panel before this.
    - The Assistant Director - Regulatory explained that the review date aligned with the Sub-regional Strategy to ensure consistency between strategic documents. Bringing the policy back earlier would likely result in the same discussion, as changes would take time to implement.
  - Members wanted assurance that the policy was committed to minimising single-use items.
    - The Assistant Director - Regulatory agreed this was a valid point and noted that the Sustainable Products Policy, which sat under the Environment Policy, was driving changes in purchasing behaviour. However, changes across the

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partnership would take time to implement.

- Members asked how progress on reducing single-use products and paper usage was measured.
  - The Assistant Director - Regulatory confirmed that audit work on purchasing behaviours was ongoing and that data would be provided to the panel at a future meeting.

*Councillor M Le Sage left the meeting at 8.26pm.*

**AGREED:**

- 1) That the content of the report be noted.
- 2) That the Environment Policy is next reviewed in 2028/29 in line with the Sub-Regional Strategy to ensure that the two documents continue to be aligned in their focus and ambition.

*Councillor J Whitbourn left the meeting at 8.28pm*

*Councillor D Ashby left the meeting at 8.29pm*

**57. TREE & HEDGEROW STRATEGY ACTION PLAN**

Consideration was given to the report of the Assistant Director – Regulatory which asked members to consider the proposed Tree and Hedgerow Strategy Action Plan prior to its adoption at Cabinet.

The Environment and Sustainability Officer attended virtually and highlighted the following key points;

- That trees and hedgerows played a vital role in addressing biodiversity loss and climate change, providing resilience against extreme weather events, and supporting community protection.
- The Tree and Hedgerow Strategy Action Plan set out short, medium, and long-term targets to deliver the ambitions of the strategy, to ensure appropriate management, protection, and enhancement of trees and hedgerows across the sub-region.
- Planting must follow the principle of “right tree in the right place” and would include the maintenance of existing trees and hedgerows.
- South Holland and parts of Boston were predominantly

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Fenland landscapes which had a naturally lower tree coverage.

- The plan would align with the forthcoming Lincolnshire Local Nature Recovery Strategy, expected in late 2026, and a light-touch review would follow to ensure complementarity.
- The recommendation was for the Panel to consider the proposed action plan, provide feedback, and recommend adoption to Cabinet.

Members considered the report and made the following comments.

- Members asked how the plan would address concerns about large numbers of trees attracting pigeons and impacting farmland.
  - The Environment and Sustainability Officer explained that in South Holland, planting would focus mainly on urban areas, community orchards, and woodlands. Hedgerow schemes for farmers would also be available. A project team would be established to identify suitable sites and consider surrounding land use.
- Members enquired how inappropriate planting near drainage ditches or pipes would be avoided.
  - The Environment and Sustainability Officer confirmed that the project team approach would be used to include a team of technical officers to ensure planting did not compromise drainage infrastructure.
- Members asked if the action plan linked in with existing planning policies, particularly those regarding large solar installations that removed trees and hedgerows.
  - The Environment and Sustainability Officer stated that planning and biodiversity net gain (BNG) were referenced in the action plan. Conditions would be applied to planning approvals to mitigate biodiversity loss. BNG mechanisms aimed to offset impacts, though off-site mitigation was possible under current rules.
- Members asked what planting was anticipated for South Holland, and when would targets be set.
  - The Environment and Sustainability Officer explained that targets would be established within two years, following site investigations and funding

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assessments. Likely projects would include community orchards in urban areas, with other opportunities being considered.

- Members queried if the Tree and Hedgerow Strategy Action Plan applied only to Council-owned land or did it apply to all land within the district.
  - The Environment and Sustainability Officer confirmed that the strategy applied to both Council-owned land and other sites where landowners expressed an interest.
- A question was raised if there was sufficient resources for planting and maintenance.
  - The Environment and Sustainability Officer advised that external funding would be sought. Volunteer support and engagement would also be utilised. Maintenance plans, including stakes and guards would be included within the funding bids to ensure that the trees and hedgerows planted would be protected.
- Members asked could support be provided, such as pruning advice, for parish councils that had received trees under previous schemes.
  - The Environment and Sustainability Officer agreed to provide practical support and would run 'help and support' sessions if required.
- A question was asked relating to the status of the Council-owned land near Pinchbeck that had been earmarked for tree planting.
  - The Environment and Sustainability Officer confirmed this would be investigated, and an update would be provided to the Panel.

**AGREED:**

- 1) That following consideration from the Panel the comments and feedback be noted.
- 2) That the recommendation to Cabinet for adoption of the Tree and Hedgerow Action Plan be supported.

**58. NET ZERO ACTION PLAN**

Consideration was given to the report of the Assistant Director –

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Regulatory which asked the Panel to provide input into the draft Net Zero Action Plan prior to its adoption at Cabinet.

The Environment and Sustainability Officer attended virtually and highlighted the following points:

- The draft Net Zero Action Plan supported the Council's commitment to achieve net zero by 2040.
- It set out a pathway which included potential projects and actions;
  - Fleet decarbonisation: Transition to electric vehicles would be in line with the government's zero-emission mandate. Clarification was noted that the ban applies to the sale of non-EV HGVs (under 26 tonnes by 2035, over 26 tonnes by 2040), not their operation.
  - Exploration of alternative fuels such as Hydrotreated Vegetable Oil (HVO) and technologies such as solar mats for vehicle hydraulics.
  - Improvements to operational buildings, including EV charging points, HVAC upgrades, and solar panels.
  - Work on social housing retrofits and to be energy efficient at sewage treatment works and pump stations.
  - Behavioural changes, engaging with staff, and creating a Green Champions group.
- The plan was dynamic with certain projects being removed or added following feasibility studies.
- External funding would be sought to support delivery, by having an approved plan this would strengthen funding bids.
- Approval of the plan did not commit the Council to immediate financial obligations.

Members considered the report and made the following comments;

- Members asked how other local authorities were progressing with solar mats for fleet vehicles.
  - The Environment and Sustainability Officer confirmed that West Lindsey had trialled them, but early results were less positive than expected. Once further feedback was gained the members would be updated.
- It was noted that the electric vehicle (EV) range for waste collection vehicles was poor, especially in adverse

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- weather. How would this be addressed.
- The Environment and Sustainability Officer acknowledged the issue and explained that technology was improving. Government deadlines allowed some flexibility, and future advancements should improve the range of electric vehicles.
  - Members asked if SHDC currently sourced green energy.
    - The Environment and Sustainability Officer would confirm with procurement and update the plan accordingly.
  - Members asked why new waste collection vehicles had been purchased as diesel rather than electric. Members expressed concern that this contradicted the net zero ambition.
    - The Environment and Sustainability Officer explained that the technology for larger vehicles was not yet sufficient for operational needs, infrastructure limitations also influenced decisions. Where possible, greener features such as electric bin lifts had been included.
  - Members asked if hydrogen had been considered as an alternative fuel.
    - The Environment and Sustainability Officer confirmed that hydrogen was referenced in the plan but was still at an early stage of development. Further investigation would be undertaken.
  - Members enquired what the strategy was for recycling or disposing of EV batteries.
    - The Environment and Sustainability Officer acknowledged this was a valid concern and committed to investigating regulatory requirements and best practice for battery disposal and would report back to the Panel.
  - Members asked if the plan included battery storage for solar energy at depots and offices.
    - The Environment and Sustainability Officer noted that battery storage was being considered, but current technology had limitations during power cuts unless advanced systems (e.g., Tesla Powerwall) were used. This would be explored further as part of feasibility work.

**AGREED:**

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- 1) That following consideration of the draft Net Zero Action Plan, the feedback of the Panel be noted.
- 2) That the recommendation to Cabinet for the adoption of the Net Zero Action Plan be supported, in line with the Council's commitment to achieve Net Zero by 2040.

**59. POLICY DEVELOPMENT PANEL WORK PROGRAMME**

Consideration was given to the report of the Assistant Director – Governance (Monitoring Officer) which set out the Work Programme of the Policy Development Panel.

The Chairman introduced the report to members:

- a) Appendix A listed the schedule of meetings for 2025/26 with expected items populated against each meeting.
- b) Appendix B outlined the task groups of the Panel.

Members considered the current Work Programme and discussed forthcoming items.

- Members noted that the Waste Policy was scheduled for a future meeting and emphasised the importance of thorough scrutiny.
- Members requested early sight of the draft Waste Policy to allow adequate time for review.
  - The Democratic Services Officer advised that statutory requirements required agendas to be published at least five working days before the meeting, earlier publication could be explored where possible.
- Members stressed that the Panel should not be expected to “rubber stamp” policies without proper scrutiny. Members agreed that if they were not satisfied with the content, they would refer the policy back for further work.
- The Panel noted that a session on budget savings was scheduled for 13 January 2026. Members queried whether Portfolio Holders would attend to enable direct scrutiny.
  - The Democratic Services Officer confirmed that arrangements were still being finalised.
- Members discussed the Business Frontage Task Group,

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which had now largely been incorporated into the Spalding Town Centre Strategy.

- It was agreed to keep the item on the work programme for awareness, given ongoing issues with vinyl signage and enforcement limitations.

**AGREED:**

That the Work Programme of the Policy Development Panel be noted.

**60. ANY OTHER ITEMS WHICH THE CHAIRMAN DECIDES ARE URGENT.**

There were none.

(The meeting ended at 9.15 pm)

(End of minutes)

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Minutes of a meeting of the **POLICY DEVELOPMENT PANEL** held in the Meeting Room 1, Council Offices, Priory Road, Spalding, on Wednesday, 17 December 2025 at 6.00 pm.

## PRESENT

A R Woolf (Chairman)  
L J Eldridge (Vice-Chairman)

D Ashby  
P Barnes

A C Beal  
R A Gibson

In Attendance: The Director of Communities, the Assistant Director – Neighbourhoods, the SELCP Group Manager – Waste and Fleet Services, the Portfolio Holder for Environmental Services, the Assistant Director – Regulatory, the Group Manager Public Protection and the Democratic Services Officer.

Apologies for absence were received from or on behalf of Councillors M Geaney, M Hasan, J L Reynolds, M Le Sage and J Whitbourn

### 61. **DECLARATION OF INTERESTS.**

There were none.

### 62. **WASTE POLICIES**

Consideration was given to the report of the Director of Communities which proposed new Waste Policies required to implement the new waste collection delivery model.

The Director of Communities, the Assistant Director – Neighbourhoods, the SELCP Group Manager – Waste and Fleet Services and the Portfolio Holder for Environmental Services attended for this item.

The Assistant Director introduced the report and provided the panel with the legislative context, including the Environment Act 2021. Members were reminded that a new waste service delivery model for South Holland had already been approved in 2025 to meet the legislative changes. Appendix A set out strategic commitments, statutory responsibilities, 18 proposed new waste and recycling collection policies and governance information. Appendix B outlined a comparison with current policies.

Members considered the report and made the following comments against each proposed policy in turn, as outlined at

Action By

**POLICY DEVELOPMENT PANEL - 17**  
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point 3 of Appendix A:

**3.1 Waste Collection**

- Members were satisfied with this policy as written however one member suggested that communications reflect that that the Council decision to implement bins as the default receptacle, was not mandated by legislation.

**3.2 Waste collection provision**

- Members discussed the provision of kitchen and kerbside caddies for the weekly food waste collection, including the issue of liners. It was noted that a starter roll of 52 liners per household would be provided at roll-out. Views were expressed that ongoing provision of liners would drive participation and hygiene, with suggestions to allow residents to purchase additional liners if needed and for the Council to consider retailing extra rolls. Members ultimately agreed that the Council should endorse an ongoing provision of liners without an initial trial.
- Members debated whether the policy should require all food waste placed into the kerbside caddy to be bagged; some members supported a mandatory requirement, while others favoured encouragement rather than compulsion due to enforcement practicality.
- Some members suggested that the availability of 180L bins would be more appropriate for some households which may also reduce the need for some assisted collections.

**3.3 Bank Holiday collections and collection days**

- Members noted the proposal to collect on Bank Holidays, with exceptions over the Christmas period (Christmas Day, Boxing Day and New Year's Day) and sought assurance regarding staff consultation and remuneration for Bank Holiday and Saturday working, and the need for clear resident communications.

**3.4 Properties exempt from bin collections**

- Members discussed the circumstances under which properties may be exempt from wheeled bins, such as taking bins through a room, insufficient storage space, or where bins would be stored on the highway.
  - The Assistant Director emphasised that exemptions

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would not be a matter of choice; residents would be required to accept the most suitable alternative arrangement offered by the Council. Where sacks were provided, these would be issued to match the capacity of the equivalent bin provision, ensuring fairness and supporting the Council's aim to reduce waste.

- Members queried how the Council would ensure that waste was reduced rather than simply compacted, noting concerns that limiting capacity might lead to side waste or fly-tipping. A member highlighted that households producing significant waste could struggle under the proposed limits, and queried the options that would be available for additional capacity.
  - The Assistant Director acknowledged that behaviour change would be essential and confirmed that an engagement team, supported by County Council colleagues, would work with residents to promote waste reduction and correct recycling. It was noted that packaging changes under Extended Producer Responsibility (EPR) would gradually reduce waste volumes.
- Members raised concerns about rural properties with long private drives, questioning whether residents would be expected to wheel bins long distances.
  - The Assistant Director confirmed that the current policy requiring presentation at the curtilage of the adopted highway would remain unchanged.
- Questions were asked about communal properties and flats, where residents currently used shared bin stores.
  - The Group Manager advised that communal bins or larger containers (up to 1100 litres) would be considered, with engagement officers working with residents and landlords to agree practical solutions. On communal bins, decisions would be based on property configuration and operational feasibility, with flexibility to accommodate different layouts.
- Members queried how the engagement team would prioritise visits and whether this could lead to inconsistencies.
  - The Group Manager confirmed that Engagement Officers would be deployed to target communal areas, flats, and properties identified through data and member input.

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- Concerns were expressed about the potential subjectivity of decisions on exemptions. Members requested a clear decision-making matrix to ensure consistency and fairness, and asked whether residents would have a right of appeal.
  - The Group Manager confirmed that internal processes would be developed to guide decisions and ensure fairness. While there would be no formal appeal process, decisions would be recorded, and residents could contact the Council to discuss concerns.
- Members stressed the need for detailed internal procedures and training for engagement officers to ensure transparency and consistency. One Member offered to observe training sessions to understand the criteria being applied.
- The Portfolio Holder noted members' comments and agreed that further clarity would be provided on the procedures sitting beneath policy 3.4.

### **3.5 Side waste**

- Members raised concerns that this policy would increase littering and fly-tipping and felt that the second sentence, which suggested that littering and fly-tipping would reduce, should be removed. The Assistant Director responded that:
  - The intention had been to support the waste hierarchy, encourage residents to reduce waste, and ensure recycling remained clean and dry. Allowing side waste had historically led to increased littering and fly-tipping in other areas where bags were left outside bins or in streets; and
  - The wording would be reviewed to ensure that the core statement was clear.
- Members queried if limiting residents to one bin was reasonable and whether additional bins could be purchased where a consistent increase in waste was produced.
  - The Assistant Director added that the Council could set reasonable conditions for presentation. Limiting capacity encouraged waste reduction and recycling, which aligned with statutory obligations.
- Members requested that the line 'An additional bin may be provided at a cost' should be added.

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- Members asked whether bins with lids slightly open would be collected.
  - The Group Manager stated that this would be a reasonable decision for crews but guidance would be provided to mitigate health and safety risks.

### **3.6 Charging for bins**

Members did not support a separate charging policy at 3.6 and asked that this be consolidated within policy 3.16 'Charging for bins/services'.

### **3.7 Requirement to segregate waste**

- Members emphasized the importance of education regarding segregation of waste responsibilities and asked that all households receive the "Right Thing, Right Bin" guide and clear pictorial information at roll-out.
  - The Group Manager agreed that physical aids could be effective and confirmed that leaflets and visual guides would be distributed to all households as part of the roll-out.

### **3.8 Approach to enforcement and contamination handling**

- Members supported the education and engagement-led approach outlined in paragraph 1.
- Members strongly disagreed with policy that contaminated recycling would not be collected, as stated in paragraph 2. Members asked that crews remove visible contamination where practicable, that action be taken to support the education-led approach, such as tag/sticker the bin with the reason for removal, but that, crucially, the remainder be collected, rather than leave a full bin uncollected for a month. Clarification was sought on expectations around loose versus bagged dry recycling and the managing of hygiene where residual contamination was present.
  - The Group Manager explained that operatives would remove visible contamination where practicable and tag the bin to inform the resident. Tags would include common contamination types and allow crews to write additional details;
  - The Assistant Director acknowledged that leaving bins uncollected was not desirable and confirmed that an advisory approach would be taken during the roll-out period, with contaminated items removed

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- and the remainder collected;
  - The Portfolio Holder responded that further work was required to clarify/develop internal procedures for handling rejected bins and ensuring timely follow-up collections; and
  - The Director of Communities noted the comments from the Panel and committed to considering how the policy could be amended to reflect the steer provided by the members.
- In respect of the policy relating to bins stored on the highway at paragraph 3, members queried whether residents could be charged for return of bins removed by the Council. They also queried whether legal action or fines would apply for repeated non-compliance.
    - The Assistant Director confirmed that bins left permanently on the highway could be removed without notice and a delivery charge applied for their return. Residents failing to comply with requirements could face enforcement action, including fines under the Environmental Protection Act, although this would be a last resort. The wording would be clarified to ensure residents understood the meaning of 'highway' and the circumstances under which charges would apply.
  - Members were content with paragraph 4 as written.

### **3.9 Unadopted roads and long/private drives**

- Members referred to paragraph 1 and queried whether the Council would stop collecting waste from properties on unadopted roads, as collections had taken place for many years on many such roads. Concern was expressed regarding the impact on residents should the service change.
  - The Group Manager agreed that the policy should allow pragmatic decisions and maintain service continuity where collections had historically occurred; and
  - The Assistant Director agreed that the word 'generally' be included to support existing services.
- Members generally supported paragraph 2 but asked how the policy would apply to properties with long private drives, noting that residents might struggle to wheel bins

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long distances and that bins left at the roadside could blow over. They queried whether flexibility could be built into the policy for exceptional circumstances.

- The Group Manager responded that the policy would clarify that the default position was for bins to be presented at the curtilage of the adopted highway but allow flexibility through case-by-case officer assessments.

### **3.10 Bin colours and waste types**

- Members broadly supported this policy as written.
- Members suggested, in light of potential Local Government Reorganisation, that SHDC considered alignment of bin colours with those used by neighbouring authorities.
  - The Assistant Director responded that SHDC would be implementing the most economical system which other authorities would likely follow.
- Members requested that the body/base bin colour of 'anthracite grey' be included within the policy narrative.

### **3.11 Frequency of collection**

- Members referred to the collection of paper and card in purple-lidded bins and raised concerns about moisture levels in recycling sacks.
  - The Assistant Director explained that moisture levels in sacks were too high for paper and card to go directly to the paper mill. For properties unable to have a bin, paper and card would need to be placed in the mixed dry recycling route and separated later. The contract allowed a small amount of paper and card to go through this process, which was the only option available for those properties.
- Members raised concerns about exempt properties, noting that residents could have up to eight bags at a time (noting the potential capacity of four dry mix and four paper/card bags) and raised storage challenges between collections.
  - The Group Manager acknowledged the concern and confirmed that specific messaging would be provided to exempt properties to explain arrangements clearly.
- Members suggested that the collection schedule should be

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presented in two tables—one for standard properties and one for exempt properties—and that similar clarity should be provided for the number of bags allowed.

- The Director agreed that this approach would make the information clearer for residents and undertook to review the presentation of the schedule.

### **3.12 Bin presentation**

- Members asked how the Council would prove that a bin had not been put out on time, noting that some streets had been missed during rerouting and raising concerns about disputes when residents claimed their bins were presented.
  - The Group Manager confirmed that new collection vehicles were equipped with cameras and GPS tracking. Officers could log on remotely to view live or recorded footage, check the route, and verify whether a bin was presented. The system showed the vehicle's location, speed, and stop times, enabling quick checks when missed collections were reported.
- Regarding the third point of this policy, as discussed at 3.9, the Group Manager confirmed that the wording on presentation location would be simplified for clarity, while retaining flexibility for agreed presentation points.

### **3.13 Missed collections**

- Member queried the procedure if a bin was missed and raised concerns about the wording “recollection will be attempted within 5 working days.” They felt this was unclear and asked whether residents would need to leave bins out for several days, which could conflict with rules about leaving bins on the highway.
  - The Assistant Director responded that where a missed collection had been reported, residents would not be penalised for leaving bins out. Crews would log instances where bins were not presented at the time of the original collection, and CCTV footage could be checked if disputes arose. Regarding the queried wording, it was agreed that the word “attempted” should be removed and replaced with a clear commitment that recollection would take place within five working days; and
  - The Group Manager added that operational flexibility was required, as recollection could happen within an hour, the next day, or later in the week

depending on route planning. Automated responses could be utilised to confirm the timeframe of collection.

### **3.14 Assisted collections**

- Members asked how quickly assistance would be provided if a resident living alone became incapacitated and could not present their bin.
  - The Group Manager confirmed that the process was largely automated and that assisted collections would be picked up on the next scheduled collection. Requests would be logged promptly to ensure inclusion in the route planning.
  
- Members queried whether there were safeguards to prevent misuse of the service, such as residents requesting assistance without genuine need. They asked whether criteria existed for temporary requests.
  - The Assistant Director explained that a series of questions was used during customer contact to assess eligibility without being intrusive. This process was already in place and ensured that requests were reasonable. It was noted that customer service teams would need to be fully briefed on the policy to provide accurate advice.
  
- Members asked whether crews and sheltered housing teams proactively identified residents needing assistance.
  - The Assistant Director confirmed that crews often reported cases where residents appeared to need help. These observations were logged, and arrangements were made accordingly. Crews were also asked to record practical details, such as whether properties had dogs, locks, or specific access requirements. In addition engagement with housing teams was already planned, including meetings with sheltered housing providers in the new year. It was noted that current assisted collection numbers were low (around 700) but expected to rise significantly, in line with other councils where figures exceeded 1,000; and
  - The Group Manager confirmed that the collection model had been adjusted to factor in assisted collections, including additional time for operatives to return bins after emptying.

### **3.15 Additional capacity needs**

- Members queried how objective criteria for additional capacity (household size, nappies, health needs) had been determined. It was noted that the positioning of the last 2 bullet points be reviewed to improve readability.
  - The Assistant Director explained that the numbers were based on data from other authorities and were intended to remove subjectivity by setting clear thresholds
- Members queried how Houses in Multiple Occupation (HMOs) would be managed, noting that these properties could present unique challenges, and asked whether the policy should include specific wording for HMOs.
  - The Group Manager confirmed that HMOs would be assessed based on occupancy, similar to flats, and that landlords had a responsibility to work with the Council to ensure waste was managed appropriately.
- Members raised concerns about communal areas and asked how responsibility for contaminated bins would be determined where multiple households shared a collection point.
  - The Assistant Director acknowledged that communal areas were challenging and confirmed that engagement officers would work with residents and landlords to encourage compliance. While bins would not be individually numbered, residents would be encouraged to mark their bins for identification. It was noted that contamination in communal bins remained difficult to trace and would require strong engagement and enforcement where necessary.

### **3.16 Charging for bins/services**

- Members asked whether residents would be charged for replacement bins if they were damaged or defective.
  - The Assistant Director confirmed that charges would only apply where damage, loss, or theft was 'proven' to be the resident's responsibility. Bins damaged due to manufacturing faults or by the Council would be replaced free of charge.
- Members queried how charges would apply to community centres and village halls, noting that these venues were

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often used for mixed purposes such as public meetings, baby groups, and private events. They asked whether one free set of bins would be provided and how additional waste would be charged.

- The Assistant Director explained that legislation required the Council to charge for waste collection where premises were not wholly or mainly used for public meetings. Community centres and village halls would receive one set of bins free of charge, but any additional waste generated by commercial activities, such as private hired events, would be charged at a commercial rate; and
  - The Portfolio Holder acknowledged that this area was complex and that further clarification would be provided prior to Cabinet consideration.
- Members asked for the charging of occupiers of new homes for initial bin provision to be removed from the policy.
  - Members asked why the Council did not currently offer a commercial waste collection service and suggested that this could provide an income stream and reduce businesses placing waste in domestic bins.
    - The Group Manager explained that legislation required the Council to arrange commercial waste collection if requested, either directly or through a contractor. The new service model and vehicles had been designed to allow capacity for a charged commercial waste service if Cabinet approved this option.

### **3.17 Commercial waste**

Members were content with the policy as written

### **3.18 Collection of bulky waste**

Members were content with the policy as written.

**In conclusion**, as members had requested a number of recommendations be applied to the policy, they requested the opportunity to review an amended version of the policy prior to Cabinet approval. The Portfolio Holder noted this request and agreed to reschedule the Cabinet decision from 20 January 2026 to 17 February 2026 to accommodate the Policy Development Panel's review of the edited policies.

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**AGREED:**

- 1) That the report be noted; and
- 2) That the feedback of the panel be noted and that a revised Waste Policies report to be reviewed by the Policy Development Panel prior to submission to Cabinet.

**63. ANY OTHER ITEMS WHICH THE CHAIRMAN DECIDES ARE URGENT.**

There were none.

(The meeting ended at 9.45 pm)

(End of minutes)

## ACTIONS

<b><u>ACTIONS FROM THE POLICY DEVELOPMENT PANEL MEETING HELD ON 25 NOVEMBER 2025</u></b>			
MINUTE NO.		ITEM	RESPONSIBLE OFFICER
52. 25/26		<b>SHDC AND S&amp;ELCP POLICY REGISTERS</b>	
		Members raised concerns regarding the delay in reviewing the Data Protection Policy. <b>Minuted meeting response:</b> It was explained that the policy was being aligned across the three councils and feedback on the delay would be provided. <ul style="list-style-type: none"> <li>• <span style="color: red;">Awaiting update</span></li> </ul>	<b>Corey Gooch</b>
53. 25/26		<b>ARTIFICIAL INTELLIGENCE (AI) POLICY</b>	
✓	a)	<b>Minuted meeting response:</b> The Business Change and Development Manager to confirm if AI tools such as ChatGPT and Google Gemini were blocked for officers. <ul style="list-style-type: none"> <li>• <span style="color: red;">Awaiting update</span></li> </ul>	<b>Corey Gooch/Democratic Services</b>
	b)	Members asked if Copilot could be automatically installed on members' devices. <b>Minuted meeting response</b> The Business Change and Intelligence Manager agreed this would be ideal and would check with ICT and would report back to the members if this could be arranged. <ul style="list-style-type: none"> <li>• <span style="color: red;">Awaiting update</span></li> </ul>	
	c)	Members questioned if it was safe to use ChatGPT on their council iPads for tasks like risk assessments. <b>Minuted meeting response:</b> The Business Change and Intelligence Manager would confirm the official position on ChatGPT access for members. <ul style="list-style-type: none"> <li>• <span style="color: red;">Awaiting update</span></li> </ul>	
	d)	Members asked if they could receive training and a demonstration on AI tools like Copilot. <b>Minuted meeting response:</b> The Business Change and Intelligence Manager confirmed that ICT had delivered staff training sessions and would check whether similar training could be arranged for members. <ul style="list-style-type: none"> <li>• <span style="color: red;">Awaiting update</span></li> </ul>	
	e)	That an update of the Artificial Policy be presented to the Panel in a year. <span style="color: red;">UPDATE:</span> <span style="color: red;">Added to Work Programme</span>	

# ACTIONS

54. 25/26		<b>SOCIAL MEDIA POLICY</b>	
✓	a)	<p>A member highlighted a typographical error in the policy document on page 6 where Facebook was repeated instead of LinkedIn.</p> <p><b>Minuted meeting response:</b> The Group Communications and Engagement Manager acknowledged the error and confirmed that the document would be corrected and reissued.</p>	<b>Shaun Gibbons/ Democratic Services</b>
✓	b)	<p>Members agreed that three working days might be too long for residents to wait for a response from Facebook comments.</p> <p><b>Minuted meeting response:</b> The Group Communications and Engagement Manager agreed to check whether the Facebook page included a direct messaging link and would report back.</p> <ul style="list-style-type: none"> <li>• The Group Communications and Engagement Manger confirmed that direct messaging was used on Facebook.</li> </ul>	
✓	c)	<p>Members referred to the objectives section, which stated that social media house rules would be shared in the file section of the social media pages. They asked whether it was possible to request that users should agree to these rules when following the page and suggested including a clause requiring passwords to be changed when staff with access leave the organisation.</p> <p><b>Minuted meeting response:</b> The Group Communications and Engagement Manager agreed that passwords changes were already standard practice but confirmed this would be explicitly referenced in the policy. It was agreed to review whether pre-populated agreement questions could be implemented for pages, noting that if this was not possible, compliance would be implied through interaction with posts.</p> <ul style="list-style-type: none"> <li>• The Group Manger confirmed that Password changes would be implemented when users with access left the organisation.</li> <li>• The Group Manager noted that compliance with Facebook House rules would be implied via posts.</li> </ul>	
✓	d)	<p>That an update be presented to the Panel one year from its adoption:</p> <p><b>UPDATE:</b> Added to the Work Programme</p>	

## ACTIONS

<b>55.</b> <b>25/26</b>		<b>HOUSING STANDARDS POLICIES</b>	
✓	a)	<p>Members asked for confirmation that enforcement applied to private properties as well as rented accommodation as it was unclear in the report.</p> <p><b>Minuted meeting response:</b> The Group Manager, Safer Communities confirmed that it would apply to both rented and private properties and agreed to review the wording in the report to make it clearer.</p> <ul style="list-style-type: none"> <li>• <b>Action completed; policy updated.</b></li> </ul>	<b>Johnathon Challen</b>
✓	b)	<p>Members commented that the policy should not only set standards but also ensure adequate resources to implement them.</p> <p><b>Minuted meeting response:</b> The Group Manager, Safer Communities acknowledged this and confirmed that feedback would be provided to Cabinet regarding resource implications.</p> <ul style="list-style-type: none"> <li>• <b>Would report to Cabinet once resourcing requirements are established.</b></li> </ul>	
✓	c)	<p>Members noted that GDPR restricted the sharing of personal information and requested guidance on what could be disclosed to residents.</p> <p><b>Minuted meeting response:</b> The Group Manager, Safer Communities would confirm GDPR compliance and what data could be shared with residents.</p> <ul style="list-style-type: none"> <li>• <b>We will work with the Council's Information Governance Team to ensure compliance in this area.</b></li> </ul>	
✓	d)	<p>That an update on the Housing Standards policy would be presented to the Policy development Panel and year after its adoption at Cabinet.</p> <p>UPDATE:</p> <ul style="list-style-type: none"> <li>• <b>Added to the Work Programme.</b></li> </ul>	
<b>56.</b> <b>25/26</b>		<b>PARTNERSHIP ENVIRONMENT POLICY</b>	
✓		That an update on the Environment Policy would be provided for review in 2028/29.	<b>Christian Allen</b>

## ACTIONS

		<p><b>UPDATE:</b> Added to the Work Programme.</p>	
<b>57. 25/26</b>		<b>TREE AND HEDGEROW STRATEGY ACTION PLAN</b>	
✓		<p>A question was asked relating to the status of the Council-owned land near Pinchbeck that had been earmarked for tree planting.</p> <p><b>Minuted meeting response:</b> The Environment and Sustainability Officer confirmed this would be investigated, and an update would be provided to the Panel.</p> <ul style="list-style-type: none"> <li>• The Environment &amp; Sustainability Officer has been advised that this piece of land is referred to as Belnie Meadows, and that the Strategic &amp; Operational Property Manager (Marc Whelan) is currently exploring potential multi-use opportunities for the site, including an area of woodland. The Environment &amp; Sustainability Officer will liaise with Marc on this work.</li> </ul>	<b>Heather Prescott</b>
<b>58. 25/26</b>		<b>ZERO NET ACTION PLAN</b>	
✓	a)	<p>Members asked how other local authorities were progressing with solar mats for fleet vehicles.</p> <p><b>Minuted meeting response:</b> The Environment and Sustainability Officer confirmed that West Lindsey had trialled them, but early results were less positive than expected. Once further feedback was gained the members would be updated.</p> <ul style="list-style-type: none"> <li>• WLDC contacted for an update and further enquiries made with other organisations using this technology once identified. Information will be shared once received.</li> </ul>	<b>Dean Hemsall</b>
✓	b)	<p>Members asked did SHDC currently source green energy.</p> <p><b>Minuted meeting response:</b> The Environment and Sustainability Officer would confirm with procurement and update the plan accordingly.</p> <ul style="list-style-type: none"> <li>• Enquiry sent direct to energy supplier and procurement, awaiting response. Plan will be updated as soon as information received.</li> </ul>	
✓	c)	<p>Members enquired what was the strategy for recycling or disposing of EV batteries.</p> <p><b>Minuted meeting response:</b> The Environment and Sustainability Officer acknowledged this was a valid concern and committed to investigating regulatory requirements and best practice for battery disposal and would report back to the Panel.</p>	

# ACTIONS

		<ul style="list-style-type: none"> <li>• Further investigations required and report/update will follow.</li> </ul>	
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<b><u>TRACKING OF OUTSTANDING ACTIONS FROM PREVIOUS POLICY DEVELOPMENT PANEL MEETINGS</u></b>			
MINUTE NO.	ITEM	RESPONSIBLE OFFICER	
65. 22/23	<b><u>28 February 2023: SPALDING CEMETERY</u></b>	<b>Marc Whelan, Andy Fisher</b>	
*	<p>Members requested that councillor membership of the proposed working group be taken from the Policy Development Panel and that both the Portfolio Holder for Assets and Planning, and the Portfolio Holder for Health and Wellbeing, Conservation and Heritage be made aware that the matter required urgent attention. Members strongly recommended that the working group be set up as soon as the new administration was in place.</p> <p>MINUTED MEETING RESPONSE: The request was noted at the meeting by the Portfolio Holder for Health and Wellbeing, Conservation and Heritage and would be relayed to the Portfolio Holder for Assets and Planning.</p> <p>UPDATE: The Strategic Property Manager confirmed that the Working Group would need to be established after the 4 May 2023 Election.</p> <p>UPDATE 3/7/23: Working Group formation is underway and has been circulated to key members (Wellbeing, Health and Heritage &amp; Assets) on the basis that they will look to find other interested members with the strategic Operational &amp; Property Manager included as Council liaison with also potentially the Cemetery Manager (Keith Taylor) and Facilities Manager (Katie Potter) involved</p> <p>UPDATE 18/09/23: Cemetery Expansion Working Group - The formation of the group is currently on hold at present. Cllrs and officers involved are working on reviewing still further the charges for non-residents. The likely further substantial increase will help limit the number of enquiries from outside the South Holland area. This was as per the enquiry from Cllrs at the last PDP meeting. This will give the Strategic &amp; Operational Property Manager / Facilities Manager and the Cemetery team more time to investigate potential areas that may become available over the coming months with a view to bringing a concrete proposal forward in the future.</p>		

✓ = completed, \* = in hand, x = outstanding

## ACTIONS

		<p>UPDATE 17/11/23: No further update to report at this stage. Work is still going on in the background.</p> <p>UPDATE 18/03/24: It's on the project list when resources allow but the new depot &amp; Sheep Market projects took precedence.</p> <p>UPDATE 15/05/24: We are looking at a piece of land now owned by SHDC and setting up a dig to look at water tables etc. Progress over the next couple of weeks and we might know a bit more come PDP.</p> <p>UPDATE 29/07/24: Bore holes have been dug and water table not hit until over 5ft down in both locations. SOPM to talk to group about preferable site.</p> <p>UPDATE 4/11/24 Work currently on hold until first quarter next year to prioritise office moves</p> <p>UPDATE 16/01/25 Pursuant to the 2023 statutory guidance "Protecting Groundwater from Human Burials"; officers have commissioned an Environmental Consultant and Hydrogeologist to undertake a the necessary 'Tier 1' ground monitoring protocol to determine whether the Council's adjoining land is suitable for use as a cemetery extension. Depending on the ongoing monitoring results, a Tier 1 assessment can take up to 12 months.</p> <p>UPDATE 22/05/2025 Tier 1 assessment has progressed and looks positive. We have arranged to check until we have enough data. As of this week, SOPM has agreed that we revisit end of August for a continued overview. Once we have that data it will be down to the group to decide if we progress the site or not by appointing the next stage of the process to align with DEFRA 2023 guidance.</p> <p>UPDATE 04/09/25 Geo report being finalised shortly and will be circulated accordingly.</p> <p>UPDATE 29/10/25 Awaiting some further wet weather to help ensure data is as accurate as possible</p>	
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KEY DECISION PLAN

Issued – 26 January 2026

*Representations in respect of all the matters shown should be sent in writing, at least one week before the date or period the decision is likely to be made, to:*

*Democratic Services, Council Offices, Priory Road, Spalding, Lincolnshire, PE11 2XE*

*Telephone: 01775 764451 Email: [demservices@sholland.gov.uk](mailto:demservices@sholland.gov.uk)*

**The Key Decision Plan shows all Key decisions that the Council is likely to make over the next **twelve** months**

*The Key Decision Plan is updated on a rolling basis and shows the decisions that will be considered and the date when the decision is expected to be made. In accordance with the Council's Constitution the DECISIONS detailed within this document, unless otherwise stated, come into force and may then be implemented on the expiry of a 5 working day call-in period from the date of publication of any decision.*

**Key decisions are:** "A decision which, in relation to an executive function, has a significant effect on communities in two or more Wards of the Council and / or is likely to result in the Authority incurring expenditure, generating income or making savings in any single financial year above the threshold of £75,000 in respect of revenue expenditure and £180,000 in respect of capital expenditure."

PORTFOLIO HOLDER / SUBJECT	PURPOSE OF DECISION	CONSULTEES AND METHOD OF CONSULTATION	SUPPORTING DOCUMENTS	LIKELY DATE OF DECISION AND WHO WILL MAKE DECISION	OFFICER CONTACT INFORMATION
<p><u>Portfolio Holder for Strategic and Operational Housing (Councillor Tracey Carter)</u></p> <p>HRA business plan and asset management strategy</p>	<p>To consider and provide feedback on the Housing Revenue Account (HRA) Business Plan 2026-2056 and the HRA Asset Management strategy 2026-2035</p>	<p>Members and tenants, informally and then formally commencing November</p>	<p>Report and any relevant appendices</p>	<p>South Holland District 28 Jan 2026</p>	<p>Vikki Cherry, Assistant Director - Housing <a href="mailto:vcherry@sholland.gov.uk">vcherry@sholland.gov.uk</a></p>
<p><u>Portfolio Holder for Corporate and Environmental Services (Councillor Jim Astill)</u></p> <p>Waste Policies</p>	<p>To review existing and introduce new waste policies to enable implementation of the new household waste collection model.</p>		<p>Report and any relevant appendices</p>	<p>Cabinet 17 Feb 2026</p>	<p>Matt Fisher, Head of Environmental Services <a href="mailto:matt.fisher@sholland.gov.uk">matt.fisher@sholland.gov.uk</a></p>

PORTFOLIO HOLDER / SUBJECT	PURPOSE OF DECISION	CONSULTEES AND METHOD OF CONSULTATION	SUPPORTING DOCUMENTS	LIKELY DATE OF DECISION AND WHO WILL MAKE DECISION	OFFICER CONTACT INFORMATION
<p><u>Leader (Councillor Charles Nicholas Worth)</u></p> <p>Destination Lincolnshire Local Visitor Economy Partnership Destination Management Plan and SELCP Destination Management Plan</p>	<p>Destination Lincolnshire are the defined Local Visitor Economy Partnership (LVEP) for the Lincolnshire and Rutland areas. As part of this they have created a Plan to 2033 to promote and co-ordinate the Visitor Economy. This Plan will cover and impact the South Holland District Council area. In addition, a Destination Management Plan has been produced for the Partnership area. These two documents together form a suite to support the visitor economy in the Partnership area from the local to the sub-regional. It is therefore proposed that the LVEP Destination Management Plan should be acknowledged and agreed by the Council and the SELCP Destination Management Plan agreed by the Council.</p>		<p>Report and any relevant appendices</p>	<p>Cabinet 28 Apr 2026</p>	<p>Pranali Parikh, Director of Economic Development <a href="mailto:pranali.parikh@boston.gov.uk">pranali.parikh@boston.gov.uk</a></p>

PORTFOLIO HOLDER / SUBJECT	PURPOSE OF DECISION	CONSULTEES AND METHOD OF CONSULTATION	SUPPORTING DOCUMENTS	LIKELY DATE OF DECISION AND WHO WILL MAKE DECISION	OFFICER CONTACT INFORMATION
<p><u>Portfolio Holder for Health &amp; Wellbeing, Conservation &amp; Heritage (Councillor Elizabeth Jane Sneath)</u></p> <p>SELCP Safeguarding Policy</p>	<p>To agree a joint SELCP Safeguarding Policy in order to standardise the Partnership's approach to Safeguarding children and adults in the work we do.</p>		<p>Report and any relevant appendices</p>	<p>Cabinet 17 Feb 2026</p>	<p>David Postle, Wellbeing Service Manager &amp; Deputy Strategic Safeguarding Lead  <a href="mailto:David.Postle@e-lindsey.gov.uk">David.Postle@e-lindsey.gov.uk</a></p>

PORTFOLIO HOLDER / SUBJECT	PURPOSE OF DECISION	CONSULTEES AND METHOD OF CONSULTATION	SUPPORTING DOCUMENTS	LIKELY DATE OF DECISION AND WHO WILL MAKE DECISION	OFFICER CONTACT INFORMATION
<p>Approval of the award and spend of funding from the UK Shared Prosperity Fund and Rural England Prosperity Fund 25/26</p>	<p>Decision to allocate grant funding from the UK Shared Prosperity Fund and the Rural Prosperity Fund for South Holland District, in line with the Programme's three core themes highlighted in the Prospectus (Communities and Place, Supporting Local Businesses, People and Skills). This item could cover multiple Key Decisions in relation to the above, for the period until the end date of the entire programme (end of March 2026)</p>	<p>Panel of relevant Officers in Economic Development, Portfolio Holder and where appropriate, Leader of the Council</p>	<p>Report and any relevant appendices</p>	<p>Portfolio Holder for Finance Before 31 Mar 2026</p>	<p>Saul Farrell, Senior Programme Manager - Local Growth and Grant Funding <a href="mailto:Saul.Farrell@sholland.gov.uk">Saul.Farrell@sholland.gov.uk</a></p>

PORTFOLIO HOLDER / SUBJECT	PURPOSE OF DECISION	CONSULTEES AND METHOD OF CONSULTATION	SUPPORTING DOCUMENTS	LIKELY DATE OF DECISION AND WHO WILL MAKE DECISION	OFFICER CONTACT INFORMATION
<p><u>Portfolio Holder for Health &amp; Wellbeing, Conservation &amp; Heritage (Councillor Elizabeth Jane Sneath), Portfolio Holder for Assets &amp; Strategic Planning (Councillor Henry J W Bingham)</u></p> <p>Spalding Conservation Area Appraisal, Spalding Heritage Strategy, Holbeach Conservation Area Appraisal, SELCP Design Guide.</p>	<p>To consider the documents prior to public consultation .</p>		<p>Report and any relevant appendices</p>	<p>Cabinet 28 Apr 2026</p>	<p>Emilie Wales, Heritage Manager  <a href="mailto:Emilie.Wales@e-lindsey.gov.uk">Emilie.Wales@e-lindsey.gov.uk</a></p>

**\*Cabinet Membership**

Councillor C N Worth (Leader)  
Councillor P Redgate (Deputy Leader)  
Councillor J Astill (Portfolio Holder)  
Councillor H Bingham (Portfolio Holder)  
Councillor T Carter (Portfolio Holder)  
Councillor A Casson (Portfolio Holder)  
Councillor E Sneath (Portfolio Holder)  
Councillor G J Taylor (Portfolio Holder)

**If you have any comments or queries regarding any of the entries in the Key Decision Plan please contact:**

Democratic Services, Council Offices, Priory Road, Spalding, Lincolnshire, PE11 2XE  
Telephone: 01775 764451 Email: [demservices@sholland.gov.uk](mailto:demservices@sholland.gov.uk)

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## SHDC Policy Register

Directorate	Policy Title	SHDC Approved Date	Policy Review Cycle	SHDC Policy Review Date	Policy Status	Latest Commentary	Policy Owner
Governance	Data Protection Policy	Dec-21	3 years	Dec-24	Pending Approval	Coming to Feb PDP in same report as RMP	John Medler
Governance	Records Management Policy	May-22	3 years	May-25	Pending Approval	Coming to Feb PDP	Richard Steele
Governance	Whistleblowing	Sep-24	4 Years	Sep-25	Pending Approval	G+A end of Jan for approval	John Medler
Communities and Leisure	Graffiti and Street Art Management Policy	Oct-22	3 Years	Oct-25	In review	Policy on Work Programme for Feb 2026	Emily Spicer
HRA	Housing Comments, Compliments Complaints and Compensation Policy	Dec-22	3 years	Dec-25	Pending Approval	Coming to Feb PDP	Vikki Cherry

Finance	Capital Strategy	Feb-25	1 year	Feb-26	In review	Part of budget setting process	Russell Stone
Finance	Fees and Charges Policy	Feb-25	1 year	Feb-26	In review	Part of budget setting process	Russell Stone
Finance	Medium Term Financial Strategy	Feb-25	1 year	Feb-26	In review	Part of budget setting process	Russell Stone
Finance	Treasury Management Strategy (Includes Statement and Clauses)	Feb-25	1 year	Feb-26	In review	Part of budget setting process	Russell Stone
Finance	Minimum Revenue Provision Policy Statement	Feb-25	1 year	Feb-26	In review	Part of budget setting process	Russell Stone
Wellbeing and Community Leadership	Private Sector Housing Strategy	Feb-25	3 years	Feb-26	In review	Coming to Feb PDP	Emily Spicer
Corporate	ICT Employee & Member Access Policy	Jul-24	2 years	Jul-26	Approved		Jackie Wright (PSPS)
Corporate	ICT Removable Media	Jul-24	2 years	Jul-26	Approved		Jackie Wright (PSPS)
Corporate	ICT Remote Working Policy	Jul-24	2 years	Jul-26	Approved		Jackie Wright (PSPS)
Corporate	ICT Third Party Supplier Access Policy	Jul-24	2 years	Jul-26	Approved		Jackie Wright (PSPS)
Corporate	ICT Systems Acquisition Development and Deployment Policy	Jul-24	2 years	Jul-26	Approved		Jackie Wright (PSPS)
Corporate	Communications Strategy	Sep-23	3 Years	Sep-26	Approved		James Gilbert
Corporate	AI Policy	Nov-24	1 Year	Nov-26	Approved		James Gilbert
Governance	Freedom of Information Policy	Nov-23	3 years	Nov-26	Approved		John Medler
Regulatory	Sustainable Products Policy	Jul-25	3 Years	Dec-26	Approved		Sarah Baker
Wellbeing and Community Leadership	SHDC Mobile Homes and Caravan Site Licensing and Fee Policy	Dec-23	3 Years	Dec-26	Approved		Emily Spicer
HRA	Housing Allocations Policy	Feb-25	2 Year	Feb-27	Approved		Vikki Cherry
Regulatory	Health & Safety Policy	Feb-24	3 years	Feb-27	Approved		Christian Allen
Regulatory	RIPA 2000 Partnership Policy	Feb-24	3 Years	Feb-27	Approved		Christian Allen
HRA	Damp, Condensation and Mould Policy	N/A	3 Years	Apr-27	Approved		Chris Hale
Governance	Unreasonable Behaviour and vexatious requests	May-24	3 years	May-27	Approved		John Medler
Regulatory	Corporate Enforcement Policy	May-24	3 years	May-27	Approved		Donna Hall

Regulatory	Climate Change Strategy	Sep-25	2 years	Jun-27	Approved		Sarah Baker
HRA	Strategic Tenancy Policy	Jul-24	3 years	Jul-27	Approved		Jason King
General Fund Assets	Industrial Units Letting and Management Policy (25-30)	Oct-25	2 Year	Oct-27	Approved		Andy Fisher
Regulatory	Street Naming and Numbering Policy	Nov-24	3 years	Nov-27	Approved		Pauline Lyon
HRA	Housing Knowledge and Information Management Strategy	Nov-24	3 Years	Nov-27	Approved		Vikki Cherry
Wellbeing and Community Leadership	Health and Wellbeing Strategy	Jan-25	3 years	Jan-28	Approved		Emily Spicer/Roxanne Warrick
Regulatory	Gambling Policy - Statement of Principles	Jan-25	3 years	Jan-28	Approved		Donna Hall
General Fund Assets	Asset Management Policy	Jan-23	5 years	Jan-28	Approved		Richard Hodgson/Andy Fisher
Corporate	Equality, Diversity & Inclusion Statement	Feb-24	4 Years	Feb-28	Approved		Rachel Robinson
Regulatory	Litter and Fly-Tipping Engagement and Enforcement Strategy	Feb-24	3 years	Feb-28	Approved		Donna Hall
HRA	Tenant Engagement and Influence Strategy	Mar-25	3 years	Mar-28	Approved		Jason King
Regulatory	Sexual Establishments Policy	Mar-23	5 Years	Mar-28	Approved		Donna Hall
Corporate	Long Service	Sep-24	4 Years	Sep-28	Approved		Rachel Robinson
Communities and Leisure	South and East Lincolnshire Community Safety Strategy	Oct-25	3 Year	Oct-28	Approved		Emily Spicer
Wellbeing and Community Leadership	Safeguarding Policy	Nov-25	3 years	Nov-28	Approved		Emily Spicer
Finance	Counter Fraud and Corruption Policy	Sep-24	3 years	Dec-28	Approved		John Medler/Russell
Governance	Customer Feedback Policy	Dec-24	3 Years	Dec-28	Approved		John Medler
Corporate	Pension Discretions (including Retirement - Early, Ill health normal)	Nov-25	4 Years	Nov-29	Approved		Rachel Robinson
Regulatory	Statement of Licensing Policy	Jan-26	5 years	Jan-31	Approved		Donna Hall

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## Partnership Policy and Strategy Register

Directorate	Policy Title	SHDC Approved Date	BBC Approved Date	ELDC Approved Date	Policy Review Cycle	SHDC Policy Review Date	BBC Policy Review Date	ELDC Policy Review Date	Policy Status	Latest Update	Policy Owner
Governance	Data Protection Policy	Dec-21	Dec-21	Dec-21	3 years	Dec-24	Dec-24	Dec-24	Pending Approval	Coming to Feb Meeting (SHDC)	John Medler
Governance	Records Management Policy	May-22	May-22	May-22	3 years	May-25	May-25	May-25	Pending Approval	Coming to Feb Meeting (SHDC)	Richard Steele
Governance	Whistleblowing	Sep-24	Sep-24	Sep-24	4 Years	Sep-25	Sep-25	Sep-25	Pending Approval	Going to Committee Jan/Feb	John Medler
Communities and Leisure	Graffiti and Street Art Management Policy	Oct-22	Oct-22	Oct-22	3 Years	Oct-25	Oct-25	Oct-25	Approved	Policy on Work Programme for April	Emily Spicer
Finance	Capital Strategy	Feb-25	Feb-25	Feb-25	1 year	Feb-26	Feb-26	Feb-26	In review	Part of budget setting process	Russell Stone
Finance	Fees and Charges Policy	Feb-25	Feb-25	Feb-25	1 year	Feb-26	Feb-26	Feb-26	In review	Part of budget setting process	Russell Stone

Finance	Medium Term Financial Strategy	Feb-25	Feb-25	Feb-25	1 year	Feb-26	Feb-26	Feb-26	In review	Part of budget setting process	Russell Stone
Wellbeing and Community Leadership	Health and Wellbeing Strategy	Feb-25	Feb-25	Feb-25	1 Year	Feb-26	Feb-26	Feb-26	In review	Part of budget setting process	Russell Stone
Finance	Minimum Revenue Provision Policy Statement	Feb-25	Feb-25	Feb-25	1 year	Feb-26	Feb-26	Feb-26	In review	Part of budget setting process	Russell Stone
Corporate	ICT Employee & Member Access Policy	Jul-24	Jul-24	Jul-24	2 years	Jul-26	Jul-26	Jul-26	In review		Jackie Wright (PSPS)
Corporate	ICT Removable Media	Apr-22	Apr-22	Apr-22	2 years	Jul-26	Jul-26	Jul-26	Approved		Jackie Wright (PSPS)
Corporate	ICT Remote Working Policy	Apr-22	Apr-22	Apr-22	2 years	Jul-26	Jul-26	Jul-26	Approved		Jackie Wright (PSPS)
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Corporate	AI Policy	Nov-25	Nov-25	Nov-25	1 Year	Nov-26	Nov-26	Nov-26	Approved		James Gilbert
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Regulatory	Sustainable Products Policy	Nov-23	Nov-23	Nov-23	3 Years	Dec-26	Dec-26	Dec-26	Approved		Sarah Baker
Wellbeing and Community Leadership	SHDC Mobile Homes and Caravan Site Licensing and Fee Policy	Dec-23	Dec-23	Dec-23	3 Years	Dec-26	Dec-26	Dec-26	Approved		Emily Spicer
Regulatory	Health & Safety Policy	Feb-24	Feb-24	Feb-24	3 years	Feb-27	Feb-27	Feb-27	Approved		Christian Allen
Regulatory	RIPA 2000 Partnership Policy	Feb-24	Feb-24	Feb-24	3 Years	Feb-27	Feb-27	Feb-27	Approved		Christian Allen
Regulatory	Corporate Enforcement Policy	May-24	May-24	May-24	3 years	May-27	May-27	May-27	Approved		Donna Hall
Governance	Unreasonable Behaviour and vexatious requests	May-24	May-24	May-24	3 years	May-27	May-27	May-27	Approved		John Medler
Regulatory	Climate Change Strategy	Sep-25	Sep-25	Sep-25	2 Years	Jun-27	Jun-27	Jun-27	Approved		Sarah Baker
HRA	Strategic Tenancy Policy	Jul-24	Jul-24	Jul-24	3 years	Jul-27	Jul-27	Jul-27	Approved		Vikki Cherry
Regulatory	Street Naming and Numbering Policy	Nov-24	Nov-24	Nov-24	3 years	Nov-27	Nov-27	Nov-27	Approved		Pauline Lyon
Governance	Customer Feedback Policy	Dec-24	Dec-24	Dec-24	3 Years	Dec-27	Dec-27	Dec-27	Approved		John Medler
Wellbeing and Community Leadership	Health and Wellbeing Strategy	Jan-25	Jan-25	Jan-25	3 years	Jan-28	Jan-28	Jan-28	Approved		Emily Spicer/Roxanne Warrick
Regulatory	Gambling Policy - Statement of Principles	Jan-25	Jan-25	Jan-25	3 years	Jan-28	Jan-28	Jan-28	Approved		Donna Hall
General Fund Assets	Asset Management Policy	Jan-23	Jan-23	Jan-23	5 years	Jan-28	Jan-28	Jan-28	Approved		Richard Hodgson/Andy Fisher
Corporate	Equality and Diversity	Feb-24	Feb-24	Feb-24	4 Years	Feb-28	Feb-28	Feb-28	Approved		Rachel Robinson
Regulatory	Litter and Fly-Tipping Engagement and Enforcement Strategy	Feb-24	Feb-24	Feb-24	3 years	Feb-28	Feb-28	Feb-28	Approved		Donna Hall
Regulatory	Sexual Establishments Policy	Mar-23	May-24	Mar-23	5 years	Mar-28	May-28	Mar-28	Approved		Donna Hall
Corporate	Long Service	Sep-24	Sep-24	Sep-24	4 Years	Sep-28	Sep-28	Sep-28	Approved		Rachel Robinson
Communities and Leisure	South and East Lincolnshire Community Safety Strategy	Oct-25	Oct-25	Oct-25	3 Year	Oct-28	Oct-28	Oct-28	Approved		Emily Spicer
General Fund Assets	Industrial Units Letting and	Oct-25	Oct-25	Oct-25	2 Year	Oct-28	Oct-28	Oct-28	Approved		Andy Fisher
Wellbeing and Community Leadership	Safeguarding Policy	Oct-25	Oct-25	Oct-25	3 years	Oct-28	Oct-28	Oct-28	Approved		Emily Spicer

Finance	Counter Fraud and Corruption Policy	Sep-24	Sep-24	Sep-24	3 years	Dec-28	Dec-28	Dec-28	Approved		John Medler/Russell Stone
Corporate	Pension Discretions (including Retirement - Early, Ill health normal)	Oct-25	Oct-25	Oct-25	4 Years	Oct-29	Oct-29	Oct-29	Approved		Rachel Robinson
Regulatory	Statement of Licensing Policy	Jan-26	Jan-26	Jan-26	5 years	Jan-31	Jan-31	Jan-31	Approved		Donna Hall

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<b>Report To:</b>	Policy Development Panel
<b>Date:</b>	Tuesday, 3 February 2026
<b>Subject:</b>	Extension of the Housing Landlord Strategy
<b>Purpose:</b>	To seek feedback on a one-year extension to the current Landlord Strategy timeline, aligning it with ongoing service transformation activity and enabling deeper tenant engagement in shaping the next strategy.
<b>Key Decision:</b>	No
<b>Portfolio Holder:</b>	Cllr Tracey Carter, Portfolio Holder for Strategic and Operational Housing
<b>Report Of:</b>	Vikki Cherry, Assistant Director - Housing
<b>Report Author:</b>	Adel Gardner, Housing Transformation (HRA) Manager
<b>Ward(s) Affected:</b>	All
<b>Exempt Report:</b>	No

## Summary

This report provides an update on progress to date against the current Housing Landlord Strategy and recommends a one-year extension to its timeline. The extension will allow alignment with ongoing transformation activity within the housing landlord service and create space for more meaningful tenant engagement. This will ensure tenants have a genuine opportunity to shape the next strategy, making it more relevant, inclusive, and reflective of current service developments.

The Policy Development Panel is requested to consider the progress to date and request for extension of the strategy. The Panel's comments and any associated recommendations will be considered and reported to the Cabinet meeting on 28<sup>th</sup> April 2026.

## Recommendations

1. Notes the progress in delivering the Strategy
2. Considers and provides feedback on the proposed revised extended Housing Landlord Strategy 2024-2027 (Attached at Appendix A) and recommends it to Cabinet for adoption.

## Reasons for Recommendations

To ensure the Council continues to have a clear approach for the delivery of the Landlord Services. To ensure tenants have the opportunity to shape and co create the next strategy once more meaningful tenant engagement opportunities have been embedded.

## Other Options Considered

1. **Do nothing** - Allow the current strategy to lapse without extension or formal closure. This would mean operating without a strategic framework and without capturing or reporting on progress made to date. This option risks losing momentum, reducing transparency, and missing the opportunity to build on recent service improvements.
2. **Develop a new strategy immediately** - Begin drafting a new strategy now, without aligning with ongoing transformation activity or allowing time for deeper tenant engagement. While this would meet the original timeline, it may result in a strategy that is disconnected from current service developments and lacks meaningful tenant input.

## 1. Background

- 1.1 The current Housing Landlord Strategy 2024–2026 was formally adopted by Cabinet in February 2024 following consultation with tenants, Members, and officers. The strategy sets out the Council's vision for delivering high-quality, responsive, and accountable landlord services across South Holland.
- 1.2 It was developed in response to increasing expectations on registered providers, including new regulatory requirements under the Social Housing (Regulation) Act 2023, and the need to improve property condition, tenant experience, and transparency.
- 1.3 The strategy is built around four strategic themes:
  - Culture and Operational Excellence
  - Accountability and Transparency
  - Quality Homes and Connected Neighbourhoods
  - Tenant Voice and Opportunity
- 1.4 To support delivery, a Housing Transformation Team was established, and a programme mandate was created to guide service improvement and regulatory readiness.
- 1.5 The Council received a C2 grading issued by the Regulator of Social Housing in July 2025. The Council conducted a root cause analysis to understand the journey to C2 and has developed an action plan to address weaknesses identified in the judgement. Officers are actively working towards a C1 grading as part of the provider improvement plan.

## **2. Progress to date against the four Landlord Strategy themes**

### **2.1 Culture and Operational Excellence**

- 2.2 Embedding a professional culture - There is a growing emphasis on proactive resolution, learning and making improvements, with teams working to put things right when issues arise. Partnership working and task ownership are increasingly evident across service areas; this has also been reflected in the staff culture survey.
- 2.3 Resourcing and talent development – Recruitment efforts have been strengthened with new emphasis on the importance of tenant engagement across all roles. Clear expectations and support being set. Managers studying the appropriate level qualifications in line with the new Competence and Conduct Standard.
- 2.4 Improving tenant experience – Staff have been briefed on the new reasonable adjustments policy and better equipped to support vulnerable tenants. Work is ongoing to improve intelligence of the homes and our tenants and how people can be supported. Learning from tenant experience is a key aspect with satisfaction surveys being developed across the service in different areas.
- 2.5 Capacity for change – Embedding a value led approach with policies and procedural briefings linking back to the corporate values and behaviours. Reinforcing behaviours and professional standards as part of the competence and conduct project. Launching a culture survey across the department to identify areas for improvement.
- 2.6 Benchmarking best practice – Actively building relationships with other Councils to share learnings, approaches and best practice.

### **2.7 Accountability and Transparency**

- 2.8 Performance monitoring and scrutiny - Hosting tenant focus groups on performance to support scrutiny of the annual tenant satisfaction measures. Publishing performance online regularly and in the annual report for tenants.
- 2.9 Governance and assurance – Adoption of the HRA Governance Framework which created several clinics to monitor the ongoing compliance and performance of the service. Publishing all consultation outcome reports online for tenants. Quarterly Cabinet reports on progress against meeting the consumer standards.
- 2.10 Benchmarking and learning – Tenants told the Council they would like data benchmarked against neighbouring authorities to compare performance; this has been actioned for the 24/25 annual report.

### **2.11 Quality Homes and Connected Neighbourhoods**

- 2.12 Compliance and safety – Established Housing compliance and performance clinic and capital programme clinic to monitor regulatory, statutory and legislative responsibilities.
- 2.13 Data – Up to date stock condition data across the Councils homes to help make informed proposals on where tenants money should be spent.
- 2.14 Repairs project – Transformation has embarked on a housing repairs project which will work with tenants to improve the service and meet their needs.
- 2.15 Contractors – Development of a contractor code of conduct with tenants to ensure tenants are treated fairly and with respect.
- 2.16 Awaabs Law – Steps taken to ensure compliance with Awaabs Law phase 1 which came into force on 27<sup>th</sup> October 2025.
- 2.17 Green Homes – Establishment of the Green Homes Programme.

## 2.18 Tenant Voice and Opportunity

- 2.19 Flexible engagement opportunities - Tenants are being offered more varied and accessible ways to engage with the service in ways that suit them, including digital, calls, in-person tenant forums, and targeted outreach such as pop-up events. This flexibility is helping to reach a broader range of voices.
- 2.20 Tenant involvement in governance – Tenants have the opportunity to scrutinise the service’s performance and contribute to decision making including the HRA Business Plan. Work is ongoing to establish a formal Tenant Panel.
- 2.21 Tenant satisfaction – in the 24/25 Tenant Satisfaction Measures tenants report that 83% agreed that they are treated fairly and with respect and 65% were satisfied that the Council listens to their views and acts upon them.
- 2.22 Choice and accessibility – Efforts have been made to improve how tenants can access services. This includes how tenants can report a repair if hearing impaired introducing text relay and work is underway to establish an online repairs portal.
- 2.23 Service improvements – Adoption of the Tenant Engagement and Influence Strategy to provide meaningful opportunities for tenants to engage with, scrutinise and feedback on the landlord service.

## **3. Measuring success**

- 3.1. The Council continues to monitor the effectiveness of the landlord strategy using the National Tenant Satisfaction Measures (TSMs) and other key indicators. The following progress highlights the commitment to delivering improved housing services:
- 3.2. The Council was inspected by the Regulator of Social Housing and received a C2 grading, reflecting compliance and areas of strength.
- 3.3. TSMs have remained consistent or improved across the board. Tenant satisfaction surveys have been rolled out across key service areas following transformation initiatives, including:
  - Damp, condensation and mould (DCM)
  - Aids and adaptations
  - Complaints handling
  - Tenant engagement
- 3.4. Satisfaction with repairs has increased, supported by updates to the repairs policy and improved response times.
- 3.5. EPC ratings of homes have improved, contributing to better energy performance and tenant comfort.
- 3.6. Anti-Social Behaviour (ASB) data and insights have been strengthened through the development of an ASB framework and introduction of new KPIs, which are now reported to the Performance and Compliance Clinic monthly.
- 3.7. The Council has adopted several new and updated policies to support inclusive and responsive service delivery:
  - Reasonable Adjustment Policy
  - Tenant Engagement and Influence Strategy

- Disabled Aids and Adaptations Policy
- Updated Damp and Mould and Repairs Policies
- HRA Governance Framework 2025
- Knowledge and Information Management Framework
- Updated Allocations Policy
- ASB Framework

3.8. A Complaints Working Group has been established to enhance data collection and insight, ensuring continuous improvement in service delivery.

3.9. The Council is committed to being open and transparent about performance, and accountable to all stakeholders.

#### **4. Tenant Voice**

4.1. Regarding the proposed extension, the Transformation Manager discussed the rationale and approach with tenants at the Tenant Forum meeting on 14 October 2025. Tenants expressed support for the extension, recognising the value of allowing more time for extensive and meaningful engagement. They welcomed the opportunity to shape the next strategy once a formal Tenant Panel is established and a broader range of tenant voices can be included in the process.

4.2. Tenants continue to be actively involved in the development of new policies, and service improvements as the current Landlord strategy is delivered in real time in line with the Tenant Engagement and Influence Strategy. The Tenant Engagement and Influence Lead is coordinating this work to ensure that tenant voice is embedded throughout. The Regulator of Social Housing meets monthly with the Assistant Director Housing and the Director of Communities to monitor the progress against the provider improvement plan which has a key focus on tenant engagement to ensure that tenant involvement continues to be a central to service delivery and improvement.

#### **5. Conclusion**

5.1. The Council has made progress in delivering the aims of the current Housing Landlord Strategy, particularly in strengthening tenant engagement and preparing for the regulatory inspection. The ambitions within the Strategy remain relevant. A full progress update against the programme mandate can be found in Appendix 2.

5.2. The development of a dedicated Tenant Engagement and Influence Strategy in June 2025 has laid the foundation for more inclusive, responsive, and co-designed services. Alongside this, the service has worked diligently to meet the expectations of the Regulator of Social Housing, embedding compliance and assurance into daily operations. Extending the current strategy by one year will allow the Council to build on the progress made, align with ongoing transformation activity, and ensure tenants are meaningfully involved in shaping the next phase of strategic direction.

5.3. The existing Landlord Strategy has been updated with the following amendments:

- Change the title to reflect the new end date (from Landlord Strategy 2024 – 2026 to Landlord Strategy 2024-2027)
- Update to national context
- Inclusion of the regulator judgement outcome and root cause analysis
- Inclusion of TSM results
- Supporting our tenant's section includes 24/25 data.

- Updated property figures
- Updated monitoring arrangements.

Full summary of changes can be found in appendix 3.

## **Implications**

### **South and East Lincolnshire Councils Partnership**

None.

### **Corporate Priorities**

The Policy will support the following South & East Lincolnshire Councils Partnership Sub Regional Strategy priorities:

Healthy Lives – we will work with our partners to provide reliable, consistent services, and tailored intensive support to those tenants who need us the most. We will focus on pride in place, such as tenants satisfaction with their communities.

Safe and Resilient Communities – we will overhaul our approach to the service we provide to victims of anti-social behaviour and how we manage hate crime. We will review the service offered to Domestic Abuse victims including our repairs service for this cohort.

Environment – we will explore energy reduction initiatives and ensure tenants are aware of ways to reduce their energy consumption and carbon footprint. We will invest in homes as planned for in the asset management strategy. We will continue to seek funding and actively invest in homes to improve energy efficiency, thermal comfort and seek to reduce the running costs of homes.

Efficiency and Effectiveness – we will embed compliance and assurance at the heart of our Service through good governance arrangements. We will benchmark ourselves against organisations inside and outside the Housing sector. We will transform how we provide services including service level agreements with our partners.

### **Workforce Capacity Implications**

None.

### **Staffing**

None.

### **Constitutional and Legal Implications**

Housing matters, including this Strategy, are Executive functions and are therefore a matter for the Cabinet to determine.

The Strategy sets out how we will deliver a compliant Landlord service. The Monitoring Officer is part of the Transformation Programme Board to track constitutional and legal implications. All policies produced as part of the Strategy will be cross referenced with the relevant legislation and reviewed by our Housing solicitors.

It is proposed that approval of minor changes to the Strategy are delegated to the Assistant Director Housing in consultation with the Portfolio Holder for Strategic and Operational Housing. It is necessary for this arrangement to be in place due to the changing environment – the Regulator of Social Housing is yet to finalise consultation outcomes on many matters.

### **Data Protection**

Privacy notices are published on our website. Consultations will be carried out as part of delivering the Strategy with a variety of stakeholders. We will ensure that the Data Protection Officer is informed throughout the process and, where necessary, Data Protection Impact Assessments/similar are completed.

### **Financial**

None.

### **Risk Management**

Extending the strategy mitigates the risk of misalignment between strategic direction and ongoing transformation activity. It also reduces the risk of tenant disengagement by allowing more time for meaningful involvement

### **Stakeholder / Consultation / Timescales**

Tenants were consulted during the original drafting of the Landlord Strategy in 2024. The outcomes of that consultation can be found [Housing Landlord Strategy - Consultation Results](#).

Tenants were consulted on the proposed extension of the Landlord Strategy on 14 October 2025 at the face to face tenant forum event. They expressed support for the extension and indicated a strong interest in co-creating a new strategy once full delivery of the current strategy has been achieved, in alignment with the Regulator's provider improvement plan and the wider transformation programme

The Council has consulted the following:

- Director – Communities
- Assistant Director Housing
- Portfolio Holder for Strategic and Operational Housing
- Transformation Programme Board
- Housing Landlord Board

### **Reputation**

The extension supports the Council's reputation as a responsive and tenant-focused landlord. It demonstrates a commitment to transparency, co-production, and continuous improvement.

### **Contracts**

None.

### **Crime and Disorder**

None.

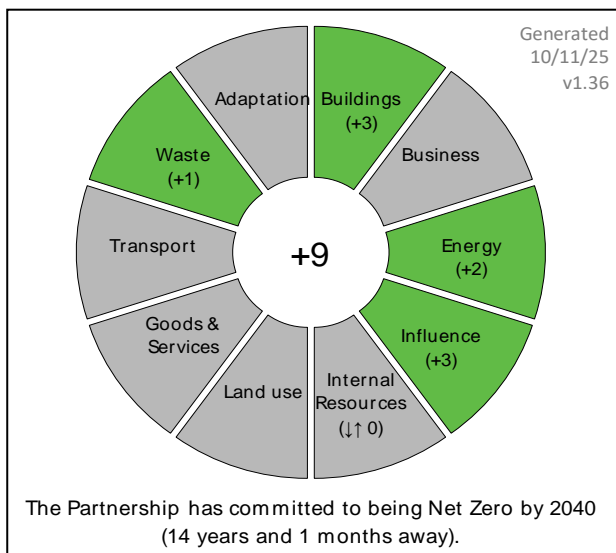
## Equality and Diversity / Human Rights / Safeguarding

The original Equality Impact Assessment (EqIA) for the Housing Landlord Strategy has been reviewed and updated to reflect the proposed extension and the progress made to date. The updated EqIA is attached to this report as Appendix 4 and continues to demonstrate the Council's commitment to inclusive service delivery, ensuring that the strategy supports equitable access, protects vulnerable residents, and upholds human rights and safeguarding responsibilities.

## Health and Wellbeing

The strategy contributes to improved health and wellbeing outcomes by addressing issues such as damp and mould, housing quality, and access to support services.

## Climate Change and Environment Impact Assessment



The Housing Landlord Strategy demonstrates positive climate impacts through retrofitting investment to improve energy efficiency and reducing energy demand, alongside measures to enhance thermal comfort and reduce reliance on fossil fuels. Tenant engagement and transparency are central to the approach, supported by a programme of face-to-face events, which may increase staff travel emissions. External funding will be sought to deliver energy efficiency improvements, and property projects may extend asset life, reducing waste.

## Acronyms

HRA – Housing Revenue Account  
TSMs – Tenant Satisfaction Measures  
ASB – Anti-Social Behaviour  
DCM – Damp, Condensation and Mould  
RSH – Regulator of Social Housing  
EQIA – Equality Impact Assessment

## Appendices

Appendices are listed below and attached to the back of the report:

Appendix 1	Housing Landlord Strategy 2024-2027.
Appendix 2	Housing Transformation and Improvement Programme Mandate Update 2026.
Appendix 3	Summary of changes to the strategy.
Appendix 4	Equality Impact Assessment.

## **Background Papers**

Background papers used in the production of this report are listed below: -

<b>Document title</b>	<b>Where the document can be viewed</b>
Housing Landlord Strategy 2024-2026	<a href="#">SHDC Housing Landlord Strategy 2024-2026.pdf</a>

## **Chronological History of this Report**

*This report has not been considered by another body.*

## **Report Approval**

Report author:	Adel Gardner, Housing Transformation (HRA) Manager Adel.Gardner@sholland.gov.uk
Signed off by:	Vikki Cherry, Assistant Director - Housing vcherry@sholland.gov.uk
Approved for publication:	Councillor Tracey Carter, Portfolio Holder for Strategic and Operational Housing

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<b>DATE:</b>	15 <sup>th</sup> September 2025
<b>SUBJECT:</b>	Root Cause Analysis
<b>PURPOSE:</b>	To understand SHDC's Journey to C2 Grading
<b>REPORT AUTHOR:</b>	Adel Gardner, Housing Transformation Manager

## SUMMARY

This report outlines the journey that led South Holland District Council (SHDC) to receive a C2 grading from the Regulator of Social Housing. It provides a detailed analysis of the contributing factors, root causes, and the impact on service delivery. The report also sets out the lessons learned, and the actions being taken to address the issues and improve future performance.

## 1. BACKGROUND

- 1.1 Throughout 2023 and into 2024, SHDC undertook several key activities to prepare for the evolving regulatory landscape:
  - Participated in a Local Government Association (LGA) Peer Challenge focused on social housing management, in anticipation of The Charter for Social Housing Residents: the social housing white paper and the Social Housing (Regulation) Act 2023.
  - Commissioned an external Health Check to assess and report on the effectiveness of the council's landlord function.
  - Conducted self-assessments against the Regulator of Social Housing's Consumer Standards in 2023, 2024, and 2025, demonstrating a commitment to continuous improvement.
- 1.2 In December 2023, South Holland District Council (SHDC) established a Housing Transformation Team following a self-assessment against the draft Consumer Standards. This marked the beginning of a strategic shift in how the council approached its landlord responsibilities and service delivery.
- 1.3 In February 2024, a report was presented to Cabinet proposing a Transformation and Service Improvement Programme, sponsored by the Deputy Chief Executive (Corporate) and S151

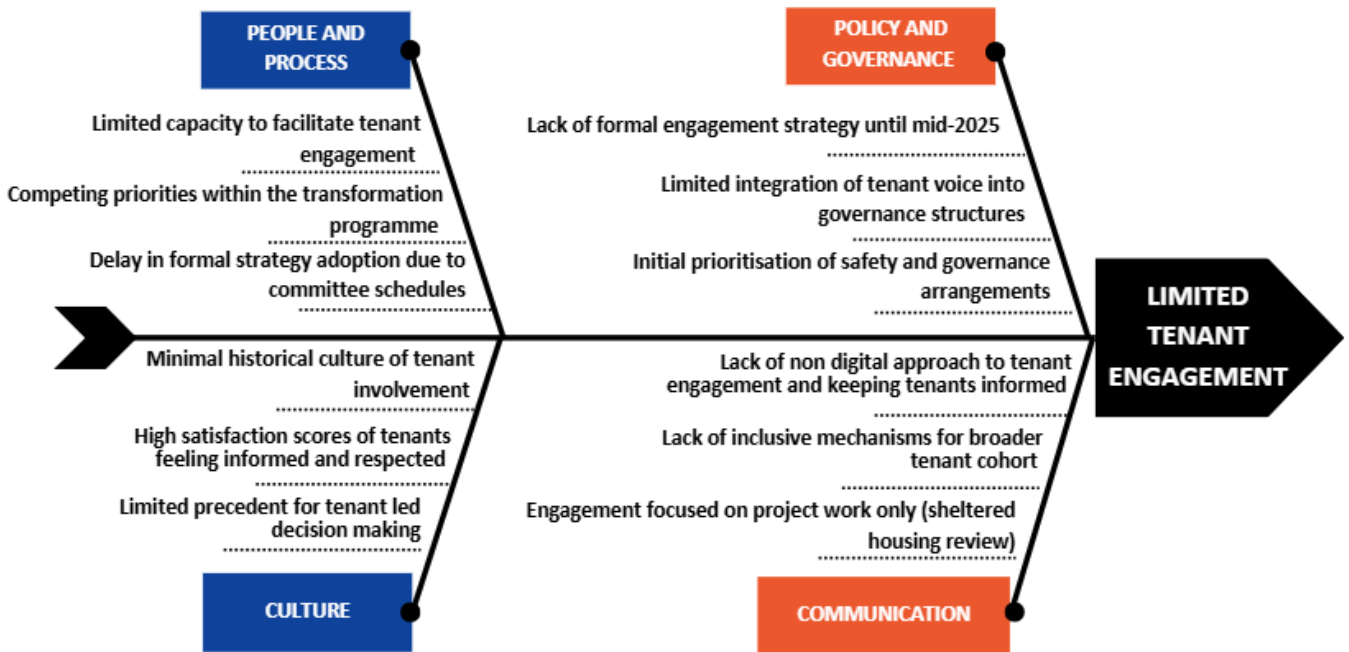
Officer. Cabinet formally adopted the programme, which aimed to address areas of partial or unmet consumer standard expectations identified. To oversee the programme, a Transformation Board was formed, chaired by the Portfolio Holder for Strategic and Operational Housing and comprising a range of Assistant Directors from across the partnership. This board was tasked with monitoring progress and ensuring accountability across service areas.

- 1.4 In October 2024, transformation resources were increased to accelerate the pace of the transformation programme, reflecting the Council's recognition of the importance of compliance with the Consumer Standards.
- 1.5 Following a review of the self-assessment content in January 2025, the Assistant Director – Housing, designated as the Person Responsible for Compliance with the Consumer Standards, concluded that there continued to be no material issues of non-compliance or potential non-compliance that required formal notification to the Regulator of Social Housing.
- 1.6 The 2025 self-assessment identified areas of improvement including:
  - Tenant engagement and scrutiny
  - Stock condition data collection
  - HRA business plan development
  - Producing policies with tenants
  - Tailoring services to tenants needs
  - ASB case management
- 1.7 Despite the proactive measures taken during 2025 such as the establishment of the Tenant Engagement and Influence Strategy: the absence of a formal and embedded tenant engagement mechanism remained. This gap, directly linked to the Transparency Accountability and Influence Standard, was identified by the Regulator of Social Housing as an area of concern. While operational improvements were underway, the lack of structured tenant involvement in decision-making and service design ultimately led to the C2 grading. This report explores the journey to that outcome, the contributing factors, and the corrective actions now being implemented to ensure compliance and rebuild trust with tenants and stakeholders.

## **2. ROOT CAUSE ANALYSIS**

- 2.1 The primary driver behind the C2 grading was due to weaknesses with the Transparency, Accountability and Influence Standard, specifically the absence of a formal, embedded approach to tenant engagement across the whole tenant cohort. While the Council had undertaken meaningful engagement work with sheltered housing tenants to review the service offering in 2024, this did not extend to the wider tenant population.

2.2 The following Fishbone Diagram illustrates the key contributing factors to weak tenant engagement.



Fishbone diagram: Limited Tenant Engagement

2.3 The council had self-identified tenant engagement as a key area for improvement and had begun working with TPAS, national experts in tenant involvement, to co-develop a strategy with tenants and embed new practices. However, at the time of the Regulator’s inspection, the Tenant Engagement Strategy had only just been drafted with tenants, and the new engagement was in its infancy. This timing meant that the Regulator found that there was no formal mechanism for enable effective tenant scrutiny and that we were unable to evidence a range of mechanisms engaging the broader tenant base.

#### 2.4 5 Whys Analysis

- **Why was tenant engagement not across the whole tenant cohort?** Engagement efforts had primarily focused on sheltered housing tenants as part of the sheltered review.
- **Why was engagement limited to sheltered tenants?** The Council had not yet developed or implemented a formal inclusive tenant engagement strategy, and the timing of the sheltered housing review created a natural focus on that cohort.
- **Why was a formal strategy not yet implemented?** Work with TPAS and tenants had been finalised and a draft strategy completed however it had not yet been adopted.
- **Why was the strategy not yet adopted?** A risk-based approach was taken during the early transformation stages, which prioritised governance, safety, and quality. Due to committee scheduling, the strategy was not adopted by the time of inspection.

- **Why was broader engagement not progressed in parallel with governance and safety works?** Capacity constraints and the need to sequence transformation activities meant that foundational compliance and governance work took precedence. Engagement was recognised as important but was scheduled for a later phase to ensure it could be delivered meaningfully and sustainably.

## 2.5 Contributing Factors

- Minimal historical culture of tenant involvement in decision making
- Positive TSM results creating a perception of tenants feeling listened to and involved reducing the urgency to formalise and broaden engagement.
- Focused engagement on sheltered tenants due to a complete service redesign, this also provided an opportunity to test tenant engagement initiatives i.e. focus groups.
- Prioritised the transformation programme on a risk based approach
- Limited capacity to implement engagement initiatives.

## 3. IMPACT ASSESSMENT

- 3.1 The C2 grading issued by the Regulator of Social Housing was acknowledged by the Council as a fair and expected outcome, reflecting known weaknesses in meeting the Transparency, Accountability and Influence Standard. Rather than being viewed solely as a negative, the grading validated the council's own self-assessment and reinforced the importance of the transformation journey already underway. While it did bring increased regulatory scrutiny and highlighted the need to accelerate tenant engagement efforts, the Council remained proud of the grading as it demonstrated honesty, self-awareness, and a proactive stance toward improvement.
- 3.2 The Council had already developed robust plans to address the identified gaps, including the co-creation of a Tenant Engagement Strategy with TPAS and tenants and the establishment of dedicated resource. The grading served as a catalyst to build stronger relationships with tenants, enhance trust, and embed a culture of transparency and influence across the housing service.

## 4. LESSONS LEARNED

- 4.1 Tenant engagement must be embedded across the whole service. Building meaningful relationships with tenants takes time, consistency, and trust. While early engagement with sheltered tenants was valuable, it did not represent the wider tenant experience. The Council has recognised the need for a whole-cohort approach and is now working hard to build those relationships more broadly.
- 4.2 Positive satisfaction scores do not replace formal engagement structures. High TSMs particularly around tenants feeling respected and informed, may have contributed to a perception that tenants felt involved already. However, regulatory standards require inclusive, and demonstrable engagement based on the impact and outcome not just a measurable indicator.

- 4.3 Dedicated resources are important for sustainable engagement. The Council has established a dedicated role to lead tenant engagement and has budgeted for additional capacity to embed and sustain this work going forward. This reflects a shift from project-based activity to long-term operational commitment.
- 4.4 External expertise is valuable but must be integrated into core operations. Working with TPAS provided expert guidance, but the learning and tools must be embedded into the Councils day-to-day service delivery, governance, and culture to be effective.

## **5. ACTION**

- 5.1 In response to the C2 grading, the Council has accelerated its commitment to embedding tenant engagement across the housing service. Recognising that the grading aligned with its own self-assessment, the Council had already laid the groundwork for improvement through the co-development of a Tenant Engagement and Influence Strategy with TPAS and tenants. This strategy, formally adopted in June 2025, sets out a clear plan for inclusive, representative, and sustained tenant involvement. Dedicated resource has been allocated, including a new role focused solely on tenant engagement, and additional capacity has been budgeted to support implementation from 2026.
- 5.2 Since the adoption of the strategy, several key initiatives have been launched to embed tenant voice into service delivery. A new Tenant Forum was established in July 2025, providing a structured platform for ongoing dialogue and influence. The Council has held its first tenant focus groups, hosted the quarterly “Meet the Manager” event, and supported tenants in selecting a logo to identify tenant-approved documents. Tenants have also contributed to reviewing Awaab’s Law letters, shaping landlord strategy survey questions, and supporting to develop policies (Aids and Adaptations and Vulnerable Persons). These activities demonstrate a growing culture of collaboration and transparency. The Council is in the process of launching a dedicated tenant social media channel to further enhance communication, accessibility, and engagement across the tenant community. Additionally, to support non digital access the Council will be posting a hard copy of the 24/25 annual report to all tenants and at the next tenant forum meeting asking tenants their preferences for non-digital materials and information.
- 5.3 The Council will also be integrating engagement practices into governance structures to ensure accountability and visibility. These actions reflect a shift from project-based engagement to a long-term operational commitment, aimed at rebuilding trust, strengthening transparency, and ensuring that tenants are active partners in shaping the services they receive.
- 5.4 In addition to strengthening tenant engagement, the Council has identified and begun addressing several other service improvement areas through its transformation programme. These include improving access to information by developing non-digital communication channels to ensure inclusivity and using tenant census data to better understand tenant needs and inform the development of a Vulnerable Persons Policy.
- 5.5 The Council is also continuing to collect stock condition data, with current coverage exceeding 80%, and is working to improve tracking and analysis to support long-term asset

planning. These initiatives reflect the Council's commitment to delivering a responsive, inclusive, and well-governed housing service beyond the scope of the C2 grading.

- 5.6 The Council adopted a ASB Framework in June 2025 along with appointing a dedicated resource to begin work on the action plan to improve case management and performance reporting.

## **6. STAKEHOLDER FEEDBACK**

- 6.1 Stakeholder feedback has shaped the Council's response to the C2 grading and reaffirming its commitment to improvement. Throughout the Tenant Engagement project, Tenants expressed a desire for more consistent opportunities to influence service delivery. Their feedback highlighted the need for a structured approach that goes beyond satisfaction surveys and ensures meaningful involvement in decision-making. This directly fed into the development of the tenant forum and the mechanisms for involvement that are being developed.
- 6.2 Staff across the housing service recognised the challenges of balancing competing priorities of the transformation programme but welcomed the renewed focus on tenant voice and influence.
- 6.3 Members support the Council's transparent self-assessment process and acknowledged the importance of embedding tenant engagement into governance structures. Members have demonstrated ongoing commitment by actively participating in engagement opportunities, supporting the tenant engagement and influence strategy, and advocating that tenant voice is central coming through on service redesigns and policy developments.
- 6.4 This collective feedback has reinforced the council's direction of travel and informed the corrective actions now being implemented to build trust, improve transparency, and deliver services that reflect tenant needs and aspirations.

## **7. CONCLUSION**

- 7.1 The Council acknowledges that tenant engagement was not prioritised earlier in the transformation journey. However, this was a deliberate and necessary decision. The initial focus was placed on Safety, Quality, and Governance areas with compliance risks and potential harm to tenants. These priorities were aligned with both regulatory expectations and self-assessments.
- 7.2 Tenant engagement was always recognised as a key component of the transformation programme, with work underway to co-develop a strategy and embed new practices. The Regulator's inspection took place one year into a multi-year programme of change, at a point when engagement improvements were still in their infancy. While earlier implementation may have strengthened the Council's position against the Transparency, Accountability and Influence Standard, the Council remains confident that its prioritisation was appropriate given the circumstances and is now fully committed to embedding tenant voice across all aspects of service delivery.

# SHDC Housing Landlord Strategy

## 2024-2027



## Introduction

This Strategy outlines South Holland District Council's renewed vision for the management and improvement of its Council-owned social housing stock, for the period 2024-2027. This one-year extension to the original 2024-2026 Strategy allows the Council to consolidate progress made to date, embed key transformation projects, and respond to evolving regulatory expectations, including the implementation of the Regulator of Social Housing Improvement plan following the C2 grading issued to the Council in 2025.

With over 3,700 homes, South Holland District Council remains the largest landlord in the district, directly delivering lettings, tenancy and estate management, repairs, programmed maintenance, and rent collection. Homelessness duties continue to sit outside the scope of this Strategy.

The housing sector continues to evolve, with increasing expectations placed on Registered Providers to ensure homes are safe, well-maintained, and that tenants are treated with respect and fairness. The focus on tenant experience, property condition, and accountability has intensified, alongside greater scrutiny from the media, the Housing Ombudsman, and the Regulator of Social Housing.

Following a programmed inspection by the Regulator of Social Housing, the Council is now actively delivering a comprehensive Improvement Plan, with a strong emphasis on tenant engagement and service quality. This next phase is not only about addressing areas for improvement but also about embedding a culture of listening, learning, and acting on tenant feedback.

The Housing Transformation Team remains central to driving this work forward, ensuring that the commitments made are translated into meaningful outcomes for tenants. This Strategy should be read alongside the Housing Transformation and Improvement Programme Mandate and the South & East Lincolnshire Councils Partnership Sub-Regional Strategy 2024/25–2028/29, which together provide a framework for collaborative, inclusive, and accountable housing services.

## National context

The social housing sector is currently facing several key external drivers that will influence this Strategy over its delivery period. Over the past 2 years, there has been widespread consultation and debate but, in many areas, the detail is still being determined.

The Strategy and supporting action plan must remain agile to account for pending clarifications around key policy issues. The Strategy and action plan will be revised to reflect any financial and operation impacts arising from any material changes to the assumptions made at the time of drafting this Strategy.

- **Social Housing Regulation Act 2023**

From April 2024, the Consumer Standards introduced by the Regulator of Social Housing are now in force, marking a significant shift in how social landlords are held to account. These standards require landlords to:

- Listen to tenants and act on their feedback
- Communicate clearly and effectively
- Maintain accurate, up-to-date information about the condition of their housing stock
- Deliver responsive, accessible, and high-quality services

The new regulatory framework strengthens the role of tenants, ensuring they live in safe, decent homes, have choice and protection, and can hold their landlords to account.

The Regulator now operates a proactive inspection regime, assessing compliance with four core Consumer Standards:

- Safety and Quality
- Transparency, Influence and Accountability
- Neighbourhood and Community
- Tenancy

These are supported by a Code of Practice, providing guidance on how landlords can meet the standards in practice. The regulatory approach is no longer limited to cases of serious detriment it now includes routine inspections, data scrutiny, and tenant satisfaction measures.

- **Fire Safety Act 2021**  
Additional fire safety measures to ensure tenants are safe in their homes.
- **Building Safety Act 2022**  
New legislation to make sure all tenants are safe in their homes and landlords have a responsibility to advise and report on compliance.
- **Housing Ombudsman Complaint Handling Code**  
The Housing Ombudsman’s Complaint Handling Code sets out good practice that will allow landlords to respond to complaints raised by their residents quickly and to use the data and learning from complaints to drive service improvements. It will also help to create a positive complaint handling culture amongst staff and residents.
- **Social Housing Decent Homes Standard Review**  
A review of the standards for condition of social homes – outcome of consultation pending.
- **Minimum Energy Efficiency Standards (MEES) Consultation**  
Government proposals to introduce a minimum EPC rating of C for socially rented homes by 2030, aiming to improve energy efficiency, tackle fuel poverty, and support net-zero targets. Consultation closed; outcome pending.
- **Future Homes Standard 2025**  
Ensuring new built homes from 2025 produce less emissions.
- **Domestic Abuse Act 2021**  
Transforming the response to domestic abuse, helping to prevent offending, protect victims and ensure they have the support they need.
- **Care Act 2014**  
Ensuring that housing has a role to play in safeguarding adults.
- **Levelling up White paper**  
The government’s vision for spreading opportunity more equally across the UK, announcing the establishment of an Older People’s Housing Taskforce to better understand the housing market for our ageing population.
- **People at the Heart of Care, Adult Social Care Reform White Paper**  
Sets out the Government proposals for reform of Adult Social Care, highlighting prevention and positioned digital connectivity as vital to better care. The government’s key policy priority is to support people to remain at home, rather than in care homes or hospital settings, for as long as possible.

Whilst there is legislation, regulation and prescribed practice in place, the Council still has freedom to determine how it delivers services. This Strategy sets out how the Council will deliver its Housing Landlord Service “the service”.

## Regulatory Judgement

In July 2025, South Holland District Council received its first consumer regulatory judgement from the Regulator of Social Housing, resulting in a C2 grading. This outcome reflects a service that is broadly meeting the consumer standards however there are some weaknesses, particularly in relation to the Transparency, Influence and Accountability Standard. The judgement acknowledges the Council's progress in its transformation journey, including strong performance in safety and quality, where over 98% of homes meet the Decent Homes Standard, and compliance with health and safety legislation. Repairs are delivered in line with service standards, neighbourhood partnerships are tackling anti-social behaviour, and tenancy management supports community sustainability.

However, the inspection highlighted areas needing attention, especially around tenant engagement, scrutiny, and equitable access to services. While digital information is available, the Council recognises the need to diversify communication channels and formalise tenant involvement in decision making.

To better understand the factors behind the C2 grading, the Council undertook a comprehensive Root Cause Analysis (RCA) in September 2025. This analysis confirmed that the primary driver was the absence of a formal, embedded approach to tenant engagement across the whole tenant cohort, a gap directly linked to the Transparency, Influence and Accountability Standard. While engagement work had begun, particularly with sheltered tenants and through the co-development of a Tenant Engagement and Influence Strategy the timing of the Regulator's inspection meant these improvements were still in their infancy.

The RCA identified contributing factors such as a historically limited culture of tenant involvement, capacity constraints during early transformation phases, and a risk-based prioritisation of governance and safety over engagement. Lessons learned include the need for a whole-cohort approach and dedicated resources for sustainable engagement. These findings have shaped the Council's corrective actions, including accelerating the implementation of the Tenant Engagement Strategy, establishing a Tenant Forum, and embedding engagement into governance structures.

The C2 grading reflects the strategic shift initiated in 2024 through the Housing Transformation Programme, which prioritised the governance and safety and laid the foundation for improvement. Key developments included the creation of the Housing Transformation Board, Performance and Compliance Clinic, Capital Programme Clinic and the Housing Complaints Working Group, alongside the launch of the Tenants Forum. External support was commissioned to develop a new Tenant Engagement and Influence Strategy, approved in June 2025.

Looking ahead, the Council is focused on delivering the remainder of the Landlord Strategy, with a clear commitment to addressing the weaknesses identified in the judgement. This includes strengthening tenant scrutiny, improving accessibility for all tenants, embedding engagement in service design, and enhancing the use of tenant data to ensure fair and responsive services. SHDC remains committed to working closely with tenants and the Regulator to achieve a C1 grading and full compliance with consumer standards.

## Strategic vision

The overall strategic vision for the Council is directed by the South & East Lincolnshire Councils Partnership Sub-Regional Strategy 2024/25-2028/29.

A bold and ambitious partnership of Councils, working together:

- To shape policy at sub-regional level
- To secure more resources to deliver on our priorities
- To do more for the communities we serve
- To have a greater impact in tackling the wider common challenges our communities face
- To become more efficient in the way we operate

As a social landlord, South Holland District Council aims to go beyond the minimum statutory and regulatory requirements placed on local authority landlords, where the tenant's voice is heard and acted upon.

## Our Tenants

In 2023, the Council carried out a tenant census. Tenants were invited to complete the census by post, online and by telephone. 70% of tenants took part in this piece of work allowing us to understand more about current occupancy and vulnerabilities, as well as the level of interest and involvement tenants had in the service provided.

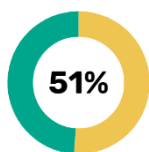
The census data continues to be updated through individual tenant interactions with officers, ensuring our records remain current and reflective of tenants' evolving circumstances. In addition, a full census programme will be undertaken every four years to maintain a comprehensive understanding of our tenant base.

Alongside this, we have introduced regular tenancy audits to complement the census. These audits provide an opportunity to verify occupancy, identify changes in household circumstances, and ensure properties are being maintained appropriately. They also help strengthen engagement with tenants and support early intervention where needed.

Data insights:



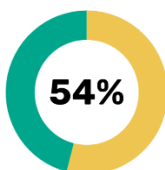
Our 'typical' tenant is a woman in her mid sixties living on her own in the Council's general needs housing



51% of tenants state that their day to day activities are limited by a long term physical or mental health condition or illness, with 40% of households experiencing permanent mobility issues



A third of general needs tenants have children living with them



54% of general needs tenants are underoccupying their home

## Tenant satisfaction

Tenant satisfaction is one of the many ways to measure the performance of the service.

From 2023, the Regulator of Social Housing requires all registered providers to collect and provide information to support effective scrutiny by tenants of their landlord's performance in managing their homes and neighbourhoods. There are 22 tenant satisfaction measures, covering five themes:

- Keeping properties in good repair
- Maintaining building safety
- Respectful and helpful engagement
- Effective handling of complaints
- Responsible neighbourhood management.

This data must be submitted to the Regulator and published. The Council has submitted its Tenant Satisfaction Measure data for 2023/2024 and 2024/2025 which has been published on the website and in the annual report.

Tenants told us they wanted the Council's TSM results to be benchmarked against other Lincolnshire authorities with housing stock. In response, we have introduced benchmarking as requested, enabling us to compare performance and identify opportunities for improvement.

PERCEPTION SURVEY RESULTS		SHDC 2023- 2024	Nation al Bench mark 24/25	SHDC 2024- 2025	City of Lincoln	North Kesteven District	South Kesteven District
<b>TP01</b>	Proportion of respondents who report that they are satisfied with the overall service from their landlord.	73%	71.8%	<b>74%</b>	68%	79.9%	61.1%
<b>TP02</b>	Proportion of respondents who have received a repair in the last 12 months who report that they are satisfied with the overall repairs service.	70%	73.6%	<b>73%</b>	73%	79.4%	66.2%
<b>TP03</b>	Proportion of respondents who have received a repair in the last 12 months who report that they are satisfied with the time taken to complete their most recent repair.	62%	69.5%	<b>76%</b>	66%	74.9%	52.4%
<b>TP04</b>	Proportion of respondents who report that they are satisfied that their home is well maintained.	71%	71.9%	<b>75%</b>	70%	78.2%	59.2%
<b>TP05</b>	Proportion of respondents who report that they are satisfied that their home is safe.	86%	77.6%	<b>86%</b>	75%	81.7%	69.1%

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<b>TP06</b>	Proportion of respondents who report that they are satisfied that their landlord listens to tenant views and acts upon them.	60%	61.6%	<b>65%</b>	56%	65.8%	49.5%
<b>TP07</b>	Proportion of respondents who report that they are satisfied that their landlord keeps them informed about things that matter to them.	73%	72%	<b>76%</b>	71%	75.7%	59.1%
<b>TP08</b>	Proportion of respondents who report that they agree their landlord treats them fairly and with respect.	84%	77.9%	<b>83%</b>	78%	78.8%	67.6%
<b>TP09</b>	Proportion of respondents who report making a complaint in the last 12 months who are satisfied with their landlord's approach to complaints handling.	28%	35.5%	<b>34%</b>	44%	42%	36.2%
<b>TP10</b>	Proportion of respondents with communal areas who report that they are satisfied that their landlord keeps communal areas clean and well maintained.	67%	66.7%	<b>81%</b>	72%	62.6%	64.9%
<b>TP11</b>	Proportion of respondents who report that they are satisfied that their landlord makes a positive contribution to the neighbourhood.	66%	64.6%	72%	65%	61.1%	59.2%
<b>TP12</b>	Proportion of respondents who report that they are satisfied with their landlord's approach to handling anti-social behaviour.	50%	59.5%	69%	55%	56.5%	57.5%

MANAGEMENT INFORMATION RESULTS		SHDC 2023-2024	SHDC 2024-2025		National Benchmark 24/25	City of Lincoln	North Kesteven District	South Kesteven District
			All managed properties	SHDC Owned Stock				
<b>BS01</b>	Proportion of homes for which all required gas safety checks have been carried out.	100.0%	100%	100%	100%	99.87%	99.96%	99.3%

Appendix 1

<b>BS02</b>	Proportion of homes for which all required fire risk assessments have been carried out.	100.0%	100%	100%	100%	91.24%	100%	100%
<b>BS03</b>	Proportion of homes for which all required asbestos management surveys or re-inspections have been carried out.	100.0%	100%	100%	100%	100%	100%	100%
<b>BS04</b>	Proportion of homes for which all required legionella risk assessments have been carried out.	100.0%	100%	100%	100%	100%	100%	100%
<b>BS05</b>	Proportion of homes for which all required communal passenger lift safety checks have been carried out.	100.0%	100%	100%	100%	100%	100%	100%
<b>NM01 (1)</b>	Number of anti-social behaviour cases, opened per 1,000 homes.	29.0	26.5	26.8	36	106	7.16	15.8
<b>NM01 (2)</b>	Number of anti-social behaviour cases that	0.5	0.26	0.3	0.7	0.4	0.00	0.00

Appendix 1

	involve hate incidents opened per 1,000 homes							
<b>RP01</b>	Proportion of homes that do not meet the Decent Homes Standard.	2.5%	0.3%	0.3%	0.5%	0.26%	1.7%	2.5%
<b>RP02 (1)</b>	Proportion of non-emergency responsive repairs completed within the landlord's target timescale.	91.0%	91.3%	91.3%	82.5%	89.12%	99.21%	68%
<b>RP02 (2)</b>	Proportion of emergency responsive repairs completed within the landlord's target timescale.	100.0%	100%	100%	94.9%	99.96%	86.91%	87%
<b>CH01 (1)</b>	Number of stage one complaints received per 1,000 homes.	9.7	55.64	56.3	53.5	52.79	49.08	39.8
<b>CH01 (2)</b>	Number of stage two complaints received per 1,000 homes.	0.0	7.58	7.7	8.3	7.71	9.71	3.10
<b>CH02 (1)</b>	Proportion of stage one complaints responded to within the	48.6%	94.84%	94.8%	89.9%	93.4%	64.6%	88%

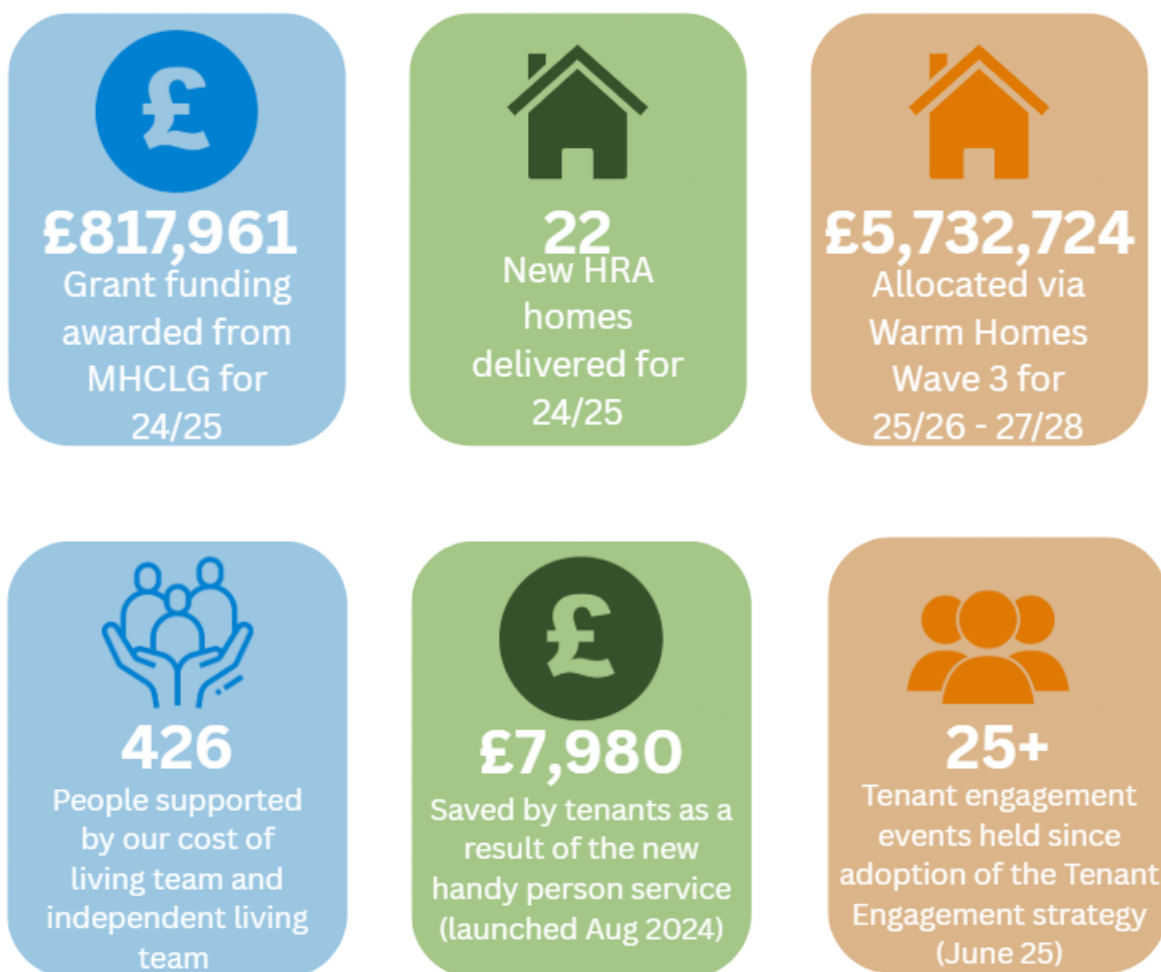
Appendix 1

	Housing Ombudsman's Complaint Handling Code timescales.							
<b>CH02 (2)</b>	Proportion of stage two complaints responded to within the Housing Ombudsman's Complaint Handling Code timescales.	0.0	100%	100%	88.9%	78.3%	86.84%	100%

Live data on tenant satisfaction is made available on our website at [www.sholland.gov.uk/GetInvolved-Feedback](http://www.sholland.gov.uk/GetInvolved-Feedback) and is shared with our tenants and Members annually.

## Supporting our tenants

The Council prides itself in supporting its tenants.



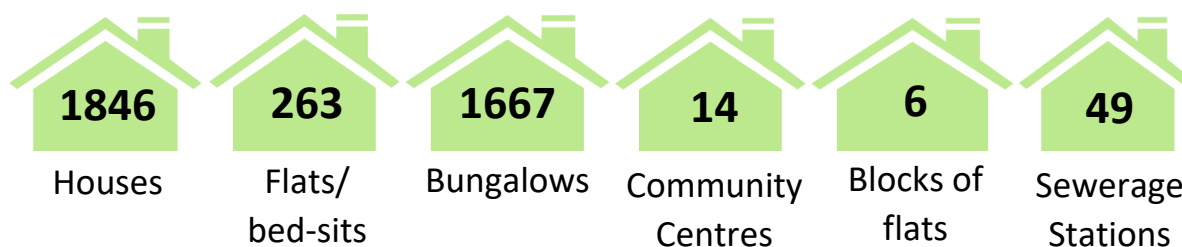
- For many years, the Council has partnered with the Citizens Advice, offering a dedicated money and debt advice service to its tenants focussed on sustaining tenancies.
- Following extensive consultation with our tenants, we have completed a review of the Sheltered Housing service offer. Alongside digital improvements designed by tenants we have also introduced a new handy person service to support tenants in their homes. The service has so far saved tenants over £7000.
- We established a Cost-of-Living Support team, concentrated on brokering support from partner agencies, having assisted over 250 households to date with a variety of issues such as improving finances, downsizing and accessing employment.
- We established an Independent Living Team, supporting tenants to live independently in our sheltered housing accommodation. The team have supported over 500 tenants since the introduction of the team in August 2024.
- Following extensive consultation with our tenants they helped shape a new Tenant Engagement and Influence Strategy which was adopted in June 2025. A new Tenant Forum has been launched to support tenants to effectively influence landlord services and shape decisions. A programme of focus groups have also been launched including on performance and complaints, tenancy management and property services.

## Our properties

South Holland District Council manages a portfolio of over 3,700 homes across the district consisting of bed-sits, flats (all below 11m tall), bungalows and houses let as general needs and sheltered housing, plus shared owners and leaseholders. 1027 units are let as sheltered housing to residents aged 55 and over and/or residents that would benefit from a wellbeing alarm system connected to a telecare service available 24/7.

Included in the portfolio are community centres scattered across the district within our Sheltered Housing schemes, as well as sewerage treatment works where our residents are not able to access mains sewers. We purchased 54 new properties in 2023 and 22 in 2024.

The portfolio is ringfenced via the Housing Revenue Account. All money received from tenants and leaseholders for rent and service charges pays for housing management services, reactive repairs, planned maintenance, estates, and asset management. The Strategy provides the overarching direction for how the resources and assets held within the HRA are used.



*Please note these figures fluctuate based on Right to Buy sales and new properties being purchased.*

## Our ambitions

This Strategy covers areas of service delivery related to landlord functions and how the Council shapes, engages, and improves services for tenants. The Strategy follows four themes:



### **Culture and Operational Excellence**

We will deliver a service that meets the needs and aspirations of our tenants, whilst keeping them safe. To accomplish this, we will:

- Embed a professional and positive culture where we respect and listen to tenants and do the right thing, including proactively putting things right when they go wrong. The corporate culture will include partnership working, inclusivity and task ownership
- Appropriately resource the service, retaining and recruiting talent
- Ensure that the service has a strong voice across the Council and South & East Lincolnshire Councils Partnership
- Make sure our colleagues have the tools, insight, knowledge and flexibility to provide a positive customer experience including intelligence into how people are living, targeting support for those in greatest need
- Equip our colleagues with the information, professionalism, skills and capacity to embed change

### **Accountability and Transparency**

We will be well governed and financially resilient, operating efficiently and responsibly, and investing wisely to fulfil our social purpose. To be successful, we will:

- Critically examine our decision making, satisfaction and performance with our tenants and our partners through the lens of their expectations
- Measure, monitor, report and publish our performance, anticipating issues before they occur
- Embed compliance and assurance at the heart of our Service through good governance arrangements
- Balance the priorities of excellence in outcomes for tenants whilst seeking efficiency and delivering value for money
- Benchmark ourselves against organisations inside and outside of the Housing sector
- Use data to make the right decisions to drive the best outcomes for our homes and our customers

### **Quality Homes and Connected Neighbourhoods**

- We will deliver well maintained, safe, affordable homes and neighbourhoods, where people are proud to live that supports their health and wellbeing. To achieve this, we will:
- Continue to take our regulatory, statutory and legislative responsibilities extremely seriously by carrying out programmed safety checks, visits, and regular inspections
- Continue to actively seek external funding and invest in our homes to improve energy efficiency, thermal comfort and seek to reduce the running costs of our homes
- Be confident in the data we hold about our assets to help us make informed proposals on where tenant's money should be spent including making strategic decisions about disposing of assets that are impacting on the standard of service we can deliver
- Continue to work with our tenants to inform us how to improve and get the best out of our Repairs Service
- Invest in the delivery of new homes across a variety of tenures to increase choice and support successful mixed communities
- Work with our partners to provide reliable, consistent services, and tailored intensive support to those tenants who need us the most.

### **Tenant Voice and Opportunity**

Tenants will be at the heart of everything we do and every decision we make. In order to ensure tenants are involved and informed, we will:

- Transform our approach to tenant engagement, ensuring that tenants have opportunities to engage with us in ways that suit them, where they can influence and shape our current and future services
- Ensure tenants are well positioned in our governance structure, inviting them to scrutinise services with us
- Ensure tenants have a high level of satisfaction, where we listen to their concerns and put things right where we need to
- Give tenants a choice in when and how they use our services, ensuring they can access high-quality services quickly, easily and in a way which suits them
- Prioritise service improvements where it will make the biggest difference to our tenants

## Measuring success

The Council will measure the success of our Strategy using a series of key performance indicators.

- National Tenant Satisfaction Measures
- Tenant satisfaction surveys
- Repair response times and satisfaction
- Quality, time and satisfaction of void properties
- EPC rating of our homes
- ASB data and insight
- Regulator of Social Housing inspection
- New policies adopted
- Complaints data and insight
- Employee satisfaction surveys
- Call and email response times to tenants

## Monitoring

The Council is committed to being open and transparent about our performance, and accountable to all our stakeholders, ensuring there is clarity about the accountability and structures framework.

The work of teams, and the results of performance, will be scrutinised and regulated collaboratively by the following:

- Council boards and committees
  - In addition to committees such as Policy Development Panel and Performance Monitoring Panel, we have established a Housing Programme Board to monitor the satisfaction, performance, and progress of the strategy.
  - Oversight for the delivery of the Strategy lies with the Portfolio Holder – Strategic and Operational Housing, Director of Communities and Assistant Director - Housing. They will make sure the service fulfils the primary requirements of the Social Housing (Regulation) Act 2023 and all other legislation
  - Compliance and performance will be reported as follows:
    - Monthly to the Portfolio Holder – Strategic and Operational Housing
    - Quarterly to Senior Leadership Team
    - Quarterly reports will be published to Cabinet
- Our tenants
  - Tenant Forum established
  - Formal Scrutiny Panel – to be established
  - Progress updates and performance information (including satisfaction) is shared regularly with our tenants including in focus groups, in the annual report and on our website
- Regulator of Social Housing and regulatory standards
  - Annual and quarterly reporting on key performance metrics, stock volumes and implementation of the regulatory standards
  - The Assistant Director of Housing meets monthly with the Regulator as part of the provider improvement plan following the c2 grading issued in 2025.
- Housing Ombudsman Service
  - Self-assessment against the Complaints Handling Code
  - Reporting complaint data and demonstrating learning from complaints
- Building safety regulation
  - Health & safety legislation and regulatory compliance
  - Responding to the emerging Building Safety Regulator within the Health and Safety sector

## Appendix 1

- Benchmarking against the sector and Lincolnshire peers following tenant feedback.

To ensure the Strategy reflects the changing landscape in the social housing sector, the content will be reviewed on a regular basis with minor operational amendments adopted by the Assistant Director – Housing in consultation with the Portfolio Holder for Strategic and Operational Housing. Progress against the Strategy will be reported annually taking account of any fundamental changes.

## Housing Landlord Transformation and Improvement Programme Mandate Update- February 2026

On 14 February 2024, Cabinet adopted the Landlord Strategy 2024-2026. The Housing Landlord Transformation and Improvement Programme Mandate was an appendix to this Strategy. This document sets out the progress to date and the programme for activity during 2025/26 and activity planned for 2026/27 as part of extending the Landlord Strategy until 2027.

### Progress update

In 2025, Officers from the Transformation and Housing teams successfully supported the Council through a programmed inspection by the Regulator of Social Housing (RSH). Their coordinated efforts contributed to the Council achieving a C2 grading, reflecting the significant progress made in aligning with the Consumer Standards introduced in 2024.

Over the past two years, officers have laid the groundwork to ensure the Council is well-positioned to meet its regulatory obligations. This has included:

- Establishing governance structures such as clinics and strategic boards to monitor compliance and performance.
- Delivering briefings to Senior Officers and Members to raise awareness of operating within a regulated environment.
- Responding proactively to the evolving legislative landscape, including the implementation of the final Consumer Standards published in April 2024 and Awaabs Law.
- Developing a clear understanding of the new inspection regime, ensuring the Council is prepared for ongoing regulatory scrutiny.

This foundational work has not only supported the Council's recent inspection outcome but also strengthened its capacity to deliver safe, high-quality, and tenant-focused housing services resulting in the C2 grading.

### 1. Governance and oversight of the Housing Landlord Service

- Risk register produced. Risk now scrutinised by Housing Landlord Board, Senior Officers, and Performance Monitoring Panel.
- HRA Business plan adopted in 25/26.
- Housing Governance Framework adopted in 24/25 and updated in 25/26.
- Creation of Performance and Compliance Clinic, Complaints Working Group and No Access Working Group.
- Capital programme clinic established to monitor the capital programme performance.
- Suite of Key Performance Indicators adopted. Reported to Housing Clinics, Senior Officers, and Performance Monitoring Panel.
- Learning & development programme established.
- Service Level Agreements reviewed with internal departments including Customer Contact, Grounds and Parks, and Facilities (caretaking of flat schemes).
- Officer roles and responsibilities determined (as per Regulatory requirements) and published.
- 'About Us' webpage and Annual Report – sharing key items around governance with Tenants.
- Cost-mapping exercise completed benchmarking 23/24 and 24/25 accounts to evidence value for money.
- Member scrutiny arrangements reviewed with Cabinet.
- Quarterly reporting to Cabinet advising on progress of meeting the Consumer Standards.
- Tenant's and Member consultation on the HRA Business Plan, November 2025.
- Tenant Engagement Impact report presented to Cabinet.

## 2. Addressing complaints fairly, effectively, and promptly

- Complaints policy and procedure reviewed to ensure Tenants can access the service and are informed of the timescales involved.
- Revised internal approach to complaint handling, resulting in a more efficient process.
- Working group, attend by the Member Responsible for Complaints established focused on learning from complaints.
- Increased oversight of complaint themes and improvements by Officers, Senior Officers, Members.
- Meet the Housing Ombudsman event held on 7<sup>th</sup> October 2024. (First in Lincolnshire)
- Enhancements made to the website, ensuring it is easy to give feedback.
- Annual Complaints Performance and Service Improvement Report submitted and published.
- Tenant focus group help on performance and complaints on 14<sup>th</sup> October 2025.
- Complaint satisfaction surveys established.
- Access to complaints services report to identify any barriers in tenants reporting complaints.

## 3. Tenant Engagement

- TPAS Re-engineering engagement project delivered including survey conducted with Tenants along with focus groups and several interactive sessions with Tenants, Officers, and Members.
- Recruitment to a Tenant Engagement and Influence Lead Officer in April 2025.
- Tenant Engagement and Influence Strategy adopted in June 2025.
- Tenant Influence Working Group established with Tenants (focussed on embedding the strategy).
- Tenant engagement roadshow held across a variety of estates in February 2025.
- First tenant forum events hosted across a variety of locations in July 2025.
- First new face to face tenant focus groups held in August and September 2025.
- Tenant scrutiny panel being established with the support of external trainers.
- Recruitment planned for two additional Tenant Engagement Officers, one in January 2026 and one in April 2026.
- Annual report hard copy posted to all tenants for 23/24 and 24/25.
- Tenants actively involved in reviewing policies such as; aids and adaptations policy, reasonable adjustments policy, tenant engagement strategy, ASB framework and damp and mould policy.
- Tenants informed about the regulatory judgement and provider improvement plan
- Tenants actively engaged in the HRA Business plan consultation.

## 4. Data and Information Management

- Knowledge and Information Management Strategy adopted.
- Programme established for keeping tenant data up to date.
- Stock condition survey programme carried out on 87% of homes.
- Tenant Satisfaction Measures for 23/24 and 24/25 scrutinised by Members and shared with tenants (including benchmarking). 25/26 satisfaction surveys being completed currently.
- Deeper analysis of the dissatisfaction reported in the 24/25 survey carried out with a detailed action plan adopted by Housing Landlord Board and scrutinised by Members and Tenants.
- Equality Impact Assessment completed regarding access to the Housing Landlord Services, with action plan adopted to deliver fair and equitable outcomes to Tenants.
- Reasonable adjustment policy adopted in November 2025 with training rolled out to officers and contractors.
- Procurement procedure adopted for third party data information sharing.

## 5. Disabled aids and adaptations

- A new policy and procedure adopted to ensure Tenants are supported and well informed.

- Extensive tenant engagement carried out on development of the new policy.
- Improved partnership working with Occupational Therapists reducing delays for tenants.
- Enhanced case management.
- Ensuring tenants have the support needed to confidently access the service.
- Introduced a Trusted Assessor service.

## 6. Awaabs Law

The following steps have been taken to ensure compliance with Awaab’s Law phase 1 which came into force from 27<sup>th</sup> October 2025.

- Engaging with the out-of-hours service provider to triage DCM reports.
- Updating internal procedures within the Housing Repairs Team to include a written summary for all emergency repairs from October 2025.
- Reviewing written summaries with tenants to ensure the language used is clear, easy to understand and meets their needs regarding what they need to know and what the legislation requires the Council to detail.
- Established a new suite of KPIs to monitor compliance with Awaabs Law.
- Established satisfaction surveys.
- Updated webpages to provide clear and consistent information.
- Briefings held with Officers across the department on their roles and responsibilities.
- Internal and external communications campaign on Awaabs Law.
- Briefing sessions held with contractors on the expectations under Awaabs Law.
- Revisions made to the Damp and Mould Policy and the Fitness for Habitation Policy – adopted by Cabinet in September 2025 to support compliance with Awaabs Law with amended timescales.

## Focus for the next 12 months

The programme for 2026/27 is to be adopted by the Housing Transformation Programme Board in January 2026. Prioritisation within the programme is focused on the Council’s ability to demonstrate outcomes of the Consumer Standards together with the current and future ability to meet tenants wants and needs. The Transformation Team continue to be focused on working towards the c1 grading.

2026/27 Transformation Programme	
<b>Safety and Quality Standard</b>	<ul style="list-style-type: none"> <li>• Stock quality and decency.</li> <li>• Data insights.</li> <li>• Repairs, maintenance and planned improvements.</li> </ul>
<b>Transparency, Accountability and Influence Standard</b>	<ul style="list-style-type: none"> <li>• Fairness and respect towards Tenants.</li> <li>• Understanding the diverse needs of Tenants and delivering fair and equitable outcomes.</li> <li>• Improved access to services for Tenants.</li> <li>• Tenant scrutiny: reviewing our performance and decision making.</li> </ul>
<b>Neighbourhood and Community Standard</b>	<ul style="list-style-type: none"> <li>• Effective policies and procedures to tackle ASB and Hate incidents, which are developed with and communicated to all tenants.</li> <li>• Data insights, eliminating barriers to reporting incidents</li> </ul>

During 24/25 it was important to establish tenant engagement mechanisms prior to reviewing ASB, domestic abuse and safeguarding services, as engagement is pivotal to the success of these reviews. During this time, the Council has a variety of operational arrangements in place for these items including Countywide partnerships focussed on ASB and Domestic Abuse, dedicated Domestic Abuse Officers concentrating on improving case management and supporting Officers responding to domestic abuse, commencement of Domestic Abuse Housing Alliance accreditation, and a recently reviewed Safeguarding

Policy and training programme. The Council has also recruited a Housing ASB Lead who is focused on managing a case load of ASB cases, delivering enhanced service to tenants.

### Monitoring progress

Performance towards meeting the Consumer Standards and the HRA Transformation Programme continues to be reported to the Transformation Board and Cabinet on a quarterly basis.

## **Summary of changes**

### Introduction

- The strategy title has been updated to reflect the extended timeframe: 2024–2027.
- The introduction now includes the rationale for extending the strategy by one year, ensuring alignment with evolving priorities and regulatory expectations.
- A new reference has been added to highlight the programmed inspection conducted by the Regulator of Social Housing, including the grading outcome received.

### National context

- The section on the Social Housing Regulation Act has been revised to incorporate the outcomes of the Consumer Standards review, along with details of the standards assessed.
- Inclusion of the Minimum Energy Efficiency Standards (MEES) Consultation

### Regulatory judgement

- A new section has been introduced to outline the 2025 regulatory judgement received by South Holland District Council (SHDC).
- Inclusion of the root cause analysis,

### Our tenants

- Updated to reflect that tenant census data is continuously refreshed through direct interactions with officers, ensuring records remain accurate and responsive to changing circumstances.
- A full census programme will be conducted every four years to maintain a comprehensive understanding of the tenant population.
- Removed the census information about tenants that would like to be more informed about the service and those that would like to be involved in improving the services as there is now a active tenant engagement offering with engaged and involved tenants.

### Tenant Satisfaction Measures

- This section now includes the Tenant Satisfaction Measures (TSM) results for 2023/2024 and 2024/2025.
- Inclusion of the national benchmarking for 24/25.
- Inclusion of benchmarking against other Lincolnshire authorities as requested by Tenants.

### Our properties

- Updated to reflect current housing stock, ensuring the strategy remains relevant to the existing asset base.

Our ambitions – No changes made to this section as these ambitions continue to be delivered upon.

## Appendix 3

### Supporting out tenants

- Enhanced with key highlights from 2024/25, including:
  - Number of new homes delivered
  - People supported
  - Engagement events held since the launch of the new strategy.

### Monitoring

- Performance information will now be shared with tenants via focus groups, promoting transparency and accountability.
- The Assistant Director of Housing now meets monthly with the Regulator as part of the Provider Improvement Plan, following the C2 grading issued in 2025.
- Benchmarking practices have been updated to include comparisons with Lincolnshire peers, in response to tenant feedback.
- The Portfolio Holder title has been amended from Communities and Operational Housing to Strategic and Operational Housing.

### Appendix

- Root cause analysis included as an appendix for transparency.

Equality Impact Assessment

<b>Report title</b>	Housing Landlord Transformation and Improvement Programme Update 2026
<b>Completed by</b>	Adel Gardner
<b>Approved by</b>	Vikki Cherry
<b>Date</b>	

The following statements will help you decide whether an EIA is necessary:	Tick all that apply.
Does it affect customers, colleagues or the wider community, and therefore potentially have an effect in terms of equality (for example, removing a service, workforce restructure, employment practices)	<input checked="" type="checkbox"/>
Could it result in a decision being made that would significantly affect how functions and services are delivered (for example, reducing a service or introducing a charge for a service)	<input checked="" type="checkbox"/>
Does it relate to a service that previous engagement has identified as being important to people	<input checked="" type="checkbox"/>
Does it, or could it in the future, affect different groups of people differently	<input checked="" type="checkbox"/>
Does it relate to a policy or service where there is significant potential for reducing inequalities or improving outcomes	<input checked="" type="checkbox"/>
Have there been, or are there likely to be, any public concerns about the policy or proposal	
Does it have an effect on how other organisations operate in terms of equality (i.e. commissioned services)	<input checked="" type="checkbox"/>

Section 3 Equality impacts	
Briefly explain what the policy/service/project aims to achieve	When the Housing and Landlord Transformation and Improvement programme is completed, we will have established a Landlord service that delivers a proactive, bespoke offering whilst demonstrating best practice. Our tenants are informed and have the opportunity to regularly

	<p>scrutinise our services. We hold up to date and validated data about our properties of which underpins decision making. We deliver a safe and compliant landlord service meeting regulatory and legislative requirement, where performance is measured, and Councillors and Senior Officers have assurance and oversight of the service.</p> <p>This is an equality impact assessment (EIA) of the proposals to transform the Housing Landlord service at South Holland District Council (SHDC). The EIA assesses the Transformation Programme for its impact on age, race, disability, religion or belief, gender and sexual orientation.</p> <p>The delivery of the Housing Landlord Transformation and Improvement Programme is supported by a suite of new and updated policies that enhance inclusive service delivery and regulatory compliance. These include the Reasonable Adjustment Policy, Disabled Aids and Adaptations Policy, Updated DCM and Repairs Policies, ASB Framework, Updated Allocations Policy, HRA Governance Framework, and the Knowledge and Information Management Framework.</p> <p>This assessment is intended to help the Transformation team consider the potential impact of transformation on individual members of staff and tenants. It will prepare plans to support individuals through change and will ensure the plans and projects do not discriminate against individuals in the groups outlined above.</p>
<p>Have you undertaken consultation or involved people who are most likely to be affected or interested?</p> <p>Please include: data or community feedback, gaps in data, and how you intend to fill these gaps (where possible)</p>	<p>The Housing Transformation proposals will affect:</p> <ul style="list-style-type: none"> <li>• Tenants</li> <li>• Housing managers and staff</li> <li>• Third party service providers (PSPSL, other SHDC departments, Support service providers)</li> </ul> <p>The Housing Transformation proposals will interest:</p> <ul style="list-style-type: none"> <li>• Members of the Council</li> </ul>

	<ul style="list-style-type: none"> <li>Residents of the district</li> </ul> <p>These groups have been engaged with as part of defining the Housing Transformation and Improvement Programme Objectives.</p> <p>Tenant Satisfaction Measures were carried out in 2023 to feedback on areas that tenants were least satisfied with. This data has informed the Transformation programme.</p> <p><b>Data used</b></p> <ul style="list-style-type: none"> <li>Tenant Satisfaction Measures</li> <li>Self-assessment health checks</li> <li>Survey results</li> <li>Tenant census data</li> <li>Stock data</li> </ul>
<p>Is there any evidence or research that demonstrates why some individuals or groups are, or are not, affected</p>	<p><b>N/A</b></p>
<p><b>What impacts are there for each of the following characteristics?</b></p>	
<p><b>Characteristics</b></p>	<p><b>Positive and negative impact</b></p>
<p>Gender</p>	<p>64% of South Holland tenants are female. (Tenant census 2023)</p> <p>Positive:</p> <ul style="list-style-type: none"> <li>Females make up two thirds of our tenants and are likely to be impacted positively by the Landlord Strategy and Housing Landlord Transformation and Improvement programme.</li> <li>Statistically, women are more likely to be a victim of Domestic Abuse than men. Women suffering domestic violence will benefit from the development of a domestic abuse policy and the Council becoming DAHA (domestic abuse housing alliance) accredited.</li> </ul>

	<p>Negative:</p> <ul style="list-style-type: none"> <li>• 2019 report by ONS indicated that there was a higher proportion of women who had never used the internet 8.7%, compared with men at 6.3% potentially putting them of experiencing a negative impact of participating via online surveys or accessing online services.</li> </ul> <p>Any mitigation required: The Landlord Strategy and the Housing Landlord Transformation and Improvement programme are high level documents. Policies and plans that have a direct impact on this protected group will be subject to consultation and EIA assessment to identify and mitigate any identified direct or indirect gender discrimination. Face to face consultation sessions in addition to online.</p>
Age	<p>The median age of South Holland tenants is 63, however it should also be noted that there are more 76 year old tenants than any other single tenant age (modal average), eight of the top ten biggest single ages are in the mid sixties to mid seventies. There are around 100 residents aged 90 or above (Tenant census 2023)</p> <p>Positive:</p> <ul style="list-style-type: none"> <li>• Offering more age-appropriate services, including age-appropriate property settings.</li> <li>• Making it easier for individuals to complain by providing different channels to complain which minimises the risk of over 65 from being restricted from making a complaint as a digital exclusion.</li> <li>• Produce reasonable adjustments for individuals who may need to access our complaints process.</li> </ul> <p>Negative:</p> <ul style="list-style-type: none"> <li>• Some staff with protected characteristics may struggle to adapt to the pace and scale of change e.g. changing processes and procedures, introduction of new policies and supporting tenants through change.</li> <li>• The Landlord Strategy may not be representative of older residents and staff – as younger residents and staff are more likely to complete the online survey.</li> </ul>

	<p>Any mitigation required:                  The Landlord Strategy and the Housing Landlord Transformation and Improvement programme are high level documents. Policies and plans that have a direct impact on this protected group will be subject to consultation and EIA assessment to identify and mitigate any identified direct or indirect age discrimination. Face to face consultation sessions in addition to online.</p>
<p>Disability</p>	<p>40% of all council housing residents have a such a limiting disability. This compares to just 19% of the South Holland district population as whole that has a limiting disability. When restricting analysis to just tenants, the proportion with a limiting disability increases to 51%. This proportion is higher than average, as only 41% of tenants in social housing in England and Wales in the UK 2021 census have a limiting disability (household reference person). Almost two thirds of households had at least one member with a disability (60%). (Tenant census 2023)</p> <p>The Disabled Aids and Adaptations Policy and Reasonable Adjustment Policy adopted in 2025 directly support tenants with disabilities by ensuring tailored support.</p> <p>Positive:</p> <ul style="list-style-type: none"> <li>• Data will enable proactive approaches to managing and supporting tenants in properties. For example, blind tenants would proactively have their properties inspected for damp and mould.</li> <li>• Provision of more housing that is accessible and adaptable will increase choice and help mitigate any shortfall or barriers in access.</li> <li>• Better understanding of our property types with adaptations will disproportionately positively impact disabled, vulnerable, and older people who are the primary end users of such accommodation.</li> <li>• Produce and document reasonable adjustments for individuals who may need to access our services.</li> <li>• It will encourage officers to listen to the individuals voice in designing services.</li> </ul>

	<p>Negative:</p> <ul style="list-style-type: none"> <li>Using online methodology for consultation may lead to lower participation by those that are disabled who account for 51% of tenants</li> </ul> <p>Any mitigation required: The Landlord Strategy and the Housing Landlord Transformation and Improvement programme are high level documents. Policies and plans that have a direct impact on this protected group will be subject to consultation and EIA assessment to identify and mitigate any identified direct or indirect disability discrimination. Face to face consultation sessions in addition to online.</p>
Race	<p>8% of tenants are from a Black or minority ethnic group. (Tenant census 2023)</p> <p>Positive: Tenant and staff engagement will seek out the voices for under-represented groups</p> <p>Negative: no significant impact.</p> <p>Any mitigation required: The Landlord Strategy and the Housing Landlord Transformation and Improvement programme are high level documents. Policies and plans that have a direct impact on this protected group will be subject to consultation and EIA assessment to identify and mitigate any identified direct or indirect race discrimination. Resident groups will form a true representation of the make-up of our tenants.</p>
Religion or belief	<p>Positive: Tenant and staff engagement will seek out the voices for under-represented groups</p> <p>Negative: no significant impact.</p> <p>Any mitigation required: The Landlord Strategy and the Housing Landlord Transformation and Improvement programme are high level documents. Policies and plans that have a direct impact on this protected group will be subject to consultation and EIA assessment to identify and mitigate any identified direct or indirect religion or belief discrimination.</p>

<p>Sexual orientation</p>	<p>A little over one in ten of those tenants that completed the census declined to give their sexual orientation, but amongst those that did, 1.7% are LGBTQ including 0.7% gay or lesbian, 0.6% bisexual and 0.4% other. (Tenant census 2023)</p> <p>Positive:</p> <ul style="list-style-type: none"> <li>• Tenant and staff engagement will seek out the voices for under-represented groups</li> <li>• ASB policy to support victims from all communities including LGBTQ</li> </ul> <p>Negative: no impact identified.</p> <p>Any mitigation required: The Landlord Strategy and the Housing Landlord Transformation and Improvement programme are high level documents. Policies and plans that have a direct impact on this protected group will be subject to consultation and EIA assessment to identify and mitigate any identified direct or indirect sexual orientation discrimination.</p> <p>The ASB Framework adopted in 2025 ensures that anti-social behaviour is addressed inclusively, supporting victims from all communities including LGBTQ+.</p>
<p>Gender reassignment</p>	<p>Positive: no impact identified</p> <p>Negative: no impact identified</p> <p>Any mitigation required: The Landlord Strategy and the Housing Landlord Transformation and Improvement programme are high level documents. Policies and plans that have a direct impact on this protected group will be subject to consultation and EIA assessment to identify and mitigate any identified direct or indirect gender reassignment discrimination.</p>
<p>Pregnancy, maternity and paternity</p>	<p>Positive: no impact identified</p> <p>Negative: no impact identified</p>

	<p>Any mitigation required:                  The Landlord Strategy and the Housing Landlord Transformation and Improvement programme are high level documents. Policies and plans that have a direct impact on this protected group will be subject to consultation and EIA assessment to identify and mitigate any identified direct or indirect pregnancy maternity or paternity discrimination.</p>
Marriage and civil partnership	<p>Positive: no impact identified</p> <p>Negative: no impact identified</p> <p>Any mitigation required:                  The Landlord Strategy and the Housing Landlord Transformation and Improvement programme are high level documents. Policies and plans that have a direct impact on this protected group will be subject to consultation and EIA assessment to identify and mitigate any identified direct or indirect marriage and civil partnership discrimination.</p>
Rural isolation	<p>Positive: no impact identified</p> <p>Negative: no impact identified</p> <p>Any mitigation required:                  The Landlord Strategy and the Housing Landlord Transformation and Improvement programme are high level documents. Policies and plans that have a direct impact on this protected group will be subject to consultation and EIA assessment to identify and mitigate any identified direct or indirect rural isolation discrimination.</p>
Socio-economic factors	<p>Positive:</p> <ul style="list-style-type: none"> <li>• Individuals will be able to raise complaints in any way with any member of staff. This promotes awareness and access for individuals who are less confident in expressing themselves in writing.</li> <li>• Review and improvement of our complaint procedure to use appropriate language when responding in writing to adjust to meet the needs of the complainant.</li> </ul>

	<ul style="list-style-type: none"> <li>• Cost of living response officers to provide welfare, benefit, housing and debt advice to tenants at risk of falling into arrears or losing tenancies.</li> <li>• Improvement in neighbourhoods and estates and investment in our community centres and green and open spaces within our estates.</li> </ul> <p>Negative: no impact identified</p> <p>Any mitigation required: The Landlord Strategy and the Housing Landlord Transformation and Improvement programme are high level documents. Policies and plans that have a direct impact on this protected group will be subject to consultation and EIA assessment to identify and mitigate any identified direct or indirect socio-economic discrimination.</p>
<p>Other <i>(for example, those with dependents/caring responsibilities, asylum seeker and refugee communities, children in the care system, etc)</i></p>	<p>Positive: No impact identified</p> <p>Negative: No impact identified</p> <p>Any mitigation required: The Landlord Strategy and the Housing Landlord Transformation and Improvement programme are high level documents. Policies and plans that have a direct impact on this protected group will be subject to consultation and EIA assessment to identify and mitigate any identified direct or indirect other discrimination.</p>
<p>Carers are not a protected characteristic under the Public Sector Equality Duty, however we need to consider the potential impact on this group to ensure that there is no associative discrimination (i.e. discrimination against them because they are associated with people with protected characteristics). The definition of carers developed by Carers UK is that ‘carers look after family, partners or friends in need of help because they are ill, frail or have a disability. The care they provide is unpaid. This includes adults looking after other adults, parent carers looking after disabled children and young carers under 18 years of age.’</p>	

<p>Overall, if there is a potential adverse impact after the mitigation, please state why and whether this is justifiable.</p>	<p>n/a</p>
<p>How will you monitor this to ensure there is no adverse effect in the future?</p>	<p>The Landlord Strategy and the Housing Landlord Transformation and Improvement programme are high level documents. Policies and plans that have a direct impact on protected groups will be subject to consultation and EIA assessment to identify and mitigate any identified direct or indirect discrimination.</p>
<p>Outcome of EIA:</p>	<p>Adjustments:</p> <ul style="list-style-type: none"> <li>• Steps have already been taken to address barriers around digital exclusion. These include the introduction of printed materials, sending documents in alternative formats, and promotion of events and activities through a variety of channels. Additional tools such as text relay for hearing-impaired tenants has been introduced and the development of an online repairs portal are underway.</li> <li>• Change management support has been initiated, with staff briefings and training aligned to new policies and service standards such as reasonable adjustments policy and Awaabs Law.</li> <li>• A suite of new and updated policies has been developed to support inclusive service delivery and regulatory compliance. These include:             <ul style="list-style-type: none"> <li>○ Reasonable Adjustment Policy</li> <li>○ Disabled Aids and Adaptations Policy</li> <li>○ Updated DCM and Repairs Policies</li> <li>○ ASB Framework</li> <li>○ Updated Allocations Policy</li> <li>○ HRA Governance Framework</li> <li>○ Knowledge and Information Management Framework</li> <li>○ Tenant Engagement and Influence Strategy</li> </ul> </li> </ul> <p>Further work is ongoing to interrogate potential impacts on groups where data gaps exist, particularly in under-represented communities and intersectional characteristics.</p>

	<p>The Landlord Strategy and the Housing Landlord Transformation and Improvement Programme will continue to be reviewed periodically. Equality impacts will be reassessed at each review point, and formal Equality Impact Assessments will be carried out for each new policy introduced under the programme.</p>
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**Report To:** Policy Development Panel

**Date:** 3<sup>rd</sup> February 2026

**Subject:** Data Protection Policy and Records Management Policy

**Purpose:** To review updated policies prior to Cabinet consideration.

**Key Decision:** N/A

**Portfolio Holder:** Councillor Jim Astill

**Report Of:** John Medler, Assistant Director Governance and Monitoring Officer

**Report Author:** Richard Steele, Group Manager for Information Governance and Data Protection Officer

**Ward(s) Affected:** All

**Exempt Report:** No

## Summary

The Council's Data Protection Policy and Records Management Policy have been reviewed to ensure the Council's compliance with the latest statutory requirements, including the UK GDPR, Data Protection Act 2018, and the new Data Use and Access Act 2025 (DUAA). The intention is to align these policies across the South & East Lincolnshire Councils Partnership (SELCP).

This report seeks the Committee's feedback on the revised draft policies which are attached at Appendices 1 and 2.

## Recommendations

That the Committee considers the draft Data Protection Policy and Records Management Policy attached at Appendices 1 and 2 and recommends them to Cabinet for approval.

## **Reasons for Recommendations**

Reviewing and adopting revised policies demonstrates the Council's commitment to transparency, accountability, and the protection of individual rights, which is vital for public trust.

## **Other Options Considered**

Not to recommend or make suggested changes to the policies.

## **1. Background**

- 1.1 The Data (Use and Access) Act 2025 (DUAA), which received Royal Assent on 19 June 2025, amends both the UK GDPR and the DPA 2018 to modernise data protection and privacy law and to support new data-sharing and innovation objectives. It introduces a range of reforms — for example, adjustments to automated decision-making, new lawful grounds for processing (including recognised legitimate interests), updated complaint-handling requirements, and clarifications to international data transfers and law enforcement data use — while maintaining the UK GDPR and DPA 2018 as the core data protection regime
- 1.2 Accordingly it is appropriate for the Council to review its policies in relation to information handling to maintain the Council's ability to service its constituents effectively and within the legal framework.

## **2. Report**

- 2.1 The Data Protection Policy sets out how personal data is handled, whilst the Records Management Policy establishes the framework for managing all records, including personal data.
- 2.2 The Records Management Policy establishes the framework for managing all records, including personal data, ensuring they are accurate, accessible, secure, and retained appropriately. It supports compliance with legal and regulatory frameworks and applies to all recorded information held by the authority, regardless of format, across all departments and services.
- 2.3 The Records Management Policy covers the full lifecycle of information—from creation and storage to sharing, archiving, and destruction. The Data Protection Policy ensures that personal data within this lifecycle is processed lawfully, fairly, and securely.
- 2.4 Both policies define clear roles and responsibilities, including those for the SIRO (Senior Information Asset Owner), DPO (Data Protection Officer), Information Asset Owners, and all staff. This ensures coordinated governance and accountability.
- 2.5 Additionally both policies incorporate requirements from the DUAA, such as lawful access, interoperability, transparency registers, and risk assessment for data sharing.

### **3 Key Updates and Changes**

3.1 The review has included benchmarking against SELCP and other Councils policies.

#### **Data Protection Policy**

3.2 The Policy has been updated to reflect the Data Use and Access Act 2025 including:

- lawful access and reuse of public-sector datasets, with transparency and interoperability.
- the formalisation of a complaints process for handling subject's rights activities in line with new statutory requirements. Further details of this process are included in Appendix F within the Data Protection Policy.
- that a 'reasonable' search will be undertaken (rather than an exhaustive search under the previous legislation) which will reduce some burden on the authority.

#### **Records Management Policy**

3.3 The draft Policy aligns with the Legal Framework, which includes the FOIA 2000, various Local Government Acts, Public Records Act 1958, and Data Use and Access Act 2025. The key aspects of the policy are:

- Lifecycle Management: This ensures records are accurate, accessible, secure, and retained/disposed of appropriately.
- AI & Digital Transformation: Includes management of AI-generated records and integration with digital initiatives.
- Retention Schedules: The systematic approach to retention and disposal of records, with evidence for audit and challenge.

### **4. ICO guidance and future amendments**

4.1 The draft policies have been reviewed in line with current ICO guidelines which are mandatory for councils. The ICO is currently reviewing its guidance documents, this may require further updates to be made to one or both policies. Officer delegations will be sought from Cabinet to update the policies to ensure ongoing compliance and responsiveness to regulatory changes.

### **5. Conclusion**

5.1. Together, the draft policies create a unified framework for information governance, supporting statutory compliance, operational efficiency, and public trust. Both are designed for regular review and amendment as laws and guidance evolve, ensuring the Council remains agile and compliant.

## **Implications**

### **South and East Lincolnshire Councils Partnership**

The alignment of these policies will ensure that officers are working to a single policy and set of procedures, ensuring consistency for officers and residents alike. Updating and aligning the policies will also provide an opportunity to promote the policies and confirm procedures to ensure service areas are aware of their responsibilities in relation to feedback and complaints.

### **Corporate Priorities**

None

### **Staffing**

None

### **Workforce Capacity Implications**

None

### **Constitutional and Legal Implications**

The impact on individuals Human Rights have been considered throughout the Policy. The ICO will update their "advice and guidance" for all local councils in England under section 91 of the Data Use and Access Act 2025. Councils should consider any new ICO guidance when developing policies and procedures or make appropriate considerations.

### **Data Protection**

Both policies have a direct impact on Data Protection.

### **Financial**

None

### **Risk Management**

Upon adoption details of the revised policies will be communicated to staff and support provided where necessary to ensure compliance. These steps will help to mitigate against potential complaints to the Regulator.

### **Stakeholder / Consultation / Timescales**

Consultation has taken place with the Senior Management Team, Portfolio Holder, Senior Information Risk Owner.

### **Reputation**

None

### **Contracts**

None

### **Crime and Disorder**

None

### **Equality and Diversity / Human Rights / Safeguarding**

Equality Impact Assessments for the draft policies have been undertaken and identify that the draft policies do not have a disproportionate or adverse impact on people with protected characteristics.

### **Health and Wellbeing**

None

### **Climate Change and Environment Impact Assessment**

Not undertaken

### **Acronyms**

- **UK GDPR:** United Kingdom General Data Protection Regulation
- **DPA 2018:** Data Protection Act 2018
- **DUAA:** Data Use and Access Act 2025
- **S&ELCP:** South and East Lincolnshire Councils Partnership
- **ICT:** Information and Communication Technology
- **ICO:** Information Commissioner's Office
- **PFH:** Portfolio Holder
- **AD:** Assistant Director
- **DPO:** Data Protection Officer
- **FOIA:** Freedom of Information Act
- **EIA:** Equality Impact Assessment
- **SIRO:** Senior Information Risk Owner

### **Appendices**

Appendices are listed below and attached to the back of the report:

Appendix 1	(Data Protection Policy)
Appendix 2	(Records Management Policy)

### **Background Papers**

none

### **Chronological History of this Report**

none

**Report Approval**

Report author: Richard Steele, Group Manager for Information Governance and Data Protection Officer, Richard.Steele@boston.gov.uk  
Signed off by: John Medler, Assistant Director Governance and MO, John.Medler@e-lindsey.gov.uk  
Approved for publication: Councillor Jim Astill



## Data Protection and Data Use Policy 2026

Document Author:	Richard Steele CIPM, Group IG Manager and DPO
Document Approved:	SHDC BBC ELDC
Document Review date:	

### 1. Introduction

This document ("Policy") outlines how ("the Council", "we", "our", "us") handles personal data, protecting individuals' privacy under the:

- UK General Data Protection Regulation (UK GDPR) 2018
- Data Protection Act 2018 (DPA 2018)
- Privacy and Electronic Communications Act 2018 (modified GDPR)
- Human Rights Act 1998 (Article 8)
- Data (Use and Access) Act 2025 (DUAA)
- And guidance from the Information Commissioner's Office (ICO).

It applies to all staff, elected members, contractors, agency staff, consultants, and partners.

### 2. Scope

This Policy applies to all personal data in all formats (electronic, paper, audio, etc.) held by or on behalf of the Council and to all individuals or organisations processing this data.

Personal data means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

This policy supports our other policies. We may supplement or amend this policy by additional policies and guidelines from time to time.

### 3. Data Protection Principles

We are committed to the seven UK GDPR principles:

1. **Lawfulness, fairness & transparency** – process data legally and openly.
2. **Purpose limitation** – collect only for specified, explicit reasons.
3. **Data minimisation** – gather only what is necessary.
4. **Accuracy** – maintain data accuracy and timeliness.
5. **Storage limitation** – retain only as long as required.
6. **Integrity & confidentiality** – protect data with safeguards.
7. **Accountability** – show compliance clearly.

We commit to the DUAA specific commitments:

- Enabling **lawful access & reuse** of public-sector datasets.
- Ensuring **interoperability** and **transparency** in data sharing.

### 4. Roles and Responsibilities

Each Council is designated “Data Controller” for the data it generates, uses and accesses in delivery of its public task.

**Senior Information Risk Owner (SIRO):** Strategic oversight.

**Data Protection Officer (DPO):** Compliance monitoring, advice, liaison.

**Managers/Service Leads:** Operational enforcement.

**All Staff & Members:** Must follow this Policy and report concerns promptly.

Members may be a Data Controller for personal information not covered by this Data Protection and Data Use Policy where that processing is for political, personal or casework. (this is expanded in Appendix G)

### 5. Rights of Individuals

Each person has a right to know that the Council is using, storing and sharing their information in a clear and transparent way. There are provisions within the Data Protection Act known as ‘subject’s rights’ that an individual can use to see, amend and challenge the use of their information. This is known as a “subject access request” or a “SAR”. All SARs must be directed to the DPO for co-ordination. (this is expanded in Appendix A)

In some cases the Council uses information to meet a lawful obligation placed upon it by a series of legislation. If this is the case the Council may need to withhold some of the 'subject's rights'.

Individuals have the right to:

- Access their personal data.
- Correct errors.
- Request erasure ("right to be forgotten").
- Restrict or object to processing.
- Port data.
- Withdraw consent.
- Challenge automated decisions.
- Lodge complaints with the Council and the ICO

Under DUAA, we also ensure transparency about who accesses and reuses public data.

## **6. Data Sharing and Access**

Data will only be shared under a valid legal basis, supported by contracts or Information Sharing Agreements (ISAs).

Per DUAA, we mandate:

- Lawful access to datasets where required.
- Use of interoperable formats.
- A transparency register of accessed/shared data.

All data sharing must be documented and risk assessed by the DPO, approval for processing of high risk will be the Councils' SIRO, for any other processing will be the designated information risk owner. Processing against DPO advice will be recorded in accordance with ICO guidance.

## **7. Automated Decision Making**

The DUAA allows the Council to use automated systems to make decisions more widely—for example, in service allocation or eligibility checks. Where these decisions have a significant impact, individuals must be told that automation was used and given the chance to challenge it and request a human review.

Automated Decision Making using sensitive data (like health or ethnicity) is still restricted and only allowed with a clear legal basis. Safeguards must be in place to ensure fairness, transparency, and accountability.

## 8. Accountability and Governance

We will:

- Ensure that processes meet required standards to protect personal data.
- Ensure that sub processors, agents and suppliers meet the same requirement through contract.
- Keep “records of processing activities” (ROPA).
- Conduct DPIAs for high-risk or DUAA-related processes.
- Report data access or reuse activities publicly as required.
- Investigate and respond to any data breaches (this is expanded at Appendix B)

Being transparent and providing accessible information to individuals about how we will use their personal data is important to the Council. We will ensure a privacy notice is in place for each circumstance where we are collecting and processing information. (this is further expanded at Appendix C)

## 9. Security

We will use appropriate **technical and organisational measures**— encryption, access controls, secure storage, contractual clauses and staff training—to adequately protect data. Security controls are contained in the Council’s ICT Acceptable Use Policy.

## 10. Training

Training for all staff includes:

- Induction training.
- Annual refresher sessions.
- Specialist programmes where needed (e.g., SARs, breach response).
- Guidance and training available for members
- Training records will be kept for auditing.

This is expanded at Appendix D.

## 11. Policy Review

This Policy is reviewed every three years or sooner when significant legal changes occur (for example, DUAA updates).

All updates will be communicated to staff and published as needed.

## **Data Protection and Data Use Policy Appendices**

Appendix A – Subject Access Requests (SARs)

Appendix B – Data Breach Procedure

Appendix C – Appropriate Policy Document (Special Category & Criminal Data)

Appendix D – Information Sharing & DUAA Compliance

Appendix E – Training & Awareness

Appendix F – Complaints Handling (DUAA Compliance)

Appendix G – Councillors

DRAFT

## Appendix A – Subject Access Requests (SARs) and/or rights requests.

Any individual has the legal right to know what personal information the Council holds about them. This is known as a Subject Access Request (SAR). This process applies equally for other rights provided to subjects under UK GDPR.

- A SAR can be made **in writing, by email, or verbally**. Staff should not refuse a request simply because it is not written on a form.
- When receiving a SAR, staff must **check the identity of the requester** before releasing any information. If the request is made by a third party, we must confirm that they have the data subject's written consent or legal authority.
- The Council will apply the DUAA's "**stop the clock**" provision when awaiting clarification from requesters.
- Under DUAA **reasonable and proportionate searches** are required when responding to SAR.
- The Council must provide a response **within one calendar month**. Where the request is complex, the DPO may extend the deadline by a further two months. The requester must be informed in writing of any extension.
- Requests that are **manifestly unfounded or excessive** may be refused, but this decision must be approved by the DPO and explained clearly to the requester.
- If information about other individuals is contained in the records, this data will only be disclosed if it is lawful and fair to do so. Otherwise, it will be redacted.
- If an individual is unhappy with the Council's response, they may make a complaint. Complaints should first be reviewed internally by the SIRO. If unresolved, the individual may escalate the matter to the Information Commissioner's Office (ICO).
- Under the **DUAA**, we are also required to keep a record of requests for access and reuse of public data. This ensures transparency in how public data is made available.
- We will abide by any request from an individual not to use their personal data for direct marketing purposes and notify the DPO about any such request.
- It is essential that you contact the DPO for advice on direct marketing before starting any new direct marketing activity. You must not send direct marketing material to someone electronically (e.g. via email) unless you have an existing business relationship with them in relation to the services being marketed.

## Appendix B – Data Breach Procedure

A personal data breach is any event that leads to the loss, destruction, unauthorised disclosure of, or access to, personal information. Examples include sending personal information to the wrong recipient, losing files, or an IT system being hacked.

- Any member of staff who becomes aware of a possible breach must **report it immediately to the DPO**. Staff should not try to investigate or fix the breach themselves without direction.
- The DPO will **log the incident** and carry out an initial risk assessment using the Council's breach risk matrix.

- If the breach is likely to result in a risk to people's rights or freedoms, the Council must **report it to the ICO within 72 hours** of becoming aware of it.
- Where there is a high risk of harm to individuals, the Council will also **notify those affected directly**, explaining what has happened, what data was involved, and what steps they can take to protect themselves.
- Even if a breach does not need to be reported to the ICO, it must still be **logged internally** with details of the cause, impact, and any corrective action taken.
- The Council will review all breaches to learn lessons and improve its systems and training, reducing the risk of recurrence.
- Lessons learnt from data breach incidents will be collated and used to prevent similar occurrences going forward.
- Volumes of data breach, type and impact will be reported to Senior Leadership Team, portfolio holders, and annually in information governance reporting.

### Appendix C – Appropriate Policy Document (Special Category & Criminal Data)

The Council often needs to process special category data, such as health information, or criminal conviction data. This is more sensitive than ordinary personal data and requires additional safeguards.

- Special category data will only be processed when **absolutely necessary** and when a lawful condition under Article 9 UK GDPR or the DPA 2018 applies.
- Criminal offence data will only be processed when authorised by law, for example under the Council's safeguarding or enforcement duties.
- The Council will keep a **written record** of the legal condition relied on for processing, the purpose of the processing, and the retention and erasure rules that apply.
- Special category and criminal data will be retained **only as long as necessary** for the purpose for which it was collected and securely deleted once no longer needed.
- Access to such data will be **strictly limited** to staff who need it for their role and who have received appropriate training.
- Under the DUAA, special category and criminal data will **not** be made available for reuse or access unless there is a clear legal basis.

Specifically this policy covers the requirement under Schedule 1 para 39 of the Data Protection Act 2018 for processing dependant on Schedule 1 para 38.

- This includes processing for:
  - Health or Social Care purposes (Schedule 1 part 1 section 2) (GP referrals)
  - Processing for Public Health. (Schedule 1 part 1 section 3) (Public health England)
  - Processing for Research. (Schedule 1 part 1 section 4) (anonymisation of data)

- Processing for Statutory and Government Purposes. (Schedule 2 part 2 section 6) – documented in the Register of Processing Activities.

## Appendix D – Information Sharing & DUAA Compliance

The Council shares information with partners and other organisations to deliver services, meet legal duties, and support public safety. Sharing will always be carried out in a controlled and transparent manner.

- No personal data will be shared without a valid legal basis. Before sharing, staff must consult the DPO if there is any doubt.
- Information Sharing Agreements (ISAs) or legally binding contracts will be put in place with external organisations, setting out how data will be used, stored, and protected.
- Any sharing of personal data must be **necessary, proportionate, and secure**. Only the minimum amount of data needed should be disclosed.
- The DUAA introduces additional requirements for **lawful access to public sector datasets**. Where these apply, the Council will ensure data is provided in interoperable formats and with appropriate technical safeguards.
- The Council will maintain a public transparency register of datasets that are shared or made available under the DUAA, showing which organisations have access to the data and for what purpose.
- All data sharing decisions must be logged, and the risks assessed, before any information is released.

## Appendix E – Training & Awareness

All staff have a responsibility to understand and follow this Policy.

- Every new starter must complete **mandatory data protection training** as part of their induction.
- All staff must complete **regular refresher training**, with updates provided sooner if laws change (such as new DUAA rules).
- Staff in roles with higher data protection responsibilities (for example, housing, and service managers) will be given additional **specialist training**.
- The Council will keep records of all training attendance. These records will be reviewed regularly to ensure compliance.
- Awareness campaigns, such as posters, newsletters, and intranet articles, will be used to keep staff informed about data protection responsibilities and any changes in the law.

## Appendix F – Complaints Handling (DUAA Compliance)

All individuals have the right to raise concerns about how their personal data is handled. The Council is committed to resolving complaints fairly, transparently, and in line with the Data Use and Access Act 2025 (DUAA).

- The Council will provide an **electronic complaints form, and email address** accessible via its website and intranet.
- All complaints will be **acknowledged within 30 calendar days**, with updates provided if resolution takes longer.
- Complaints will be handled **without undue delay**, and outcomes will be clearly communicated to the complainant.
- Where a complaint relates to automated decision-making, data sharing, or reuse under DUAA, the Council will ensure appropriate review and explanation.
- Staff must refer any data-related complaints to the **Information Governance Team** immediately and must not attempt to resolve them independently.
- The **Data Protection Officer (DPO)** will oversee complex or high-risk complaints and ensure lessons are learned.
- The Council will maintain a **complaints log**, including outcomes and corrective actions, for audit and improvement purposes.
- Individuals dissatisfied with the Council's response may escalate their complaint to the **Information Commissioner's Office (ICO)**.

## Appendix G – Councillors

Councillors may process personal data in **three distinct roles**, and depending on the context, they may **not be acting on behalf of the public authority** (i.e., the Council). These roles are:

1. **As a Ward Representative**

When handling casework or assisting residents with personal issues (e.g., complaints, housing matters), councillors act independently. In this role, they are considered data controllers in their own right, not processing data on behalf of the Council.

2. **As a Political Party Representative**

During election campaigns or party activities, councillors may process personal data under the authority of their political party. Here, the party is the data controller, and the councillor is acting on its behalf—not the Council

3. **As a Member of the Council (e.g., Committee or Cabinet)**

In this role, councillors are typically processing data on behalf of the Council, which is the data controller. However, if they use data outside of Council purposes (e.g., for personal or political use), they are no longer acting on behalf of the public authority

Understanding these distinctions is crucial for compliance with UK GDPR and the DUAA, especially regarding registration, lawful basis, and data sharing responsibilities

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## Record Management Policy 2026

Document Author:	Richard Steele CIPM, Group IG Manager and DPO
Document Approved:	SHDC BBC ELDC
Document Review date:	

### 1. Introduction

This policy establishes the framework for managing records created or received by the authority, ensuring they are accurate, accessible, secure, and retained appropriately.

It supports compliance with various legal and regulatory frameworks.

It applies to all staff, elected members, contractors, agency staff, consultants, and partners.

### 2. Scope

This policy applies to all recorded information held by the authority, regardless of format (paper, digital, email, audio, video), across all departments and services.

This policy applies to the full information or data lifecycle.

This includes:

- the collection or creation of information,
- the storage,
- the use or processing,
- any sharing ,
- any archiving
- and the deletion/destruction of information.

In addition to automated decision outputs, records generated by AI systems must be managed, retained, and reviewed in accordance with this Policy.

This policy supports our other policies. We may supplement or amend this policy by additional policies and guidelines from time to time.

### 3. Principles

The Section 46 Code of Practice is official guidance issued under Section 46 of the Freedom of Information Act 2000 (FOIA). It sets out recommended standards for the creation, management, retention, and disposal of records by public authorities in England, Wales, and Northern Ireland. The Code is maintained and updated by The National Archives and is supported by the Information Commissioner's Office (ICO).

In line with the Section 46 Code of Practice, this policy is built on:

- **Accountability** – Records must support transparency and decision-making.
- **Integrity** – Records must be authentic, reliable, and complete.
- **Accessibility** – Records must be retrievable and usable when needed.
- **Security** – Records must be protected from unauthorized access or loss.
- **Retention** – Records must be retained only as long as necessary.

### 4. Roles and Responsibilities

Each Council is designated "Data Controller" for the data it generates, uses and accesses in delivery of its public task. Clear roles and responsibilities are defined to ensure effective implementation and oversight of this Policy

- **Senior Information Risk Owner (SIRO):** Strategic oversight.
- **Information Governance Team:** Compliance monitoring, advice, liaison.
- **Managers/Service Leads as Information Asset Owners (IAOs)** Accountable for specific datasets
- **All Staff & Members:** Responsible for good recordkeeping practices and compliance with this policy and legislative requirements.

### 5. Legal and Regulatory Framework

- FOIA 2000 – Section 46 Code of Practice: Sets standards for record creation, retention, and disposal
- Local Government Act 1972: Requires proper custody of records (Section 224)
- Local Government Transparency Code 2015: Mandates publication of key datasets

- Data Protection Act 2018 / UK GDPR: Requires lawful, fair, and secure processing of personal data
- Public Records Act 1958: Governs historical records and transfer to The National Archives.
- Data (use and access) Act 2025: Lawful access to datasets where required, Use of interoperable formats, a transparency register of accessed/shared data.

## **6. Policy Commitments**

As with personal data, all data sharing must be documented and risk assessed by the Information Governance lead. Approval for processing of high risk data will be considered by the Council's SIRO. For any other processing the approval for processing will be considered by the designated information asset owner (IAO).

The Council aims to:

- Maintain a Records Retention Schedule aligned with statutory and operational needs.
- Apply metadata standards to support classification and retrieval.
- The origin and method of creation (e.g., "generated by AI system X on [date]") should be documented to support auditability and public trust where generative AI is used.
- Conduct annual audits to monitor compliance and identify risks.
- Ensure secure disposal of records in accordance with the Section 46 Code.
- Publish required datasets under the Transparency Code.
- Integrate records management into digital transformation initiatives.
- Update and amend a publication scheme.

## **7. Retention Schedules**

Systematically disposing of materials at the end of their life is good business practice and is essential we comply with the law. For each of our activities, the retention schedule sets out:

- What collections of information are held and their purpose.
- Who is responsible for them (the 'information asset owner').
- How long materials need to be kept and what the trigger is to count down to disposal, for example six years from date of case closure.

Whether the retention period is defined in law or based on common business practice. In maintaining our retention schedule, we will:

- Identify the records the Council needs to keep - and those it does not need to retain
- Define how long information is kept to meet the legal, financial and other requirements of public administration.
- Apply those rules systematically to its information.
- Confirm how information will be stored at different stages of its life-cycle and how it will be destroyed at the end of its life.
- Provide evidence that records have been disposed of consistently in case of challenge.
- Mark and include AI-generated records in the “Retention Schedule” and dispose of them in accordance with statutory and operational requirements.

## 9. Security

We use appropriate **technical and organisational measures**— encryption, access controls, secure storage, contractual clauses and staff training—to adequately protect data. Security controls are contained in the Council’s ICT Acceptable Use Policy.

## 10. Training

Training for all staff includes:

- Induction by the relevant manager on record management arrangements.
- Guidance available to all staff.
- Specialist programmes where needed (e.g., Information asset owners).
- Training records will be kept for auditing.

## 11. Policy Review

This Policy is reviewed every three years or sooner when significant legal changes occur (for example, DUA updates).

All updates will be communicated to staff and published as needed.



<b>Report To:</b>	Policy Development Panel (PDP)
<b>Date:</b>	03 FEB 2026
<b>Subject:</b>	South Holland District Council (SHDC) Markets Policy review
<b>Purpose:</b>	To present for members consideration an update to the SHDC's existing Markets Policy and the introduction of a new SHDC Markets Severe Weather Policy.
<b>Key Decision:</b>	No
<b>Portfolio Holder:</b>	Leader Councillor Nick Worth
<b>Report Of:</b>	Phil Perry – Assistant Director, Leisure & Local Services Division
<b>Report Author:</b>	David Smith – Markets Manager
<b>Ward(s) Affected:</b>	Spalding, Holbeach, Long Sutton, Crowland
<b>Exempt Report:</b>	No

## Summary

This is a review of the current SHDC Markets Policy (**Appendix 1**) to support the implementation of an updated online bookings and payments system (GOSS) and the introduction of a new Severe Weather Policy.

This review is required as the service evolves, to ensure the market is operated efficiently, consistently and safely. This report details the draft of the new policies for the service.

The purpose of the new Market Policy (**Appendix 2**) and Severe Weather Policy (**Appendix 3**) is to set out the matters the Council will take into account, when considering and undertaking its duty to provide and manage its markets. It details the responsibilities of the council in official guidance of the policy for the Council to act in a particular way and the expectation set of the traders.

## **Recommendations**

1. Review the draft Market Policy (**Appendix 2**) and Severe Weather policy (**Appendix 3**) as provided in this report.
2. Provide any feedback to be recommended to Cabinet for consideration for incorporation into the draft South Holland Markets Policies, as provided at Appendix 2 and Appendix 3 of this report.

## **Reasons for Recommendations**

To enable members to review, comment and challenge the information presented, and consider the new measures being proposed.

## **Other Options Considered**

To not progress the reviewed draft Markets Policies. This has been discounted to ensure through a review, the commitments made by Cabinet are delivered against, to ensure the market is operated efficiently, consistently, and safely.

## **1. Background**

- 1.1 The Markets Service last saw a full review of its Markets Policy in June 2022 and has since seen small amendments to the policy. The bookings and payments system that has been used for the majority of this period requires improvement to bring in line with most systems used across the Country, including the partner authorities at East Lindsey District Council (ELDC) and Boston Borough Council (BBC). As a result, the Markets Service has worked closely with Public Sector Partnership Services Ltd (PSPS) ICT colleagues and GOSS Interactive to create a bespoke, modern, online service which will result in a better service for traders as well as markets staff.
- 1.2 With the new GOSS booking and payment system in development, the Markets Policy needs to be brought up to date to ensure the Councils and the trader's responsibilities are clear.

## **2. Report**

- 2.1 The purpose of the Market Policy is to set out the matters the Council will take into account, when considering and undertaking its duty to provide and manage its markets. It details the responsibilities of the council in official guidance of the policy for the Council to act in a particular way and the expectation set of the traders. The Markets Policy has been reviewed for the 2026/27 financial year and is attached as **Appendix 2**.

- 2.2 Market Policies should be reviewed annually to update any change of fees and charges and minor changes, but due to the implementation of the new and more advanced booking and payments system it was determined that a wider review of the policy was also needed.
- 2.3 The review of the Markets Policies was undertaken with some extensive research of other local authority markets policies and draws on best practice from them all.
- 2.4 Within the draft Market Policy, some of the principal changes to consider have been noted below and aim to make the policy clearer and as accessible as possible:
- Traders will now be classified as regular or casual traders upon application.
  - The ability to introduce promotional fees to promote existing and new special markets such as Makers Markets.
  - There is a new requirement for traders to provide risk assessments if using their own stalls/equipment upon request.
  - Instructions on how to make a trader application on the new GOSS system.
  - Instructions made clear that payment to stand must be made prior to standing.
  - Instructions on the new process for traders to apply to change their line of goods to sell via the new GOSS system.
  - A new initiative where charity stalls are now allowed to stand free, once a quarter across all markets.
  - Casual traders are now able to book 28 days in advance rather than the current 14 days.
  - Market days and fees made clearer.
  - New incentives added for traders. Any trader that would like to return to SHDC markets who hasn't traded with the Council for over 12 months, will be eligible to return and receive the current incentives, such as receiving a free trial day at each market.
  - Changes have been made to the disciplinary procedures, with the trader conduct section updated to bring in line with modern issues such a conduct online that could damage the Councils reputation or market traders.
  - Information on selling second-hand goods on the market has been added.
  - Information on the provision of generators being used on the market has been added.
  - Health and safety inspection details added to provide guidance to traders on what the Markets officer inspection will consist of.
  - Each year, regular traders will receive 8 non-attendance days per market they stand on.
  - Relevant legislation in line with Trading Standards and relevant law has been added to the policy to ensure traders are aware and to assist with any breaches of policy for market staff.
  - Food hygiene regulations and guidance have been added to the policy.
  - Severe Weather Policy created, taking guidance from the MET Office, the National Association of British Markets and the Councils own Liability insurance.
  - If a restricted market is declared due to severe weather, traders will not have to use one of their non-attendance days.
- 2.5 The Markets Service has also experienced changing weather patterns that have led to increasing numbers of storms adversely affecting the markets, with higher windspeeds more often, that can be dangerous due to the nature of gusts of wind being unpredictable. A new Severe Weather Policy has therefore been drafted in

collaboration with the health and PSPS Safety Manager, to mitigate against the changing weather throughout the year.

2.6 The aim of the Severe Weather Policy is to determine when and how the decision to restrict or close a market is taken, as it can cause a lot of disruption with the potential for financial and logistical impacts for all concerned and therefore is never taken lightly. Its key priority is to protect the public, traders, and staff safety in the event of any severe weather which would affect any open-air market or event operated by South Holland District Council. The policy may apply in the following circumstances:

- A severe weather warning is in force and has been issued by the Met Office or,
- in the opinion of the Markets Team there is a risk to safety due to adverse weather conditions.

2.7 The Markets Team will offer help sessions for traders, to assist with the transition to the new GOSS system. Traders will be offered to attend in-person demonstrations, Microsoft Teams online sessions, assistance over the phone and also assistance in person on the market for those unable to attend any other sessions.

2.8 The new system will also provide notifications to traders to remind them of key factors such as their insurance expiring and their payments becoming due.

2.9 The new policies will see South Holland District Council have some of the most comprehensive and high-quality policies in the Country, showcasing the professional standards that the Council upholds.

2.10 With the introduction of a custom-built booking and payment system, an increasingly popular markets Facebook page, new market banners, and competitive fees, the Markets Team has established a strong foundation to sustain its impressive progress. These improvements make SHDC Markets significantly more appealing to both new traders and visitors.

2.11 The changes implemented this financial year have already delivered results: pitch occupancy has risen by 15% in Q1, 19% in Q2 and remained level in Q3 across the District—an achievement that defies the national trend in today's challenging climate. Q3 saw just under half a million views on our Markets Facebook page, a significant reach with no paid advertisement.

2.12 **The objectives of the Severe Weather Policy are:**

- To comply with the Council's duties and obligations to its staff, traders, and members of the public under the Health and Safety at Work Act 1974.
- To comply with the Council's common law duties under the Occupiers Liability Act 1984.
- To comply with the Council's insurers.
- To ensure any decision to close or restrict a market is taken fairly, consistently, and transparently and is communicated to all parties as soon as a decision is made.

### 3. Conclusion

- 3.1. The South Holland Market Policies have been developed to support accountability within the service to deliver strategically and operationally what is required from this important District Council asset.
- 3.2. In conclusion the draft South Holland Market Policies have been reviewed and updated in line with the evolving markets service and best practice and are presented to PDP for its consideration with a view to seeking feedback prior to submission to Cabinet on 28th April 2026.

## **Implications**

### **South and East Lincolnshire Councils Partnership**

The South Holland District Council Policies are an integral part of a Partnership approach to delivering a more sustainable markets service. The policies go towards recognising the contribution to the economy that each Market Town plays in the South and East Lincolnshire sub-region as a wider strategic economic hub and the South and East Lincolnshire Councils Partnership from a place making perspective.

### **Corporate Priorities**

The proposed Plan aligns to the following Sub-Regional South and East Lincolnshire Council Partnership priorities:

- Priority 1: Growth and Prosperity
- Priority 2: Healthy Lives
- Corporate Priority: Efficiency and Effectiveness

### **Staffing**

SHDC Markets has one full time Markets Officer.

### **Workforce Capacity Implications**

None.

### **Constitutional and Legal Implications**

The Council's Markets are required to conform to the requirements of each charter.

### **Data Protection**

There are no specific data protection implications to report as a consequence of the development of the report.

### **Financial**

There are no direct financial implications to note regarding this report.

### **Risk Management**

The policies aim to mitigate against risks within the Markets Service.

## **Stakeholder / Consultation / Timescales**

The policies have been developed following engagement work with the Portfolio Holder, Lead Officers and Partners where possible. The policy will be required to be implemented at the same time as the new booking and payment system goes live.

## **Reputation**

The policies support work to uphold the reputation of the Council by promoting an efficient and effective service that safeguards the appropriate use of each Market Town for members of the public.

## **Contracts**

None.

## **Crime and Disorder**

There are no key implications relating to crime and disorder as a consequence of this report.

## **Equality and Diversity / Human Rights / Safeguarding**

None.

## **Health and Wellbeing**

The policy makes reference to several regulatory expectations placed on traders and the market operation to ensure the health and wellbeing of others. Examples include new Emergency procedures, a new Severe Weather Policy and expectation of compliance with relevant legislation in relation to food traders.

## **Climate Change and Environmental Implications**

None.

## **Acronyms**

ELDC – East Lindsey District Council  
BBC – Boston Borough Council  
SHDC – South Holland District Council

## **Appendices**

Appendix 1	The current South Holland Markets Policy
Appendix 2	The draft South Holland Markets Policy 2026
Appendix 3	The draft South Holland Markets Severe Weather Policy 2026

## **Background Papers**

None

**Report Approval**

Report author:

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Signed off by:

Phil Perry, AD – Leisure & Culture, [phil.perry@boston.gov.uk](mailto:phil.perry@boston.gov.uk)

Approved for publication:

Leader Councillor Nick Worth – Portfolio Holder.

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# South Holland District Council



## Markets Policy

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## Our Mission Statement

To ensure the district of South Holland is a vibrant place to work, live, shop and visit and that everyone has an opportunity to be part of its future.

## Welcome to South Holland Markets

The following Market Policy details the agreement that is made between South Holland District Council and our stallholders, setting out the obligations and requirements that must be complied with to ensure safe environments for all those that frequent our markets and support the markets and their growth.

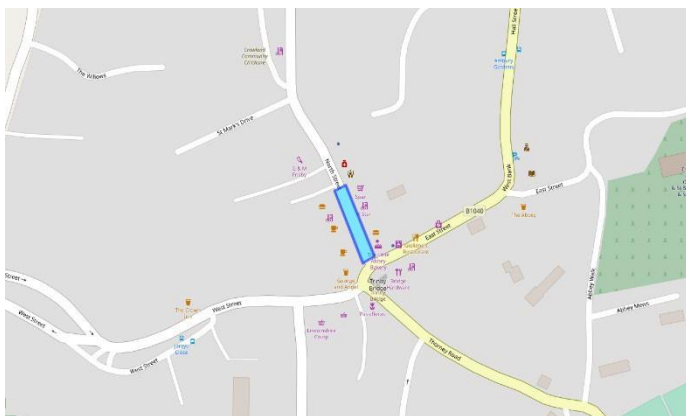
South Holland District Council is invested in the development and ongoing success of our markets. We believe that by working together, SHDC and stallholders can continue to grow each of our markets and aspire to increase footfall through a wider selection of produce and commodities.

Our markets provide customers with fresh, local and affordable products which have become more valuable to the public over the recent times. It is our commitment to work with our current and new stallholders to support, develop and advance our markets to be the markets of choice for our residents and visitors.

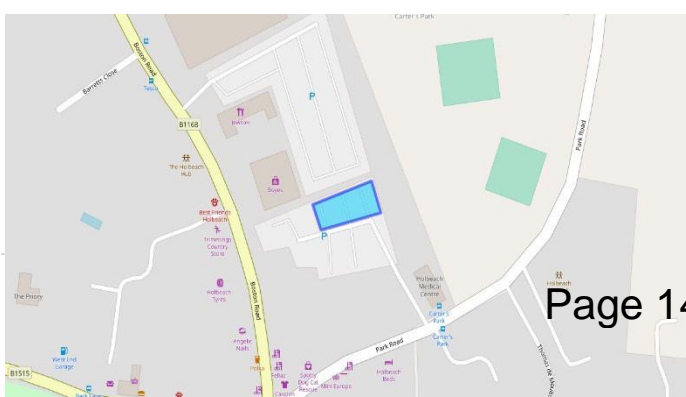
Please do not hesitate to contact us at [Markets@Sholland.gov.uk](mailto:Markets@Sholland.gov.uk) or contact the Markets Officer on 07436600979.

South Holland District Council currently run 5 markets all year round in the towns of Crowland, Holbeach, Long Sutton and Spalding.

## The markets



**Crowland**  
**North Street**  
**Every Friday**  
**09:00 – 14:00**



**Holbeach**  
**Boston Road South Car Park**  
**Every Thursday 09:00 – 14:00**

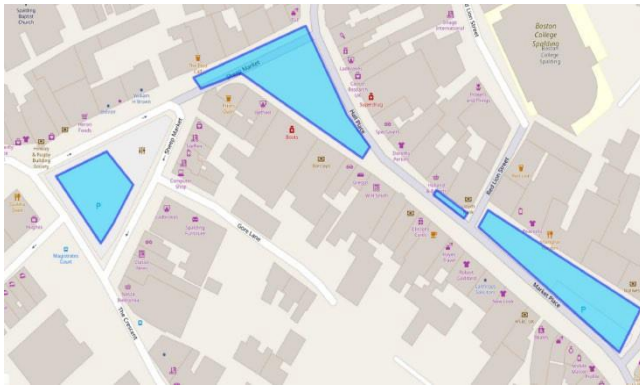


**Long Sutton**

**Market Place**

**Every Friday**

**09:00 – 14:00**



**Spalding**

**Market Place, Hall Place and Sheep Market**

**Every Tuesday and Saturday**

**09:00 – 14:00**

The days of trading may be varied around Bank Holidays but will not be held on Christmas, Boxing or New Year's Day. More details regarding our markets, including any changes around bank holidays can be found at [www.sholland.gov.uk](http://www.sholland.gov.uk).

## What you can expect from us

A Council representative will visit each market.

The Council will facilitate the online application process and check that you have everything in place to be able to stand on our markets.

The Council will facilitate and run the online booking system that will secure your position on the markets. The Council will promote the markets via the SHDC website and social media channels. The Council will update stallholders with any relevant Government advice or legislation.

## Terms of reference

**‘The council’** means the district Council of South Holland, whose principle office is The Council Offices, Priory Road, Spalding, PE11 1EX

**‘The market’** means the open-air markets held in Crowland, Holbeach, Long Sutton and Spalding respectively in the locations determined by the District Council.

**‘The Market Officer’** means the person appointed by the Council to exercise general management, supervision, control and enforcement of market rules or any person nominated to deputise in the absence of the Market Inspector.

**‘Stall/gazebo’** means any structure, standing bench, table, place or space and any vehicle or trailer used or intended to be used for the display or sale of goods.

**‘Pitch’** means the place or space in the Market Place where the stallholder is positioned containing the agreed gazebo or number of gazebos, allocated to the individual stallholder.

**‘Fittings’** means any free-standing structure or additional attachments used for displaying goods, not normally comprising of the make-up of the stall/gazebo.

**‘Vehicles’** include any mechanically propelled vehicle (other than mobility scooters or wheelchairs) and any cycle, tricycle, wheelbarrow, cart, handcart, truck, wagon or trailer.

**‘Goods’** includes provisions, commodities and articles brought into the market for the purpose of sale.

**‘Stallholder’** means a trader given permission to trade on the market. Active stallholders must inform the Council of any changes to their names or contact information.

**‘Casual Trader’** means a stallholder who is allowed to stand for the day of market only and has agreed to comply in full with the Councils Market Policy relating to the payment of rents and the operation of the market.

**“Loading and unloading”** means the process of getting goods and equipment in and out of the stallholders’ vehicles and setting up or taking down the stall/gazebo or pitch.

**“Market Licence”** means the authority of the Council, which is personal to the Stallholder, to sell permitted items on a specified market from a pitch, subject to market rules and such other conditions as may be included in the market licence.

**“Permitted Commodities”** means those goods and commodities for which the Stallholder has the approval of the Markets Officer to sell during the course of trading hours.

## Application and booking on the markets

All stallholders are required to complete an online application which is assessed by the Markets Inspector.

The application will require you to provide:

- details of all commodities that you will be selling.
- proof of public liability insurance for claims up to £5 million.
- proof of registration with the food safety team, confirmation that you hold a food rating of 3 stars or above and food hygiene certificates if you're selling food.
- business details, including any market federation membership number.
- full contact details.
- Details of the markets you wish to trade on.

Once all the required information is received, and providing the application is successful, the applicant will receive a licence to trade. The licence permits the stallholder to trade on agreed markets only and sell only the permitted commodities as provided in the application process. Should these need to be amended you must contact the Markets Team. Should you fail to do so, you will be requested to cease trading the unauthorised commodities immediately and may be subject to disciplinary procedures.

To stand on a market day, stallholders are required to book a pitch through the online book and pay system (GOSS), for which payment is required at the time of booking. For more details and access to the payment portal please see the South Holland District Council website or follow: <https://www.sholland.gov.uk/markets>

If any stallholder stands without booking and paying in advance through this system, they will be requested to cease trading on that day and may be subject to disciplinary procedures.

Stallholders will receive an email receipt for book and pay.

In the event that an allocated pitch becomes unsuitable to the stallholder it is allocated to, the Market Officer shall, at their discretion, allocate an alternative position if there are any available.

## Charity and non-commercial organisations

Where the market can be let to capacity, priority will be with commercial traders to stand.

All applications from charities and non-commercial organisations shall be treated in the same way as applications from commercial traders, including complying with all conditions set within the policy.

Each charity/non-commercial organisation shall be permitted to stand, free of charge, once every 3 months. Attendance at subsequent markets shall be chargeable at the full casual rate.

There will be no more than 4 charity/non-commercial organisations pitches permitted at each market, unless a speciality Charity Market is held. Gazebos/stalls may be provided depending on availability and staffing levels.

No organisation shall stand to promote and/or influence political parties, political campaigns, the promotion of a particular religion, or the promotion of religion in general without the consent of the

Council.

Registered Charities must complete an online application form. For more details, please contact the Markets team at [Markets@Sholland.gov.uk](mailto:Markets@Sholland.gov.uk).

## Market fees

The most up to date charges for standing on our markets can be found on our website <https://www.sholland.gov.uk/markets>

The Council reserves the right to amend its charging policies at any time and will give a minimum notice of one month to stallholders.

The costs set out below are for a 3m x 3m pitch.

Market	Fee per Pitch
Crowland	£5.00
Holbeach	£9.00
Long Sutton	£11.00
Spalding Tuesday	£10.00
Spalding Saturday	£10.00

**'Traders with 10ft pitch and additional requirements'** - £2.00 extra

Traders that would like to request additional requirements such as electric, additional seating area, gazebos etc., will need to seek permission from the Market Officer prior to booking.

## Cancellations and non-attendance

In the case of any cancellation, payments will not be refunded. Instead, the non-trading days may be reimbursed by way of a free future booking, at the discretion of the Markets Officer subject to the reason for cancellation as detailed below.

Cancellations made by the stallholder will only be reimbursed if there is an unforeseen reason such as illness or bereavement. Documentary evidence such as medical certificates may be required by the Markets Officer to authorise the reimbursement.

- a) With regard to non-attendance of a stallholder due to certified sickness and bona fide visits to medical practitioners, a stallholder will have fees reimbursed for a period of up to 3 months.
- b) Stallholders who suffer a close family bereavement will be allowed two weeks absence, without forfeiture of rights and free of market charges. An explanatory letter or email must be given by that stallholder to the Market's Officer
- c) If a stallholder is required for jury service, they must inform the Markets Officer in writing as soon as possible and the market rents may be waived.

The Council may cancel a market at short notice due to adverse weather conditions. The Council will endeavour to gain a consensus from Stallholders before the decision is made to cancel the market

and the stallholder will be reimbursed by way of a free booking on a future date.

In the event the Council has received notification from statutory undertakers or other bodies that work is to be undertaken in the Market Place, the Council reserves the right to give one weeks' notice to terminate any bookings made within the period of works.

Notice of non-attendance must be given to the Markets Officer by emailing [Markets@Sholland.gov.uk](mailto:Markets@Sholland.gov.uk) or by calling 07436 600979.

## Sale of Goods

Stallholders shall not sell any type of goods other than those for which they are registered.

Permission to change or alter commodities must be gained from the Markets Officer in writing by emailing [Markets@Sholland.gov.uk](mailto:Markets@Sholland.gov.uk). If the changes are significant a new application form may need to be completed.

Sale of live animals, fish, birds and other fowl is not permitted.

Practices of acupuncture, ear piercing, tattooing or electrolysis will not be permitted.

No counterfeit, replica guns/weapons, drug related, pornographic or adult entertainment goods to be displayed or sold.

Stallholders selling food items must comply with all current and applicable food safety legislation and must be registered with the Local Authority in whose district they reside. The Council will only accept food vendors on any of the markets with a Food Hygiene Rating of 3 stars or above and the relevant food safety rating should be displayed at all times. Food should also be labelled in accordance with statutory requirements and those handling food should be appropriately trained. For more information, please contact South Holland District Councils Food Safety Team at [Foodhs@Sholland.gov.uk](mailto:Foodhs@Sholland.gov.uk).

## Use of the Pitch

No alterations or additions can be made to the gazebo or pitch without the authorisation of the Markets Officer. Subletting of stalls/gazebos, pitches or any part thereof is prohibited.

All pitches have a maximum depth of 3m/10ft. No goods shall be placed beyond the boundaries of the stall/pitch, either hanging or on the ground unless permission to do so has been gained from the Markets Officer.

All stallholders are required to be aware of and comply with the relevant statute law and regulations.

It is the responsibility for all stallholders to acquaint themselves with the trading regulation regarding their own specialist area and abide by it.

Stallholders are responsible for supplying, erecting, dismantling and upkeep of their own stalls/gazebos.

Stallholders are required to keep their stalls/gazebos, fittings and space underneath the stalls clean and free from litter. All fittings, fixtures and appliances owned by the stallholders must be kept in good condition and must not constitute a danger to the public. The stallholder, in accepting these regulations, agrees to indemnify the Council against any liability for accidents, damage or injury

caused by or arising from the disrepair condition or construction of any stall which belongs to the stallholder.

Stallholders must ensure that they, or any person working for them, does nothing which, in the opinion of the Market Officer is a nuisance or annoyance to a member of the public or detrimental to the efficient operation of the market.

No stallholder or their assistants shall use amplified sound for the purpose of advertisement, entertainment, trade or business without the authorisation of the Markets Officer.

Generators will only be allowed if in the opinion of the Market Officer, they are not likely to be a danger, health hazard or nuisance to members of the public or other stallholders.

Electrical hook up points are available at Spalding and Holbeach and these are reserved for food vendors. No stallholder shall use these points unless agreed with the Markets Officer.

Pitches not in use are to be kept clear from obstruction and not used as storage or ad-hoc trading areas.

South Holland District Council reserves the right, through the Market Officer to request removal of goods from sale that have been identified by Trading Standards as not fit for sale.

All stalls, goods, vehicles and refuse must be removed from the markets area no more than one and a half hours after close of the market but not before 14:00. Stallholders must not leave the market site before this time unless the Markets Officer permits it and/or when circumstances (i.e. bad weather) necessitate the early ceasing of trade. If Stallholders need to leave early, they must seek agreement from the Market Officer. Unauthorised early departures will be deemed a breach of Market Policy and may result in disciplinary procedures.

## Refuse

You must keep your allocated stall or pitch, and the immediate surrounding area, clean and tidy and clear of rubbish and waste. All stallholders will ensure that any rubbish or waste is stored appropriately so that it does not spread across the market or town. It is the responsibility of each stallholder to ensure that all refuse generated by or collected upon his or her pitch, is taken away with them for disposal and it is the responsibility of each stallholder to sweep their pitch clean after each market at the end of the trading day.

Under no circumstances shall stallholders dispose of commercial market waste in public litter bins or drain water tanks or empty water containers into the public drainage system. If a Stallholder makes arrangements for the removal and disposal of their waste, it is their responsibility to ensure that any persons removing or disposing of the waste holds an appropriate waste carriers' licence which can be inspected by the Markets Officer.

If a Stallholder disposes of waste in an unauthorised way, they will be reported to the Community Safety Team for investigation and may result in disciplinary procedures.

## Vehicles

Stallholder's vehicles and/or goods delivery vehicles may only be brought into the market in such a manner as will cause no obstruction to any public road, pavement or footway used by the public nor inconvenience to other stallholders or the occupiers of any premises adjoining the market. Vehicles

may not stand for longer than is reasonably necessary for loading or unloading goods.

Unloading of goods must be carried out before commencement of the sale of goods to the public and not later than the commencement of the market at 9:00am, unless permission has been granted by the Markets Officer. No vehicles should be brought onto the market area or stalls removed from the market area before 14:00. One permit will be issued per trader for Victoria Street or Holland Road car parks.

Where it can be demonstrated that it is essential to a stallholder's commercial operation that a vehicle remains on the market, this shall be permitted where possible, with the prior agreement of the Markets Officer.

Vehicles driven by market stallholders in Spalding shall access the Market Place via Broad Street and shall leave via New Road. Movement of stallholders vehicles are not allowed in the Market Place or Hall Place, Spalding, during the hours of Lincolnshire County Councils pedestrianisation (10:00-16:00) on the day of the market. The Markets Officer may relax these provisions during adverse weather conditions or emergencies.

## General

A stallholder must notify the Council of any change in the operation of their business e.g. any amendment to the business name and/or address and any change in contact details by emailing [Markets@Sholland.gov.uk](mailto:Markets@Sholland.gov.uk). Failure to do so may result in the cancellation of the stallholder's licence.

Every stallholder shall provide third party Public Liability Insurance for the minimum of £5,000,000 (five million pounds) upon application. The insurance must be renewed, and a copy of the renewal certificate produced to the Market Officer by the stallholder each year.

Stallholders and their assistants are requested to dress in a respectable manner as would be expected within their working environment as not to cause offence to customers, Council staff and other stallholders.

Stallholders and their assistants shall not do any act or anything which may cause danger, nuisance or annoyance to other stallholders or visitors to the market. Stallholders and their assistants shall comply with all reasonable instructions and requirements of the Markets Officer.

Stallholders and their assistants shall not harass, threaten or otherwise prevent the Markets Officer from managing the markets or enforcing these regulations.

The stallholders shall comply with all of the above regulations and ignorance of the Market Policy will not be accepted as a defence. Any breach of the Market Policy may result in disciplinary procedures taking place.

## Health and Safety

All stallholders are duty bound by law to follow the Health and Safety at Work Act 1974. As a condition of your licence to occupy a pitch/gazebo upon the market, all stallholders are required to comply with all Health and Safety instructions as issued at registration of a stallholder and from time to time thereafter by the Markets Officer. Such instructions and regulations are additional to and do not vary the byelaws relating to the operation of the market.

Failure to comply will result in suspension or permanent removal from the market.

Because of possible risks to the public passing through the Market Place, it is the responsibility of all stall holders to ascertain and comply with Health and Safety legislation concerning the delivery, erection and dismantling of “own units” and the storage of their refuse, be that be done by themselves or others.

It is the responsibility of all stallholders to undertake a Health and Safety risk assessment of such working methods and apply suitable safeguards.

All Stallholders shall comply with any guidance issued by the Government for the purpose of protecting themselves and the public in regard to COVID 19.

Stallholders are reminded of the requirement to effect and maintain Public Liability insurance at all times and provide evidence of the same to the Markets Officer upon request.

All stallholders are expected to:

- a) Familiarise themselves with these health and safety instructions.
- b) Ensure Risk Assessments are undertaken, and safe systems of work are implemented and regularly reviewed.
- c) Ensure all employees, agents and contractors are adequately informed, instructed, supervised and trained in health and safety matters.
- d) Take reasonable care of their health, safety and welfare and that of others who may be affected by their acts or omissions.
- e) Assist the Markets Officer by reporting an accident or incident that has or may cause injury to a person or damage to property.
- f) Co-operate and comply with all directions given by the Markets Officer regarding Health and Safety issues.

Any accident caused through failure to observe statutory requirements or negligence is the responsibility of the licenced stallholder.

All stallholders are responsible for the safe erection and dismantling of their stall, to ensure their own safety and that of those using and visiting the stall.

Those erecting or dismantling stalls should always be aware of staff, members of the public and traffic in the surrounding area. Although different stalls have different requirements with regard to erection and dismantling, the following must be adhered to for all stalls and the Council Reserves the right to ask a stall to be removed if not deemed safe/appropriate.

- a) Stalls must be stable once erected
- b) Stalls must be capable of coping with the weather conditions on the day.
- c) All welds on stalls components must be sound
- d) Stall components must not be excessively corroded
- e) Sheeting must be securely lashed to stall structure, in a way which prevents pooling of rainwater.
- f) Trained and experienced staff only should undertake stall erection or dismantling
- g) A suitable safety platform or stepladder must be used whenever working above ground level.
- h) Working areas should be maintained in a safe and tidy condition with refuse and litter removed from the area before dismantling commences.
- i) Stallholders must ensure equipment is maintained in a good condition.
- j) Stallholders must ensure correct and safe handling techniques are used at all times.
- k) Stallholders must always wear appropriate PPE

- l) When dismantling stalls, bars are to be removed in a controlled manner (without dropping from height or left unattended causing trip hazards)
- m) Any incidents that result in injury to a member of the public, or anyone working on a stall (including those during erecting and dismantling stalls) must be reported to the Markets Officer.

## Compliance with Market Rules

Stallholders are required to comply with all reasonable directions of the Markets Officer.

As part of the application process stallholders must tick the form to say they have read, understand and intend to comply with the Market Policy.

Any acts that are a breach of any of these regulations may result in disciplinary action such as a verbal, written or final warning. It can also lead to suspension from market or revocation of licence from all SHDC run markets.

The Council has the right to terminate your Licence immediately if any trader, or its employees, breach the Markets Policy, depending on its severity.

## Disciplinary Procedure

1. First breach – The Markets Officer shall issue a verbal warning. A record of the verbal warning will be made by the Council.
2. Second breach (within any 12-month rolling period) – A first written warning shall be issued by the Market Manager.
3. Third breach (within any 12-month rolling period) – A final written warning shall be issued by the Market Manager.
4. Any further breaches may result in a suspension from trader for a period of time to be determined by the Market Manager, or termination of the traders licence.

Appeals Procedure: At all stages of the disciplinary procedure the stallholder has a right of appeal. The following appeal procedure applies:

1. The stallholder must make the appeal in writing within 10 working days of receipt of the warning. The appeal must be sent to [Markets@SHolland.gov.uk](mailto:Markets@SHolland.gov.uk), for the attention of the Markets Manager.
2. If the appeal is against a decision made by the Markets Manager, the appeal should be addressed to the Leisure and Culture Assistant Director.
3. If an appeal hearing is necessary, the stallholder shall be given adequate notice of the hearing and shall have the right to be accompanied at any hearing by a representative of their choice.

## Emergency Procedures

There may be occasions when it is necessary to evacuate the marketplace for safety reasons. Stallholders can play a valuable role in helping to ensure that a calm and effective evacuation takes place by giving clear guidance on what is expected of the members of the public.

Evacuations will only be instigated by the emergency services.

There is no officially designated assembly point and large numbers of people are likely to require moving. It is essential that such a movement is away from potential danger and that stallholders assist in ensuring members of the public are vigilant of emergency vehicles entering and exiting the Market Place.

The principal focus of an evacuation will be to protect members of the public, who will be expected to either disperse or await safe access back onto the market site, depending on the nature of the emergency.

In order to facilitate easy evacuations, stallholders must make sure that stalls do not encroach on walkways or traffic routes, taking account of the fact that there may be wheelchairs, pushchairs and prams etc. present.

## Stallholders right to assign their stalls goodwill

- a) To be considered for the right to assign a stalls goodwill to the market stallholder wishing to sell their stalls goodwill must have traded for two years or more on one of South Holland District Councils market on a continuous basis.
- b) Both the market stallholder and the chosen purchaser (i.e. market stallholder buying the stalls goodwill) must make a joint application to the Council for approval before they can enter into any agreement.
- c) To ensure the market remains balanced the purchaser buying the right to sell on the transferred stall, must only sell those lines of goods previously sold by the market stallholder selling the stalls goodwill.
- d) The new market stallholder (purchaser of the stall) must adhere to all Market Policy.
- e) No actual transfer is to take place until the application has been dealt with and approved in writing by the council.
- f) The council reserves the right to reject applications.

## Contacts and Resources

SHDC Markets team - [Markets@Sholland.gov.uk](mailto:Markets@Sholland.gov.uk)

SHDC Food Safety team – [Foodhs@Sholland.gov.uk](mailto:Foodhs@Sholland.gov.uk)

The Food Standards Agency – [www.food.gov.uk](http://www.food.gov.uk)

The Food Standards Agency Registration page - <https://www.food.gov.uk/business-guidance/register-a-food-business>

NABMA - [www.nabma.com](http://www.nabma.com), 01691 680713

National Market Traders Federation – [www.NMTF.co.uk](http://www.NMTF.co.uk) - 01226 749021

# MARKET POLICY, TERMS & CONDITIONS OF LETTING



South Holland District Council  
Priory Road, Spalding, PE11 2XE

T: 01775 761161  
E: [Markets@Sholland.gov.uk](mailto:Markets@Sholland.gov.uk)

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## **1. AIMS AND OBJECTIVES**

- 1.1 To maintain the operation of the South Holland District Council (SHDC) regular markets at the below locations:
  - Spalding Market – Market Place/Hall Place
  - Holbeach Market – Boston Rd South Car Park
  - Long Sutton Market – Market Place
  - Crowland Market – North Street
- 1.2 To preserve the markets joint functions as an economic entity and visitor attraction by offering a diverse and attractive range of goods and services to all.
- 1.3 To seek to work towards managing the market on a cost neutral basis whilst providing wider benefits to each of the market towns by having a vibrant town centre market.

## **2. GOVERNANCE**

- 2.1 The market is part of the Council's Leisure & Local Services Division. The following personnel have responsibility for operating and managing the market:
  - The Market Officer is responsible for day-to-day market operations.
  - The Market Manager will act as Line Manager for all market operations.
  - The Assistant Director will act as Head of Service for all market operations.

The market will be subject to the Council's audit process.

## **3. PERFORMANCE MONITORING**

- 3.1 The performance of the market will be monitored in terms of:
  - The number of pitches sold.
  - Income & costs in the context of the objective to operate on a cost neutral basis.

## **4. FREQUENCY**

- 4.1 The Council will hold markets on the following days:
  - Spalding Market – Tuesday and Saturday
  - Holbeach Market – Thursday
  - Long Sutton Market - Friday
  - Crowland Market – Friday
- 4.2 When bank holidays fall on market day, no market shall be held apart from Good Friday.

- 4.3 No markets will be held during the Christmas period between 25<sup>th</sup> December – 1<sup>st</sup> January inclusive under any circumstances. Any trader found to be trading on any SHDC Markets during this period will be in breach of Market Policy.

## **5. SPECIALITY MARKETS**

- 5.1 The Council may, where it considers it appropriate, encourage and support certain speciality markets providing they do not negatively impact upon the regular markets. Such markets might include, but are not restricted to, Farmers Markets, Makers Markets, Continental Markets and Antique & Craft Fairs.
- 5.2 For those speciality markets underrepresented, the Council may offer discounted promotional fee's until they deem fit.

## **6. TENANT MIX**

- 6.1 There is no specific limit to the number of traders selling the same or similar product/service, but the Council is responsible for ensuring a balance of goods to make the market attractive to customers. In the first instance, any issues between traders are to be brought to the attention of the Market Officer, who will then seek advice and a decision from the Market Manager.
- 6.2 The Markets Team will assess new applications for trading against the current balance on the market. Prospective traders will only be granted permission to trade if there is space within the current market layout, and the goods they want to sell are not overrepresented on the market.
- 6.3 Any appeals will be dealt with by the Assistant Director of service.
- 6.4 When assessing the tenant mix, regular traders and new regular traders will take precedence over casual traders, which may result in casual traders losing their right to sell certain goods if new regular traders request to sell similar goods/services.

## **7. CHANGES IN GOODS TRADED**

- 7.1 In the event of a trader wishing to make a material change in the type or range of goods traded or services provided, the trader must apply for approval via the GOSS booking and payment system by updating their personal profile. The Markets Team will then assess the request to approve or reject. The trader will then be notified of the decision.

The trader shall not make any material changes in the type or range of goods traded prior to receiving the necessary consent.

- 7.2 Where traders request to sell specific items that are not generally related to the traders original/main line of goods, the Council may reject those items upon application. For example, a fruit and veg trader requesting to sell handbags, or a clothing trader requesting to sell fruit and veg. This is to prevent traders poaching each other's best-selling lines.
- 7.3 When describing the type or range of goods in an application, traders must describe them with sufficient detail. For example, 'seasonal goods' would not be acceptable. This is to assist the Council to ensure a fair balance of goods and services for the market.
- 7.4 If traders have ceased selling a certain range of goods or services from their license and are not likely to continue to do so for the foreseeable future, they should update their profile at the earliest opportunity.

## 8. TRADING ON SOUTH HOLLAND MARKETS

- 8.1 Via [South Holland District Council website \(Markets\)](#), all traders will be required to register for a 'My Account' or log into their My Account if they already have one. Once logged in, traders will be required to complete a markets application on the GOSS booking and payments system.
- 8.2 Once all the required information is received, and providing the application is successful, the applicant will receive a licence to trade. The licence permits the stallholder to trade on agreed markets only and sell only the permitted goods as provided in the application process. Should these need to be amended you must contact the Markets Team.
- 8.3 Traders on SHDC Markets are categorised as either 'regular' or 'casual' traders. All special traders such as farmers/makers, etc. will be classed as casual traders.

**Regular traders** - Regular traders are traders who stand on a weekly basis at a particular market. They're deemed to be regular traders when they have stood for 12 consecutive market days. For example, 12 weeks standing at a Spalding Tuesday market. Regular traders will be offered, where possible, the same pitch for each market they attend; however, locations may differ depending on the day or event.

**Casual traders** - Traders are deemed to be casual traders when they attend markets on an irregular basis and meet the criteria below. Casual traders will only be offered a gazebo/pitch subject to availability and will not be entitled to stand at the same location each time they attend.

- 8.4 A trader can change from casual to regular at any time. A trader who is regular can change to a casual status at any time but will not be able to become a regular trader again for another year from the date they change.
- 8.5 Permission to commence trading on SHDC Markets, whether as a regular or

casual trader, is subject to available space and mix of traders, as well as compliance, by the trader, with all the following conditions:

- 8.6 In making the application, the trader accepts compliance with the Market Policy and Severe Weather Policy.
- 8.7 Traders will need to upload a copy of a current certificate demonstrating valid Public Liability Insurance against an amount of not less than £5,000,000 (5 million pounds).
- 8.8 Traders may need to provide current electrical and gas safety certificates for any equipment that is to be used on the market. All electrical equipment is also to be PAT tested and appropriately labelled. All tests are to be renewed annually.
- 8.9 Traders will need to provide a copy of their food hygiene and health and safety certificates if appropriate.
- 8.10 Upon request, traders will need to provide a risk assessment for any equipment used including their own stall/gazebos. If traders are unable to provide sufficient details regarding their stall's/gazebo's limitations in inclement weather conditions, the Council have the right to restrict the use of a trader's stall/gazebo.
- 8.11 No trader shall use amplified sounds such as radios, loudspeakers or other instruments without permission from the Markets Team.

## **9. REGULAR/CASUAL/SPECIAL TRADER BOOKINGS AND CANCELLATIONS**

- 9.1 All regular traders will have their pre-approved number of pitches and set up requirements automatically reserved by the GOSS booking and payment system when dates are created by the Markets Team. Traders will be emailed regarding the reservations made and will be able to pay for those reservations or book non-attendance days as soon as they're created.
- 9.2 All regular trader reservations **must be paid by 2pm**, the day before the market.
- 9.3 Casual traders will need to **book/pay by 2pm** the day before the market. They must receive confirmation of their booking to stand prior to attending the market.
- 9.4 Casual traders will be able to cancel their bookings until 2pm, the day before the market. Casual trader fees are non-refundable. If the cancellation is due to unforeseen circumstances, the Markets Team may offer a discount code for a future market.
- 9.5 The GOSS System will not allow any bookings past the 2pm deadlines and for any regular traders that have not paid for their reservation by that time, a non-attendance day will be used from their balance. If no balance is available to use, and if the Markets Team deem it necessary, the trader will lose their regular trader status

- 9.6 Casual traders will be able to book up to 28 days in advance.
- 9.7 If casual traders wish to book more than one pitch on any market, they should contact the Markets Team to ensure neighboring pitches are available.
- 9.8 For some specialist markets such as the Makers and Farmers Markets, pitch reservations may be made by the Markets Team. Any request for a pitch payment from a trader will be subject to a defined timeframe, to ensure pitch availability is secured and paid for.
- 9.9 Any regular/casual/special trader will be able to book as a casual trader on any SHDC market if approved upon application. Permission to stand casually at other markets after an application has been approved should be requested by emailing the Markets Team or speaking to the Markets Officer.
- 9.10 Regular traders trading casually on another SHDC market will be charged at their usual regular fee.

## **10. INDEMNITY AND INSURANCES**

- 10.1 Traders shall protect the Council from, and against, all claims, damages, losses, expenses, and costs in respect of any explosion, fire, accident or injury to any persons or property which may have arisen as a result of, or in connection with, the occupation or use of any gazebo/pitch on any part of any SHDC Markets.
- 10.2 Once registered, traders will be notified via email when their insurance has expired. Failure to upload proof of insurance within 7 days will result in their account being disabled and any future reservations/bookings will be cancelled with no refunds. Regular traders may also lose their regular trader status.
- 10.3 Proof of insurance against an amount of no less than £5,000,000 (five million pounds) shall be required upon initial application to trade and annually upon renewal of such insurance.

## **11. CORE TRADING TIMES**

- 11.1 Core trading times are those hours during which pitches must be occupied, stock presented and available to trade.
- 11.2 Core trading times are 9am – 2pm.
- 11.3 Traders may only start packing away 30 minutes before core trading times end, unless authorised by the Markets Team.
- 11.4 Traders must take occupation of their pitch by 9am, unless authorised by the Markets Team. In cases of inclement weather, trading times may be altered.

## **12. ALLOCATED PITCHES**

- 12.1 All regular traders should, wherever possible, be allocated the same pitch at each of their approved markets. Where this is not possible, the Council will allocate a pitch as near as possible to the regular position, or a pitch of their preference, according to availability.
- 12.2 For special markets or events, the Markets Team may move regular traders in order to facilitate the market/event to enhance the overall visitor experience or operation of the market.
- 12.3 In all cases, the allocation of gazebos/pitches remains at the absolute discretion of the Council.

## **13. VEHICLES**

- 13.1 The location of the traders vehicle(s) shall be agreed with the Markets Team to ensure that the area remains a safe environment for all.
- 13.2 Traders must ensure that they do not cause any inconvenience to the public or other traders when on the market.
- 13.3 Traders must make themselves aware of parking/loading restrictions surrounding the Market area. The Council will not be responsible for any parking tickets issued to a trader.
- 13.4 Traders shall not return their off-site vehicles to the market during core trading times nor shall on-site vehicles be removed from the market during core trading times, unless agreed by the Markets Team.

## **14. CHARITIES AND NON-COMMERCIAL ORGANISATIONS**

- 14.1 Where the market can be let to capacity, priority will be with commercial traders to stand.
- 14.2 All applications from charities and non-commercial organisations shall be treated in the same way as applications from commercial traders, including complying with all conditions set within the Market Policy.

- 14.3 Each charity/non-commercial organisation shall be permitted to stand, free of charge, once every 3 months at each market. Attendance at subsequent markets shall be chargeable at the full casual rate.
- 14.4 There will be no more than 4 charity/non-commercial organisations pitches permitted at each market, unless a speciality Charity Market is held. Gazebo's may be provided depending on availability and staffing levels.
- 14.5 SHDC reserves the right to stand at any time to promote awareness of its own services where appropriate.
- 14.6 No organisation shall stand to promote and/or influence political parties, political campaigns, the promotion of a particular religion, or the promotion of religion in general without the consent of the Council.

## 15. FEES

- 15.1 **Strictly, all bookings must be paid for prior to traders standing on any market.** Any traders found to be standing on the market without having paid will be asked to leave the market immediately and disciplinary action will be taken.
- 15.2 All paid fees are non-refundable in all circumstances. If regular traders have paid for their reservation and then decide they wish to book a non-attendance day in place of a paid booking, they will be provided a free-market discount code to use on a future reservation.
- 15.3 Once fees are paid, traders will receive an email receipt showing details of what has been booked and paid for.
- 15.4 We reserve the right to review market fees and alter the charges as we deem necessary. All traders will be notified at least 4 weeks before any changes are implemented.
- 15.5 The Markets Team have the right to dedicate part of the market footprint to an auctioneer, along with its own fees, to be confirmed upon application.
- 15.6 Fees shall be set in each case relating to the number of pitches/gazebos occupied by the trader.
- 15.7 For traders selling directly from their vehicles, they will be charged per 3.05m pitch.

### **Current fees from April 2026:**

#### **Spalding Market**

Regular trader - £10.00 per pitch  
Casual trader - £11.00 per pitch

Gazebo – £2.00  
Electric - £2.00

### **Holbeach Market**

Regular trader - £8.00 per pitch  
Casual trader - £9.00 per pitch  
Gazebo – £2.00  
Electric - £2.00

### **Long Sutton Market**

Regular trader - £11.00 per pitch  
Casual trader - £12.00 per pitch  
Gazebo – £2.00  
Electric – Not available

### **Crowland Market**

Regular trader - £5.00 per pitch  
Casual trader - £6.00 per pitch  
Gazebo – £2.00  
Electric – Not available

To book electric or a gazebo, traders must seek permission from Markets Officer before booking.

\*Please see the Severe Weather Policy regarding fees in inclement weather.

## **15.8 Incentives**

1. As a trial, all new traders can **stand for free** on their first market.
2. Any traders that have previously traded on any SHDC Market but haven't done so for over 12 months will be entitled to all incentives. *\*This doesn't include traders who have previously served a disciplinary suspension.*
3. All incentives are subject to change, at any time, by the Council.

## **16. LAYOUT**

16.1 The Council reserves the right to alter the layout of the market from time to time, in order to accommodate any work, events or other activities in the Market Place. Wherever possible, such changes will be notified to the traders affected by the changes in advance of market days.

16.2 The Council reserves the right to temporarily or permanently alter the layout of the market.

## **17. GAZEBO & PITCH BOUNDARIES**

- 17.1 All traders are responsible for ensuring the best presentation of their pitch. If the Markets Team request improvements to the presentation of the pitch, the trader shall fulfil those requirements.
- 17.2 Traders shall not, without specific approval from the Markets Team, place goods or refuse or in any way occupy any area beyond the boundaries of the gazebo/pitch rented to them. This applies to all such goods or refuse, whether placed on the ground, on tables, boxes, rails, or suspended from the frame of the gazebo.
- 17.3 The boundary of the gazebo/pitch is defined as an area enclosed by the frame of the gazebo as supplied by the Council. Gazebos/pitches are based on a 3.05m x 3.05m footprint and any additional space must be agreed with the Markets Team and charged accordingly, if required. This will also be dependent on the availability within the Market Place if space is limited.
- 17.4 The Council shall permit extensions to gazebos/pitches, at its discretion, where to do so would not impede the operation or safety of the market. Erection of extensions to gazebos will be in agreement with the Markets Team. The Council reserves the right to charge for any additional space occupied outside the usual gazebo/pitch boundary.
- 17.5 Traders must not use an empty pitch/gazebo without obtaining permission from the Market Officer.
- 17.6 Traders must not display any signs other than those connected with their retail business.

## **18. GENERATOR USE ON THE MARKET**

- 18.1 Traders are asked to only use 'silent' generators on SHDC Markets. Please seek advice from the Markets Team for which generators are suitable.
- 18.2 If complaints are received regarding the use of a traders generator, the Markets Team has the right to ask for the generator to be switched off. Failure to do so will be considered a breach of policy.

## **19. GAZEBOS - ERECTION, DISMANTLING, USE AND DAMAGE**

- 19.1 A limited number of gazebos are available to hire from SHDC. To book one, you must seek approval from the Markets Officer before making a booking.
- 19.2 Traders who hire a gazebo must assist the Markets Officer in the erection and dismantling. They must take part in training and sign a training form prior to using one.

- 19.3 Where property has been provided to traders, these remain the property of SHDC Council and are not to be used elsewhere. They must also be returned immediately upon request.
- 19.4 Should damage occur or someone be injured as a result of any trader not using their own stall/gazebo safely, they will be liable for this, rather than the Council.
- 19.5 Traders using their own stall/gazebo are to ensure they have sufficient weights and fastenings to support any stall/gazebo used in inclement weather conditions.

## **20. TRANSFER OR SUB-LETTING OF GAZEBOS/PITCHES**

- 20.1 The transfer or sub-letting of gazebos/pitches, or any part thereof, is strictly prohibited.
- 20.2 In the event of a trader disposing of their business to another, a new application for permission to stand shall be completed by the new owner and submitted to the Council for consideration. The Council, for its part, shall not unreasonably withhold permission and shall, where possible, allocate the same pitch as previously used by the previous trader. The new owner shall not stand prior to receiving the necessary approval.

## **21. ABSENCE FROM THE MARKETS**

- 21.1 Regular traders are permitted 'Non-attendance' days from the market, without being liable for payment, for up to 8 days per market day they stand on. This would include days such as holidays, inclement weather days and cancelled bookings. The absence period will run between the 1<sup>st</sup> April – 31<sup>st</sup> March.

Traders will be able to book non-attendance days as soon as the dates are created on GOSS by the Markets Team.

- 21.2 In using their permitted non-attendance days, traders will retain the benefits of being a regular trader such as cheaper fees and a regular pitch. Any regular traders that exceed their allocated non-attendance days allowance and fail to pay for their pitch will lose their regular status and will revert to a casual trader status.
- 21.3 **All non-attendance days must be booked by 2pm the day before the market.**

If a regular traders reservation isn't paid for and a non-attendance day is not booked by 2pm the day before the market, 1 non-attendance day will be automatically used from the traders balance and their pitch will not be reserved, resulting in the trader not being able to stand. The pitch will then be made available to others. This cannot be rectified on the GOSS system after the deadline has passed.

- 21.4 Regular traders trading casually at other markets will be able to cancel their

bookings without it affecting their non-attendance days balance, but the fee is non-refundable.

21.5 Any new regular traders will be issued their non-attendance days as below:

- Application approved between 1<sup>st</sup> April – 30<sup>th</sup> June – **8 days**
- Application approved between 1<sup>st</sup> July – 30<sup>th</sup> September – **6 days**
- Application approved between 1<sup>st</sup> October – 31<sup>st</sup> December – **4 days**
- Application approved between 1<sup>st</sup> January – 31<sup>st</sup> March – **2 days**

21.6 If an absence is because of short-term illness, then non-attendance days should be used. Any trader suffering a long-term illness may be asked to provide written proof, and, in such cases, will not be charged for those periods of absence and will retain their regular trader status. It will be for the Markets Manager to assess these circumstances on an individual basis.

21.7 The Council reserves the right to let vacant regular pitches to casual traders during periods of absence. However, the Council will aim to ensure a casual trader doesn't sell the same goods as where a regular trader would stand.

21.8 Any trader anticipating a delay in arriving before core trading times due to unforeseen circumstances must notify the Market Officer by 9am.

21.9 Following absence by a regular trader of four consecutive markets, without proper notification of the cause of absence, the agreement for that trader shall be terminated and the pitch re-let.

## **22. CONDUCT**

22.1 Traders, their employees or representatives shall at all times exercise courtesy towards other traders, council employees and members of the public. Verbal or physical abuse will not be tolerated.

22.2 Traders, their employees or representatives shall always conduct themselves, inside and outside of the market environment in an orderly manner, including online. Their conduct should not cause any obstruction of the market or interfere in any way with the business of another trader and in compliance with instructions given from time to time by the Council

22.3 If traders have any objections, grievances, or complaints regarding the Councils decisions for the market, they are expected to follow the Councils complaint procedure, please refer to Section 24 of this Policy. If they fail to do so and are found to engage with any media or post any online content which results in bringing the Council or the market into disrepute, or in turn obstructs and effects the trade of existing traders in the opinion of the Council, this will be considered a breach of policy.

## **23. TERMINATION OF LETTING AND DISCIPLINARY PROCEEDINGS**

23.1 The Council has the absolute right to terminate the letting of a gazebo/pitch, with immediate effect in the event of:

- Breach, by any trader, of the Market Policy.
- Breach, by any trader, of any legislation pertaining to the operation of the market.

23.2 Where immediate termination is deemed appropriate, the trader will be ordered, by the Council, to leave the market and shall, within 10 days, be notified in writing as to the reason or reasons for the termination.

23.3 Where the breach is deemed not serious enough to warrant immediate termination, the breach may be dealt with via a suspension of trading.

23.4 Any breach of Markets Policy may be subject to other penalties depending on the severity of the breach, as follows:

**Stage 1**

Verbal warning (to be confirmed in writing).

**Stage 2**

1st written warning

**Stage 3**

Second breach of policy within a 12-month period where the trader will be issued with a final written warning. A warning will be given at this stage of the consequences of a 3rd breach within a 12-month period.

**Stage 4**

Third breach of policy within a 12-month period shall result in the trader being **suspended** from trading for a term to be determined by the Market Team, **or a termination** from trading. The trader shall, within 10 days, be notified, in writing as to the reason for the suspension or termination.

23.5 If any further breaches of policy occur within a 12-month period of their spent suspension, traders will be subject to immediate suspensions for a term to be determined by the Markets Team.

## **24. COMPLAINTS PROCEDURE**

24.1 Any complaint by a trader shall be directed in the first instance, either verbally, email, or in writing, to the Market Officer. If the trader considers that the matter has not been dealt with satisfactorily, or if the Market Officer is unavailable, the complaint shall be directed, in writing or email, to the Market Manager.

24.2 If, after referral to the Market Manager, the trader still considers that the issue has not been dealt with satisfactorily, then the Council's corporate complaints procedure as set out on the SHDC website should be followed.

## 25. GOODS TRADED AND OTHER RELEVANT LEGISLATION

25.1 All goods sold must comply with the Sale of Goods Act 1979 (as amended) in that they must be:

- as described (either verbally, on the label or packaging, or otherwise) of satisfactory quality and,
- fit for purpose unless, prior to sale, any defects are brought to the attention of the buyer or where any such defects would be obvious to a prudent buyer.

25.2 All goods sold must also be lawfully in the possession of and lawfully offered for sale by the seller.

25.3 All traders should ensure that they're able to issue a written receipt showing the traders details when it is requested by the buyer.

25.4 Goods for sale must comply with all the relevant legislation in line with Trading Standards. The following must be considered; this is not an exhaustive list:

- Electrical equipment must meet European standards, indicated by a CE mark, and
- Toys must be properly marked to ensure traceability, bear the CE mark, and be accompanied by instructions for use, and warnings where necessary, and
- Upholstered furniture should comply with the Furniture and Furnishings (Fire Safety) Regulations 1988.

25.5 Traders selling pet food and pet treats must meet the requirements laid down by the Food Standards Agency ([food.gov.uk/business-guidance/pet-food](http://food.gov.uk/business-guidance/pet-food)).

25.6 Traders must comply with the Children and Young Persons Act 1933 & 1963, the Education Acts 1944–48 and the Employment of Children Act 1973.

Definitions:

**"Child"** - Any person not over compulsory school age.

**"Employed"** - Includes any child who assists in a trade or occupation even where the child receives no monetary reward.

25.7 All traders are duty bound by law to follow the Health and Safety at Work etc. Act 1974. It is their responsibility to check and use the latest addition of the act, associated regulations, and guidance available.

25.8 The Council has the responsibility to upkeep the image of the market and to ensure quality goods and services are being sold. Therefore, traders wishing to sell new or secondhand items can do so at the discretion of the Market Manager. This may be dependent on such things as what is being sold, their condition and/or availability of pitches on the market.

## **26. SALES OF ILLEGAL OR INAPPROPRIATE GOODS**

26.1 The Council have signed up to 'The Real Deal' campaign whereby Market Staff are taking positive and immediate action against those selling illegal or counterfeit goods. Traders are encouraged to report any suspicions to Market Staff at the earliest opportunity.

26.2 The Council reserves the right to terminate any letting, or to refuse any application on the grounds of illegality or inappropriateness of goods traded. Such goods include, but are not limited to pornography, knives used for non-culinary purposes, BB guns, replica guns, ornamental weapons, drugs of any class and items displaying abusive/lewd/obscene text or images.

26.3 No trader shall sell any item that contravenes any of the following, or similar associated legislation:

- a) Trade Descriptions Act 1968
- b) Video Recordings Act 1984
- c) Copyright Designs & Patents Act 1988
- d) Trademarks Act 1994

## **27. HEALTH & SAFETY**

27.1 Traders will be expected to conduct their business in a safe and responsible manner. In particular traders shall ensure that all accidents, however small, involving market operations controlled by the Council must be reported to the District Council.

27.2 All traders have a legal responsibility to safeguard their staff, members of the public and any other person who has cause to use their gazebo/pitch. Traders are required to comply with all health and safety legislation and must report to the Council any reasonably foreseeable hazards that they do not have control over. Traders must comply with any reasonable requests made by the Council in respect of health and safety.

27.3 Propane or Butane should be stored in a safe manner in accordance with relevant health and safety legislation and associated Health and Safety Executive Codes of Practice.

27.4 Traders are responsible for checking their trading area at regular intervals to ensure no risks are posed. They must either resolve any issues or report them immediately to the Market Officer.

27.5 Traders must ensure that their allocated pitches are clean and tidy throughout the day and cleaned down at the end of each day.

27.6 It is the traders responsibility to ensure all cables are covered with purpose made cable covering and out of reach of members of the public, to prevent any injury.

27.7 All traders that use their own stalls/gazebos/equipment must complete a risk assessment and provide it to the council upon request.

27.8 Traders who employ five or more people must have their own Safety Policy and documented risk assessment, both of which are required by law and must be available for inspection at all times.

27.9 A health and safety inspection should be carried out by the Markets Team during each market. The inspection shall consider, but not be restricted to:

- Stall/gazebo frames.
- Stall/gazebo frame safety pins.
- Cables.
- Electrical equipment – Should be in good order and covered by a current electrical safety certificate.
- Traders trading practices.
- Any obstructions.
- Vehicle movement/positions.

## **28. EMERGENCY PROCEDURES**

28.1 To facilitate safe evacuations of the market area, traders should ensure that stalls/gazebos do not encroach on walkways or traffic routes, taking account of the fact that there may be wheelchairs, pushchairs and prams etc. present.

## **29. INCIDENTS IN THE MARKET PLACE**

29.1 The markets are held in a public open space and as such anyone can enter the space. Council staff have no power to remove anyone from the market area, regardless of how inappropriate their behaviour might be.

29.2 If any trader witnesses or experiences incidents of such behaviour they should call 101 or 999 to report the matter to the Police and thereafter, inform the Market Officer.

29.3 For any medical emergencies, traders should call 999. For medical non-emergencies, call 111.

## **30. COMPLIANCE WITH FOOD SAFETY REGULATIONS**

30.1 All traders of hot or cold food will be required to comply with all relevant legislation and must have registered their business with the appropriate local authority. Standards to which traders must adhere are attached below. Traders are required to provide evidence of the registration.

30.2 For any advice, traders are asked to contact the Food Safety Team.

30.3 All traders of hot or cold food must have a food hygiene rating of 4 or 5.

30.4 All food traders must supply the Council with the following:

- Documentation from the local authority where the business is registered.
- Documentation showing the date of their last food hygiene inspection;  
and
- Their current hygiene rating.

30.5 Where non-compliance is demonstrated the trader will no longer be able to trade on the market until the matter is resolved to the satisfaction of the District Council's Food Safety Team.

### **31. REFUSE REMOVAL**

31.1 Traders are strictly forbidden to dispose of commercial market waste in public bins.

31.2 Traders shall be responsible for the removal and disposal of all their waste. Failure to do so may result in the Authority's Enforcement Officer taking action.

### **32. SEVERE WEATHER CONDITIONS**

32.1 Severe weather conditions will be assessed using the guidance set out in the Council's Severe Weather Policy. The Council will ensure any decision to close, restrict or cancel the market is taken fairly, consistently, transparently and is communicated to all parties as soon as practicable.

32.2 Please refer to the Council's Severe Weather Policy for further details.

### **33. CONSULTATION**

34.1 The District Council will consult with Traders and hold meetings when necessary.

### **34. CHANGES TO THIS POLICY**

34.1 This policy will be reviewed annually or sooner if required, and changes will be made where deemed necessary. Changes may be implemented without formal committee approval.

### **35. CONTACTS AND RESOURCES**

**Markets Team** – [Markets@SHolland.gov.uk](mailto:Markets@SHolland.gov.uk)

**Markets Facebook page** - @SouthHollandMarkets

**Markets Officer** – Paul Stannard – 07436 600979

**Markets Manager** – David Smith

[SHDC Food Safety Team website](#)

**The Food Standards Agency** – [www.food.gov.uk](http://www.food.gov.uk)

**NABMA** - [www.nabma.com](http://www.nabma.com) - [info@nabma.com](mailto:info@nabma.com) - 01691 680713

**National Market Traders Federation** – [www.nmtf.co.uk](http://www.nmtf.co.uk) - 01226 749021

## **SOUTH HOLLAND DISTRICT COUNCIL MARKETS**

### **STANDARD CONDITIONS FOR FOOD BUSINESS OPERATORS**

The Council recognises the need for stringent food safety procedures in the prevention of food borne illness. The following conditions have been devised to ensure food businesses trading on the markets have appropriate food safety procedures. The conditions neither replace nor override existing or future food safety/labelling legislation but must be complied with. Failure to do, so may result in the business being prohibited from trading on our markets and/or formal legal action being instigated which may include prosecution and the seizure of any unsafe food.

#### **1.0 All food businesses must:**

- a) Provide evidence (letter from registering authority) that the food business is registered in accordance with the requirements of Regulation EC 852/2004 Article 6 (2)
- b) Ensure all suppliers are reputable and details of suppliers are available for inspection on market days.
- c) Have a food safety management system compliant with the requirements of Regulation EC 852/2004 Article 5. The procedures need not be complex but must accurately describe food activities carried out and food safety controls.
- d) Keep all high-risk foods (ready to eat cooked meat, dairy and fishery products) at safe temperatures. Food must be kept at, or below 8°C during storage and transport. During display, practical measures must be taken to ensure safe temperatures are maintained, especially when the ambient temperature is above 8°C. Such measures may involve the use of refrigerated display cabinets and ice/ice blocks, but such facilities must be capable of maintaining temperature during the whole time the products are on display. The temperature of such foods must be checked at set up and regularly, (every two hours when the ambient temperature is above 15°C) during display and records kept for inspection.
- e) Protect all high-risk foods (ready to eat cooked meat, dairy and fishery products) so as to minimise the risk of contamination during transport and display.
- f) Provide the following evidence for all high-risk foods (ready to eat cooked meat, dairy and fishery products);
  - i. Name/type of the product.
  - ii. Contact details of the producer, including if relevant, a 'health mark' (This is a unique number which confirms the producers is approved to produce products of animal origin i.e. meat, fishery, egg, and dairy).
  - iii. 'Use By' date. This can only be determined by the producer and must not be changed.
- iv. Storage instructions. This can only be determined by the producer.

#### **2.0 Food businesses handling unwrapped high-risk foods and/or cooking foods (in addition to a) to f) above) must:**

- g) Comply with the Food Standards Agency guidance - E Coli 0157 Control of Cross Contamination. This can be downloaded at [www.food.gov.uk](http://www.food.gov.uk)
- h) Have food handlers who are trained and/or supervised and instructed in food hygiene matters.
- i) Provide a suitable and sufficient structure which permits good food hygiene practice. The structure of the food unit must protect food and equipment against environmental elements and other sources of contamination. It must be capable of being kept clean.
- j) Ensure all equipment is maintained and must be capable of being cleaned and where necessary, disinfected.
- k) Provide a separate hand wash basin with separate hot and cold or suitably mixed warm constant water supply. Liquid antibacterial soap and paper towels for hand drying must be always available whilst the unit is in operation. The use of non-hand-operable taps is recommended. Hand washing procedures are critical to food safety and strict procedures must be implemented.
- l) Provide a suitably equipped washing sink with an adequate supply of hot water.
- m) Provide appropriate cleaning chemicals and equipment (including single use wiping cloths). Any disinfectant or sanitiser used must at least meet the official standards of BS EN1276:1997 or BS EN 13697:2001. You can check with your supplier that chemicals meet these requirements.
- n) Monitor and record cooking temperatures. This will require the use of a digital probe thermometer and disinfectant probe wipes. Cooked foods must reach a safe centre temperature of at least 75°C. checks must take place daily and be representative of the different types of high-risk foods cooked. Records of temperature monitoring must be available for inspection.

**3.0** Food businesses selling loose foods must have information available to customers on any allergens in the food. Loose foods include everything that is not pre-packed. Foods which are wrapped on the same site as they are sold are also known as loose foods. If you provide loose foods, you will have to supply information for every item that contains any of the 14 allergens. These are: cereals containing gluten, celery, crustaceans, eggs, fish, lupin, milk, molluscs, mustard, nuts, peanuts, sesame, soya and sulphur dioxide (sulphites). Rules for declaring allergens in loose foods:

- Provide information about the allergens used in these foods.
- Allergen information should be available in writing, or by speaking to staff.
- Logos or symbols can be used when accompanied by words and numbers on menus.

For loose foods, allergen information must be:

- Easily accessible to all consumers.
- Accurate, consistent, and verifiable.
- Further information on allergens in loose foods can be found in the Food

Standard Agency's leaflet, which can be accessed online using the following link:

[www.food.gov.uk/sites/default/files/media/document/loosefoodsleaflet.pdf](http://www.food.gov.uk/sites/default/files/media/document/loosefoodsleaflet.pdf)

# Severe Weather Policy



South Holland District Council  
Priory Road, Spalding, PE11 2XE

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E: [Markets@Sholland.gov.uk](mailto:Markets@Sholland.gov.uk)

## Severe Weather Policy

### Aim

The decision to restrict or close a market can cause a lot of disruption with the potential for financial and logistical impacts for all concerned and therefore is never taken lightly.

However, our key priority is always to protect the public, traders, and staff safety in the event of any severe weather which would affect any open-air market or event operated by South Holland District Council.

This policy **may** apply in the following circumstances:

- a) a weather warning is in force and has been issued by the Met Office or,
- b) in the opinion of the Markets Team there is a risk to safety due to adverse weather conditions.

### Objectives

The objectives are:

1. To comply with the Council's duties and obligations to its staff, traders, and members of the public under the Health and Safety at Work Act 1974.
2. To comply with the Council's common law duties under the Occupiers Liability Act 1984.
3. To comply with the Council's insurers.
4. To ensure any decision to close, cancel or restrict a market is taken fairly, consistently, and transparently and is communicated to all parties as soon as practicable.

## Roles and Responsibilities

Role	Responsibility
Assistant Director for Leisure & Local Services Division (ADLLS)	Reviews and approvals of this policy as required.
Market Manager (MM)	Make the decision to implement this policy. If the MM is not available, the Market Officer (MO) will be responsible for making the decision. Discretion will be used by the MM to waive or reduce fees. Make note of the decision to cancel a market.
Markets Officer (MO)	Make the decision to activate the policy in the absence of the MM. Aims to remain available at all times until the infrastructure is taken down, or the weather warning is downgraded.
Staff	Any staff that are deployed to help when the policy is activated are to follow instructions and not place themselves in any personal danger.
Health and Safety Team	Advice on the policy and during any live situations, if required.
Communications Team	Provides effective and timely public communications during any live situation, if required.

A severe weather warning may not be considered a reason to cancel or restrict the market. The management team will actively review advance weather warnings from the Met Office.

In deciding whether the market can go ahead in a restricted capacity, or cancelled completely, the Markets Team shall use their judgement and experience together with the following:

- Predicted and/or current weather conditions.
- Weather and risk table.
- Availability of staff.
- Economic factors.
- Insight – Previous occurrences.

There are 2 key factors to be considered, as follows:

1. The infrastructure, e.g. market equipment, can be erected safely and remain safe throughout the duration of its erection.
2. That there is sufficient staff readily available at all times throughout the market to dismantle any infrastructure should the weather deteriorate whilst the market equipment is erected.

In circumstances where the weather has deteriorated and the market is cancelled, the Market Officer aims to remain on site until the infrastructure is taken down if available, or the weather has improved to a safe state.

Once a decision has been made, traders will be immediately advised through a variety of methods including but not exclusive to, social media, text or email.

### **Activating the policy**

- If wind gusts are predicted to be between 36-39mph anytime between gazebo erection, throughout core trading hours and up until gazebo dismantling, the Markets Team may decide to restrict the market. They may do so by allowing gazebos, but the use of sides and covers to be strictly monitored on a regular basis by the traders and Market Officer. If the Market Officer deems there to be a significant risk to health and safety, he may instruct traders to remove all sides/covers immediately.
- If wind gusts are predicted to be over 39mph anytime between gazebo erection, throughout core trading hours and up until gazebo dismantling, the Markets Team may restrict the market by not allowing any gazebos, and instead, allowing traders to trade from their vans and approved stands/trestles/other pre-approved methods. Depending on the severity of the wind, the Markets Team may decide to cancel the market.
- When a restricted market is declared, the following conditions shall be adhered too:
  - Heavy duty tables/boards/grid paneling will be allowed, please seek approval from the Markets Officer.
  - When setting up or taking down, tables and boards must be weighed down, if not possible, they must be laid flat on the floor.
  - No Danish style trolleys allowed.
  - The maximum height of any stacked crates/boxes used must not exceed 76cm.
  - When using any equipment, traders to ensure they're appropriately supervising their equipment at all times, particularly when setting up and taking down.
- If a restricted market is declared by the Markets Team the day before the market,

and the weather unexpectedly improves overnight resulting in predicted reasonable weather conditions during core trading hours, those traders with their own stalls/gazebos/equipment may be allowed to use them as usual with the Market Teams approval. The assessment for such decisions will be made on the morning of the market, prior to 8am, utilising the Met Office Weather app. No traders shall start erecting any equipment until the decision has been made.

- Where trading has already commenced and the Council considers it appropriate to stop trading, they shall notify the traders accordingly and supervise the removal of all goods, equipment and vehicles from the Market Place.
- Where a market is cancelled, due to adverse weather, the Council's decision will be deemed final, and all traders will be required to cease trading and vacate the Market Place immediately
- In the case of a restricted market, and if a trader is to use their own stall/gazebo/equipment, they must have a risk assessment for such equipment in severe weather and shall provide it to the Markets Team upon request.
- The Markets Team will aim to assess the upcoming weather via the Met Office website/app to maintain a consistent approach, no later than **midday**, the day before the market. If a market is restricted after review, traders will be notified by email or direct contact from the Markets Team.

### **ABSENCE FROM THE MARKET ON INCLEMENT WEATHER DAYS**

- Traders are assumed to be occupying their gazebo/pitch unless they have cancelled their booking or booked a non-attendance day (regular traders), both of which are required to be done by **2pm** the day before the market.

### **FEE'S**

- In the case of the market being cancelled prior to the market day, traders who have paid their fee will be provided a discount code for a free market to be used on a future date. All fees are non-refundable.
- In the event a market is cancelled by the Council during a market day, and if trading ceases before 1200 on that day, traders will be provided a discount code for a free market to be used on a future date.
- In the event that the market is open, and the trader is standing and wishes to no longer trade due to inclement weather 'in their opinion', they may leave the market with the permission of the Markets Team. Traders who choose to leave the market early due to inclement weather of their own decision will not receive any discount codes for future markets.
- In the case where the Markets Team has **restricted** the market, the trader will have a **choice not to stand** without penalty. Traders who have already paid will

receive a discount code for a future market.

- Traders **must strictly** adhere to the following:
  - The trader must notify the Markets Team **via** email [Markets@SHolland.gov.uk](mailto:Markets@SHolland.gov.uk) that they will not be standing on the **restricted** market, by **1pm the day before the market or contact the Markets Officer**.
- If a regular trader doesn't wish to stand on a **restricted market** and has already paid for their booking, we will issue a discount code for a free market to be used at a future market, all fees are non-refundable.
- If a regular trader hasn't paid for their reservation and doesn't wish to stand on a restricted market, they must book a non-attendance day by 2pm the day before the market. The Markets Team will then add an additional non-attendance day to their balance. The trader must still email the Markets Team before **1pm** to inform them that they will not be standing on the restricted market.

### **RISK ASSESSMENTS**

- Traders that use their own market equipment must have a detailed risk assessment for inclement weather conditions and sufficient staff take action if circumstances arise. This risk assessment must be made available to the Markets Team immediately, upon request. Traders that can't provide such documentation maybe asked to dismantle the equipment.
- A risk assessment will not automatically allow traders to use their equipment in severe weather conditions, it will be the Markets Team decision, depending on the severity of the weather, on what will be allowed. If private stalls/gazebo's are permitted, the trader must ensure correct weights are used at all times and must complete regular safety checks on their equipment, as per their risk assessment. In windy conditions, gazebo's must be double weighted on each leg.

### Decision Making Framework

Are sufficient staff available?	Weather Conditions		
	Good but deteriorating later in the day	Bad but improving later in the day	Bad and worsening
<b>Yes</b>	Hold the market if the time available to trade is acceptable. Put certain restrictions in place if required.	If possible, set out the basic infrastructure but leave sheets/sides off until it is safe to add. Put certain restrictions in place if required.	Consider restricting or cancelling the market.
<b>No</b>	Restrict or cancel the market.	Restrict or cancel the market.	Restrict or cancel the market.

**SEVERE WEATHER TABLE AND RISKS**

<b>Met Office Terminology</b>	<b>Definition</b>	<b>Risk – who may be harmed and how</b>	<b>Controls and Actions</b>
Heavy snow	Snow falling at a rate of approx. 2cm per hour or more, expected for at least 2 hours.	Slips, trips, and falls from unsafe or icy ground. Manual handling injuries from attempting to set up infrastructure in icy/snowy conditions. Impact injuries	Check weather forecasts before market. Cancel or restrict market according to forecast. Ensure operatives/staff are on standby if forecast is uncertain. Monitor travel information around the Town Centre. In the case of lighter conditions, ensure gritting of the main roads/streets and pedestrian areas. If a thaw is forecast, consider if there is sufficient safe ground to host the market.
Blizzards/ Drifting snow	Moderate or heavy snow with winds of 30mph or reduced visibility to 200 metres or less or drifting snow causing similar Conditions.	from vehicles (including market vehicles) attempting to manoeuvre on icy or snowy surfaces and poor visibility. Increase in vehicle accidents on the highway, main roads and streets around the Town Centre if traders and customers try	
Very heavy snowfall	Expected to give depths of 15cm or more with potential to result in widespread disruption in communications. Blizzards are severe with visibility reduced to near zero	to attend the market.	
Freezing rain	Rain freezes on contact with road surfaces		

Very windy	Gusts above 35mph	Impact/crush injuries from flying debris/traders goods, moving stalls/gazebo's and collapse of stalls/gazebo's. Bruising, cuts and lacerations resulting from above incidents.	Check weather forecast before market. Cancel or restrict market according to forecast. If possible, ensure operatives/ staff are on standby if forecast is uncertain. Monitor weather and circumstances throughout the market.
Heavy Rain	Expected to persist for at least 2 hours and to give at least 15mm within a 3-hour period or a period of rainfall of sufficient intensity to cause flooding on already saturated ground (includes melting snow) e.g. around 25mm per day.	Flash flooding of urban areas and main roads/streets around the Town Centre impeding the access of emergency services and causing traffic management difficulties. Collapse of market canopies/sheeting/gazebos.	Monitor weather and circumstances in advance of the market. Flooding would be a risk if the ground area was already at saturation points. Consider an early finish if flooding seems to be likely. Traders encouraged and requested to ensure that water is not allowed to build up on top of stalls/gazebo's.
Dense fog	Visibility less than 50 metres.	Increased risk of vehicle accidents on the main entry roads/streets around the Town Centre. Increased time spent in traffic tailbacks. Increased risk of accidents, particularly with market vehicles, leading to crush/impact injuries.	Monitor weather and circumstances throughout the market. Consider an early finish in daylight if fog persists. Consider staffing levels.

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<b>Report To:</b>	Policy Development Panel
<b>Date:</b>	3 February 2026
<b>Subject:</b>	Terms and Conditions alignment – Next Phase.
<b>Purpose:</b>	To consult Policy Development Panel on the policies prior to Full Council.
<b>Key Decision:</b>	N/a
<b>Portfolio Holder:</b>	Councillor Jim Astill, Portfolio Holder – Corporate, Governance and Communications
<b>Report Of:</b>	Aileen Whatmore, Head of HR & OD - PSPS
<b>Report Author:</b>	Angela Posey, HR Transformation Manager - PSPS
<b>Ward(s) Affected:</b>	N/a
<b>Exempt Report:</b>	No

## Summary

In line with the South & East Lincolnshire Councils Partnership Business Case and Alignment and Delivery Plan, the Partnership Councils are undertaking a phased programme of work to align workforce terms and conditions of employment across Boston Borough Council, East Lindsey District Council and South Holland District Council.

Phase 1 has already been undertaken. To facilitate the alignment of the terms and conditions in Phase 2, there is the need for the Council to adopt a series of revised HR policies, as described in this report. Consultation with Unions and Colleagues would be undertaken if Council approval is confirmed.

## Recommendations

- That Policy Development Panel provides feedback on the proposals in this report to facilitate Phase 2 of alignment of terms and conditions of employment across the South & East Lincolnshire Councils Partnership Councils.

## Reasons for Recommendations

- This would deliver on the commitment, where possible, of aligning terms and conditions of employment for the workforce across all three Councils.

## Other Options Considered

- Do nothing – discounted as this would be contrary to commitments previously made by the Council.

## 1. Background

- 1.1 In May 2024, Boston Borough Council, East Lindsey District Council and South Holland District Council – the South & East Lincolnshire Councils Partnership – all agreed to take forward a phased programme of work to align employee terms and conditions of employment as far as possible.
- 1.2 This is something recognised as being important to the workforce, particularly given that many officers are shared between Councils.
- 1.3 Whilst a number of terms and conditions have now been aligned through the initial phase of work, this report brings forward further terms and conditions for alignment.

## 2. Report

- 2.1 Phase 2 of the alignment proposes changes to the following terms and conditions. If agreed by Council a 45-day period of consultation would be undertaken.

*Those in grey in the table below are where there is no impact to SHDC colleagues as they are already aligned to the proposed term and condition. They have been included in this table for completeness*

Ref	Phase 2 Terms & Conditions	Current SHDC Policy position	Phase 2 Summary of changes proposed
1	Overtime (worked over FTE hours)	x1.5 standard overtime (over 37 hours) x2.0 for Bank Holidays and Sundays work when worked.	No change  (In contracts no appendix)
2	Car Loan/Purchase Assistance Policy	SHDC it applies to essential car users only. Interest - HMRC Income Tax liability rate. 4 years max	<ul style="list-style-type: none"> <li>Set max price to reduce risk of debt to Council and to employee. Avg. second hand car is circa £16,780 – 80% - £13,424. New car price would also need to account for immediate depreciation from the forecourt, therefore apply 80% to new car price. Consider max amount of lending against salary level – max 20% gross monthly salary (ELDC).</li> <li>Eligibility – for the purposes of supporting with work duties and commuting to work e.g. not a performance vehicle.</li> <li>Interest rate to be a minimum of HMRC rate (otherwise is a taxable benefit and submission through P11D processing)</li> <li>Length of Loan – 4 years max except in the case of cars not more than 3 years old at the date of purchase - max 5 years. (ELDC/SHDC).</li> <li>Loans are not offered to employees within their probation period.</li> <li>Repayment of loan required by last date of employment if</li> </ul>

			<p>employment ended (by either party)</p> <ul style="list-style-type: none"> <li>• Civil proceedings to apply should payment remain outstanding along with interest.</li> <li>• Application to be submitted in FULL to HR for due diligence on pay, AD to sign to approve, Finance to pay vendor and notify of the date payment will be BACS so employee can advise seller.</li> <li>• Option to transfer loan across the Partnership.</li> </ul> <p>(See Appendix A)</p>
3	<b>Employer and Employee Notice Period</b>	<p><u>Current EE Notice SHDC</u> Up to &amp; including SCP 21 1 calendar month</p> <p>Over SCP 22 2 calendar months</p>	<p>Align to BBC (Except Prob Period)</p> <ul style="list-style-type: none"> <li>• *Grade 1-3 = 1mth</li> <li>• Grade 4-5 = 2 mths</li> <li>• Grade 6-9 = 3 mths</li> <li>• AD, Directors/DCX = 4 mths</li> <li>• CEX = 6 mths</li> </ul> <p>Probation to align to ELDC one week employer notice, which reduces current provision, but only impacts new employees. This change along with the below proposals to amend Senior management notice provisions are consistent with industry standards and ensures operational resilience.</p> <p>Employee notice period to be equivalent to Employer notice period.</p> <p><i>*Consideration would need to be given to the Council's own grading convention to be equivalent to role level.</i></p> <p>To be amended in Contract template (there is no Policy to share with PDP)</p>
4	<b>Redundancy</b>	SHDC use an actual week's pay but no multiplier.	<p>Align to ELDC who apply a multiplier of 2, using an actual weeks pay – capped at max 60 weeks</p> <p>Single amendment to clause in Policy - Entitlements (see appendix)</p>
5	<b>Pay Protection</b>	<p>2 Years Pay protection</p> <p>3 Years Pay Protection from those who transferred from Breckland who were in shared roles prior to 1 May 21.</p>	<p>Align to ELDC (and Shared Pay Officers)</p> <p>Year 1 = 100%, Year 2 = 100% Year 3 = 50%</p> <p><i>*any continued TUPE protection will still apply if more advantageous</i></p>
6	<b>First Aid Payments</b>	SHDC - £4.33 per month	<p>Align to BBC - £17.43 per month</p> <p>Increase annually in line with NJC awards</p>

			(Paid as a fixed monthly payment - No Policy)
7	<b>Annual Leave</b>	<p>24 days rising to 29 days after 5 years' service. Including service managers. Former Shared Officers (Breckland) – 30 days</p> <p>Assistant Directors 30 days rising to 33 days after 10 years</p>	<p>Align to BBC Standard Entitlement Year 1 - 29 Days Year 2 - 30 Days Year 3+ - 31 Days</p> <p><b>**Service Mgrs Entitlement to match ELDC (31 Days rising to 34 after 10 years)</b></p> <p>Assistant Directors to be aligned with Service managers commencing and top entitlement - 31 days rising to 34 days after 10 years.</p> <p><i>**Consideration would need to be given to job titles so that notice is equivalent to role level.</i></p> <p>To be amended in Contracts and Appendix of Time Off Policy only – no change to main body of Policy</p>
8	<b>Mobility Clause</b>	<p>New Contract templates are updated and already aligned when issued for new employees, these set mobility as any location in SELCP partnership. Many employees have older contracts, with varying different mobility clause arrangements.</p> <p>“Your principal place of work will be [insert location and first line of address e.g. Municipal Buildings, Boston; Priory Road, Spalding or Horncastle Hub, Horncastle, Aura Business Centre, Skegness etc], or at such other place of employment in the service of the Council as reasonably required. The address of the Council is given above.</p> <p>Employees may be required to work, either temporarily or permanently, at any other location specified by the Council inclusive of all ‘South &amp; East Lincolnshire Partnership’ locations which are within a reasonable distance (reasonable being determined solely by the Council) as the needs of the business</p>	<p>Change only to older contracts that have varying different mobility clause arrangements – standardised to new wording for all by issuing new contracts.</p> <p>To be amended in Contracts (no Policy Appendix)</p>

		reasonably requires. An employee's usual place of work may be changed on reasonable notice.”	
9	<b>Injury Award Scheme</b>	All 3 Councils are aligned. However, the Councils use slightly different wording so we are proposing we standardise the wording to match the current provision of the Green Book.	No Change

**2.2** In order to implement the aligned terms and conditions of employment, there is the need to make revisions / to HR policies at each Council. These will be common policies for all three Councils.

**2.3** The cost associated with amendments to these terms and conditions is set out in the implications section of this report.

### **3. Conclusion**

3.1. That to achieve alignment of workforce terms and conditions of employment, adopting the revised suite of HR Policies as appended to the report would be required. This is another positive step in the journey to align terms and conditions of employment Partnership-wide.

### **Expected Benefits to the Partnership**

The alignment of workforce terms and conditions of employment is necessary to support the embedding of the Partnership, particularly as more teams come together in shared Partnership service structures.

### **Implications**

#### **South and East Lincolnshire Councils Partnership**

As in ‘Expected Benefits to the Partnership’

#### **Corporate Priorities**

This supports our ambition to continually be more Efficient and Effective.

#### **Staffing**

PSPS HR are supporting the Head of Paid Service and Assistant Director – Corporate in delivering the consultation and process to bring together terms and conditions of employment.

For staff directly, there will be a move to new terms and conditions of employment, but this should be positive for the workforce.

#### **Workforce Capacity Implications**

None

#### **Constitutional and Legal Implications**

None arising from this report as Council has previously approved the programme of work and delegated authority to the Head of Paid Service.

PSPS HR, as our Partnership’s HR experts, are supporting this work and will take legal advice where required.

#### **Data Protection**

None

#### **Financial**

Term	SHDC £ Cost
TOTAL	£ 27,727.60
First Aid Payments	£ 1,257.60
Annual Leave	£ 26,470.00

### **Risk Management**

PSPS HR, as our Partnership's HR experts, are supporting this work and flag to the Head of Paid Service and Assistant Director – Corporate any emerging risks.

### **Stakeholder / Consultation / Timescales**

Consultation will be undertaken with the workforce and Unions if Council agrees to proceed with the changes.

Senior Leadership Team, Portfolio Holders and the Partnership's Stakeholder Board have been consulted.

### **Reputation**

None

### **Contracts**

Revised terms and conditions of employment.

### **Crime and Disorder**

None

### **Equality and Diversity / Human Rights / Safeguarding**

Equality Impact Assessments will be undertaken where a need is identified.

### **Health and Wellbeing**

The revised terms and conditions may have a positive impact on some colleagues' health and wellbeing.

### **Climate Change and Environmental Implications**

None

### **Acronyms**

HR – Human Resources

PSPS – Public Sector Partnership Services Ltd

SELCP – South & East Lincolnshire Partnership

### **Appendices**

Appendices are listed below and attached to the back of the report:

Appendix A

SELCP Vehicle Purchase Assistance Policy

Appendix B

SELCP Redundancy and Redeployment – Extract only

Appendix C

SELCP Time Off Policy – Appendix only

### **Background Papers**

None

### **Report Approval**

Report author:  
Signed off by:  
Approved for publication:

Angela Posey, HR Transformation Manager - PSPS  
Rob Barlow, Chief Executive / Head of Paid Service  
Councillor Jim Astill, Portfolio Holder – Corporate, Governance and  
Communications.

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# Vehicle Purchase Assistance Policy



The Council recognises that its people are its greatest asset. To enable employees to deliver high-quality services and meet operational demands, we are committed to supporting safe, reliable, and responsible vehicle use for work and commuting purposes. This policy sets out our approach to assisting employees in acquiring and maintaining suitable vehicles, ensuring that access to vehicle loans is fair, equitable, and transparent.

Our approach balances the needs of employees with the Council's duty to manage financial and operational risks. The policy is fully compliant with equality and diversity standards, giving due care and consideration to individual circumstances while ensuring that vehicle provision aligns with the Council's business requirements.

Supporting employees with appropriate vehicle access is not only about enabling individual effectiveness, but also about strengthening organisational resilience and service continuity. This policy applies to all eligible employees and ensures fair, transparent access to vehicle support, balancing individual needs with those of the Council and offered to eligible employees as an alternative to the Councils salary sacrifice car scheme.

Policy	Vehicle Purchase Assistance Policy
Policy Author	HR Team – PSPS Limited
Policy Issue date	January 2026
Policy Review date	January 2030, or earlier if required
Policy Consultation	Trade Unions recognised by the Council Council Reader Panel Senior Leadership Team
Policy Sign-off	Head of Paid Service (at SHDC – in consultation with Portfolio Holder and PDP)

# Vehicle Purchase Assistance Policy

## Introduction

The Council recognises that its people are its greatest asset. To support the delivery of high-quality services and ensure operational continuity, this Vehicle Purchase Assistance Policy sets out the conditions under which employees may apply for financial support to purchase a suitable vehicle for work and commuting. It will promote responsible lending that minimises financial risk to both the Council and employees. The policy aims to provide fair access to loans for eligible employees, supporting operational needs while maintaining financial prudence.

## Aim

The purpose of this policy is to ensure that vehicle loans are managed fairly, consistently, and in accordance with statutory and best practice standards. The policy aims to financially support employees in acquiring a suitable vehicle for work-related travel and commuting, while safeguarding the Council's financial interests and adhering to any prevalent regulations, including HMRC.

## Scope

This policy applies to all employees of the Council, including those employed on fixed-term contracts, who require a vehicle for work duties and commuting. The policy does not apply to agency workers, self-employed contractors, or consultants. Cycles are not within the scope of this policy, but the council offer a separate provision under its salary sacrifice 'Cycle to Work' scheme.

*Where it is possible, the Salary Sacrifice Car scheme may first be explored as a more viable financial option for vehicle purchase, prior to an application for a loan being made.*

## Eligibility

- Employees must have successfully completed their probation period.
- Fixed Term Contract employees will need to be within employment for the duration of the loan period, therefore the loan term should not exceed your contract end date.
- The vehicle must be the employee's primary mode of transport for work duties and/or commuting.
- Loans will not be granted for performance vehicles, performance motorcycles, or secondary vehicles.
- Vehicles must be purchased from a Motor Vehicle Retailer or Dealership registered under Companies House who accept BACs payment. Private sellers will not be permitted.
- Employees seeking alternative transport options may use the Cycle to Work Scheme.

## Loan Amount and Financial Limits

### Maximum Loan Value:

- For second-hand cars: 80% of the average market price (currently as at Oct '25 approx. £16,780), capped at £13,424. The Council will review the average market price annually on or around October, or if there is market conditions that indicate a need to review sooner e.g. shortage of new vehicles forcing an increase in demand for second hand cars shifting market price). Information on the updated Market evaluation will be published on employee FAQ.
- For new cars: 80% of the purchase price to account for immediate depreciation.

*\*as at October 2025*

**Salary-Based Cap:** Monthly Loan deductions must not exceed 20% of the employee's gross monthly salary.

Only one vehicle loan may be held at any time. Council will take into consider other salary commitments that the employee has, when looking at this application to support with responsible lending.

Any loan confirmed over the value of £10,000.00 may be taxable, which will be submitted by Payroll via a P11D.

## Interest Rate

The interest rate will be set at a minimum of the HMRC official rate, as at the date of the loan issue. Should the initial interest rate fall below future HMRC annual rates, this would then become taxable via a P11D.

## Loan Term

- Maximum loan term: **4 years**. Except for vehicles less than 3 years old at purchase: loan term can then be **up to 5 years**.
- Vehicle age is determined by Date of registration of the vehicle.

## 1. Responsibilities under this Policy

### 1.1. The Council

- Provide fair access to vehicle loans for eligible employees, supporting operational needs while maintaining financial prudence.
- Understand the requirements of the employee's application and provide responsible financial support, while safeguarding the Council's financial interests.
- Provide clear and transparent information to the employee throughout the application process.
- Inform and offer the employee alternative or more suitable solutions to lending where possible, e.g. Cycle to Work scheme, Salary Sacrifice Car Scheme etc.

### 1.2. Employees

- Provide accurate, timely, and transparent information for the application of the loan.
- Carefully consider the impact of repayments and current financial commitments alongside the loan period.
- Understand the limits of the Policy and commit to the requirements of the repayments.

- Understand that the spirit of the Policy is to provide financial support to employees who may not be able to obtain private or reputable financial borrowing.

### 1.3. Managers

- Support employees in understanding the policy and application process.
- Verify that the vehicle is required for work duties and/or commuting.
- Liaise with HR and Finance as needed.
- Signpost employees to alternative schemes where appropriate.

## 2. Conditions

- 2.1. Full loan repayment must be completed by the employee's last working day if employment ends for any reason. In situations of a termination the Council reserve the right to deduct remaining balance from any settlement payments made to employee.
- 2.2. Civil proceedings, including interest charges, will apply for any outstanding repayments, after the last date of employment with the lending Council
- 2.3. The loan liability is with the employees' employing Council.
- 2.4. Loans are transferable across the Partnership only with approval of the incoming Directorate.
- 2.5. Where an employee transfers to another Council **outside** the Partnership, the outstanding balance of the vehicle loan must be repaid in full on or before their last day of employment with the lending Council, regardless of whether continuous service is preserved for employment purposes. It does not extend to financial agreements such as vehicle loans, which remain the responsibility of the original employing Council.
- 2.6. Should the vehicle become unroadworthy, written off or unusable, the loan will continue to be payable in full to the Council.
- 2.7. Employees must maintain an appropriate level of vehicle insurance for the duration of the loan, and thereafter if you use the vehicle for work related duties.
- 2.8. Early repayment is permitted without penalty; employees may request an early repayment calculation.
- 2.9. Employee must provide a fully completed Application Form along with supporting documentation requested for supplier/vendor set up (please refer to the Application form for details).

## 2. Application Process

- 2.9. Employees must submit a fully completed application to HR for due diligence checks on pay, general income, and affordability.
- 2.10. Employees must declare all relevant information in full to the Council; failure to do so may delay the application and any false disclosure may be treated as a misconduct issue and dealt with under councils Disciplinary Procedure.
- 2.11. HR will confirm eligibility before proceeding to Assistant Director (AD) approval.
- 2.12. Approval must be signed by the relevant Assistant Director (AD) and 151.
- 2.13. Finance will pay the vendor directly and will require new vendors to be set up as a supplier and notify the employee of the BACS payment date so the employee can inform the seller and make arrangements to collect the vehicle, once the money has been received by the seller.
- 2.14. Only one loan application may be active at any one time.
- 2.15. Employees should typically allow 2 weeks for a vehicle loan application; and should apply with sufficient time. Applications may take longer if more information is required; absence of approving AD; delays in setting new suppliers up.
- 2.16. The Employee should not confirm a collection of the vehicle until a payment date to the seller has been confirmed.
- 2.17. When the application has been approved, and details of the loan finalised, you will be notified

of the loan amount and monthly deductions, in writing, which will need your signature as confirmation of the deductions, prior to the seller being paid.

### **3. Deductions**

Loan payment Deductions will be made automatically from salary on a monthly basis. Deductions will start from the next payroll cycle after loan approval.

In case of resignation or termination:

- Outstanding balance becomes immediately payable.
- Company reserves the right to deduct from final settlement.

If an employee, due to reduction in salary (e.g. due to period of Parental leave or long-term sickness absence), cannot afford to cover the loan deductions, the Council will either reduce deductions or suspend deductions. On return to work, the Employee will receive an amended loan repayment schedule. Or the Employee may choose to settle or pay the Council directly, when salary deductions are not possible.

### **4. Decline following Application**

4.9. If the loan is declined, the employee will receive the reason for this decision.

4.10. The decision on lending is solely at the discretion of the employing Council holding the liability, and to the incoming Council in the case where an employee may transfer within the Partnership.

4.11. There is no appeal procedure against the decline of the loan. Employees may reapply after six months or if their circumstances change.

### **5. Data Protection**

The Council processes personal data in accordance with its Data Protection policy. Data collected is held securely and accessed by, and disclosed to, individuals only for the purposes of managing the car loan process effectively. Inappropriate access or disclosure of applicant data constitutes a data breach and should be reported in accordance with the Council's Data Protection policy immediately.

### **6. Review and Amendments**

This Policy is non contractual and may be reviewed, amended or withdrawn at any time the Council feels is necessary.

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## Appendix B

### SELCP Redundancy and Redeployment Policy – extract

The paragraph below will be an additional point to Section 8 with no further change to the existing policy.

8.9 The Council will calculate an employee's redundancy payment based on the statutory formula contained in the 2000 Regulations (using an actual week's pay) and then multiply that amount x2. Under this discretion the maximum compensation payment is 60 weeks. This discretion reflects the Council's wish to award discretionary compensation to an employee whose employment is terminated on the grounds of redundancy.

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## SELCP Time Off Policy Appendix

### Appendix 1 – Annual Leave Entitlements

<b>SELCP Annual Leave Entitlement</b>			
Years of Service	Entitlement Days (Excluding Bank Holidays)	Entitlement in Hours (Excluding Bank Holiday)	Entitlement in Hours (Including Bank Holiday)
Year 1	29	214.6	273.8
Year 2	30	222	281.2
Year 3+	31	229.4	288.6

<b>SELCP Service Managers Annual Leave Entitlement</b>		
	Service under 10 years	Service 10 years and Over
Service Managers	31	34
Chief Officers Assistant Directors	31	34
Chief Officers (DCX/Directors)	33	36
Chief Officers (CEX)	34	37

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<b>Report To:</b>	Policy Development Panel
<b>Date:</b>	03/02/26
<b>Subject:</b>	SHDC Housing Comments, Compliments, Complaints and Compensation Policy
<b>Purpose:</b>	To approve amendments to SHDC Housing Comments, Compliments, Complaints and Compensation policy following an annual refresh with tenants
<b>Key Decision:</b>	NA
<b>Portfolio Holder:</b>	Portfolio Holder for Strategic and Operational Housing
<b>Report Of:</b>	Vikki Cherry, Assistant Director – Housing
<b>Report Author:</b>	Beverley Chapman, Tenant Engagement and Influence Lead
<b>Ward(s) Affected:</b>	All
<b>Exempt Report:</b>	No

## Summary

Our Housing Comments, Compliments, Complaints and Compensation Policy has been developed to ensure that all tenants are treated fairly and that any issues or dissatisfaction with the services are addressed promptly and effectively and that all concerns receive a response and resolution. The policy also aligns with legal and regulatory requirements of the Housing Ombudsman's Complaint Handling Code.

This report is to highlight the amendments made to the Housing Services Housing Comments, Compliments, Complaints and Compensation Policy which was reviewed in conjunction with tenants to ensure it meets the Housing Ombudsman Code of Practice and the tenants voice is prominent throughout the Policy.

## Recommendations

That Policy Development Panel provides feedback on the Housing Comments, Compliments, Complaints and Compensation Policy.

That Policy Development Panel recommends adoption of the Housing Comments, Compliments, Complaints and Compensation Policy to Cabinet.

## Reasons for Recommendations

To ensure the Housing Landlord Services are compliant with the Housing Ombudsman Code of Practice and the Regulator of Social Housing requirements.

## Other Options Considered

**Do nothing.** Not to review the policy. This option is not recommended as it would leave us with a policy that does not recognise the tenant's voice. The Regulator of Social Housing has been in force April 1, 2024, and they expect all landlords to be accountable to tenants, addressing complaints fairly, effectively and promptly to build trust with tenants and put tenants' views at the heart of decision-making about the delivery of landlord services.

## 1. Background

- 1.1 The Housing Ombudsman's Complaint Handling Code became statutory on 1 April 2024, meaning that social landlords are obliged by law to follow its requirements. In addition, social landlords also have to ensure compliance with the complaints section within the Regulator of Social Housing's Transparency, Influence and Accountability Standard.
- 1.2 The current Policy was developed and approved in March 2024. The policy has been updated following adoption of the Tenant Engagement and Influence Strategy. The policy has also been updated to reflect revisions to staffing structures and changes in approach to monitoring of Housing Complaints.

## 2. Report

- 2.1 To bring the Housing Comments, Compliments, Complaints and Compensation Policy up to date and ensure that tenant voice was heard, the policy was reviewed with tenants at a Complaints and Performance Focus Group in November 2025.
- 2.2 Tenants were provided copies of both the current Policy and the Housing Ombudsman Code and compared the two documents to ensure that all requirements were included in the Policy. This comparison highlighted that the Policy included all the necessary parts of the code.
- 2.3 In addition, tenants were then asked to share their thoughts on the policy, and changes they thought should be made to make the policy more robust. Tenants asked for the following changes:
  - Tenants voice to be prominent throughout the policy, requesting additions of the Focus Group as a means of scrutiny.
  - Transparency of the process to be highlighted to make sure all complaints were investigated fairly and consistently.
  - Re-ordering of the policy to enable it to flow better for those reading it.
  - Addition of a timeline of the process.

- Requested that Senior Officers and Team Leaders investigated Stage 1 complaints and that Senior Managers including Assistant Director for Housing investigate Stage 2 complaints. This way those closer to the operational work would be able to identify errors more consistently, implement changes and ensure they were successful.
- A review date for the policy should be added.

2.4 Tenants were content with how compensation was awarded and suggested no changes.

2.5 In addition, officers have reviewed the policy to maintain its effectiveness, updated job titles after SELCP restructures, and ensured ongoing compliance with the Housing Ombudsman's Code.

2.6 Appendix 2 provides a summary of changes made.

### **3. Conclusion**

3.1. Working with the tenants to review the Policy has led to a strong voice for the tenant being prominent throughout the policy, whilst maintaining compliance with the Housing Ombudsman Code of Practice.

### **Implications**

#### **South and East Lincolnshire Councils Partnership**

None

#### **Corporate Priorities**

*The Policy will support the following Corporate Priority:*

- *Our Council - Continue to ensure that our regulatory and statutory services remain fully compliant with all current and emerging legislation.*
- *Your Home – We will be a landlord of choice for our council housing tenants. Delivery of the Policies set out how we will make improvements to our service and take on board the views of our tenants.*

#### **Staffing**

None

#### **Workforce Capacity Implications**

None

#### **Constitutional and Legal Implications**

These documents do not form part of the major Policy Framework and can be approved by Cabinet.

The Housing Ombudsman Scheme is approved by the Secretary of State under section 51 of the Housing Act 1996. Local housing authorities in England which are registered providers of social housing must be members of the scheme. This policy supports compliance and mitigates the risk of complaint handling failure orders and/or financial penalties.

The Housing Complaints Working Group meets quarterly to review trends and analysis of complaints and information regarding benchmarked Stage 1 and Stage 2 complaints. Attended by the Assistant Director for Housing, Portfolio Holder for Strategic and Operational Housing, Information Manager and Data Protection Officer, Service Leads, Complaints Co-Ordinator and the Tenant Influence and Engagement Lead, this Group serves to ensure that all complaints have oversight from all relevant sections of the Council. It also holds Service leads to account in their role as investigating officers.

On 14th February 2023, Cabinet approved that the Assistant Director – Housing has authority to authorise payment of compensation in connection with complaints regarding the Council's function as a social landlord of up to £1,000 in consultation with the Portfolio Holder for Strategic and Operational Housing.

### **Data Protection**

None

### **Financial**

None

### **Risk Management**

None

### **Stakeholder / Consultation / Timescales**

Consultation was undertaken with tenants on 05 November 2025 who reviewed the policy as part of our engagement offer.

The Portfolio Holder for Strategic and Operational Housing, Director for Communities and Information Manager and Data Protection Officer have been consulted.

### **Reputation**

Ongoing reviews of policies reduces the risk of reputational damage caused by enforcement from the Social Housing Regulator and/or the Housing Ombudsman (of which is published on the Ombudsman's website and social media channels).

### **Contracts**

None

### **Crime and Disorder**

None

## **Equality and Diversity / Human Rights / Safeguarding**

The Council is committed to treating everyone fairly and shall ensure that it complies with the Equality Act 2010. The document is accessible to all.

An Equality Impact Assessment has been completed and does not identify any potential Public Sector Equality Duty issues. Documents have been designed to be fully inclusive regardless of the ethnicity, gender, sexuality, religious belief, or disability of service users or residents.

The Policy makes reference to reasonable adjustments taken to accommodate a person's needs.

Where we identify, or a customer advises us of, a vulnerability we make reasonable adjustments to our services accordingly to meet the needs of those individuals. This may include altering the way we communicate with a customer to adjusting the service that we offer to that person. Each case will be judged on its individual merits to avoid a one size fits all approach.

## **Health and Wellbeing**

None

## **Climate Change and Environment Impact Assessment**

Not undertaken.

## **Acronyms**

None

## **Appendices**

Appendices are listed below and attached to the back of the report:

Appendix 1	Housing Complaints Policy
Appendix 2	Summary of changes to the Policy
Appendix 3	Equality Impact Assessment

## **Background Papers**

<b>Document Title</b>	<b>Where the Document can be viewed</b>
Housing Ombudsman's Complaint Handling Code	<a href="https://www.housing-ombudsman.org.uk/wpcontent/uploads/2020/11/Complaint-HandlingCode.pdf">https://www.housing-ombudsman.org.uk/wpcontent/uploads/2020/11/Complaint-HandlingCode.pdf</a>

## **Chronological History of this Report**

A report on this item has not been previously considered by a Council body.

**Report Approval**

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Approved for publication: Cllr Tracey Carter, Portfolio Holder for Strategic and Operational Housing

# SHDC Housing Comments, Compliments, Complaints and Compensation Policy

## 1. Introduction

The purpose of this document is to set out the Council's approach to compliments and complaints made regarding its function as a landlord. The policy also assists us to set out a fair and consistent approach to compensation when the service delivered has not met our standards. The Council's Corporate Complaints policy should be considered for all other complaints.

Compliment and complaint handling performs an important strategic role for the organisation providing vital intelligence on its health, performance and reputation. The policy and underlying procedures will allow the Council to provide a service which reflects our statutory responsibilities as a landlord as well as good practice. The policy will also ensure complaints are handled consistently. All complaints are handled taking into account our Reasonable Adjustments Policy.

We aim to provide excellent housing services and give the best customer service possible. All feedback received is viewed positively as a valuable resource, enabling us to continuously improve the services we provide.

The Complaint Handling Code became statutory on 1 April 2024, meaning that social landlords are obliged by law to follow its requirements.

This Code requires social housing landlords to have an approach to complaints that is clear, simple and accessible. The Regulator for Social Housing's Consumer Standards Code of Practice 2024 focusses on making Landlords address complaints fairly, effectively and promptly to build trust with tenants. This policy supports the Code of Practice by publishing how we promptly and fairly deal with complaints whilst treating complainants with respect, it also sets out how we will engage with tenants, publicise the complaints process and how we support Housing Ombudsman investigations.

This policy incorporates the key requirements of legislation, regulations and guidance including Social Housing (Regulation) Act 2023, Housing Act 1985, Housing Act 1988, Housing Act 1996, Data Protection Act 2018, Freedom of Information Act 2000, Human Rights Act 1998, Equality Act 2010 and Environmental Information Regulations 2004.

This policy applies to

- all existing tenants of the Council
- former tenants who have left a property within the last twelve months
- any individual or group affected by the housing services that the Council and those acting on its behalf provides.

The Council will treat a complaint submitted via a third party or representative, including friends, family, MPs, Councillors and Citizens Advice, in line with our policy and procedure for complaints. In these instances, MPs and Councillors will be acting in their role as a representative. The Council will only share personal information with

representatives where the complainant has given explicit permission for us to do so or otherwise as permitted by the data protection law. Third Party representatives can represent or accompany any meeting with us as their landlord.

Please note where this policy makes reference to 'tenants' it relates to residential tenants, licensees and leaseholders of South Holland District Council excluding those that the Council is assisting under Part VII of the Housing Act 1996.

### Definitions

A **request for service** is defined as a request by or on behalf of a tenant or group of tenants for something to be provided or put right.

A **compliment** is defined as positive feedback for a job well done. We record compliments to allow a us to identify and strengthen best practice and to celebrate the success of our colleagues and partners when we get it right.

A **comment** is defined as any other form of feedback about our services. It could include ideas for improvements, observations about our services, and include negative feedback separate to a complaint. We record comments to understand our tenants' views about services, helping to drive service improvement.

A **complaint** is defined by the Housing Ombudsman as: *'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.'* (The word 'complaint' does not have to be used for it to be treated as a complaint).

## **2. Request for service**

When a tenant makes a request for service, we will triage their request seeking to resolve it first time. When required, issues may be passed to specialist colleagues. We will communicate with tenants as required to provide updates via their chosen method. Service requests should be sent to our Customer Services Team in the first instance, either through telephone, website, social media direct messages, in writing or through email. Where dissatisfaction is expressed with a response to their service request then a formal complaint would be raised.

## **3. Compliments**

A compliment is defined as a statement of positive recognition or praise for a service or Officer. We welcome compliments to celebrate and recognise Officers for their contributions in providing a great service to our tenants.

We will maintain a central register of compliments. Compliments will be celebrated and shared amongst the department.

## **4. Complaints**

The Council is committed to dealing with complaints in an open and transparent way

that is fair and equal to everyone. Making a complaint will not have an adverse effect on any other services that a tenant receives from us.

We strive to resolve a complaint in a quick and efficient manner treating tenants fairly and with respect.

Tenants can raise their complaints in any way and with any member of staff. This can be verbally, in writing, via our feedback forms, this list is not exhaustive. Our culture will be to accept all complaints on the basis that complaints should not be seen as negative by having a well published and accessible complaints process that will encourage transparency with tenants.

Tenants can complain about issues such as:

- A failure to provide a service at the level or standard set out in the Council’s adopted policies, procedures or rules.
- Delays in responding to enquiries and requests where we have exceeded our set timescales
- Misconduct by an Officer.
- A failure to consider all information in coming to a decision.
- A failure to inform people of their rights.
- Malice, bias or discrimination.

Complaints through third parties:

- We recognise that some people who wish to complain may need support to do so. We accept complaints made by third parties (including, for example, family members, friends, advocates, or support workers) on behalf of a complainant and will take steps in line with our Data Protection Policy to make sure that the complainant is in agreement, which may include seeking written permission where this is necessary. We will also give customers the opportunity to be accompanied or represented by a third party at a meeting with us about a complaint where this is reasonable.
- Councillors and Members of Parliament (MPs) may also bring a formal complaint by acting as their constituent’s advocate; formal complaints will be handled in line with this Complaints and Compliments Policy,

Items not considered to be a complaint

The following scenarios will be excluded from this policy because they are either covered by another policy or are outside of the Council’s control:

Issue	Where this should be directed
Reporting a repair or fault	Please contact our Customer Services Team – 01775 761161.
Complaints from one tenant about another	Please see our Tenancy Management Policy. We will accept complaints if a tenant is dissatisfied with how their case was handled by Officers.

<b>Administration of the Housing Register</b>	Corporate complaints procedure <a href="https://www.sholland.gov.uk/Feedback">https://www.sholland.gov.uk/Feedback</a>
<b>Issue relating to homelessness/the Housing Options service</b>	Corporate complaints procedure <a href="https://www.sholland.gov.uk/Feedback">https://www.sholland.gov.uk/Feedback</a>
<b>Setting of rent or service charges</b>	First Tier Tribunal – Property Chamber (Residential Property)
<b>Matters that have already been considered under this or any other Council complaints policy or procedure</b>	These matters are considered to be closed.
<b>Complaints that have been investigated by the Housing or Local Government Ombudsman</b>	These matters are considered to be closed
<b>Damage to a tenant's belongings caused by circumstances beyond the Council's control e.g. through storm or flooding</b>	Contents insurance is the responsibility of the tenant. This is a term of the tenancy and tenants are informed of this requirement at tenancy sign up and at each settling in visit when they move in.
<b>Matters where the Council's/tenant's/a third party's insurer is determining liability.</b>	These matters will be investigated as part of the liability case.
<b>Matters relating to ongoing legal cases (examples include personal injury and housing disrepair claims).</b>	These matters will be investigated as part of the legal case, this only applied where legal proceedings have started.
<b>A request for an appeal or review of a statutory decision</b>	Appeals and reviews will be managed in line with the relevant policy and/or legislation.
<b>Any issue which is set out in Council policy and the policy has been followed</b>	We will not accept a complaint where the Council has followed its own policies. Our Housing policies are available at <a href="http://www.sholland.gov.uk/myhome">www.sholland.gov.uk/myhome</a>
<b>The issue giving rise to the complaint occurred over twelve months ago</b>	We will not accept a complaint where the event occurred more than 12 months ago except where there are health and safety issues or safeguarding concerns.
<b>Councillor's conduct</b>	Corporate complaints procedure <a href="https://www.sholland.gov.uk/Feedback">https://www.sholland.gov.uk/Feedback</a>
<b>Freedom of Information</b>	Freedom of Information policy

requests	<a href="https://www.sholland.gov.uk/FOI">https://www.sholland.gov.uk/FOI</a>
Data protection and data protection requests	Data Protection Policy <a href="https://www.sholland.gov.uk/dataprotectionpolicy">https://www.sholland.gov.uk/dataprotectionpolicy</a>
Complaints from contractors about their commercial or contractual relationships with the Council.	Corporate complaints procedure <a href="https://www.sholland.gov.uk/Feedback">https://www.sholland.gov.uk/Feedback</a>
Expression of dissatisfaction with services made through a survey	The person completing the survey will be made aware of how they can pursue a complaint if they wish to

We will not consider a complaint where an external appeals process is being pursued. This means in cases where, for example, a leasehold valuation tribunal, rent assessment committee, or a court of law is considering the complaint, we will follow the external process. The decision of the external process will be final, and a complaint related to the same issue cannot be lodged again or reopened.

We may refuse to consider a complaint where we are taking linked legal action against the complainant, including the issue of a claim against the complainant e.g. a complaint about the conduct of an Officer who is a witness in a claim for possession. We will continue to seek complaint resolution with a tenant pursuing Pre-Action Protocol for Housing Condition Claims in line with the Housing Ombudsman Service's guidance from November 2021.

Where we determine the issue will not be treated as a complaint, we will explain why the matter is not suitable for the complaints process and provide information on how to contact the Housing Ombudsman.

Where we conduct surveys, we will ensure that the survey makes tenants aware of this policy and how to give feedback.

Each complaint will be considered on its own merit and there will be no blanket refusal if a complaint fits into a category above. Where we do not accept a complaint, we will provide an explanation to the resident setting out the reasons why and their right to take that decision to the Housing Ombudsman.

## 5. Making a compliment or complaint

Compliments and complaints can be made in a variety of ways:

- Online at [www.sholland.gov.uk/GetInvolved-Feedback](http://www.sholland.gov.uk/GetInvolved-Feedback)
- By email to [info@sholland.gov.uk](mailto:info@sholland.gov.uk)
- By telephone 01775 761161
- By post to Housing Feedback, South Holland District Council, Council Offices, Spalding, Lincs PE11 2XE.

We will accept compliments and complaints from the following individuals:

- a) A person who is or has been in a landlord/tenant relationship with the Council. This includes people who have a lease, tenancy, licence to occupy or other

arrangement to occupy premises owned or managed by the Council. If the complaint is made by an ex-occupier, they must have had a legal relationship with the Council within the last twelve months;

- b) A representative(s) of any of the people above who has that person's written consent to make a complaint on their behalf;
- c) A representative(s) of any of the people above who does not have the capacity to give their consent to someone to act on their behalf. The Council must be satisfied that the representative has the legitimate authority to act on the person's behalf; or
- d) A person with the legal capacity to make a complaint on behalf of any of the people above who is deceased e.g. matters relating to the termination of the tenancy after the tenant has passed.

We will not proceed with complaints where they are:

- Made via social media - we will signpost the complainant to complain via our website. Confidentiality and privacy will be maintained.
- Anonymous however, we will still consider whether action is required by us to deal with the issue.
- Made by a representative of the tenant and the representative is not acting in their best interest. In this scenario, we will consult with the Member Responsible for Complaints (Portfolio Holder for Strategic and Operational Housing).

To ensure tenants are aware of the ways to give us feedback and how to contact the Housing Ombudsman, we have:

- Established a section on our website focused on tenant feedback and how feedback is handled
- Amended frequently used letter templates including gas servicing
- Provided 'feedback cards' to our Officers and contractors to hand out to tenants (for completion after Officers/contractors have left their home)
- Installed posters in our Community Centres.
- Include a section in our annual report on compliments and complaints received, our learnings from them and improvements made.

### The complaints process

We will always attempt to speak to the complainant & formally acknowledge their complaint within 5 working days. We will offer the complainant the choice of:

- An informal response to put things right quickly – known as a 'Service Request'.
  - We will treat this as an opportunity to correct or put something right. Examples include re-booking missed appointments, completing an outstanding repair, offering an update to a delayed service.
  - "Service Requests" will be recorded and outcomes noted for monitoring trends and performance purposes.
  - If a Service Request is unsuccessful, either because deadlines are missed or the tenant is dissatisfied, the case will be escalated to a formal stage 1 complaint for investigation.
- A formal complaint investigation through our internal process.

There are 2 stages to our formal complaints process following which the matter may be considered by the Housing Ombudsman. We aim to resolve the majority of complaints at stage 1 and, where appropriate, we will resolve the matter informally. We will respond to a complaint when the answer is known not when outstanding actions required to address the issue are complete. Outstanding actions will be tracked and actioned promptly informing the tenant.

All investigations carried out are by Senior Officers / Managers who are trained in complaint handling and the service area they are investigating to ensure that tenants are given confidence complaints will be handled fairly by the appropriate person.

The timescales are set by the Housing Ombudsman in the Complaint Handling Code. Complainants can seek advice from the Housing Ombudsman throughout their complaint, not only when complaints process is exhausted.

If we are unable to comply with the code due to exceptional circumstances, such as a cyber incident, we will inform the Housing Ombudsman and where possible provide information to residents. We will publish this notification on our website if possible and provide an estimate time of resolution to residents and the Housing Ombudsman.

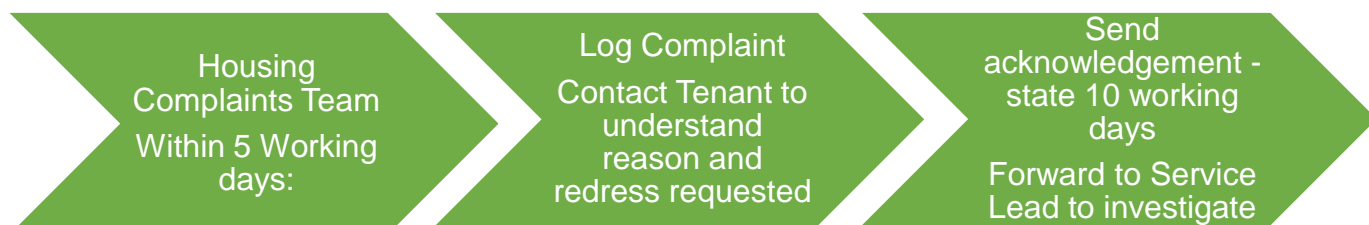
Our complaints process is published on the website including South Holland District Councils Self-assessment against the complaint handling code. Information on the complaints process is included in our suite of standard letters that are used outside of the complaints process. All staff are also required to understand the complaints process and are encouraged to report dissatisfaction by tenants.

The self-assessment of the Housing Ombudsman will be reviewed following:

- A significant restructure
- Merger
- Change in procedure
- A Housing Ombudsman investigation.

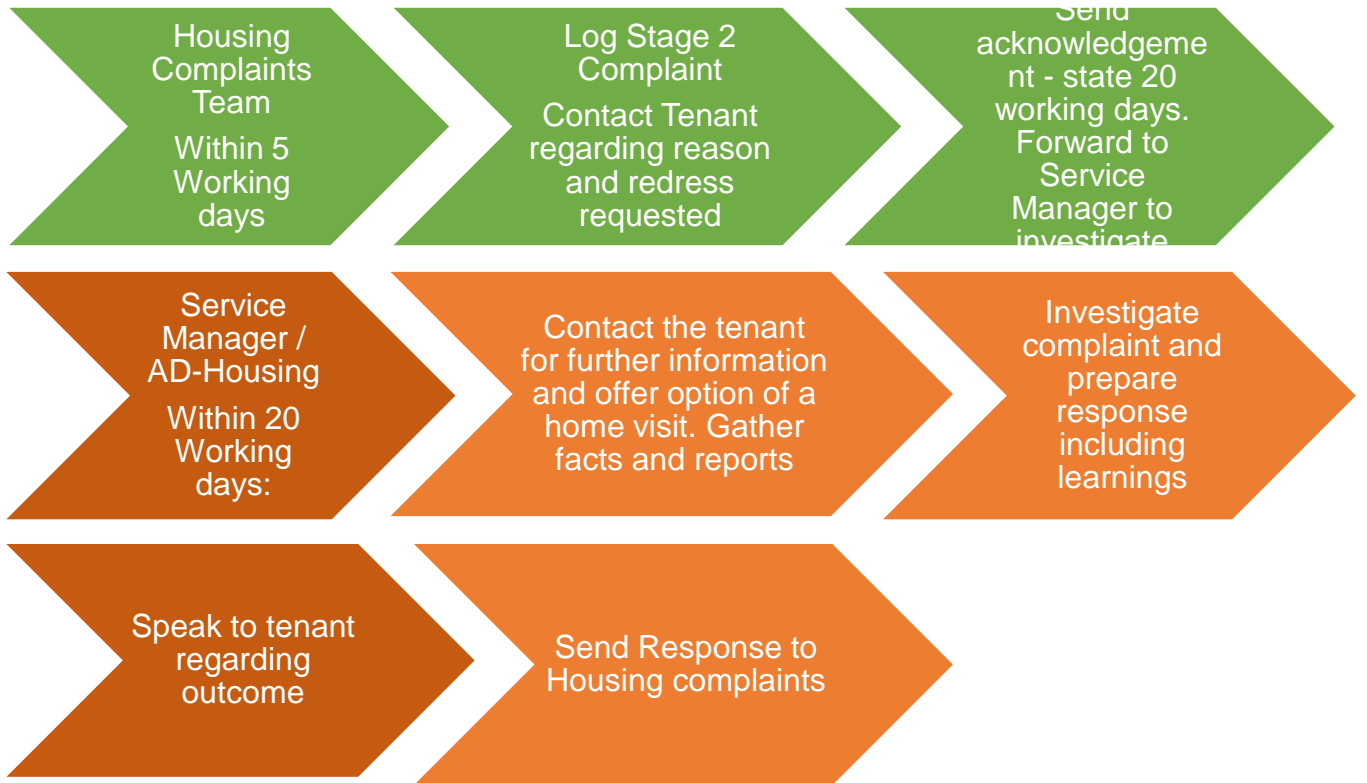
### Timeline for complaints

#### STAGE 1 COMPLAINTS:





**STAGE 2 COMPLAINTS:**



**Stage 1: Formal complaint made**  
**Investigating Officer: Senior Service Officer / Team Leader**

Wherever possible, complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within five working days\* of the complaint being received. We will manage expectations, being clear where a desired outcome is unreasonable or unrealistic.

The Senior Service Officer / Team Leader will investigate the complaint and usually respond with their findings within 10 working days\*\* of the complaint being acknowledged and logged. In exceptional circumstances, where there is a good reason for it, the process may take longer, in which case we will notify the tenant of the likely timeframe for a response in our acknowledgement.

Where additional complaints are raised during the investigation they will be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.

If we are not able to respond within 10 working days, we will contact the complainant to agree an extension. The reasons why an extension is required must be explained and recorded to aid in transparency of the complaint process. If we are unable to agree an extension with the tenant, we will provide them with the contact details of the Housing Ombudsman Service so they can seek support. Where a complaint takes some time to investigate, we will keep the complainant updated as to the progress of the investigation.

Where we make adverse findings against the complainant or any member of staff, agent or contractor of the Council, they will be given the opportunity to comment on those adverse findings before a final decision is made. This may lengthen the process.



**Stage 2: review of complaint –  
Investigating Officer : Service Manager or Assistant Director – Housing**

If all or part of the complaint is not resolved to the complainant's satisfaction at stage 1, the complaint can be escalated to stage 2. This request will be logged and acknowledged within 5 working days of the escalation request.

Where additional complaints are raised at stage 2, they will be incorporated into a stage 1 response, if they are relevant and a stage 1 response has not been issued. Where this will delay a response to stage 2, a separate complaint will be logged.

Residents are not required to explain their reason for requesting a stage 2 consideration. The complaint must be progressed unless an exclusion ground applies. In instances where the Council declines to escalate a complaint, the Officer will clearly communicate in writing the reasons for not escalating as well as the tenant's right to approach the Ombudsman about the decision.

Investigating Officer will investigate the complaint and respond within 20 working days\*\* of the request to escalate the review. If we are not able to respond within 20 working days, we will contact the complainant to agree an extension. If we are unable to agree an extension with the complainant, we will provide them with the contact detail of the Housing Ombudsman Service so they can seek support.



**Housing Ombudsman**

If all or part of the complaint is not resolved to the complainant's satisfaction at stage two, they can escalate the complaint to the Ombudsman.

The contact details for the Housing Ombudsman Service are:

- Online complaint form: [www.housing-ombudsman.org.uk/online-complaint-form/](http://www.housing-ombudsman.org.uk/online-complaint-form/)
- Phone: 0300 111 3000
- Postal address: Housing Ombudsman Service, PO Box 1484, Unit D, Preston, PR2 0ET

The Council will cooperate with the Ombudsman providing information within 15 working days of request.

\*Working days are Monday to Friday excluding bank holidays.

\*\*Timescales can be extended both by agreement and in extenuating circumstances as per the Complaint Handling Code. Within the complaint acknowledgement letter(s), we will set out our understanding of the complaint and the outcomes the complainant is seeking, confirming the deadline for a response. If any aspect of the complaint is unclear, the complainant will be asked for clarification and the full

definition agreed between both parties giving the resident a fair chance to set out their position.

A complaint investigation for stage 1 & 2 will be carried out at the earliest available opportunity. The investigator will:

- Deal with complaints on their merits
- Act independently and have an open mind
- Take measures to address any actual or perceived conflict of interest
- Consider all information and evidence carefully including previous complaints about a recurring issue
- Collaborate and co-operate working with colleagues across other departments
- Present any adverse findings to the complainant before a final decision is made
- Keep the complaint confidential, as far as possible, with information only disclosed if necessary to properly investigate the matter
- Keep the complainant updated of the investigation where the investigation is taking longer than the standard timescale by a method of communication agreed with the complainant.
- Act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing.
- Take into account our Reasonable Adjustments Policy

Complaint responses for stage 1 & 2:

- Be written in plain language that is appropriate to the complainant
- Address all of the points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice, where appropriate
- Not identify individual members of staff or contractors (as per Ombudsman recommendations)
- Advise of:
  - The complaint stage.
  - The complaint definition.
  - The decision of the complaint.
  - The reasons for decisions made.
  - The details of any remedy offered to put things right.
  - Details of any outstanding actions - these actions will be tracked and actioned expeditiously with regular updates provided to the complainant. Outstanding actions will not delay the complaint response.
  - Details of how to escalate the matter further if dissatisfied
- Clearly set out the obligations of both parties where the complaint relates to legal obligations as a landlord.

We will not unreasonably refuse to escalate a complaint through all stages of the complaints procedure. Reasons for declining to escalate a complaint will be the same as the reasons for not accepting a complaint (as set out above). Where we refuse to allow a complaint to escalate, we will write to the complainant confirming:

- That the request to escalate the complaint has been refused
- The reasons for refusing the escalation

- The right to approach the Ombudsman about the decision (and their contact details).

We will keep a full record of a complaint, including the original complaint, any further correspondence from the complainant, any acknowledgements and responses to either stage of the complaint.

## 6. Complaint Outcomes

Housing services categorises decisions about complaints as:

- **Complaint upheld**  
This is where the Investigating Officer agrees that the complaint was justified and that there has been a failure to provide the service to the expected standard.
- **Complaint partially upheld**  
This is where the Investigating Officer agrees that part of the complaint was justified and there has been a failure to provide the service to the expected standard and part of the complaint was not justified and is therefore not fully upheld.
- **Complaint not upheld**  
This is where Housing Services do not agree that the complaint was justified.

### Putting things right

Where something has gone wrong, we will ensure that our response acknowledges this, and we will set out the action we have taken or will take to put it right. This may include:

- Acknowledging where things have gone wrong
- Providing an explanation, assistance or reasons
- Apologising
- Taking action if there has been a delay
- Reconsidering or changing a decision
- Amending a record
- Providing compensation; and/or
- Changing policies, procedures or practices.

Remedies will clearly set out what will happen and by when, in agreement with the complainant where appropriate. Any remedy offered must reflect the impact on the resident as a result of any fault identified taking into account any guidance issued by the Housing Ombudsman.

We will look past the individual complaint and consider whether the process or systems need to be reviewed. We will take collective responsibility for any shortfalls identified through complaints.

In some cases, a complainant may have a legal entitlement to redress. We will still offer a resolution where possible after obtaining legal advice regarding how the resolution should be worded.

## **7. Unreasonable, persistent or vexatious complainants**

In general, dealing with a complaint is a straightforward process, but in a minority of cases people pursue their complaints in a way that can delay the investigation of their complaint or can have significant resource implications for the Council making it necessary for special measures to be taken

The Council's Unreasonably Persistent Complaints, Customer Behaviour and Vexatious Requests policy sets out our right to restrict or change access to our services where we consider a customer's actions to be unacceptable. A copy of this document is available on our website at

<https://www.sholland.gov.uk/media/17706/Vexatious-Policy/pdf/SHDC-CouncilDemocracy-InformationGovernance-VexatiousPolicy.pdf?m=637461267801170000>

We may consider legal action, which may include action against the tenancy, where it is apparent that the restrictions have been ineffective, and a tenant continues to act in an unreasonable manner.

## **8. Compensation**

Putting things right is the first step to repairing and rebuilding the landlord and tenant relationship. If something has gone wrong, we will acknowledge this and set out the actions that we have already taken or intend to take to put things right. Remedies can include an apology, an explanation, preventative action, staff training, amendments to policies/procedures, payments for loss or damage, or in exceptional circumstances financial compensation. Any remedy offered will reflect the extent of any and all service failures, and the level of detriment caused to the complainant as a result. We will carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness on other residents.

Financial compensation is a payment, either obligatory or discretionary, in recognition of loss suffered by the complainant. There are two types of compensation - payments that a landlord is obliged to make (usually due to legal requirements) such as statutory Home Loss and Disturbance payments, and discretionary compensation that the Council can choose to make.

Delegations for payments of compensation are as follows:

- The Assistant Director – Housing has authority to authorise payment of compensation in connection with complaints regarding the Council's function as a social landlord of up to £1,000 in consultation with the Portfolio Holder for HRA & Private Sector Housing.
- All Chief Officers have authority to authorise payment of compensation in connection with complaints regarding the Council's function as a social landlord over £1,000 subject to the agreement of the Monitoring Officer and Portfolio Holder for HRA & Private Sector Housing, and to informing the Performance Monitoring Panel.

## Mandatory compensation

As a landlord, the Council has a duty to provide compensation as part of statutory obligations set out in the table overleaf.

<b>Right to Repair (Right to Repair Regulations 1994)</b>	<p>Where 'qualifying repairs' which cost less than £250 are not completed within timescales set out in the Right to Repair legislation.</p> <p>The compensation is fixed at £10, plus £2 for every day that the repair is not finished, up to a limit of £50.</p>
<b>Right to Compensation for Improvements (Compensation for Improvements Regulations 1994)</b>	<p>When tenants move out of their home, they may have a legal right to compensation for improvements (as long as the Council gave permission for the improvements in writing). Tenants must submit a request for compensation. Compensation varies dependent on the improvements carried out.</p>
<b>Disturbance Payments (Land Compensation Action 1973)*</b>	<p>Where tenants are required to move to another property temporarily or permanently (but have lived at the property less than 12 months). The payment is intended to reimburse the resident for actual and reasonable expenses incurred in moving and setting up home, or allow a notional sum in appropriate circumstances. There is a maximum payment allowable as set out in the law from time to time and it will cover such things as removal of contents and furniture, disconnection and reconnection of cookers and washing machines, disconnection and reconnection of aerials or satellite dishes, telephone and broadband, and the redirection of mail.</p>
<b>Homes Loss Payments (Land Compensation Action 1973)*</b>	<p>Where tenants have lived in their property for a minimum of 12 months and are required to move home permanently as a result of redevelopment or demolition of their home. This compensation is paid as a flat rate as set by the Government.</p> <p>A statutory Home Loss payment is only payable where displacement occurs as a result of the compulsory purchase of the property or a possession order is granted to facilitate redevelopment of the land or where a move is inevitably required.</p> <p>It is not payable where a tenant agrees to move voluntarily. The Council may, at its sole discretion, make a discretionary home loss payment to a tenant, who has agreed to move voluntarily where if they had not done so, and a compulsory purchase or a possession order were made, they would have been entitled to a statutory home loss payment.</p>
<b>Disrepair Claims</b>	<p>Compensation (including court costs) where the Council</p>

accepts liability for actionable disrepair and/or the courts order the Council to make payment.

\*All Home Loss and Disturbance payments must be authorised by the Assistant Director - Housing. There is a right to appeal these amounts under the Land Compensation Act 1973 and any claims should be made to the Upper Tribunal. You can submit documents and track your case digitally online with the E-Filing service <https://www.gov.uk/guidance/hmcts-e-filing-service-for-citizens-and-professionals> or send the form to their address : Upper Tribunal (Lands Chamber) 5th floor, 7 Rolls Buildings Fetter Lane, London EC4A 1NL. Email: [lands@justice.gov.uk](mailto:lands@justice.gov.uk) Telephone: 020 7612 9710 Fax: 020 7612 9723

### Quantifiable loss payments

Payments will be considered where the tenant can demonstrate actual loss as a result of the Council's actions or omissions, or those of a contractor working on the Council's behalf. This could include (but is not limited to):

- Increased utility bills due to disrepair
- Having to pay for alternative accommodation or takeaway food
- Paying for cleaning
- Carrying out repairs where it is proven that the Council has failed to carry out its obligations
- Replacement of lost or damaged possessions. Tenants will need to provide the following within 7 calendar days:
  - Proof of ownership and the value of the lost or damaged item. For example, photos, instruction booklets or receipts
  - Evidence of the damage - this may include the damaged items themselves

This policy is not intended to replace or compensate for the lack of contents insurance - where payment is due, it will be made at the current value, not the value the item was purchased at. It is the tenant's responsibility to insure their possessions against accidental damage e.g. to address with damage following flooding.

If a contractor acting on behalf of the Council causes damage to a tenant's property, we will refer the matter to the contractor. The Council will mediate so that the contractor reaches a fair and reasonable settlement with the tenant.

### Discretionary compensation

As part of our approach to resolving complaints, we may offer discretionary compensation in the following scenarios:

- Poor complaint handling
- Delays in providing a service e.g. in undertaking a repair
- Failure to provide a service that has been charged for
- Temporary loss of amenity
- Failure to meet target response times
- Loss of use of part of the property
- Failure to follow policy and procedure

- Unreasonable time taken to resolve a situation.

Compensation may be in the form of one or more of the following:

- An apology
- Specific action by the Council
- Review of policy or procedures
- Gesture of goodwill
- Financial compensation.

In awarding compensation, we will consider:

- Whether any statutory payments are due
- If any quantifiable losses have been incurred
- Any inconvenience and distress caused
- The extent or severity of the service failure
- Vulnerabilities within the household impacted.

Compensation will not be paid in the following scenarios:

- Issues are, or have been, subject to legal proceedings
- Liability issues that are subject to an insurance claim
- Claims that should be covered by a home contents insurance policy, including damage through flood or fire to belongings such as floor coverings
- Claims for personal injury
- Claims for loss of income/time off work
- Issues raised 6 months after the incident/issue arising.
- Loss or damage was caused by the tenant, another household member or visitor to their property. This includes failure to report a repair promptly or to keep an appointment.
- The fault was unforeseeable and/or caused by a 3rd party or the Council had no control over it, such as water leaking from a neighbouring property (unless we had already been alerted to this and had not resolved it promptly)
- Personal possessions are lost, stolen or damaged through no fault of the Council or its contractors
- Service failure or damage that is the result of extreme or unforeseen conditions, such as extreme weather
- Loss of supply of gas, electricity or water that is outside of the Council's control, such as a failure by the utility provider.

In some circumstances, it may be appropriate to offer a combination of recompense which includes work to a tenant's home and a financial compensation payment, but only if this is acceptable and agreed by the tenant in advance as part of their complaint resolution.

#### Payment of compensation/damages

Before financial awards are approved, consideration will be given to a range of remedies. If financial compensation is considered appropriate by the Investigating Officer, any outstanding debt to the Council including arrears and rechargeable repairs may be deducted from the amount of compensation awarded. Any remaining

balance will be paid directly to the tenant by BACS transfer within 14 calendar days. Payments will only be made to bank accounts held in the name of third parties where there are evidenced safeguarding concerns.

Any payment made will be a full and final settlement and does not imply any acceptance of liability on the behalf of the Council.

## **8. Learning from complaints**

We are committed to using tenant feedback as a learning experience and, where appropriate, we will put things right.

We are committed to improving service delivery through the complaints reporting and feedback process and ensuring our tenant voice is heard. Data on complaint and service request handling, alongside other management information, provides assurance and aids in the assessment of risks. Information on complaints can provide essential insight into the Service including any themes or trends, systematic issues and risks. We will also use the findings to revise policies and procedures, to train staff and contractors and improve communication and record-keeping. Data captured from complaints received will also improve information provided to tenants to help them understand what is the Council's responsibility, what is the responsibility of other organisations and what is the tenant's responsibility.

We will report any improved service change made following a complaint outcome and publish it on the Council's website at [www.sholland.gov.uk/myhome](http://www.sholland.gov.uk/myhome) and our Annual Report.

Learnings are reported at the quarterly Housing Complaints Working Group attended by the Assistant Director for Housing, Portfolio Holder for Strategic and Operational Housing, Information Manager and Data Protection Officer, Service Leads, Complaints Co-Ordinator and the Tenant Influence and Engagement Lead.

Tenants are informed of learnings at our Complaints and Performance Focus Group and monthly bullet ins are sent out to all tenants signed up to our Tenants Forum.

## **9. Scrutiny and oversight**

Complaint performance is monitored through our tenant led Complaints and Performance Focus Group, Housing Performance and Compliance Clinic, Complaints Working Group and Councillors at Cabinet.

Surveys on the complaints process are sent to all tenants who have submitted a complaint and feedback received used to improve the complaints service.

Monthly performance on complaint volumes, comparisons year on year and compliance with the Complaint Handling Code is provided to the Housing Compliance and Performance Clinic (attended by Portfolio Holder for Strategic and Operational Housing, Director Communities and Assistant Director Housing).

Quarterly reports are produced for Complaints Working Group and the Tenants

Complaints and Performance Focus Group highlighting:

- the number of complaints and compliments received
- performance
- compliance
- trends and learning outcomes
- individual complaint outcomes, where necessary, including where the Ombudsman has made findings of severe maladministration or referrals to regulatory bodies
- Compensation payments awarded.

These two groups challenge and scrutinise performance and outcomes and ensure all complaints are dealt with fairly and transparently according to this policy.

## **10. Governance**

Accountability and transparency are integral to a positive complaint handling culture. We will update tenants on wider learning and improvements in response to complaints and compliments in our annual report and our website.

We produce an annual complaints performance and service improvement report, which is scrutinised by Cabinet which includes:

- An annual self-assessment against the Complaint Handling Code to ensure our complaint handling remains in line with its requirements. This will also be carried out immediately following a significant restructure and/or change in procedures. Following each self-assessment, we will:
  - Publish the outcome of the self-assessment on our website
  - Include the self-assessment in our annual report to tenants as part of our complaints handling performance
- A qualitative and quantitative analysis of our complaint handling performance. This will also include a summary of the types of complaints that have been refused
- Any findings of non-compliance of the Housing Ombudsman Code
- Any service improvements made as a result of the learning from complaints
- Any annual report of our performance from the Housing Ombudsman
- Any other relevant reports or publications produced by the Ombudsman in relation to the work of the of South Holland District Council as a landlord

Tenants will be surveyed on their satisfaction with complaint handling as part of the annual Tenant Satisfaction Measure surveys, of which are reported to the Regulator of Social Housing and published nationally. As part of the Tenant Satisfaction Measures, we will also supply data to the Regulator of Social Housing regarding the number of complaints received and the percentage of complaints responded to within the Housing Ombudsman timescales.

The Portfolio Holder – Strategic and Operational Housing is the Member Responsible for Complaints (MRC) The lead Officer for Complaints is the Tenant Engagement and Influence Lead, and is responsible for ensuring the Portfolio Holder - Communities & Operational Housing receives regular information on complaints that provides insight on our complaint handling performance.

## **11. Accessibility and equal opportunities**

The Council recognises and values the diversity of its communities. We aim to reduce barriers and ensure that everyone has equal access to the complaints service. The Council is committed to treating everyone fairly and shall ensure that it complies with the Equality Act 2010.

We are committed to making reasonable adjustments to accommodate a person's needs in accordance with the Equality Act 2010. This includes the following:

- Use of plain language;
- Accepting complaints over the phone or in person where it is not reasonable to request that they are submitted in writing;
- Providing information and responses in braille, large print, audio, easy read format and other languages where needed; and
- Providing translators (including sign language translators) where needed.

## **12. Record keeping and data sharing**

We respect the confidentiality of all tenants. The collection, storage, access to, provision and disclosure of data is in accordance with the Council's Data Protection Policy and the provisions of the General Data Protection Regulations (GDPR) and the Data Protection Act 2018.

In order to progress a complaint, it may be necessary to share the complaint with a third party such as a contractor.

## **13. Complaint Handling Staff**

The Tenant Engagement and Influence Lead of the Housing Service is the designated responsible officer for complaint handling (Lead Officer for Housing Complaints). Whilst service complaints are investigated by the officers identified within the policy the "Lead Officer for Housing Complaints " is responsible for ensuring compliance with the policy and code.

Our Data Protection and Privacy statement is available at <https://www.sholland.gov.uk/article/9020/Tenancy-and-Leasehold-Agreement-Management-privacy-notice>

**Last reviewed - January 2026**

**Next Review due – January 2027**

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## **Summary of Housing Comments, Compliments, complaints and Compensation Policy Updates – January 2026**

This document outlines the key updates made to the Housing Comments, Compliments, Complaints and Compensation Policy to ensure it reflects current structures, responsibilities, and legislative requirements. The following high-level changes have been implemented:

### **Introduction**

- Addition of a note to highlight that all complaints are handled taking into account of the Reasonable Adjustments Process
- Charter for Social Housing updated to reflect new Consumer Standards Code of Practice. Brief sentence added regarding the complaints section within the Code of Practice.

### **Complaints**

- A short paragraph on how tenants can raise complaints has been moved from further down in the policy to be more prominent in this section – tenants felt that this was important.
- A paragraph has been added to confirm that complaints from third parties who are supporting tenants will be accepted.

### **Making a Compliment or complaint**

- This section has been moved from after the process on complaints to before the process. Tenants felt that this made the policy read better and helped them see quite quickly how to complain.

### **Complaints process**

- A paragraph has been added to highlight that all complaints are conducted by Senior staff who are trained in complaints and the service area to give tenants the confidence that complaints will be handled fairly by the appropriate person.
- A sentence has been added to 'How tenants can find out about complaints' explaining that all staff are required to know about the complaints process and encouraged to work with tenants to log complaints.
- A clear timeline for complaints handling has been added including who is responsible for what element.

### **Process flow chart**

- Stage 1 complaint – the investigating officer has been changed to a Senior Service Officer or Team Leader. This is at the request of tenants and is consistent with the approach adopted by other authorities.

## Appendix 2

- The reasons for any extensions to the timeframe for a complaint has been added – tenants wanted to highlight in the policy that all extension reasons must be recorded to aid in transparency of the complaint process
- Stage 2 complaint – the investigating officer has been changed to the Service Manager or Assistant Director of Housing. This is at the request of tenants and is consistent with the approach adopted by other authorities.
- Housing Ombudsman contact details have been updated using the information from their website.

### **Definitions of complaint Outcomes**

- Definitions of ‘upheld’ and ‘not upheld’ added to give tenants a better understanding of the terms used in the response letters.

### **Compensation**

- How to appeal a Home Loss and Disturbance Payment has been updated using contact information from Governments website.

### **Learning from complaints**

- Tenants wanted the tenant voice to be strong in this element of the policy and have added the wording “ensuring our tenant voice is heard”.
- A paragraph has been added to detail where all learnings from complaints are reported and also how tenants are kept informed.

### **Scrutiny and Oversight**

- A new section on how the performance on complaints is to be monitored and scrutinised on an on-going basis has been added. This includes the new Complaints and Performance Focus Group which is tenant led. Tenants felt that this needed to be in the policy for greater transparency, but also to capture the other scrutiny from Managers and Senior Officers.

### **Governance**

- The parts that duplicated with Scrutiny and oversight have been removed.
- Role changes and responsibilities have been updated to reflect the new policy and process.

### **Complaint Handling Staff**

- The person responsible for complaint handling job title has been changed following a change in staffing structures within Housing. This role is now held by the Tenant Engagement and Influence Lead.  
A follow-on review date has been added at the end of the policy.

### Equality Impact Assessment

<b>Report title</b>	<b>SHDC Housing Landlord Service Complaint Handling Policy and Procedure</b>
<b>Completed by</b>	<b>Bev Chapman</b>
<b>Approved by</b>	<b>Vikki Cherry</b>
<b>Date</b>	<b>23/12/25</b>

<b>The following statements will help you decide whether an EIA is necessary:</b>	<b>Tick all that apply</b>
Does it affect customers, colleagues or the wider community, and therefore potentially have an effect in terms of equality (for example, removing a service, workforce restructure, employment practices)	<input checked="" type="checkbox"/>
Could it result in a decision being made that would significantly affect how functions and services are delivered (for example, reducing a service or introducing a charge for a service)	<input checked="" type="checkbox"/>
Does it relate to a service that previous engagement has identified as being important to people	<input checked="" type="checkbox"/>
Does it, or could it in the future, affect different groups of people differently	<input checked="" type="checkbox"/>
Does it relate to a policy or service where there is significant potential for reducing inequalities or improving outcomes	<input checked="" type="checkbox"/>
Have there been, or are there likely to be, any public concerns about the policy or proposal	
Does it have an effect on how other organisations operate in terms of equality (i.e. commissioned services)	

<b>Section 3 Equality impacts</b>	
Briefly explain what the policy/service/project aims to achieve	SHDC Housing Landlord Service have revised their Housing Complaints Policy to ensure it reflects the guidance and requirements from the Housing Ombudsman.

	<p>The policy explains in detail who can make a complaint, how long it may take to investigate and what will and will not be investigated. It is expected that by providing this information to SHDC tenants, it will assist them in locating the information and advice they require in order to make a complaint and helpful links and advice to assist them.</p> <p>SHDC Housing Landlord Service have a separate Complaints policy from the corporate arrangements to ensure maximum compliance with the Housing Ombudsman complaint handling code. By adhering to a separate policy it will deliver real operational benefits for SHDC landlord service as well as improving tenant perception and relationships with SHDC service users.</p> <p>The policy provides a clear and concise methodology to both tenants wishing to complain and to officers managing the complaints process.</p> <p>The revised policy has been undertaken with our Complaints and Performance Focus Group to ensure that the policy reflects the voice of the tenant.</p>
<p>Have you undertaken consultation or involved people who are most likely to be affected or interested?</p> <p>Please include: data or community feedback, gaps in data, and how you intend to fill these gaps (where possible)</p>	<p>The revised policy responds to the requirements of the Housing Ombudsman and self assessment in line with the complaints handling code.</p> <p>The newly established Complaints Working Group has been informed of the changes, which reflect the work that they have been heading towards.</p> <p>The policy has been communicated to tenants in the Annual Report. This will also be published on the website. Tenants went through these revisions at the Focus Group meeting in November 2025.</p> <p>The policy has been drafted in accordance with the complaint handling code has been drafted with accessibility and equitable access in mind. The policy and complaint handling process are available in other formats including online and alternative languages upon request. The online policy has a high rating for accessibility.</p> <p>The service continues to promote the revised policy internally and externally and officers have Equality Diversity and Inclusion training scheduled for completion.</p>

Is there any evidence or research that demonstrates why some individuals or groups are, or are not, affected	<p>This policy seeks to ensure fair, robust and transparent investigation and resolution of complaints for everybody. It is clear that complaints can be received in a range of formats and can also be submitted by a third party or advocate.</p> <p>Consideration will be given to collating and monitoring information relating to diverse groups.</p>
<b>What impacts are there for each of the following characteristics</b>	
<b>Characteristics</b>	<b>Positive and negative impact</b>
Gender	<p>2019 report by ONS indicated that there was a higher proportion of women who had never used the internet 8.7%, compared with men at 6.3% potentially putting them of experiencing a negative impact of participating via online surveys or accessing online services.</p> <p>Positive: Range of options</p> <p>Negative: Digital Exclusion</p> <p>Any mitigation required: The complaint handling code specifies at 3.1 that organisations must make it easy for individuals to complain by providing difference channels to complain which minimises the risk of restriction from making a complaint due to digital exclusion. We have mitigated this by providing telephone numbers so that residents can ring the office and lodge their complaint. They have also been given a postal address should they wish to write into the office. Complaints can be received in a range of formats and via a third party or advocate.</p>
Age	<p>The median age of South Holland tenants is 63, however it should also be noted that there are more 76 year old tenants than any other single tenant age (modal average), eight of the top ten biggest single ages are in the mid sixties to mid seventies. There are around 100 residents aged 90 or above (Tenant census 2023)</p> <p>Positive: Making it easier for individuals to complain by providing different channels to complain which minimises the risk of over 65 from being restricted from making a complaint as a digital exclusion.</p> <p>Negative: Digital Exclusion</p> <p>It is possible that a higher percentage older residents may not have proficient ICT skills so may have difficulty</p>

	<p>locating online web forms.</p> <p>Any mitigation required: The complaint handling code specifies at 3.1 that organisations must make it easy for individuals to complain by providing difference channels to complain which minimises the risk of adults over 65 from being restricted from making a complaint due to digital exclusion. We have mitigated this by providing telephone numbers so that residents can ring the office and lodge their complaint. They have also been given a postal address should they wish to write into the office. Complaints can be received in a range of formats and via a third party or advocate. The code goes onto specify that organisations must anticipate the needs and reasonable adjustments of individuals who need to access the complaints process. We have mitigated this by carrying out a tenant census to understand the diverse needs of our tenants and further work will be done to understand our tenants' preferences.</p> <p>Awareness of the policy will form a key part of the implementation plan.</p>
Disability	<p>40% of all council housing residents have a limiting disability. This compares to just 19% of the South Holland district population as whole that has a limiting disability. When restricting analysis to just tenants, the proportion with a limiting disability increases to 51%. This proportion is higher than average, as only 41% of tenants in social housing in England and Wales in the UK 2021 census have a limiting disability (household reference person). Almost two thirds of households had at least one member with a disability (60%). (Tenant census 2023)</p> <p>Positive: Produce and document reasonable adjustments Our complaints handling process takes a pro-active approach in finding out if the tenant needs any assistance in making their complaint. Complaints can be received in a range of formats and via a third party or advocate. The complaint handling code states organisations must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities an individual has disclosed. These reasonable adjustments can be recorded on the complaint handling spreadsheet. We will not report on where reasonable adjustments have been made but recording the information may help our service provision in the future.</p> <p>Negative: Using online webforms may lead to lower participation or digital exclusion by those that are disabled who account for 51% of tenants.</p> <p>Any mitigation required:</p>

	The complaint handling code specifies at 3.1 that organisations must make it easy for individuals to complain by providing difference channels to complain which minimises the risk of restriction from making a complaint due to digital exclusion. We have mitigated this by providing telephone numbers so that residents can ring the office and lodge their complaint. They have also been given a postal address should they wish to write into the office. Complaints can be received in a range of formats and via a third party or advocate.
Race	<p>Positive: Reasonable adjustments</p> <p>The complaint handling code states organisations must keep a record of any reasonable adjustments agreed. These reasonable adjustments can be recorded on the complaint handling spreadsheet. We will not report on where reasonable adjustments have been made but recording the information may help our service provision in the future.</p> <p>Negative:</p> <p>Any mitigation required:</p>
Religion or belief	No impact identified
Sexual orientation	No impact identified
Gender reassignment	No impact identified
Pregnancy, maternity and paternity	No impact identified
Marriage and civil partnership	No impact identified
Rural isolation	<p>Positive: Range of options</p> <p>Negative: Digital exclusion.</p> <p>There is a possibility that rural isolation may impact a tenants ability to access online webforms.</p> <p>Any mitigation required: We have mitigated this by providing telephone numbers so that residents can ring</p>

	the office and lodge their complaint. They have also been given a postal address should they wish to write into the office. Complaints can be received in a range of formats and via a third party or advocate. Awareness of the policy will form a key part of the implementation plan. Home visits offered by investigating officer.
Socio-economic factors	<p>Positive:</p> <ul style="list-style-type: none"> <li>• Range of options for raising complaints in any way that suits them.</li> <li>• Review of our letters and use of appropriate and understandable language to meet the needs to the tenants.</li> </ul> <p>Negative: Digital exclusion. There is a possibility that socio-economic factors may impact a tenants ability to access online webforms.</p> <p>Any mitigation required: We have mitigated this by providing telephone numbers so that residents can ring the office and lodge their complaint. They have also been given a postal address should they wish to write into the office. Complaints can be received in a range of formats and via a third party or advocate. Awareness of the policy will form a key part of the implementation plan. Home visits offered by investigating officer.</p>
Other <i>(for example, those with dependents/caring responsibilities, asylum seeker and refugee communities, children in the care system, etc)</i>	No impact identified
Overall, if there is a potential adverse impact after the mitigation, please state why and whether this is justifiable.	No adverse impact identified.

<p>How will you monitor this to ensure there is no adverse effect in the future?</p>	<p>Protected characteristics will be recorded as part of the complaint handling process, by asking for this information it can be monitored how the Council has dealt with a complaint, and this might help identify any gaps or where people with protected characteristics are disproportionately affected which would in turn inform the annual review of the policy and when reporting on the relevant KPIs.</p>
<p>Outcome of EIA:</p>	<ul style="list-style-type: none"> <li>• Ensure the policy can be made available in a range of formats and media to make it accessible for all tenants upon request.</li> <li>• Continue to promote the complaints policy internally and externally.</li> <li>• On-going promotion of the policy via engaged tenants and groups.</li> </ul> <p>Who needs to know about the EQIA</p> <p>Internally</p> <ul style="list-style-type: none"> <li>• Officers – EQIA to be published</li> </ul> <p>Externally</p> <ul style="list-style-type: none"> <li>• Tenants – EQIA to be published.</li> </ul> <p>Others</p> <ul style="list-style-type: none"> <li>• EQIA to be published on the website</li> <li>• Update to Member responsible for complaints</li> <li>• Implementation briefing to Housing Service Managers</li> </ul>

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<b>Report To:</b>	Policy Development Panel
<b>Date:</b>	3 <sup>rd</sup> February 2026
<b>Subject:</b>	Consultation for Heritage documents - Spalding Conservation Area Appraisal and Management Plan including Spalding Shopfront Design Guide, Spalding Heritage Strategy, Holbeach Conservation Area Appraisal and Management Plan, SELCP Design Guide.
<b>Purpose:</b>	To consult with PDP and provide feedback on the progress of public consultation.
<b>Key Decision:</b>	No
<b>Portfolio Holder:</b>	Elizabeth Sneath
<b>Report Of:</b>	Pranali Parikh, Director of Director of Economic Development
<b>Report Author:</b>	Emilie Wales, Heritage Manager
<b>Ward(s) Affected:</b>	Spalding St. John, Spalding St. Mary's, Spalding St. Pauls and Spalding Castle and Holbeach Town
<b>Exempt Report:</b>	No

## Summary

This report is intended to provide an update on the public consultation carried out for the following documents so far, provide opportunity for members to make comment and present next steps.

Heritage Documents for consultation:

- **The Spalding Conservation Area Appraisal** and Management Plan and Appendix including **Spalding Shop front Design Guide**.
- **The Spalding Heritage Strategy** including Action Plan and Theory of Change
- **Holbeach Conservation Area Appraisal** and Management Plan
- **South and East Lincolnshire Council Partnership Design Guide**

For interest the following documents are also out to consultation:

- Boston Conservation Area Appraisal and Management Plan
- Alford Conservation Area Appraisal and Management Plan
- Horncastle Conservation Area Appraisal and Management Plan
- Spilsby Conservation Area Appraisal and Management Plan
- Wainfleet Conservation Area Appraisal and Management Plan

Next steps will be to collate all the comments received and instruct the consultants to make necessary changes to the documents as a result. Where possible in line with legislation comments received will be incorporated into the final documents. A summary of these comments and changes will be included in a report presented alongside the final documents to be taken to Cabinet.

### **Recommendations**

That PDP provide comments on the documents and support the proposed course of action which involves further consultation, subsequent amendments to the documents and placing before Cabinet for approval.

### **Reasons for Recommendations**

These documents help to highlight the importance of heritage across the partnership. They can be used as evidence in future Local Plan reviews and all aim to support enhancement of our historic areas in line with our statutory duties though Section 69 of The Planning (Listed Building and Conservation Areas) Act 1990.

These documents also formed part of the evidence based used to inform Spalding Pride in Place. They show why heritage should form a huge part of the Plan vision but also recognise that there are opportunities to compliment and capitalise on this momentum by targeting additional funding championing heritage in our Town Centres.

Consultation has been an opportunity to increase awareness and public participation in heritage.

Public consultation is a statutory requirement for any proposal to designate or amend conservation areas under Sections 70 and 71 of the Planning (Listed Buildings and Conservation Areas) Act 1990. It is also necessary for the resulting documents to carry weight in the planning process. Where possible, and in accordance with relevant policy and legislation, the documents will be amended to reflect the comments received through the consultation. The final reports will then be presented to Cabinet for approval.

## Other Options Considered

Not to progress with these documents.

### 1. Background

- 1.1 Thanks to The National Lottery Heritage Fund and National Lottery players, Spalding Reconnected (2022-2025) project proved the power of collaboration across arts, heritage, environmental and wayfinding initiatives in celebrating the historic market town of Spalding and its uniquely picturesque riverside. The project was developed and delivered by South Holland District Council, Heritage Lincolnshire, Transported, East Mercia Rivers Trust and Landmark with expertise from Lincolnshire County Council. The project team worked closely with local people at heritage workshops, free arts activities, and enriching volunteering opportunities, all of which helped inform the exciting outputs. These include a series of living willow artworks, an environmental education programme with local schools (the Eels in the Classroom initiative) 'floating eco-systems,' wildflower planting, enhanced way-markers and produced the Spalding Heritage Strategy - which envisions the future of heritage in the town over the next 10 years.
- 1.2 Sections 66 and 71 of the Planning (Listed Building and Conservation Areas) Act 1990 require the council to from time to time assess our conservation areas and publish proposals for their preservation and enhancement. While both Spalding (2007) and Holbeach (2009) have been assessed previously, over 15years has passed since these. No assessment has been made during the current *SEL Local Plan (2019)* period nor against the latest Historic England guidance *Conservation Area Appraisal, Designation and Management (2019)*.
- 1.3 The SELCP Design Guide was born from a desire across the partnership to provide advice to building owners and occupiers championing proper repair and maintenance of historic fabric. As a go to guide for officers and potential applicants as a first port of call, but also to signpost towards relevant Council teams. This document is in its early stages, highlighting topics for discussion and will be added to and amended following consultation to ensure it reflects resident's needs. The document is long, it is not designed to be printed or read all together its created online in a way that you would open it and go straight to the section you required such as 'windows'.

### 2. Report

- 2.1 The Spalding Heritage Strategy outlines high-level themes and priorities for Spalding's heritage over the next 10 years developed through co-production with the local community and heritage organisations. The practical ways to achieve those goals are detailed in the Action Plan for Transformative Change. These documents aim to show how a focus on heritage across Spalding will create an environment for local people to be proud of with an improved healthy high street, spaces for improving wellbeing and connecting with nature and each other.

- 2.2 This is not a planning document but purely a document which can be used in support of future funding bids for Spalding Town Centre. The document was produced following Spalding Reconnected with The National Lottery Fund in mind, however it has been written in such a way that it can be used to support a number of other town centre focused funds as and when they come along.
- 2.3 This document comes along at the same time as the Spalding Pride in Place, an endowment-style fund to invest £20m over the next decade. The documents referred to in this report highlight why heritage should form a huge part of the vision. But also recognises there are opportunities to compliment and capitalise on the momentum this initial funding provides by targeting additional funding.
- 2.4 While the action plan highlights a number of potential and existing projects many of these if taken forward would require further development should opportunity or funding become available.
- 2.5 Actions included Townscape Assessment and Building Improvements have already been actioned by the production of the Spalding Conservation Area Appraisal and Design Guides. The Holbeach Conservation Area Appraisal was commissioned at the same time and therefore forms part of the same consultation.
- 2.6 Holbeach conservation area was added to the Historic England Heritage At Risk Register in 2025 after the current draft was completed, the final amended document will acknowledge this.
- 2.7 Within the Spalding Conservation Area Appraisal, Spalding can be described in 5 distinct character areas; Riverside, Historic Commercial Centre, Church Street and Ayscoughfee Hall, Priory Road Grammer School and St Tomas's Road, Pinchbeck Road. Suggested boundary changes for consultation include the addition of; small outbuilding in the grounds of 1 Holland Road; 74 to 80 (evens) Pinchbeck Road; 6 and 7 Priory Road; 1 to 39 (consecutive) Spring Street; 25 to 59 (odds) St Thomas' Road; 52 to 78 (evens) St Thomas's Road, The Immaculate Conception & St Norbert Catholic Church and former non-conformist chapel corner of Green Lane, 1 to 50 (consecutive) Cross Street, 1 to 9 (odds) South Parade, Willow Villa, 10 Green Lane, 13a, 15 and 17 Green Lane, 1 to 11 Henrietta Street, 4 to 35c (consecutive) Spring Gardens including CC41 Motors. Exclusions for consultation are; 10 New Road (Mark Forth), 6 Swan Street (Ark Property), Kwik Fit Tyre Swan Street. The management plan includes a number of other recommendations which echo those included in the Spalding Heritage Strategy, including a desire to improve design, prevent loss of historic fabric. As a result, a Spalding Shop Front Design Guide has been created and appended to this document.
- 2.8 Early assessment of the consultation responses so far appear to support much of the above. The Civic Trust have made further suggestions for extensions including Kings Street. To include this as an area for addition we will need to write to the affected properties.
- 2.9 In summary the appraisal states Holbeach can be described in 4 distinct character areas: Market Hill, Albert Street, Stukeley Park, Holbeach Cemetery (and Park Road). Suggested boundary changes for consultation include the addition of; 12-40 (evens) Spalding Road, 14-26 (evens) Fleet Street, Dragon Pearl Restaurant St John Street and adjacent car park , 4-10 (evens) Victoria Street , 1-9 (odds) Victoria Street,

1, 1a, 1b, 2, 2a, 2b Green Lane, Tonwood Home Hardware Chapel Street, 8 – 26 (evens) Barrington Gate, 21-35 (odds) Barrington Gate, 1, 3 and 21a Albert Walk. There are no suggested exclusions. The management plan includes a number of other recommendations similar to those highlighted for Spalding, including a desire to improve design, prevent loss of historic fabric.

- 2.10 A brief assessment of the responses received so far show very little comments on boundary.
- 2.11 The desire to improve design, prevent loss of historic fabric taken from the conservation area appraisal management plans is an action which is also included the Conservation Area Appraisals produced for Boston, and areas in East Lindsey. Thus, a SELCP wide Traditional Building Design Guide was created to start to address this.
- 2.12 The SELCP Traditional Building Design Guide is in its early stages, highlighting topics for discussion and will be added to and amended following consultation to ensure it reflects resident's needs. However, as a design guide its weight in Planning is limited. It can be used to signpost residents and agents for advice but is not a statutory or policy document. In order to address the desire to have a document for Spalding Town Centre with more weight to influence planning decisions a Spalding shop Front Design Guide has been added as an appendix to the Spalding Conservation Area Appraisal and Management Plan making it a material planning consideration.
- 2.13 The Spalding Shop front Design Guide includes advice on retaining historic features, carrying out proper maintenance and repair as well as advice on appropriate signage, lighting, security and awnings. There is also a section of when and when not to use window vinyls.
- 2.14 Although both Spalding and Holbeach Conservation Area Appraisals include recommendations to introduce or amend existing Article 4 directions, if members wished to implement these actions this would need to form part of a future consultation process. At this stage the recommendations included in the Management plans are included to show what is possible. Article 4 Directions are not being considered at this stage as they require a deeper level of consultation and legal input before implementing.
- 2.15 Consultation on the Conservation Area Appraisals began on 19<sup>th</sup> of November, include writing to the addresses considered for boundary changes (addition and exclusion from the conservation area). Providing Site Notices around the area (minimum of 4 per area) and local Press Notice. All of the documents are available to view online [Heritage Consultation Documents - South Holland District Council](#) and on the planning search pages under reference H16-1094-25 and H09-1095-25. A hard copy is available in Priory Road Council Offices on request. At least 1 in person public event was held in each area, and officers contact details shared should anyone wish to discuss them separately. A further event for businesses is planned in Spalding on 28th January. PDP for the 3rd February and Spalding Town Board on 9th February will conclude the consultation.

### **3. Conclusion**

- 3.1 Next steps will be to collate all the comments received and instruct the consultants to make necessary changes to the documents as a result. Where possible in line with legislation comments received will be incorporated into the final documents. A summary of these comments and changes will be included in a report presented alongside the final documents to be taken to Cabinet.
- 3.2 The recommendation is for PDP to provide comments on the documents and support the proposed course of action which involves further consultation, subsequent amendments to the documents and placing before Cabinet for approval.

## **Implications**

### **South and East Lincolnshire Councils Partnership**

Similar report will be presented in Boston and East Lindsey for consultation and approval of their respective Heritage documents.

### **Corporate Priorities**

Support investment in our communities.

### **Staffing**

None

### **Workforce Capacity Implications**

None.

### **Constitutional and Legal Implications**

None at consultation stage. Implications will be discussed as part of cabinet report should the documents move forward to approvals.

### **Data Protection**

None

### **Financial**

None

### **Risk Management**

None

### **Stakeholder / Consultation / Timescales**

Consultation thus far has included; social media posts, a press notice, site notices, letters to addresses proposed for areas of addition or exclusion and a public event in both

Holbeach and Spalding on 24<sup>th</sup> November. The documents are available in hard copy on request, and online. The documents can be found on the councils consultation pages [Heritage Consultation Documents - South Holland District Council](#) and on the planning search pages under reference H16-1094-25 and H09-1095-25. Although the initial consultation period of 6 weeks has expired, the documents remain online for further comment.

A further event for businesses is planned for 28<sup>th</sup> January. PDP for the 3<sup>rd</sup> February and Spalding Town Board on 9<sup>th</sup> February will conclude this consultation.

## **Reputation**

None

## **Contracts**

None

## **Crime and Disorder**

None

## **Equality and Diversity / Human Rights / Safeguarding**

None

## **Health and Wellbeing**

None

## **Climate Change and Environment Impact Assessment**

None

## **Acronyms**

None

## **Appendices**

Appendices are listed below and attached to the back of the report:

Appendix 1	Spalding Heritage Strategy
Appendix 2	Spalding Heritage Action Plan
Appendix 3	Spalding Theory of Change
Appendix 4	Spalding Conservation Area Appraisal and Management including Plan & Spalding Shop Front Guide
Appendix 5	Holbeach Conservation Area Appraisal and Management
Appendix 6	SELCP Design Guide

Due to the share size of these documents, they can all be found here:

## Background Papers

None

Background papers used in the production of this report are listed below: -

<b>Document title</b>	<b>Where the document can be viewed</b>
xxx	xxx

## Chronological History of this Report

A report on this item has not been previously considered

## Report Approval

Report author: Emilie Wales, Heritage Manager, [emilie.wales@e-lindsey.gov.uk](mailto:emilie.wales@e-lindsey.gov.uk)

Signed off by: Pranali Parikh

Approved for publication: Elizabeth Sneath



<b>Report To:</b>	Policy Development Panel
<b>Date:</b>	Tuesday 3 February 2026
<b>Subject:</b>	Policy Development Panel Work Programme
<b>Purpose:</b>	To set out the Work Programme of the Policy Development Panel
<b>Key Decision:</b>	No
<b>Portfolio Holder:</b>	n/a
<b>Report Of:</b>	John Medler, Assistant Director - Governance (Monitoring Officer)
<b>Report Author:</b>	Andrea Tait, Democratic Services Officer
<b>Ward(s) Affected:</b>	None
<b>Exempt Report:</b>	No

## Summary

This report sets out the Work Programme of the Policy Development Panel and allows the Panel to monitor its progress and identify any additional items to be added to the Programme.

## Recommendations

That the Panel considers the content of this report and identifies any issues for discussion.

## Reasons for Recommendations

To allow members to feed into the Panel's calendar of Work Programme items and the Work Programme on a regular basis, to ensure that they stay relevant and up to date.

## **Other Options Considered**

Do nothing

### **1. Background**

1.1 This report records the issues for consideration that have been identified by the Panel for inclusion on its Work Programme.

### **2. Report**

2.1 Appendix 1 sets out the dates of future Panel meetings along with proposed items for consideration. These items were either originally suggested by councillors or are being referred to the Panel from officers or the Cabinet. The appendix will be updated as new items are identified.

2.2 Appendix 2 sets out the task groups that have been identified by the Panel. The table shows: the name of the task group; what it wants to achieve; key dates; membership of the task group and when the task group will be reporting back to the Panel.

### **3. Conclusion**

3.1. In presenting the information to the Panel, and by having the report as a standing item on the agenda, it will record the issues identified by the Panel and provide the opportunity for councillors to monitor the progress of its Work Programme.

## **Implications**

### **South and East Lincolnshire Councils Partnership**

None

### **Corporate Priorities**

In identifying issues for inclusion on the Work Programme, Members consider the suitability of the subject, taking into account considerations such as whether the issue is strategic and significant and whether it is likely to lead to effective outcomes.

### **Staffing**

None

### **Workforce Capacity Implications**

The establishment of task groups requires additional workforce capacity of a Lead Officer and Democratic Services support throughout the life of the task group.

**Constitutional and Legal Implications**

None

**Data Protection**

None

**Financial**

None

**Risk Management**

None

**Stakeholder / Consultation / Timescales**

None

**Reputation**

None

**Contracts**

None

**Crime and Disorder**

None

**Equality and Diversity / Human Rights / Safeguarding**

None

**Health and Wellbeing**

None

**Climate Change and Environmental Implications**

None

**Acronyms**

None

**Appendices**

Appendices are listed below and attached to the back of the report:

Appendix 1  
Appendix 2

Work Programme Calendar 2025/26  
Task Group Work Programme 2025/26

### **Background Papers**

No background papers as defined in Section 100D of the Local Government Act 1972 were used in the production of this report.

### **Chronological History of this Report**

A report on this item has not been previously considered by a Council body

### **Report Approval**

Report author: Andrea Tait, Democratic Services Officer  
[atait@sholland.gov.uk](mailto:atait@sholland.gov.uk)

Signed off by: Assistant Director - Governance (Monitoring Officer)  
[John.medler@e-lindsey.gov.uk](mailto:John.medler@e-lindsey.gov.uk)

Approved for publication: N/A

**CALENDAR OF WORK PROGRAMME ITEMS 2025/26**  
**SHDC POLICY DEVELOPMENT PANEL**

3 Feb 2026	<ul style="list-style-type: none"> <li>• SHDC and S&amp;ELCP Policy Registers <b>Corey Gooch</b></li> <li>• SHDC Markets Policy Review <b>David Smith</b></li> <li>• Spalding Conservation Area Appraisal, Spalding Heritage Strategy, Holbeach Conservation Area Appraisal, SELCP Design Guide <b>Pranali Parikh / Emilie Wales</b></li> <li>• Housing Comments, Compliments, Complaints and Compensation Policy <b>Beverley Chapman</b></li> <li>• Extension of the Housing Landlord Strategy <b>Adel Gardner</b></li> <li>• Data Protection Policy and Records Management Policy <b>Richard Steele</b></li> <li>• Terms and Conditions alignment – next phase <b>Aileen Whatmore</b></li> </ul>
9 Feb 2026 Special PDP meeting	<ul style="list-style-type: none"> <li>• Waste policies – Follow-up <b>Matt Fisher / Victoria Burgess</b></li> </ul>
21 Apr 2026	<ul style="list-style-type: none"> <li>• SHDC and S&amp;ELCP Policy Registers <b>Corey Gooch</b></li> <li>• S&amp;ELCP Private Sector Housing Strategy <b>Jon Challen</b></li> <li>• <i>Review of new policy one year from adoption – approved by Cabinet February 2025</i></li> <li>• Business Frontage Task Group – Tracking of Recommendations six-month update <b>Pranali Parikh</b></li> <li>• Housing (HRA) Damp and Mould Policy <b>Adel Gardner</b></li> <li>• Customer Feedback Policy <b>Richard Steele</b> <i>Review of new policy one year from adoption – approved by Cabinet December 2024</i></li> <li>• Graffiti and Street Art Management Policy <b>Emily Spicer / Rachel Rowett</b></li> <li>• Write Off/Debt Policy <b>Russell Stone</b></li> <li>• Final Report – Derelict and Untidy Sites Task Group <b>Marc Whelan/Chairman of Task Group</b></li> </ul>

**PENDING WORK PROGRAMME ITEMS**  
**SHDC POLICY DEVELOPMENT PANEL**

<p>June 2026</p>	<ul style="list-style-type: none"> <li>• Tenant Engagement and Influence Strategy 2025-2027 <b>Adele Gardner</b> <i>Update be presented to the Policy Development Panel one year from adoption at Cabinet – due to be received by Cabinet in June 2025</i></li> </ul>
<p>July 2026</p>	<ul style="list-style-type: none"> <li>• PSPS Transformation and Service Modernisation Programme <b>James Gilbert / Lewis Duckett</b> <i>Review of delivery of the programme 18 months from adoption – approved by Cabinet January 2025.</i></li> </ul>
<p>November 2026</p>	<ul style="list-style-type: none"> <li>• Vulnerable Person and Reasonable Adjustment Policy – Housing Landlord Service 2025 – 2029 <i>review of new policy one year from adoption</i> <b>Adel Gardner</b></li> <li>• Disabled Aids and Adaptations Policy: Housing Landlord Service <i>review of new policy one year from adoption</i> <b>Louis Humphreys</b></li> <li>• South and East Lincolnshire Councils Partnership Safeguarding Policy <i>review of new policy one year from adoption</i> <b>David Postle</b></li> <li>• AI Policy <b>Corey Gooch</b> <i>Policy Development Panel requested to review the policy in November 2026</i></li> <li>• Social Media Policy <b>Shaun Gibbons</b> – review of new Policy one year from its adoption at cabinet January 2027</li> <li>• Partnership Environment Policy <b>Sarah Baker</b> <i>Request to review policy 2028/29</i></li> <li>• Housing Standards Policies <b>Jon Challen / Luke Settle</b> <i>Empty Homes Policy, Housing Enforcement Policy, Houses of Multiple Occupation Policy development Panel review of new policy one year from its adoption at Cabinet.2027</i></li> </ul>

## POLICY DEVELOPMENT PANEL – WORK PROGRAMME 2025/2026

## TASK GROUPS

Name of Task Group	What the Task Group wants to achieve	Date added to Work Programme	Date Work Commenced	Membership of Task Group	Proposed date to report back to Panel
Derelict and Untidy Sites Policy Task Group	To evaluate the policy's value and potential future use and in so doing, decide whether the policy should be retired.	23 Sept 2025	First meeting 19 Nov 2026	D Ashby P Barnes M Geaney M Le Sage J Reynolds	Follow up meeting of the Task Group held on 15 January 2026. Provisional date for final report to PDP 21 April 2026.
Business Frontage Task Group (previously Street Scene)	To set up a mechanism which encourages/enforces improvements to the aesthetics of: 1) district-wide town centre commercial/shop windows in respect of vinyl treatments; and 2) district-wide town centre frontages of empty commercial buildings/shops.	11 Oct 2023	Date of first meeting 16 Jan 2024	D Ashby M Geaney J Le Sage J Whitbourn A Woolf	Final report presented to PDP on 11 February 2025, and to Cabinet on 1 April 2025. Six- monthly update due to PDP September 2025.
South Holland Centre Task Group (JOINT)	To review the historic operation of the SHC, examine the proposals, consider other activities, uses and operation that may be possible to help inform the task group in making recommendations to enable the Centre to serve the public and ensure a viable future.	8 Sept 2021	28 September 2021	B Alcock (Chair) F Biggadike P Redgate S Walsh D Wilkinson A Woolf	The final report was presented to a Joint PMP/PDP meeting on 4/05/22 and recommendations agreed at Cabinet on 7/06/22. A Cabinet sub-group was appointed, and an Action Plan submitted to Cabinet on 15/11/22; and to PMP on 29/11/22. Follow-up meetings of the Joint Task Group were held on 25/01/23; 15/02/23; 22/03/23; and 12/04/23. Updates presented to PMP on 04/07/23 and 13/09/23; to a Special Joint PMP/PDP on 18/04/24; further updates to PMP on 16/10/24, 11/12/24 and 20 May 2025.

**PENDING TASK GROUPS**

Name of Task Group	What the Task Group wants to achieve	Date added to Work Programme	Date Work Commenced	Membership of Task Group	Proposed date to report back to Panel
Local Government Reorganisation (LGR)	Scope to be confirmed - task Group agreed at 24 June 2025 PDP meeting	24 June 2025	Start date on hold - UFN	TBC when approaching start date	TBC
Data Protection/ Data Retention Task Group	To consider the implications of forthcoming changes to the Data Protection Policy: To develop the new policy in light of issues raised in the gap analysis and legislative changes and that a more detailed suggested scope would be circulated prior to the first Task Group meeting.	3 October 2017	11 December 2017	H Drury M D McLean A R Woolf (Chairman) A Harrison	To PDP 1 May 2018 To Cabinet 29 May 2018