

AGENDA



- Committee - **POLICY DEVELOPMENT PANEL**
- Date & Time - Tuesday, 21 April 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: 13 April 2026

AGENDA

1. Apologies for absence.
2. Minutes -
To sign as a correct record the minutes of the following meetings
(copies enclosed):
 - a) Joint Performance Monitoring Panel/Policy Development Panel - 13 January 2026 (Pages 5 - 16)
 - b) Policy Development Panel - 3 February 2026 (Pages 17 - 40)
 - c) Special Policy Development Panel 9 February 2026 (Pages 41 - 54)
3. Actions - (Pages 55 - 68)
To consider updates to actions that arose at the 3 February 2026 Policy Development Panel meeting and the tracking of outstanding actions
(enclosed).
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 69 - 78)
To note the current Key Decision Plan (copy enclosed).
9. SHDC Policy Register & SELCP Policy Register - (Pages 79 - 84)
To note the SHDC Policy Register and the S&ELCP Policy Register
(enclosed).
10. Health and Safety Policy – General Statement of Intent and Arrangements - (Pages 85 - 102)
To seek views from the Policy Development Panel on proposed amendments to the Councils Health and Safety Policy (report of the Assistant Director – Regulatory enclosed).
11. Final Report of the Derelict and Untidy Sites Task Group - (Pages 103 - 114)
To consider the Final Report of the Derelict and Untidy Sites Task Group and provide feedback prior to its consideration by the Cabinet
(report of the Derelict and Untidy Sites Task Group enclosed).

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|-----|--|-------------------------|
| 12. | Anti-Social Behaviour (ASB) and Hate Crime Policy for the Housing Landlord Service -
To consider the Anti-Social Behaviour (ASB) and Hate Crime Policy for the Housing Landlord Service (report of the Assistant Director – Housing enclosed) | (Pages
115 -
176) |
| 13. | Housing (HRA) Damp, Condensation and Mould Policy -
To consider the updated Damp, Condensation and Mould Policy 2026 (Appendix 2) (report of the Assistant Director – Housing enclosed). | (Pages
177 -
214) |
| 14. | Graffiti and Street Art Management Policy -
To present to members an updated Street Art Management Policy and outline the rationale for separating graffiti from street art within the Council policy (report of the Assistant Director – Housing and Communities enclosed) | (Pages
215 -
242) |
| 15. | Policy Development Panel Work Programme -
To set out the Work Programme of the Policy Development Panel (Report of the Assistant Director - Governance (Monitoring Officer) enclosed) | (Pages
243 -
250) |
| 16. | Debt Write Off Policy -
To review the Debt Write Off Policy (report of the Director of Finance (Section 151 Officer) enclosed). | (Pages
251 -
266) |
| 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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|-----|--|-------------------------|
| 18. | To consider resolving that, under Section 100A (4) of the Local Government Act 1972, the public be excluded from the meeting for the following item(s) of business on the grounds that it involves the likely disclosure of exempt information as defined in Paragraph 3 of Part 1 of Schedule 12A of the Act. | |
| 19. | Debt Write Off Policy -
To review the restricted appendix to agenda item 16 (Appendix 1 enclosed). | (Pages
267 -
284) |

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Minutes of a meeting of the **JOINT PERFORMANCE MONITORING PANEL AND POLICY DEVELOPMENT PANEL** held in the Council Chamber, Council Offices, Priors Road, Spalding, on Tuesday, 13 January 2026 at 6.30 pm.

PRESENT

B Alcock (Chairman)

D Ashby
P Barnes
A C Beal
M D Booth

C J T H Brewis
L J Eldridge
M Geaney
R A Gibson

J L Reynolds
M Le Sage
I Sheard
A R Woolf

Apologies for absence were received from or on behalf of Councillors N Chapman, M Hasan and J Whitbourn

In Attendance: The Director of Finance (Section 151 Officer), the Assistant Director - Housing, the Head of Finance Delivery SHDC (PSPS), the Portfolio Holder for Strategic and Operational Housing and the Democratic Services Officer.

7. ELECTION OF CHAIRMAN

Councillor Alcock was elected as Chairman for the duration of the meeting.

8. DECLARATION OF INTERESTS

Councillor Brewis declared that he was a Director of PSPS.

9. BUDGET OVERVIEW 2026/27 – 2030/31

Consideration was given to the report of the Director of Finance (Section 151 Officer) to consider and scrutinise the Council's financial outlook, provisional finance settlement and draft General Fund budget position prior to consideration by Cabinet and Council.

The Director of Finance (Section 151 Officer) and the Head of Finance Delivery SHDC (PSPS) attended for this item.

The Director of Finance introduced the report to members and the following main points were highlighted by way of a presentation (appended to the minutes at Appendix 1):

- The role of Overview and Scrutiny as part of the budget process;
- A recap of the process to date;
- Key headlines from the Provisional Local Government

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Finance (LGF) Settlement 2026/27 including significant complex changes and the release of illustrative figures for subsequent years, which will be updated on an annual basis;

- A summary of budget pressures;
- A summary of efficiency proposals;
- The provisional draft budget; and
- Next steps.

In addition, it was highlighted that:

- £5 million of grant funding towards Internal Drainage Board had been secured for 2026/27;
- Due to the late notification of the finance settlement from central government and the fact that further information was still awaited, the report had been prepared and presented with the caveat that work on the budget remained ongoing. This included, in particular, the following elements:
 - The Capital Programme and its funding arrangements, which were yet to be finalised; and
 - Financial assumptions relating to food waste collection and Extended Producer Responsibility, which had not yet been confirmed and would be incorporated into the budget when available. It was noted that these outstanding elements would have a consequential impact on the Treasury Management position and, in turn, on projected investment income;
- Work undertaken to date had reduced the 2026/27 initial funding gap from £2.5m to £250,000. It was noted that pressure was anticipated to increase in subsequent years and that, while further management measures would be required, the overall position was considered reasonable moving forward.

Members considered the report and made the following comments:

- Members queried whether grants consolidated within the finance settlement were ring-fenced for their respective purposes.
 - The Director of Finance explained that, while the consolidation of grants represented a departure from previous settlement approaches, the settlement documentation clearly identified the individual grant values and confirmed that these remained ring-fenced for their intended purposes.

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- Members queried the likely impact of forthcoming changes to business rates, including the revaluation of licensed premises.
 - The Director of Finance explained that the business rates revaluation would potentially affect all ratepayers across the district. It was noted that, while the intention of the revaluation was that increases and reductions should broadly balance out at a national level, the impact would vary between individual businesses depending on their circumstances and ability to absorb change. Members were advised that the local implications would not be fully understood until detailed data was available later in the process.

- Members queried why government calculations overestimated Council Tax income by £109,000.
 - The Director of Finance explained that the national funding methodology applied standardised assumptions in relation to collection rates, Council Tax base growth, and the application of premiums for second homes and empty properties. It was noted that these assumptions did not fully reflect South Holland's local circumstances, which resulted in an overestimation within the government's calculations.

- Members commented on the savings and efficiency proposals relating to the generation of income from CCTV and expressed concern that transferring these costs to Parish Councils, while not representing a saving to the local taxpayer overall, could potentially place the future provision of the service at risk.

- Members queried whether the projected £175,000 reduction in premises-related expenditure over a two-year period was realistic and raised concerns that previous maintenance issues, including those at the Lutyens Memorial, suggested there was a risk that savings could result in underinvestment in Council buildings.
 - The Director of Finance reassured members that the anticipated reduction related to specific service areas, principally relating to the leisure contract and the swimming pool, and not to council-wide asset maintenance. The property team remained responsible for ensuring buildings were kept in good

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repair.

- Members queried why some of the budget lines did not appear to reconcile.
 - The Director of Finance explained that the movements within the budget were derived from a combination of inflation assumptions, rounding, service-level adjustments and outcomes from the Star Chamber process. As a result, the figures did not reconcile on a like-for-like basis and additional budget adjustments beyond the headline pressures and savings contributed to the overall efficiency requirement.

- Members queried why income from investment interest was forecast to remain flat, despite expectations that interest rates would change over the medium term and questioned whether this represented a financial risk.
 - The Director of Finance explained that this budget line remained subject to further work and that a flat assumption had been applied at this stage to avoid overstating income without full information. It was noted that the final position would depend on movements within the capital programme, treasury management activity and reserve balances, and that the figure was therefore likely to change as these elements were finalised. In acknowledging the sensitivity of the investment income line to market volatility, the Director of Finance advised that the Council had some flexibility to manage exposure through internal borrowing arrangements, including between the General Fund and the Housing Revenue Account, which could reduce reliance on external borrowing and help mitigate risk.

- Members asked for details regarding the £500,000 'Direct Revenue Financing of Capital Expenditure' budget line within the Medium-Term Financial Strategy (MTFS).
 - The Director of Finance explained that this sum represented an in-and-out budget movement, with a corresponding entry within relevant service areas, and therefore had a net nil impact on the Council's overall revenue position. It was further noted that, while the Capital Programme was still being finalised, it was not anticipated to differ significantly from the 2025/26 position, and any amendments would be fully funded and would not adversely affect the revenue budget.

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- Members sought clarification on the anticipated level of Internal Drainage Board (IDB) levies and the associated risk.
 - The Director of Finance advised that positive and ongoing discussions were taking place with the Internal Drainage Boards through the Special Interest Group. It was noted that, in line with Government advice, grant assumptions within the budget had been based on 2025/26 figures. Whilst indicative information had been shared, formal confirmation of IDB levy requirements was not expected until spring or summer 2026, and this uncertainty presented a degree of ongoing risk within the projections.

- Members raised concerns about the Council's use of expensive temporary accommodation for homelessness and queried whether the financial examination of a Council-owned provision, such as a hostel, had been considered.
 - The Director of Finance advised that the current approach to homelessness provision was considered effective, and while alternative options were not currently being progressed, Members were welcome to explore and propose other solutions for consideration.
 - The Portfolio Holder for Housing further explained that a Council-owned provision had previously been explored; however, an identified property had been assessed as unsuitable and was not taken forward. It was noted that the Council's reliance on bed and breakfast accommodation had significantly reduced as a result of a strategic shift towards prevention activity. Members were also advised that the approved departmental restructure had strengthened this preventative approach, including expanding engagement with private sector landlords to secure additional accommodation. In addition, funding secured through round three of the Local Authority Housing Fund had enabled improvements to temporary accommodation, and the introduction of small 'top-up' charges from April 2026 was intended to support tenant readiness and assist the transition to longer-term housing solutions.

- Members requested further detail regarding the £455,000

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annual saving attributed to staff vacancies and sought clarification on the potential impact of forthcoming Local Government Reorganisation (LGR) on staffing levels and resources.

- The Director of Finance explained that:
 - The vacancy saving was generated through natural staff turnover, recruitment lead-in times and new starters commencing on lower salary points within established grades. It was noted that this approach reflected common practice across the local government sector and was informed by historic experience, which demonstrated that approximately 4% in-year savings could be achieved in this way; and
 - In relation to Local Government Reorganisation, he advised that while some statutory roles were likely to consolidate under any future arrangements, operational service staff would continue to be required. It was further noted that a degree of natural workforce reduction could occur; however, experience elsewhere had shown that reorganisation typically created increased short-term demand for staff capacity due to transformation, transition and service integration activity.
- Members queried changes to the Council's pension contribution levels following the triennial review.
 - The Director of Finance advised that the triennial pension review had resulted in a reduced employer contribution rate of 18.3%, which was due to take effect from April 2026. It was noted that this reduction would deliver a significant saving of approximately £700,000, which had been incorporated into the 2026/27 budget and reflected within the Medium-Term Financial Strategy forecasts for subsequent years.
- The Chairman acknowledged that a substantial amount of work had been undertaken by officers to develop the draft Budget and Medium-Term Financial Strategy. However, it was noted that the late receipt of the Government finance settlement, combined with uncertainty within some of the data presented, had made the Panel cautious about suggesting specific variations at this stage. It was further

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observed that the timing of the report had limited members' ability to scrutinise the budget as fully and effectively as it would have wished.

- In conclusion, the Panel recommended that Cabinet be urged to continue detailed exploration and refinement of the budget during the remaining period, with a view to improving the overall position prior to the Council Tax rate being set.

AGREED:

That following scrutiny of the Draft Budget and Medium-Term Financial Strategy for the period 2026/27 to 2030/31, the comments of the Joint Performance Monitoring Panel and Policy Development Panel be noted and considered by Cabinet on 17 February 2026.

10. HRA BUSINESS PLAN AND ASSET MANAGEMENT STRATEGY

Consideration was given to the report of the Assistant Director - Housing which asked members to provide feedback on the Housing Revenue Account (HRA) Business Plan 2026-2056 and HRA Asset Management Strategy 2026-2035.

The Assistant Director – Housing and the Portfolio Holder for Strategic and Operational Housing attended for this item, with support from the Director of Finance.

The Assistant Director - Housing introduced the report to members and the following main points were highlighted by way of a presentation (appended to the minutes at Appendix 2):

- Background;
- Headlines;
- Consultation: November 2025;
- Sewage treatment works: update;
- Asset Management Strategy: outcome;
- Stock investment requirements;
- Approach to financing;
- A summary and next steps.

Members considered the report and made the following comments:

- Members reported that residents had given positive

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feedback regarding the tenant engagement work.

- Members had queried whether an alternative plan had been considered to avoid the Council going into further debt.
 - The Assistant Director - Housing had explained that, based on current modelling and government requirements for energy efficiency and Decent Homes standards, additional borrowing was necessary, however grants and potential rent-setting changes may reduce reliance on debt. The plan would be reviewed annually as part of the budget setting.
- Members asked if divesting housing stock had been considered.
 - The Assistant Director - Housing had confirmed that stock transfer had not been considered as part of this work.
- Members raised concerns about underinvestment in sewage treatment works and pumping stations and whether assets would fail before funding was available.
 - The Assistant Director - Housing responded that, in her opinion, there had not been an underinvestment. An intensive maintenance contract was in place, all sites had been surveyed independently approximately two years ago and are subject to ad-hoc inspections by the Environment Agency. While a capital programme was not in place at present, the existing Medium-Term Financial Strategy had a contingency for capital investment, and the programme would commence during 2026/27.
- Members queried whether South Holland Homes should be brought into the HRA.
 - The Assistant Director - Housing had noted that the acquisition of the units by the HRA was subject to ongoing discussion. Tenant consultation would be necessary; however they would benefit from additional rights under the HRA.
- Members had sought clarification on tenant feedback suggesting disposal of high-cost homes.
 - The Assistant Director - Housing had confirmed that an asset performance evaluation would be undertaken as part of the strategy to identify

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properties that might be costly to maintain or obsolete. Findings would be reported back to councillors.

- Members had asked whether investment in properties would increase stock valuation.
 - The Director of Finance (Section 151 Officer) explained that valuations were based primarily on rental income rather than component upgrades however poor-quality stock could negatively affect valuation;
 - The Assistant Director - Housing added that capital improvements reduced repairs expenditure and reduced fuel costs for tenants.
- Members had queried the borrowing strategy and options.
 - The Director of Finance (Section 151 Officer) highlighted that borrowing for investment was not inherently negative if affordable and linked to asset enhancement. Options included maturity loans, equal instalment of principal, or annuity-based repayment, each with merits depending on circumstances.
- Members had questioned why repair and management costs were high compared to other authorities.
 - The Assistant Director - Housing had explained that costs related to the maintenance of sewage treatment works, which were unique to South Holland. The Council could not fully recover these costs through tenant charges due to regulatory limits -maximum rates needed to align with those charged by Anglian Water. Efforts to reduce running costs were planned, such as exploring the installation of solar panels to reduce electricity costs.
- Members had asked when the maintenance contract was last tendered and plans for future tendering.
 - The Assistant Director - Housing had confirmed the contract had last been tendered approximately two years ago. Plans were in place to retender and potentially break down the contract into smaller packages to achieve better value following capital investment.
- Members had queried why staffing and workforce capacity implications were listed as 'none'.

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- The Assistant Director - Housing had clarified that the Delivery team had been repurposed to focus on wider HRA capital investment, and most works were contracted out. The main requirement was contract management rather than direct delivery.
- In conclusion, members acknowledged the huge amount of work that had taken place to produce the report and thanked all involved. Nonetheless, members commented on the general uncertainty of planning for a 30-year period and stressed the need for ongoing monitoring. Both financial and human resources needed to be reviewed annually to avoid slippage and ensure programme delivery. The committee agreed that this feedback be relayed to Cabinet for consideration.
- Upon invitation by the Chairman, the Portfolio Holder concluded with her acknowledgement of the work undertaken in the production of the documents by the Assistant Director – Housing and her team, the consultant (Savills) and the PSPS Finance team, and for the support of members.

AGREED:

- a) That following the Panel's review of the HRA Business Plan 2026-2056, and the noting by Cabinet of the Panel's comments in respect of monitoring and resources, the recommendation to Cabinet to adopt the Plan be endorsed;
- b) That the recommendation to Council to delegate minor operational and legislative amendments to the HRA Business Plan 2026-2056 to the Assistant Director for Housing in consultation with the s151 Officer and the Portfolio Holder for Strategic and Operational Housing, be supported;
- c) That following the Panel's review of the HRA Asset Management Strategy 2026-35, and the noting by Cabinet of the Panel's comments in respect of monitoring and resources, the recommendation to Cabinet to adopt the Strategy be endorsed; and
- d) That the recommendation to Council to delegate minor operational and legislative amendments to the HRA Asset Management Strategy 2026-2035 to the Assistant Director for Housing in consultation with the s151 Officer and the

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Portfolio Holder for Strategic and Operational Housing, be supported.

11. ANY OTHER ITEMS WHICH THE CHAIRMAN DECIDES ARE URGENT

There were none.

(The meeting ended at 8.10 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 Tuesday, 3 February 2026 at 6.30 pm.

PRESENT

L J Eldridge (Vice-Chairman, in the Chair)

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 Assistant Director - Communities and Housing Services, the Tenant Engagement and Influence Lead, the Housing Transformation (HRA) Manager, the Director of Economic Development, the Assistant Director - Leisure and Local Services, the Information Manager and Data Protection Officer, the Heritage Manager and the Head of Human Resources and Organisational Development (PSPS), the Transformation Officer, the HR Projects and Transformation Manager, the Democratic Services Officer and the Democratic Services Support Officer.

Apologies for absence were received from or on behalf of Councillors R A Gibson and A R Woolf

64. MINUTES

AGREED:

That the minutes of the following meetings be signed by the Chairman as a correct record:

- Policy Development Panel held on 25 November 2025; and
- Special Policy Development Panel meeting held on 17 December 2025 with an amendment required to insert the note that Cllr Tyrrell attended as a substitute for Cllr Reynolds.

65. ACTIONS

Consideration was given to the update on actions which arose at the 25 November 2025 Policy Development Panel meeting and the tracking of outstanding actions.

The Democratic Services Officer relayed the following updates;

Action By

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- In respect of action 52. 25/26, the following response was provided by the Information Manager and Data Protection Officer.
'delay in reviewing the Data Protection Policy was due to the Policy being aligned across the partnership.
- In respect of action 53. 25/26, the following response was provided by the Business Intelligence and Change Manager;
'an update had been provided to the members with the responses to the members questions. Members confirmed they were content for these updates to be noted in the minutes.
- In respect of action 58. 25/26, the following response was provided by the Environment and Sustainability Officer;
'an update had been circulated to the members. Members confirmed they were content for these updates to be noted in the minutes.

AGREED:

That the update regarding actions be noted.

66. DECLARATION OF INTERESTS.

There were none.

67. QUESTIONS ASKED UNDER STANDING ORDER 6

There were none.

68. TRACKING OF RECOMMENDATIONS

There were none.

69. ITEMS REFERRED FROM THE PERFORMANCE MONITORING PANEL

There were none.

70. KEY DECISION PLAN

Consideration was given to the Key Decision Plan dated 26

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January 2026.

AGREED:

That the Key Decision Plan be noted.

71. SHDC AND S&ELCP POLICY REGISTERS

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

The Business Intelligence and Change Manager introduced the report and gave the following update:

- A discrepancy regarding the status of the Graffiti and Street Art Management Policy had been identified and would be rectified, with the correct status updated on the register accordingly;
- That several policies listed on the SHDC Policy Register were included on the current agenda for consideration and review, including the Data Protection Policy and the Records Management Policy, which were being presented together;
- The Whistleblowing Policy had been considered by the Governance and Audit Committee and would continue through the relevant approval processes.
- The Graffiti Street Art Management Policy would now be presented at a future Policy Development Panel meeting, and this adjustment would be reflected in the policy register;
- The Assistant Director – Wellbeing and Community Leadership confirmed that the Private Sector Housing Strategy would be brought to a future meeting, with only minor changes anticipated;
- A number of financial policies were undergoing a review as part of the budget-setting process and that the majority had already been considered by the Governance and Audit Committee and would progress to Cabinet for final approval. This would remove a significant section of pending policies from the register; and
- A substantial number of ICT policies were currently in consultation with the Portfolio Holder and would be added to the policy register once the review was completed.
- That the Communications Strategy was scheduled for consideration in September 2026.

Overall, the policy register was reported to be in a healthy position, and that upcoming policies would continue to be

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monitored and updated.

AGREED:

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

72. 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.

Consideration was given to the report of the Director – Economic Development which asked the Panel to provide feedback on the progress of the public consultation.

The Heritage Manager and the Director – Economic Development attended for this item.

The Heritage Manager presented the report and provided the Panel with a detailed update on the progress of the public consultation relating to a suite of heritage documents as set out in the report including:

- Spalding Conservation Area Appraisal and Management Plan (including the Spalding Shopfront Design Guide)
- Spalding Heritage Strategy
- Holbeach Conservation Area Appraisal and Management Plan
- S&ELCP Traditional Building Design Guide

It was noted that:

- The documents sat across two portfolio areas — Heritage & Conservation and Planning. The consultation had commenced in November 2025 and had included social media campaigns, press and site notices, letters to properties proposed for inclusion or removal, and public events held in both Spalding and Holbeach. Hard copies had been made available on request, which included Members and the Civic Society. Documents were also accessible on the Council's consultation webpage and via the planning portal;
- Although the formal six-week consultation period had elapsed, the documents remained online to allow further comment. The Heritage Manager noted a lack of responses from Spalding town centre businesses, prompting further engagement coordinated with the

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Spalding BID. Additional engagement was planned with the Spalding Town Board on 9 February 2026. All comments were requested by 13 February 2026 to allow a consolidated submission to consultants; and

- The Heritage Strategy and the Traditional Building Design Guide served as guidance only documents and had no formal adoption.

Members considered the report and made the following comments:

- Members queried the lack of responses from Spalding town centre businesses during the consultation.
 - The Heritage Manager explained that while initial engagement was low, an additional event had been held with Spalding BID and further outreach undertaken. It was suggested that businesses may have felt unaffected due to no proposed changes to conservation area boundaries, or because many were not owner-occupiers. The consultation remained open until 13 February 2026 and further responses might still be received.
- Members asked had the follow-up engagement yielded improved responses from businesses, and what proportion as a percentage had responded overall.
 - The Heritage Manager reported that a handful of attendees had attended the BID event along with two email comments, but the total number of businesses as a percentage figure was not available to report at the meeting.
- Members commended the clarity of the documents and asked about formal sign-off.
 - The Heritage Manager confirmed the documents were in a draft format and that formal sign-off arrangements would be addressed once amendments had been made to where possible incorporate consultation responses at the final stage.
- Members referred to the Spalding Conservation Area Appraisal and noted that public comments suggested that resources should focus on improvements to the existing conservation area rather than an extension of it. Could specific detail of the feedback be provided.

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- The Heritage Manager reported that residents commonly raised issues related to the condition of windows, doors and materials on residential properties and explained that such matters currently fell under permitted development rights, limiting the Council's control, but that the management plan identified possible mechanisms for increasing restrictions. Feedback had included the use of residential Grant Schemes to assist with costs.
- Members asked how licensing regulations relating to visibility into shopfronts might interact with planning control in conservation areas.
 - The Heritage Manager confirmed that licensing and planning were separate legal regimes and that licensing considerations had not been assessed as part of the appraisal.
- Members raised concerns about the map quality within the Spalding and Holbeach appraisals and asked whether higher-resolution mapping could be provided.
 - The Heritage Manager acknowledged the comment and confirmed that higher-definition mapping would be explored for future versions to aid readability.
- Members asked how many conservation area appraisals were being consulted across the partnership, and what were the cost implications of completing the remainder.
 - The Heritage Manager stated that seven appraisals were out to consultation across the S&ELCP. They were exploring ways to deliver the remaining appraisals, which typically cost £5,000–£15,000 each, depending on size of the area.
- Members referred to the Holbeach Conservation Area Appraisal and queried whether residents affected by the proposed extensions been contacted directly, and if so were response levels known.
 - The Heritage Manager confirmed that direct letter-drops to properties within the proposed additions/removals area had been delivered along with multiple site notices. Around five responses had been received for Holbeach, which was broadly consistent with response levels seen in other areas.

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Relating to the Spalding Shopfront Design Guide, members raised the following questions;

- Members queried whether the Spalding Shopfront Design Guide be district-wide rather than Spalding-specific.
 - The Director – Economic Development, advised that the Spalding Shopfront Design Guide had been funded via the Spalding Town Board and appended to the Spalding appraisal, hence its limited geographic scope. A partnership-wide treatment was being progressed in the separate S&ELCP Traditional Building Design Guide, which provided generic guidance across the area.
- Members asked whether feedback from businesses included both independents and multinationals traders and what input was received.
 - The Director – Economic Development, explained that the Business Improvement District covered all businesses in scope, with several local businesses engaging at the provided sessions. Feedback focused less on specific design points and more on historic enforcement concerns and wider management issues.
- Members referred to the Shopfront Guide and queried whether its application as ‘material consideration’ would deter multinationals or disadvantage local independents if their corporate branding conflicted with the guide.
 - The Director – Economic Development and the Heritage Manager explained that economic development and planning colleagues had typically worked with corporate applicants and design teams to secure acceptable, brand-compliant solutions. In conservation areas, proposals must preserve or enhance; the guide would provide solutions rather than impose a blanket prohibition. Proposals that preserved character should be supported; enhancements were sought where preservation was not achieved. Decisions would be made on planning merits rather than business type.
- Members asked what resources and capacity would be available to enforce the Spalding Shopfront Design Guide.
 - The Director – Economic Development responded that the document was a guide and not enforceable.
 - The Heritage Manager noted a step-change in conservation staffing since March: a full-time

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Principal Conservation Officer now worked wholly on conservation (previously split role), and a second full-time Conservation Officer post had been shared across the partnership, along with the appointment of an Assistant Conservation Officer. It was noted that while formal planning enforcement sat with the Enforcement Team, the Conservation Team could now draft robust conservation responses to support notices and would look to handle simpler cases more proactively as capacity allowed.

- Members asked if officers were actively striving for enhancement rather than mere preservation in day-to-day casework.
 - The Heritage Manager confirmed that, for every application within a conservation area, they would assess whether proposals preserved or enhanced. Where applications did not preserve in the first instance then officers would seek enhancements. For sites not currently proposing works, it was recognised that there was a need for proactive engagement (including potential grants and proactive enforcement) to encourage improvement.
- Members asked whether officers could pursue the enhancement of prominent buildings such as the former Johnson Hospital.
 - The Heritage Manager confirmed that the aspiration to improve key sites was reflected in the Heritage Strategy and wider regeneration plans, and proactive measures would be explored.
- Members referred to the placeholder images in the S&ELCP design guide and asked if these could be replaced with local photographs.
 - The Heritage Manager advised that the placeholders would be replaced with local photographs to illustrate examples from within the partnership area.

AGREED:

- a) That the comments of the Panel be noted; and
- b) That the proposed course of actioned, which involved further consultation, subsequent amendments to the documents and placing before Cabinet for approval, be supported.

73. EXTENSION OF THE HOUSING LANDLORD STRATEGY

Consideration was given to the report of the Assistant Director – Housing which sought feedback on a one-year extension to the current Landlord Strategy timeline, aligning it with ongoing service transformation activity and enabling a deeper tenant engagement in shaping the next strategy.

The Housing Transformation (HRA) Manager presented the report which set out the proposal to extend the current Housing Landlord Strategy and highlighted the following:

- The extension was intended to align the strategy with ongoing service transformation work, to allow further tenant engagement, and support the co-creation of a revised future strategy;
- Members were advised that the service continued to deliver improvements following the Regulator of Social Housing inspection, and that work on the provider improvement plan was progressing well;
- Recruitment for the new Tenant Scrutiny Panel was underway, supported by training to strengthen tenant-led oversight. Monthly meetings with the Regulator of Social Housing were taking place to evidence progress; and
- Tenants had been consulted in October 2025 and expressed strong support for extending the strategy which allowed more meaningful involvement and engagement.

Members considered the report and made the following comments;

- Members sought assurance that improvements were continuing across the service, particularly benchmarking performance against neighbouring authorities.
 - The Housing Transformation (HRA) Manager confirmed that:
 - The Tenant Satisfaction Measures for 2025/26 had recently been completed and once validated, would be brought back to Members.; and
 - Tenants had also requested additional benchmarking against neighbouring authorities with housing stock; therefore, comparative data for North Kesteven, South Kesteven and Lincoln had been included.
- Members asked how the survey would engage with the

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- elderly and geographically remote tenants.
- The Housing Transformation (HRA) Manager responded that:
 - Tenant engagement events were being held across the district, with attendance monitored to ensure a representative spread of tenant voices. Where community centres were not available, village halls and church halls were used; and
 - Updates for members were provided through Member Briefings, posters in the members lounge and agreement to send direct emails where possible.
 - Members asked how the recruitment to the Tenant Scrutiny Panel was progressing.
 - The Housing Transformation (HRA) Manager informed the Panel that eight strong expressions of interest had been received, with two further forms expected. If all were confirmed, a 10-member panel would be established. Membership was drawn from across the district, and a full geographical breakdown could be provided.
 - Members asked how the service would ensure engagement with sheltered housing tenants and those with mobility issues.
 - The Tenant Engagement and Influence Lead advised that events were being held within sheltered housing schemes, with newsletters hand-delivered by the Independent Living Team. Tenants unable to attend events could contact the service by phone or email, and information was regularly posted to those requesting it.
 - Members asked whether the appendices to the report could be re-ordered in future to assist readability.
 - The Housing Transformation (HRA) Manager confirmed that the sequence of appendices would be reviewed in future reports.
 - Members sought further information on the Councils progress towards achieving a C1 regulatory grading.
 - The Housing Transformation (HRA) Manager confirmed that tenant engagement had been the main area of weakness, and that monthly meetings with the Regulator allowed ongoing updates. Once the scrutiny panel was established and scrutiny

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activity demonstrated improved outcomes for tenants, the Regulator would consider internal validation for regrading.

- Members requested further detail regarding the Complaints Working Group referenced in the report.
 - The Housing Transformation (HRA) Manager advised that the group, established in early 2025, comprised of the Assistant Director - Housing, the Portfolio Holder, and service team leaders. The group monitored complaint trends and themes to identify service learning and improvements.
- Members queried why Stage 1 and Stage 2 complaints had increased significantly.
 - The Housing Transformation (HRA) Manager explained that the Housing Ombudsman had advised that complaints were previously under-reported, and the Council had undertaken a major internal and external campaign to ensure all dissatisfaction was properly captured. The resulting increase therefore reflected improved accuracy and aligned with sector averages.
- Members asked when would 100% stock condition data coverage would be achieved.
 - The Housing Transformation (HRA) Manager replied that coverage had since risen to 90.05%. All properties had been attempted at least three times, the current coverage level was considered acceptable by sector data specialists and the Regulator, but the Council would continue working toward 100%.
- Member raised concerns about ensuring that properties were appropriately matched to household needs, particularly where tenants were under-occupying larger homes.
 - The Housing Transformation (HRA) Manager advised that housing officers supported tenants to move where appropriate and agreed to seek further information regarding any additional work underway in this area.

AGREED:

- a) That the progress in delivering the Housing Landlord Strategy be noted;

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- b) That following consideration and the noting of feedback from the Policy Development Panel, the revised extended Housing Landlord Strategy 2024/2027 (Appendix A) be recommended to Cabinet for adoption.

74. DATA PROTECTION POLICY AND RECORDS MANAGEMENT POLICY

Consideration was given to the report of the Assistant Director – Governance and Monitoring Officer which asked members to review the updated policies prior to Cabinet consideration.

The Group Manager for Information Governance and Data Protection Officer introduced the report and stated that the policies had been updated to comply with the latest statutory requirements, which included the new Data (Use and Access) Act 2025 (DUAA), and were to be aligned across the partnership. The key updates included:

- The introduction of a new statutory complaints process under the DUAA, which required a 30-day response deadline, which is outside of the Council’s complaint process;
- A shift to proportionate searches for rights requests and subject access requests (SARs), replacing the previous requirement for exhaustive searches; and
- A new high-level approach to Records Management, focused on accuracy, security, retention, and transparency, supported by the Information Commissioners Office Code of Practice.

Members considered the report and made the following comments;

- Members asked for clarification on the term “port data” referenced within the Data Protection Policy.
 - The Group Manager for Information Governance and Data Protection Officer explained that this related to the GDPR right to data portability, whereby individuals may request that certain categories of their personal data be transferred to another organisation. It was confirmed that this transfer was not automatic and would only occur upon request, with engagement between the Council and the receiving organisation as appropriate.

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- Members raised the need for Member training on data protection, explaining that the policies were highly technical and that councillors routinely handled sensitive information.
 - The Group Manager for Information Governance and Data Protection Officer confirmed that training sessions had previously been delivered at the other partnership councils and that they would be willing to provide group training sessions on request, covering Data Protection and Freedom of Information, and agreed to liaise with Democratic Services to arrange sessions.
- Members asked whether the Council had experienced data protection breaches and enquired about liability and insurance cover.
 - The Group Manager for Information Governance and Data Protection Officer advised that one voluntary report to the Information Commissioner had been made in the past twelve months. The Council, as data controller, carried liability for compensation where required, including liability relating to data processors. It was confirmed that insurance was in place, although claims would depend on the findings of loss adjusters, and that the existence of current policies formed part of the required control environment. Further information would be provided to the members outside of the meeting.
- Members asked if the Council could refuse a data portability request.
 - The Group Manager for Information Governance and Data Protection Officer replied that it was a qualified right, not an absolute one, and could be refused in defined circumstances. The Policy wording would be amended to reflect “right to request” rather than an unconditional right.
- Members queried how identity was verified when a subject access request (SAR) was made verbally, particularly when documents such as driving licences were provided electronically.
 - The Group Manager for Information Governance and Data Protection Officer responded that:
 - Verification was risk-based, however the officers were able to access existing information, identification documents, and

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- could request face-to-face checks:
 - The Information Commissioners Office guidance discouraged creating unnecessary barriers, but additional checks were used where needed; and
 - An enhanced written guidance outlining how identity checks were carried out for SARs would be produced.
- Members asked whether any examples existed where individuals had provided information that was later deemed insufficient to verify their identity.
 - The Group Manager for Information Governance and Data Protection Officer advised that most requests related to individuals already known to the Council and that additional documents such as Power Of Attorney were requested where required. The Council aimed to balance appropriate verification with avoiding unnecessary barriers for individuals seeking access to their data.
- Members raised concerns regarding the potential risks of scammers attempting to obtain personal data and queried whether strengthened processes were required.
 - The Group Manager for Information Governance and Data Protection Officer noted that scammers were increasingly sophisticated and confirmed that risk-based checks and additional verification steps were applied when necessary, including ensuring that unfamiliar email addresses were appropriately challenged. Additional written guidance was again agreed.
- Members sought clarification on the 'stop-the-clock' provision within the Data Use and Access Act.
 - The Group Manager for Information Governance and Data Protection Officer confirmed that where further information or clarification was required from the requester, the statutory response period did not run until the necessary information had been received.
- Members asked how long the Council retained records of

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the subject access requests.

- The Group Manager for Information Governance and Data Protection Officer responded that records of SARs were kept for six years, in line with the limitation period requirements and agreed to include further clarification within the policy for readability.

AGREED:

That following consideration by the Committee the Data Protection Policy and Records Management Policy attached at Appendices 1 and 2 be recommended to Cabinet for approval.

75. SHDC MARKETS POLICY REVIEW

Consideration was given to the report of the Assistant Director - Leisure and Local Services Division which presented for members consideration an update to the SHDC existing Markets Policy and the introduction of a new SHDC Severe Weather Policy.

The Assistant Director - Leisure and Local Services Division introduced the report and highlighted the following key proposed changes:

- Classification of traders as regular or casual at the point of application.
- Allowing casual traders to book pitches up to 28 days in advance (increased from 14):
- Introducing promotional fees for specialist events such as Makers' Markets:
- Traders using their own stalls to provide risk assessments:
- Clearer application and payment instructions:
- Incentives for new and returning traders, including a free trial day for those absent for over 12 months:
- Updated disciplinary procedures, including inappropriate online behaviour;
- Updated health and safety requirements and food hygiene expectations; and
- Improved support during the system transition, including demonstrations and on-market assistance.

Members were also advised of recent improvements in market performance, including a 50% increase in trader attendance in Quarter 1, and 42–50% increases in subsequent quarters, which was up against national declining trends.

Members considered the report and made the following comments;

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- Members asked whether repetition between the revised policy and the terms and conditions indicated a need for amalgamation:
 - The Assistant Director responded that repetition was intentional to ensure key information was not missed and that the documents remained separate due to health and safety guidance.
- Members queried the reported 15% increase in market stalls and whether a breakdown per market was available:
 - The Assistant Director explained that increases were district-wide and that detailed figures could be provided outside the meeting.
- Members queried whether local buskers who turned up on market days and use amplified sound were subject to the same rules as stallholders, or if they required licences.
 - The Assistant Director advised that the Council could prevent the use of amplified sound within the defined market area but could not stop individuals on the public highway. The Assistant Director would look to check the specific incidents referenced to and would report back to the members.
- Members asked whether the notice periods for weather-related cancellations could be included in the policy itself, not only in the Terms & Conditions.
 - The Assistant Director responded that the cancellation notice details would be included in the Markets Policy as well as the Terms & Conditions.
- Members queried fee implications should a trader become ill during the trading day;
 - The Assistant Director confirmed that traders in such circumstances would be supported by the Market Office. Although fees were non-refundable a line could be added to the Policy to clarify that fee adjustments would be considered on a case-by-case basis.
- Members asked whether the Markets Officer was first-aid trained.
 - The Assistant Director understood that most operations staff had received first-aid training but

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would confirm the first aid training status of the Markets Manager and arrange training if required.

- Members questioned contradictions in fee schedules between regular and casual traders.
 - The Assistant Director explained that new fees would take effect when the Goss system launched and that the current policy remained until June.
- Members enquired if regular traders had to pay for non-attendance, and how many non-attendance days were granted.
 - The Assistant Director responded that regular traders did not have to pay for non-attendance. They were entitled to book off days equivalent to one month's trading, shared across the markets they operate in, and added this entitlement would be clarified in the Policy.
- Members noted that the website link in the policy was outdated and asked if this could be removed.
 - The Assistant Director confirmed it would be removed in both the existing and new policy versions.

Councillor M Le Sage and Councillor M Hasan left the meeting at 19.59.

AGREED:

- a) That the review of the draft Market Policy and Severe Weather Policy report be noted, and
- b) That following consideration of the draft South Holland Markets Policies, at Appendix 2 and 3 of the report, the panel's feedback be noted prior to consideration of the documents by Cabinet.

76. TERMS AND CONDITIONS ALIGNMENT – NEXT PHASE

Consideration was given to the report of the Head of Human Resources & Operational Development – (PSPS) which asked the members to provide feedback on the proposals to facilitate Phase 2 of the alignment of terms and conditions of employment across South & East Lincolnshire Councils Partnership Councils.

The Head of HR & OD (PSPS), presented the report and highlighted the following three policy amendments;

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1. Car Loan Policy – to be replaced with a new partnership-wide policy;
2. Annual Leave (Time Off Policy) – Appendix amendment only; and
3. First Aid Payment Policy – Appendix amendment only.

The Head of HR & OD (PSPS) confirmed that all annual leave figures referenced were exclusive of statutory bank holidays, which would be added separately within the policy. Clarification was also provided regarding the forecast financial impacts; cost implications were included within the report. Formal consultation with staff and recognised unions were proposed, and therefore implementation would not occur until consultation and Council approval were complete.

Members considered the report and raised the following questions:

- Members sought clarification on the forecast costs associated with the proposals.
 - The Head of HR & OD (PSPS) responded that the figures represented anticipated costs for South Holland, with any increases largely arising where operational services such as Waste Operations would require backfill to cover additional annual leave. For other services, additional annual leave was not expected to be a direct cost, as work would be picked up on return. The uplift to first aider payments was minor and aligned with the BBC model and was in line with NJC awards.
- Members queried the wording of the Car Loan Policy regarding recovery through civil proceedings and asked whether the Council would recover associated costs as well as any outstanding balance and interest.
 - The Head of HR & OD (PSPS) advised that:
 - The Council would follow its standard debt-recovery process via Credit Control and the local courts, where costs were generally minor; any escalation to solicitors would be assessed on a case-by-case basis; and
 - The policy wording would be clarified to refer to 'interest and associated costs' and further noted that, where feasible, outstanding amounts would first be recovered from final salary, or otherwise by repayment plan, and that proportionality would be considered where recovery costs might outweigh the remaining debt.

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- Members asked that references to annual leave entitlements be made clear if excluding statutory bank holidays, and that this wording be applied consistently across the Time Off Policy appendix tables.
 - The Head of HR & OD (PSPS) confirmed that annual leave figures quoted excluded bank holidays and agreed to mirror the wording across both tables for consistency.

- Members raised concerns that the proposed alignment of first aider allowances could lead to a disproportionate increase in the number of trained first aiders.
 - The Head of HR & OD (PSPS) explained that first aiders were nominated and coordinated by the Health and Safety Team, that numbers would be kept proportionate to operational need, and that an uncontrolled increase was not anticipated.

- Members sought assurance that the new mobility clause in contracts would not remove entitlement to claim travel expenses when staff were required to work at alternative locations.
 - The Head of HR & OD (PSPS) confirmed that reasonable expenses were already provided for elsewhere in the contract, in line with the Council's expenses policy. The extract presented to the Panel covered the mobility clause only; however, the suggestion to include a cross-reference to the expenses policy was noted.

AGREED:

That the Panel's feedback on the proposals in the report to facilitate Phase 2 of alignment of terms and conditions of employment across the South & East Lincolnshire Council Partnership Councils, be noted.

77. SHDC HOUSING COMMENTS, COMPLIMENTS, COMPLAINTS AND COMPENSATION POLICY

Consideration was given to the report of the Assistant Director – Housing which asked the members to consider amendments to SHDC Housing Comments, Compliments, Complaints and Compensation Policy following an annual refresh with tenants.

The Tenant Engagement and Influence Lead introduced the

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report and advised Members that, on the day of the meeting, the Housing Ombudsman had released new guidance on compensation. The Tenant Engagement and Influence Lead had not yet been able to review the document and noted that further changes to the compensation section of the policy might be required. If so, the policy would be returned to the Panel for further consideration.

The summarised key updates to the policy were:

- Greater accessibility and transparency, including clearer information on how to make a complaint;
- Requirements to consider the Reasonable Adjustments Policy, ensuring equitable access for all tenants;
- Strengthened expectations for Stage 1 complaints to be investigated by senior officers or team leaders who have operational oversight;
- Stage 2 complaints to be investigated by Service Managers or the Assistant Director, reflecting good practice and tenant preferences;
- Clearer statutory timeframes, with added transparency around when extensions may be permitted and under what circumstances, and
- Improved tenant voice and accountability through the Complaints Focus Group, enhanced reporting routes and year-on-year trend analysis.

Members considered the report and made the following comments;

- Members asked whether new guidance published by the Housing Ombudsman on compensation would require amendments to the policy.
 - The Tenant Engagement and Influence Lead advised that the guidance had only been released that day and required a full review; any necessary changes would be assessed, and if significant, the updated policy would be brought back to the Panel, with amendments clearly highlighted.
- Members queried whether complainants were contacted following the resolution of their case to provide feedback.
 - The Tenant Engagement and Influence Lead confirmed that all complainants were sent a written response with a survey link and, where appropriate, a posted satisfaction survey. Response rates, however, were low; therefore, the service intended to introduce follow-up spot telephone calls to improve insight into tenant experience.

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- Members raised concerns about the positioning of policy updates in the agenda pack and suggested that appendix updates be placed before the policy itself.
 - The Tenant Engagement and Influence Lead acknowledged the suggestion and agreed that this ordering could be improved for future reports.
- Members asked how long complaint records were retained.
 - The Tenant Engagement and Influence Lead confirmed that records were kept for six years in accordance with data protection requirements and Housing Ombudsman guidance.
- Members queried whether only senior officers should handle Stage 1 complaints, expressing concern that this may limit learning opportunities for other staff.
 - The Tenant Engagement and Influence Lead responded that Stage 1 complaints would be investigated by senior officers or team leaders, while Stage 2 complaints would be undertaken by service managers. This structure aligned with tenant feedback and good practice, ensuring Stage 1 resolution was achieved effectively.
- Members referred to wording in the policy suggesting investigations would be completed 'as soon as possible' and asked for clarification in relation to formal timescales.
 - The Tenant Engagement and Influence Lead confirmed that all complaints must be acknowledged within five working days; Stage 1 complaints responded to within ten working days; and Stage 2 within twenty working days unless an extension was agreed with the tenant. It was agreed to review and amend any ambiguous wording.
- Members asked how long tenants had to escalate a Stage 1 complaint to Stage 2 and how often this occurred.
 - The Tenant Engagement and Influence Lead confirmed tenants had twelve months from the Stage 1 response to request escalation. Although exact figures were not available, early trends suggested fewer Stage 2 escalations this year, potentially due to stronger Stage 1 resolutions.
- Members sought clarification on whether compensation calculations were broken down for all awards and what categories were used.

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- The Tenant Engagement and Influence Lead explained that the Housing Ombudsman recommended three categories: mandatory payments (such as home loss), quantifiable loss (evidenced financial loss), and discretionary payments. Discretionary levels were grouped into low, moderate and high bands, with new Ombudsman guidance expected to improve consistency. Annual reports included full compensation data and would continue to be provided to Members.
- Members asked whether full compensation data across all categories was available to the Panel.
 - The Tenant Engagement and Influence Lead confirmed that the Complaints and Performance Focus Group received quarterly data, and the annual report to all Members contained the complete data set reviewed by officers. A request to include key data in future policy reports was noted for implementation.

AGREED:

- a) That the Policy Development Panel feedback on the Housing Comments, Compliments, Complaints and Compensation Policy be noted, and
- b) That the Policy Development Panel recommended adoption of the Housing Comments, Compliments, Complaints and Compensation Policy to Cabinet.

78. 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

Appendix 1 listed the schedule of meetings for 2025/26 with expected items populated against each meeting.

Appendix 2 outlined the task groups of the Panel

Members considered the report and made the following comments:

- The longstanding Data Protection Task Group was not

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- required and could be removed from Appendix 2; and
- The Business frontage Task Group was discussed but it was agreed this would remain on the Appendix 2.

The Assistant Director – Communities and Housing Services added that as the SELCP Private Sector Housing Strategy had been presented within a suite of policies at the previous meeting, the Chairman had agreed, rather than the Panel receiving another report for noting on the matter, that any updates be added to the Policy register for consideration.

- Members agreed with this approach.

The Democratic Services Officer requested that the additional meeting on 9 February 2026, arranged for the Waste Policies follow-up, be noted within the Work Programme and confirmed that the meeting would take place at 6pm in the Council Chamber.

AGREED:

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

79. ANY OTHER ITEMS WHICH THE CHAIRMAN DECIDES ARE URGENT.

There were none.

(The meeting ended at 8.30 pm)

(End of minutes)

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Minutes of a Special meeting of the **POLICY DEVELOPMENT PANEL** held in the Council Chamber, Council Offices, Priory Road, Spalding, on Monday, 9 February 2026 at 6.00 pm.

PRESENT

L J Eldridge (Vice-Chairman, in the Chair)

D Ashby
P Barnes

A C Beal
M Geaney

J L Reynolds
J Whitbourn

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

Apologies for absence were received from or on behalf of Councillors R A Gibson, M Le Sage and A R Woolf.

80. DECLARATION OF INTERESTS.

There were none.

81. WASTE POLICIES

Consideration was given to the report of the Director of Communities which proposed revised Waste Policies, including the Policy Development Panel's (PDP) feedback.

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

The Assistant Director – Neighbourhoods introduced the report which included the following:

- Appendix A - The Waste and Recycling Collection Policies considered by PDP at a Special meeting held on 17 December 2025; and
- Appendix B - The proposals which arose from the Special PDP meeting compared with the initial policy. This document also included additional notes to capture the wider discussions from the December meeting.

During the introduction, the Assistant Director stressed that whilst the proposed policies represented the default position on both the roll-out of the service and the long-term model the Council intended to deliver, it was recognised that concessions would be

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necessary during the roll-out period to support residents as they adjusted. In this regard, a significant engagement programme would accompany implementation, supported by a newly-recruited engagement team whose role would be to work with residents during the roll-out.

The Assistant Director guided members through each element of Appendix B where changes/additions had been made (in red) following feedback received from PDP members at the Special 17 December 2025 meeting.

Members considered the amended policies in turn and made the following comments:

3.1 - Waste Collection

No comments were made in respect of this policy.

3.2 – Waste Collection Provision

- Members referred to the ongoing cost of providing kitchen caddy liners, noting the figure of £8,000 per annum, and sought clarity on whether this cost included bulk purchasing across the partnership.
 - The Assistant Director confirmed that the stated figure related solely to South Holland District Council's own purchasing costs. The first year's supply would cover all households, and that future costs were likely to reduce as larger quantities were procured. It was further confirmed that this cost was not shared across the partnership and related only to South Holland's provision.
- Members raised concerns that the option of a 180-litre waste bin did not appear to have been carried forward into the policy wording. They asked whether the 180-litre bin option had been discounted or whether the policy could be amended to state that 180-litre bins may be provided where appropriate.
 - The Assistant Director responded that the default provision remained the 240-litre bin, as this size had already been ordered for the roll-out, however, as the service matured, alternative bin sizes may be considered where assessed as appropriate. It was agreed that wording could be incorporated within the policy to allow for different bin sizes to be considered on a case-by-case basis.

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3.3 - Bank Holiday collections and collection days

- Members sought clarification that the policy now explicitly stated the only bank holidays with altered collections were Christmas Day, Boxing Day and New Year's Day. Concerns were also raised should residents miss their final pre-Christmas collection, noting the extended gap that could follow.
 - The Assistant Director responded that:
 - The wording for collections over the festive period had been added; and
 - The Council relied on waste being presented in order to collect it effectively and therefore substantial effort would be made to communicate changes clearly.
- Members sought information on how the calendar would be distributed, expressing concerns that residents might disregard leaflets delivered through letterboxes and suggested additional local communication methods such as via ward councillor involvement, parish magazines and parish noticeboards, particularly for residents who did not use social media.
 - The Assistant Director advised that advance communications would alert households to expect the calendar, that it would also be available online, and that multiple communication channels, as used across the sector, would be utilised to maximise resident awareness. The primary focus would be on clear, accessible household calendars delivered to every household.
- A member suggested the use of easy-peel stickers on bins as an additional reminder of Christmas collection changes. Other members did not support this method due to weather related issues.
 - The Assistant Director noted that whilst stickers could be explored, they often failed to adhere properly, especially in wet conditions, and that paper calendars were generally preferred by residents. It was emphasised that effective communication rather than stickers would be the primary tool.
- Members asked whether collection-date messaging could be included within the Council Tax bill mail-out.
 - The Assistant Director confirmed that this channel was used, but as collection days varied by

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postcode, it was not possible to provide specific dates in the Council Tax envelope. Instead, residents would continue to be signposted to check their personalised calendars.

- Members queried the timeframe for the route modelling and communications to residents, raising concerns about potential changes to collection rounds after calendars were distributed.
 - The Group Manager – Waste and Fleet responded that:
 - Rounds would undergo detailed tactical modelling which included on-the-ground testing by drivers and a subsequent ‘polishing’ process to adjust boundaries based on local knowledge. Crews possessed strong local knowledge which would be integral to the testing and acceptance process, and operational considerations such as winter conditions would be accounted for; and
 - The final rounds were expected to be confirmed around late August to early September 2026, which would be followed by clear and reliable resident communication.
 - The Assistant Director added that contingency arrangements were planned to support the transition, including managing situations where residents might otherwise face longer waits between collections.

3.4 - Properties exempt from bin collections

- Members asked whether the Council had considered retaining purple sacks to keep paper and card separate for properties using sack-based collections, citing observations that such items filled current green sacks.
 - The Assistant Director explained that the purple sack trial had not been successful because moisture within the paper and card stored in sacks had caused problems at the paper mill, and the mill was unable to handle the plastic sacks. Therefore, paper and card could not be collected in sacks and must be placed in bins where provided.
- Members sought reassurance that assisted collections would continue for residents who were unable to present their waste.

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- The Assistant Director confirmed that the Council already held accurate records of residents receiving assisted collections and anticipated that the number may increase following roll-out. The newly formed Engagement Team would work with households to assess their needs and ensure those requiring support received it.
- Referring to the debate raised at the 17 December 2025 meeting, the Assistant Director confirmed that the principles for exemption of bin collections would be circulated to all councillors and that the Portfolio Holder held oversight of the operational procedures supporting such decisions. It was acknowledged that the needs of residents could change over time and a clear 'request to review' process would be in place allowing residents to seek clarification or challenge decisions. Clear communication channels would be provided to guide residents on how to request a review.
- Members raised concerns that the introduction of heavier wheeled bins could increase the workload for collection crews.
 - The Assistant Director responded that these considerations formed part of the route-modelling process, which accounted for assisted collections, new developments and the physical parameters of collection rounds. Wheeled bins were easier for operatives to manoeuvre than sacks although weights varied significantly between households depending on waste types. Redesigned rounds would improve operational efficiency compared to the current overstretched service.
- Members asked about the expected weight of a full 240-litre bin and how this compared to the current 'unlimited' sack system, noting that households currently disposing of large volumes would initially struggle with limited bin capacity.
 - The Assistant Director responded that the Engagement Team and operational staff would support residents through the transition, offering advice on waste reduction and recycling. The aim was to positively assist people who were struggling with the changes.

Councillor Beal joined the meeting at 18:22

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3.5 - Side waste

- Members queried whether households could request an additional bin, at cost, where they produced more waste than could be accommodated in their standard allocation.
 - The Assistant Director explained that under legislation, the Council had to provide a waste collection service at 'no cost' however a one-off charge could be levied for the provision of an additional residual waste bin as a temporary commercial-style arrangement. The policy wording had been changed to reflect this position and Boston Borough Council's 'big bin hire' scheme was referenced as an example of such a service.

- Members expressed concern that allowing discretion for additional bins during peak periods, such as Christmas, could create unrealistic expectations and demand across thousands of households.
 - The Assistant Director reiterated that statutory obligations required the Council to provide a waste collection at no cost but restricted its ability to charge for extra domestic residual capacity. Discretionary support during exceptional events would be considered carefully to avoid operational pressures.

3.6 - Charging for bins

Members noted that policy 3.6 had been removed as it was reflected in policy 3.16 and raised no further comments.

3.7 - Requirement to segregate waste

- Members requested that the draft pictorial guide be circulated to councillors for comment prior to distribution to residents.
 - The Assistant Director confirmed that the draft version of the pictorial guide would be shared with members for feedback prior to general circulation. To complement the guide, the Council's existing online tool would also be updated to provide clear guidance on the materials appropriate for each bin.

3.8 - Approach to enforcement of regulations

- Members suggested alternative methods to tags/stickers such as leaving uncollected contaminated waste in labelled

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- bags advising of appropriate disposal.
 - The Assistant Director acknowledged members' suggestions but reiterated that tags were preferred noting that behaviour change would be supported through sustained engagement.
- Members expressed concern about the additional time required to manage contamination during the early stages of implementation and the establishment of new habits.
 - The Assistant Director advised that additional support would be provided during the roll-out period, with engagement officers accompanying crews where needed and intensive work planned to assist residents in adjusting to the new requirements.
- Members asked whether the Council would keep records of tagged properties so that the engagement team could provide targeted support.
 - The Assistant Director confirmed that in-cab technology enabled crews to record tagging events against individual properties, allowing patterns to be identified and informing follow-up engagement activity.
- Members highlighted that some residents might attempt to conceal contamination within bins, making it difficult for crews to identify issues.
 - The Assistant Director acknowledged this challenge and emphasised that ongoing education and reinforcement of correct behaviours would be essential. Persistent non-compliance by certain properties might require further action in the longer term.

3.9 - Unadopted roads

Members did not raise any comments to the revised policy wording.

3.10 – Bin colours and waste types

- Members asked how the service would respond when residents placed materials in the wrong bin, such as presenting paper and card in the mixed recycling bin.
 - The Assistant Director explained that, although the material itself might be recyclable, the bin presented must align with the correct waste stream because paper and card will be sent directly to the paper mill.

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Crews would be unable to collect bins containing the 'right' material but placed in the wrong container. Clear information and guidance at roll-out would help prevent such errors.

- Members raised concerns about residents who were colour blind or those who might struggle to remember which bin corresponded to each waste stream and suggested that labelled or embossed bin lids be utilised to assist correct action at the point of disposal.
 - The Assistant Director stated that clear calendars and written guidance would accompany the roll-out however where issues were identified, the Council would work with individual residents to provide appropriate support

3.11 – Frequency of collection

Members did not raise any comments regarding this policy.

3.12 – Bin presentation

- Members raised concerns about the requirement for bins to be presented after 6.30pm, noting that this could be difficult or unsafe for some residents, increasing the risk of trips and falls during the dark winter months. Other members noted that an earlier time could contribute to pavement obstruction risks during the busy periods.
 - The Assistant Director acknowledged these concerns but explained that the intent of the policy was to prevent excessively early presentation rather than penalise vulnerable residents and that enforcement would be proportionate and pragmatic. The chosen time aligned with practice across other Lincolnshire authorities.

3.13 – Missed collections

- Members suggested that when a missed collection was reported via the contact centre, residents be provided with a reference number confirming that re-collection had been authorised and therefore offering reassurance against action resulting from reports of incorrect presentation or fly-tipping.
 - The Assistant Director confirmed that this was already standard practice and that residents would continue to receive a reference number when reporting a missed bin. This would provide

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reassurance and could be used as evidence should any queries arise during the re-collection window.

3.14 - Assisted collections

- Members sought clarification on how existing assisted collection arrangements would transfer into the new system.
 - The Assistant Director confirmed that operational processes would ensure appropriate residents remained supported.
- Members stated a general unawareness of the current assisted collections service and requested that the service be more widely publicised so residents knew they could request support.
 - The Assistant Director acknowledged the comment and confirmed that the roll-out period provided a valuable opportunity to promote the scheme more proactively.
- Members asked whether the housing service could help raise awareness through sheltered schemes and tenant communications.
 - The Assistant Director confirmed that engagement sessions with tenant groups had already been arranged and would be used to listen to residents' concerns and gather ideas for improving communication.
- Members requested that the criteria for assisted collections be circulated so that councillors could help promote the scheme through village magazines and local newsletters. Members also suggested that posters be provided for display in community venues, churches and village halls to ensure older or less digitally-confident residents were aware of the support available.
 - The Assistant Director agreed that the criteria information could be shared and that other promotional suggestions would be explored as part of the wider communication plan. It was noted that all applications would continue to be made through the standard waste services contact routes.
- Members discussed whether greater promotion of the scheme might significantly increase demand and asked whether assisted collections could become chargeable if uptake grew.

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- The Assistant Director stressed that the service existed specifically to support those who genuinely needed help and therefore charging would not be appropriate. Eligibility depended on residents' circumstances, including whether another adult in the household could move the bin, and noted that alternative arrangements such as sack collections could be considered where suitable.
- Members sought reassurance that the scheme would not be open to abuse, querying how officers would distinguish between genuine need and inappropriate requests, such as residents seeking assisted collections while away on holiday.
 - The Group Manager – Waste and Fleet responded that Customer Contact staff used a structured series of screening questions to assess eligibility; and
 - The Assistant Director added that whilst an increase in requests for this service was anticipated, where concerns remained, engagement officers could undertake follow-up visits, and crews were also able to report issues through in-cab recording systems.
- Members asked whether assisted collections were reassessed over time, noting that some residents' needs were temporary.
 - The Assistant Director confirmed that all assisted collection records were stored within the system and reviewed periodically with the frequency of review varying depending on individual circumstances.
- Members responded that a clear review period for each case was needed and suggested that Engagement Officers could support this work.
- Members queried the longer-term resourcing of Engagement Officers, given that the need for ongoing reviews might continue beyond the initial roll-out period.
 - The Group Manager – Waste and Fleet advised that Engagement Officers would be in post for three months during the current year, throughout the following year, and a small provision retained for a period into the year after, ensuring continued capacity to support residents and undertake necessary reviews.

3.15 – Additional capacity needs

Members did not raise any comments regarding this policy.

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3.16 – Charging for bins/services

Regarding chargeable item/service (a):

- Members raised concerns in respect of stolen or vandalised bins and questioned whether it was fair for householders to bear replacement costs in such circumstances. Members agreed with charging for replacement for bins only where damage was proven, and the bin was not defective.

Regarding chargeable item/service (b)

- Members asked whether the 'additional bin' accepted any type of waste for collection.
 - The Assistant Director clarified that only materials permitted within the Council's standard waste streams could be collected, and that waste placed in hired bins would still need to comply with segregation requirements.

No comments were made in respect of chargeable item/service (c)

Regarding chargeable item/service (d)

- Members queried whether the charging policy for bins at new properties still applied.
 - The Assistant Director confirmed that, following the Panel's comments at the December meeting, the proposed charge for initial bin provision at new builds had been removed from the policy.

Regarding chargeable item/service (e):

- Members sought clarity on how places of worship would be treated within the policy and on the charging arrangements for village halls and community centres.
 - The Assistant Director explained that whilst all the venues listed were grouped together within the legislation, there was a distinction between premises used wholly for public meetings, which would not be charged, and those generating commercial income through hires or events, which would be charged.
- Members continued the debate on this item as follows:
 - Members highlighted the difficulty of distinguishing between charitable village halls and debated whether places of worship should also be charged;
 - It was also noted that many halls operated on a hire-based model and that such venues should be

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- charged at a commercial waste rate for collections beyond a standard provision;
 - Members noted that some premises lacked storage capacity for multiple bins and queried whether it would be cheaper for such venues to use a single commercial bin rather than separate containers;
 - Members suggested that hall hire agreements should place responsibility upon the hirer to remove rubbish/ take rubbish home however concerns were raised that this could lead to excessive domestic waste;
 - Ultimately members agreed that a consistent approach should apply, and that charging a commercial rate for collections from village halls and community centres should be considered due to the commercial usage. Members agreed this should be clearly reflected in the policy wording as 'authorised locations will be provided with one set of bins if requested and charged at a commercial rate'.
- Members queried the implications for charity shops under the policy.
 - The Assistant Director confirmed that recent changes in legislation required charity shops to pay for the collection and disposal of waste that arose from their operations.
 - Members stressed the importance of early engagement with local charities so they could prepare for the potential impacts and put measures in place to separate reusable donations from waste.

3.17 – Commercial waste

No comments were made in respect of this policy.

3.18 – Collection of bulky waste

No comments were made in respect of this policy.

Additional issues raised:

- Members discussed practical matters, including bin cleaning services, noting that private companies had already begun advertising such services locally.
- Members sought clarification on when the roll-out period would formally end and when the Council would move to

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full enforcement of the new policies.

- The Assistant Director advised that significant engagement support would be provided in the early stages of roll-out and that data such as bin-tagging rates and resident queries would be monitored. Previous experience had suggested a bedding-in period of approximately two months, though the scale of changes meant this could vary. The expectation was that the full policy would be embedded by April 2027.
- The Panel discussed whether they needed to review the final version of the policies prior to consideration by Cabinet.
 - The Portfolio Holder noted that the decision had already been rescheduled from the 20 January 2026 Cabinet meeting to enable further scrutiny by the Panel at the current meeting. The Waste Policies were now scheduled to be presented to Cabinet the following week, on 17 February 2026, and any further delay could impact operational planning, including staffing and engagement strategy development.
- In conclusion, members supported the item continuing to go forward to the 17 February 2026 Cabinet meeting on the proviso that they were satisfied with the amended and fully updated policy following feedback at the current meeting. It was agreed that the full amended policy would be circulated to the Panel on Tuesday 10 February and that any comments by members were to be sent to Democratic Services by Friday 13 February 2026.

82. ANY OTHER ITEMS WHICH THE CHAIRMAN DECIDES ARE URGENT.

There were none.

(The meeting ended at 8.00 pm)

(End of minutes)

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ACTIONS

<u>ACTIONS FROM THE POLICY DEVELOPMENT PANEL MEETING HELD ON 3 FEBRUARY 2026</u>			
MINUTE NO.		ITEM	RESPONSIBLE OFFICER
74. 25/26		<u>EXTENSION OF THE HOUSING LANDLORD STRATEGY</u>	
✓	a)	<p>Members asked if they could be provided with a geographical breakdown of panel applicants and the area where they are from.</p> <p>Minuted meeting response: The Housing Transformation (HRA) Manager confirmed that this could be provided to the members.</p> <p>UPDATE: The Tenant Engagement and Influence Lead provided the members with a geographical breakdown of the Tenant Panel - documents attached as an appendices to the actions.</p>	Adel Gardner/ Beverley Chapman
✓	b)	<p>Members asked if the housing officers supported tenants through the allocations policy and how was this assessed.</p> <p>Minuted meeting response: The Housing Transformation (HRA) Manager would report back to Members with further detail on how under-occupation/suitability assessments were being addressed.</p> <p>UPDATE: We currently prioritise households under occupying social housing on the housing register, and Housing Officers promote this as part of their ongoing discussions with tenants. Our new aids and adaptations policy also includes a clause allowing us to refuse adaptations where a household is under occupying and suitable alternative accommodation is available. We intend to establish a more proactive approach to addressing under occupation during 2026/27, however we are not legally able to require households to downsize.</p>	Adel Gardner/ Beverley Chapman
75. 25/26		<u>DATA PROTECTION AND RECORDS MANAGEMENT POLICY</u>	
✓	a)	<p>Members asked for clarification on what “port data” meant.</p> <p>Minuted meeting response: The Data Protection Officer explained that the term was unclear. It referred to data portability, meaning an individual’s right to request that their data be transferred to another organisation. This is not</p>	Richard Steele

ACTIONS

		<p>automatic; it requires a request. The Data Protection Officer would clarify the terminology in the policy.</p> <p>UPDATE: Actioned.</p>	
*	b)	<p>Members asked if training could be provided on data protection due to the complexity of the material.</p> <p>Minuted meeting response: The Data Protection Officer confirmed he had delivered such training at other councils and could provide sessions on request.</p> <p>UPDATE: Democratic Services were awaiting the 2026/27 schedule of meeting to be confirmed, once this is finalised some dates for training will be provided to the Data protection Officer.</p>	Richard Steele
✓	c)	<p>Members asked if there had been any data protection breaches and if so, how many, and had the breaches been reported to the Information Commissioners Office (ICO).</p> <p>UPDATE: A data breach profile had been shared with PDP members via email.</p>	Richard Steele
✓	d)	<p>Members referred to ‘data portability’ and requested that the policy wording be amended to reflect “right to request” rather than an unconditional right.</p> <p>UPDATE: Actioned</p>	Richard Steele
✓	e)	<p>Members queried the verification of identity processes for verbal SARs.</p> <p>Minuted meeting response: The Data Protection Officer agreed to produce enhanced written guidance outlining how identity checks were carried out for SARs.</p> <p>UPDATE: Actioned</p>	Richard Steele
✓	f)	<p>Members asked if the policy could be amended to explicitly state the six-year retention period for SARS requests.</p> <p>UPDATE:</p>	Richard Steele

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

ACTIONS

		Actioned																					
76. 25/26		<u>SHDC MARKETS POLICY REVIEW</u>																					
✓	a)	<p>Members requested a market-to-market breakdown of the occupancy increases.</p> <p>UPDATE: The quarterly figures for each market, for pitches occupied were as follows:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Spalding Tuesday</th> <th>Spalding Saturday</th> <th>Long Sutton</th> <th>Holbeach</th> <th>Crowland</th> </tr> </thead> <tbody> <tr> <td>Q1 – 342</td> <td>Q1 – 256</td> <td>Q1 – 250</td> <td>Q1 – 76</td> <td>Q1 – 7</td> </tr> <tr> <td>Q2 – 345</td> <td>Q2 – 221</td> <td>Q2 – 262</td> <td>Q2 – 78</td> <td>Q2 – 3</td> </tr> <tr> <td>Q3 – 257</td> <td>Q3 – 180</td> <td>Q3 – 198</td> <td>Q3 – 76</td> <td>Q3 - 5</td> </tr> </tbody> </table>	Spalding Tuesday	Spalding Saturday	Long Sutton	Holbeach	Crowland	Q1 – 342	Q1 – 256	Q1 – 250	Q1 – 76	Q1 – 7	Q2 – 345	Q2 – 221	Q2 – 262	Q2 – 78	Q2 – 3	Q3 – 257	Q3 – 180	Q3 – 198	Q3 – 76	Q3 - 5	Phil Perry and David Smith
Spalding Tuesday	Spalding Saturday	Long Sutton	Holbeach	Crowland																			
Q1 – 342	Q1 – 256	Q1 – 250	Q1 – 76	Q1 – 7																			
Q2 – 345	Q2 – 221	Q2 – 262	Q2 – 78	Q2 – 3																			
Q3 – 257	Q3 – 180	Q3 – 198	Q3 – 76	Q3 - 5																			
✓	b)	<p>Members asked if the Markets Manager was first-aid trained</p> <p>Minuted meeting response: The first aid training status of the Markets Manager would be confirmed and training arrangements made if required.</p> <p>UPDATE: The Markets Manager was not first-aid trained.</p>	Phil Perry and David Smith																				
✓	c)	<p>Members asked whether buskers on the public highway who used amplified sound were subject to the same rules as stallholders.</p> <p>UPDATE: The Markets Team do not have any authority over buskers, as these performers operate independently on public pavements and come and go at their discretion. Since buskers do not register as traders, they are not bound by the same terms and conditions that apply to market traders.</p>	Phil Perry and David Smith																				
✓	d)	<p>Members noted that there was a significant repetition between the revised Market Policy and the Market Terms & Conditions and asked whether the documents could be merged.</p>	Phil Perry and David Smith																				

ACTIONS

		<p>Minuted meeting response; The Assistant Director, Leisure and Local Services Division would review any specific areas of unnecessary repetition before submission to Cabinet.</p> <p>UPDATE: Actioned</p>	
✓	e)	<p>Members asked whether the notice periods for weather-related cancellations could be included in the policy itself, not only in the Terms & Conditions.</p> <p>Minuted meeting response: The Assistant Director, Leisure and Local Services Division responded that the cancellation notice details would be included in the Markets Policy as well as the Terms & Conditions.</p> <p>UPDATE: Actioned</p>	Phil Perry and David Smith
✓	f)	<p>Members queried fee implications should a trader become ill during the trading day.</p> <p>Minuted meeting response: The Assistant Director, Leisure and local Services Division confirmed that a line could be added to the Policy to clarify that fee adjustments would be considered on a case-by-case basis</p> <p>UPDATE: Actioned</p>	Phil Perry and David Smith
77. 25/26		<u>TERMS AND CONDITIONS ALIGNMENT – NEXT PHASE</u>	
✓	a)	<p>Members referred to the car loan policy and asked for the wording to be clarified to reference “<i>interest and associated costs</i>” to accurately reflect the range of potential charges.</p> <p>UPDATE: Actioned</p>	Aileen Whatmore
78. 25/26		<u>SHDC HOUSING COMMENTS, COMPLIMENTS, COMPLAINTS AND COMPENSATION POLICY</u>	
✓	a)	<p>Members questioned the wording relating to timeframes as the policy referred to investigations being completed “as soon as possible,” which was unclear given prescribed statutory timeframes.</p> <p>Minuted meeting response;</p>	Bev Chapman

ACTIONS

		The Tenant Engagement and Influence Lead acknowledged the inconsistency and agreed to amend the wording to ensure alignment with statutory deadlines. UPDATE: Actioned	
✓	b)	Members queried the compensation calculation methods and whether a full breakdown of compensation costs were available for each case. Minuted meeting response: The Tenant Engagement and Influence Lead would review the new compensation framework and ensure clearer internal guidance and Member awareness. UPDATE: Actioned	Bev Chapman
✓	c)	Members requested that the compensation data be appended for context when the report next comes back to the panel UPDATE: Noted for future reports.	Bev Chapman

		<u>TRACKING OF OUTSTANDING ACTIONS FROM PREVIOUS MEETINGS</u>	
MINUTE NO.		ITEM	RESPONSIBLE OFFICER
52. 25/26		<u>25 November 2025</u> <u>SHDC AND S&ELCP POLICY REGISTERS</u>	
✓	a)	Members raised concerns regarding the delay in reviewing the Data Protection Policy. UPDATE: The Data Protection Manager informed the Panel that due to the policy being aligned across the partnership the Policy was not ready for review.	Corey Gooch
53. 25/26		<u>25 November 2025</u> <u>ARTIFICIAL INTELLIGENCE (AI) POLICY</u>	
✓	a)	Members queried if AI tools such as ChatGPT and Google Gemini were blocked for officers.	Corey Gooch

ACTIONS

		<p>UPDATE: The Business Intelligence and Change Manger provided the following update to the members via email. <i>'At present the councils proxy solution has a block on "Generative AI" other than Co-Pilot. There is an exception group to bypass the block where required, copilot is bypassed from this for all users. This will apply anyone that is proxied by the ICT firewall, for example work devices, however councillor iPad's would not be impacted by this'.</i></p>	
✓	b)	<p>Members asked if Copilot could be automatically installed on members' devices. Minuted meeting response: The Business Intelligence and Change Manager agreed this would be ideal and would check with ICT and would report back to the members if this could be arranged.</p> <p>UPDATE The Business Intelligence and Change Manger provided the following update to the members via email <i>'ICT will look into pushing the application for members'.</i></p>	Corey Gooch
✓	c)	<p>Members questioned if it was safe to use ChatGPT on their council iPads for tasks like risk assessments. Minuted meeting response: The Business Intelligence and Change Manager would confirm the official position on ChatGPT access for members.</p> <p>UPDATE: The Business Intelligence and Change Manger provided the following update to the members via email <i>'ICT do not proxy traffic from members iPads and as such do not block their access to ChatGPT, however the recommended AI is licensed CoPilot where possible'.</i></p>	Corey Gooch
✓	d)	<p>Members asked if they could receive training and a demonstration on AI tools like Copilot. Minuted meeting response: The Business Intelligence and Change Manager confirmed that ICT had delivered staff training sessions and would check whether similar training could be arranged for members.</p> <p>UPDATE: A training session could be provided for members, however decisions on licensing and topics would need to be had prior to this and will be discussed.</p>	Corey Gooch

ACTIONS

✓	e)	<p>That an update of the Artificial Policy be presented to the Panel in 12 months.</p> <p>UPDATE: Added to Work Programme</p>	Democratic Services
58. 25/26		<u>25 November 2025</u> <u>NET ZERO ACTION PLAN</u>	
✓	a)	<p>Members asked how other local authorities were progressing with solar mats for fleet vehicles.</p> <p>UPDATE: The Environment and Sustainability Officer attached a case study from a waste management company and provided the following response: I have also spoken to WLDC as there were some concerns with their supplier which has left them with, in their words, a “sub optimal product” and have advised us to look elsewhere, they have recommended a company called Trailer. I have more information should we chose to investigate further including a business case and projections which WLDC have been happy to share. The procurement process would need to be very robust given WLDC’s experience. They haven’t monitored performance for quite some time which I think tells its own story. If we do take this forward, we should trial it on one or two vehicles.</p>	Dean Hemsall
✓	b)	<p>Members asked whether SHDC currently sourced green energy. Minuted meeting response: The Environment and Sustainability Officer would confirm with procurement and update the plan accordingly.</p> <p>UPDATE: The Environment and Sustainability Officer had reached out to both procurement and the energy supplier and it appears the contract for SHDC does not specifically state that electricity should be provided from renewable sources. I have asked for further clarity and to confirm the situation for ELDC and BBC as it appears they do receive “green” energy but waiting for confirmation. I will have a further chat with procurement once I know for sure and it’s something we can certainly look at once I know the terms of the contract. Noted for future action.</p>	Dean Hemsall

ACTIONS

✓	c)	<p>Members queried the strategy for recycling or disposing of EV batteries.</p> <p>Minuted meeting response: 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. Further investigations required and report/update will follow.</p> <p>UPDATE: Recycling isn't yet widespread, but things are improving. Batteries are usually sent back to the manufacturer via the dealership or garage and then passed on to one of the few recycling facilities provided by for example EcoBat and Veolia. EV batteries that are not recycled are classed as hazardous waste and disposed of accordingly with one of the major risks centred around thermal runaway, this is a scenario in which the battery catches fire due to a short circuit etc and can't be extinguished, it has to burn out on its own which can take days. Used batteries can also be repurposed for use as alternative energy storage devices such as storage for Solar. Other Whilst looking into EV battery disposal I have also discovered that recycling of solar panels, inverters and batteries is relatively easy, at a cost. Shouldn't be an issue for several years given the life expectancy of the panels, around 25 years, but worth noting should we ever need to do this.</p>	Dean Hemsall
65. 22/23		<p><u>28 February 2023:</u> <u>SPALDING CEMETERY</u></p>	
*		<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>	Marc Whelan, Andy Fisher

ACTIONS

		<p>UPDATE 3/7/23: Working Group formation is underway and has been circulated to key members (Wellbeing, Health and Heritage & Assets) on the basis that they will look to find other interested members with the strategic Operational & 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 & 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> <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 & 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</p>	
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ACTIONS

		<p>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> <p>UPDATE 3/02/2026 Started a plan on CAD for debate with Councillors shortly.</p>	
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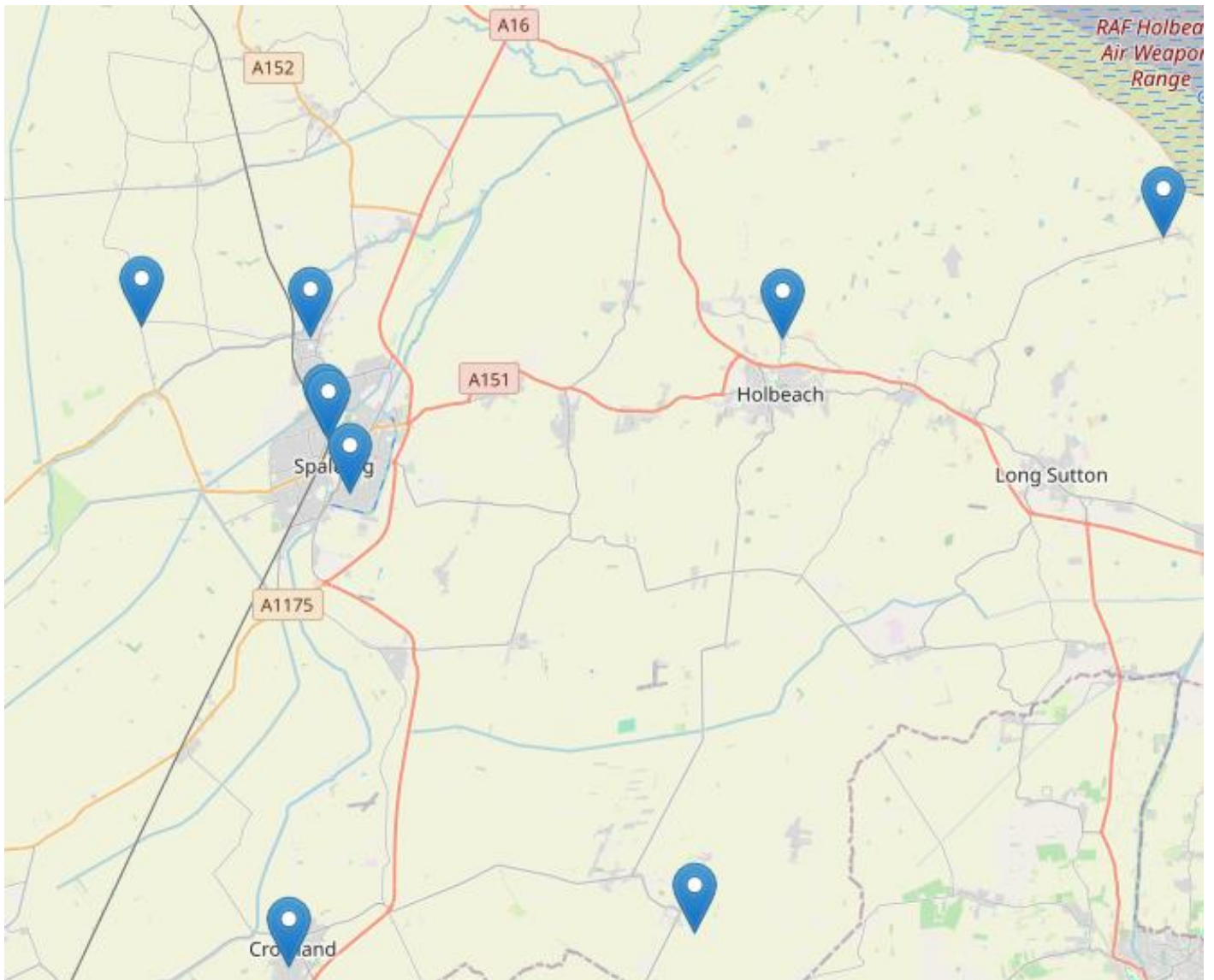
GEOGRAPHICAL AREAS WHERE THE HRA TENANT PANEL MEMBERS LIVE

9 Tenant panel members

5 women

4 men

Age range 49 to 79



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Upcoming Tenant Engagement Events

Tuesday 24th February 2026 – Repairs Roadshow – Trinity Court, Crowland, 2.00pm to 4.00pm – come and give us your views on our repairs service.

Monday 2nd March 2026 – Sheltered Housing Focus Group – St Marys Community Centre, Long Sutton – 9.00am to 10.30am – to look at sheltered service, repairs and waste services

Tuesday 3rd March 2026 – Sheltered Housing Focus Group – Nene Court, Spalding – 11.30am to 1.00pm - to look at sheltered service, repairs and waste services

Tuesday 3rd March 2026 – Meet the Managers – Spring Gardens Community Centre, Long Sutton, 10am to 12pm – meet the managers behind the services, give us your views on your repairs service

Wednesday 4th March 2026 – Tenancy Focus Group and Quality Checkers- Lime Court Spalding PE11 2PY – 9.15am to 11:15am – a look at our ASB service, what is the data telling us – setting a programme for inspections , Housing Officer competency standards

Wednesday 4th March 2026 – Repairs Roadshow – Sezanne Walk, Spalding, 2.00pm to 4.00pm and then 6pm to 7pm - come and give us your views on our repairs service.

Thursday 5th March 2026 – Repairs Roadshow – St Margarets Village hall, Quadring, 10am to 12pm come and give us your views on our repairs service.

Tuesday 10th March 2026 – Repairs Roadshow – St Matthews Community Centre, Sutton Bridge, 10am to 12.30pm come and give us your views on our repairs service.

Wednesday 11th March 2026 – Repairs Roadshow – Tonic Health Holbeach hub – 10am to 12pm - come and give us your views on our repairs service.

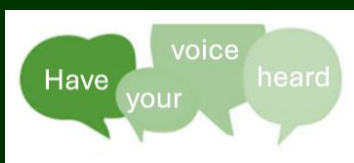
Wednesday 11th March 2026 – Sheltered Housing Focus Group – Hargate Close Community Centre, Fleet - to look at sheltered service, repairs and waste services

Wednesday 11th March 2026 - Complaints Focus Group – Arthurs Avenue Holbeach, - 2.00pm to 4.00pm – to look at our performance and complaints

Thursday 12th March 2026 – Sheltered Housing Focus Group – Arthurs Avenue Holbeach – 11am to 12.30pm to look at sheltered service, repairs and waste services

Wednesday 18th March 2026 – Tenants Forum –venue TBC 10:00am to 12:00am – talks from Ageing Better, Waste Services and our Transformation Team

Tuesday 24th March 2026 – Property Focus Group – Park Court Community Centre Weston, PE12 6RA, 2.00pm to 4.00pm – update on our Repairs and DCM service and performance.



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KEY DECISION PLAN

Issued – 13 April 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

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>Lincolnshire Good Home Alliance and Disabled Facilities Grant funding</p>	<p>To accept and approve the use of Better Care/Disabled Facilities Grant funding received from Lincolnshire County Council to contribute funding to an extension of the Lincolnshire Good Home Alliance Advice and Casework service</p>		<p>Report and any relevant appendices</p>	<p>Cabinet 28 Apr 2026 (Not before 28 Apr 2026)</p>	<p>Jonathan Challen, Safer Communities Service Manager, Adam Newman-Pring, GHA Lead jonathan.challen@e-lindsey.gov.uk</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 Assets and Strategic Planning</u> (Councillor Henry Bingham)</p> <p>Disposal of Land and Property Assets</p>	<p>The Council holds a broad range of land and property assets; some of those provide limited amenity, others present cost risks with many offering alternative opportunity. A number of Executive Decisions will come forward in the short to medium term, all of which will be 'key decisions' taken by the Portfolio holder, declaring a range of land and property assets surplus and seeking to dispose of them. In all cases, due process will be followed so they can be put to the market and disposed/let in the most appropriate way including but not being limited to their freehold disposal or being let on a long or short tenancy.</p>	<p>Portfolio Holder for Assets and Strategic Planning Local ward members Portfolio Holder for Strategic and Operational Housing Housing team</p>	<p>Report and any relevant appendices</p>	<p>Portfolio Holder for Assets & Strategic Planning Before 30 Apr 2026</p>	<p>Andy Fisher, Deputy Chief Executive – Delivery and Assistant Director - General Fund Assets andy.fisher@boston.gov.uk</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>Councillor Charles Nicholas Worth</u> nickworth@sholland.gov.uk</p> <p>Pride in Place Programme</p>	<ul style="list-style-type: none"> • For each local authority to accept the Government's offer of grant funding under the Pride in Place programme for their respective towns (Boston, Skegness, Mablethorpe, Spalding) • To delegate authority to the Director of Economic Development and Assistant Director (Culture and Regeneration) to progress and approve the necessary delivery arrangements for each programme in consultation with the Council's s151 Officer, respective portfolio holder lead and the respective Town/Neighbourhood Chair. • To update the Council's capital and revenue budgets in line with the funding confirmation 		Report and any relevant appendices	South Holland District Council 13 May 2026	Jon Burgess, Programme Manager (Economic Development) jon.burgess@e-lindsey.gov.uk

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>Portfolio Holder for Health & Wellbeing, Conservation & Heritage (Councillor Elizabeth Jane Sneath), Portfolio Holder for Assets & Strategic Planning (Councillor Henry J W Bingham)</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 30 Jun 2026</p>	<p>Emilie Wales, Heritage Manager Emilie.Wales@e-lindsey.gov.uk</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 30 Jun 2026</p>	<p>Pranali Parikh, Director of Economic Development pranali.parikh@boston.gov.uk</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 & Wellbeing, Conservation & Heritage</u> (Councillor Elizabeth Jane Sneath)</p> <p>Crisis and Resilience Fund</p>	<p>To accept funding allocation from Lincolnshire County Council to deliver the Government funded Crisis and Resilience scheme locally. Crisis and Resilience Fund: Guidance for local authorities in England (1 April 2026 to 31 March 2029) - GOV.UK</p>		<p>Report and any relevant appendices</p>	<p>Cabinet 30 Jun 2026 (Not before 18 Apr 2026)</p>	<p>Roxanne Warrick, Strategic Lead - Healthy Living, Wellbeing and Community Leadership roxanne.warrick@e-lindsey.gov.uk</p>
<p><u>Councillor Tracey Carter</u> traceycarter@sholland.gov.uk</p> <p>Award of periodical electrical testing for landlord safety certificate</p>	<p>A contract to be awarded, following full tender process, to an appropriate contractor to undertake the periodical Electrical Installation Condition Report that is required under legislation for the HRA Landlord to obtain.</p>	<p>Tracey Carter - Portfolio Holder</p> <p>Vikki Cherry - Assistant Director for Housing</p> <p>Russell Stone - S151 Officer</p> <p>John Medlar - Assistant Director for Governance</p>	<p>Report and any relevant appendices</p>	<p>Assistant Director – Housing Before 31 Aug 2026</p>	<p>Chris Mycock, Housing Property and Repairs Manager cmycock@sholland.gov.uk</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 Finance</u> <u>Councillor Paul Redgate</u></p> <p>Approval of the award and spend of funding from the UK Shared Prosperity Fund and Rural England Prosperity Fund</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).</p> <p>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</p> <p>Before 31 Aug 2026</p>	<p>Saul Farrell, Senior Programme Manager - Local Growth and Grant Funding Saul.Farrell@sholland.gov.uk</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>Portfolio Holder for Health & Wellbeing, Conservation & Heritage (Councillor Elizabeth Jane Sneath), Portfolio Holder for Assets & Strategic Planning (Councillor Henry J W Bingham)</p> <p>Cultural Services Delivery Arrangements</p>	<p>To consider proposals for the future delivery of cultural services</p>		<p>Report and any relevant appendices</p>	<p>South Holland District Council 15 Oct 2026</p>	<p>Mark Humphreys, Head of Special Projects (Leisure) mark.humphreys@e-lindsey.gov.uk</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

SHDC Policy Register

Directorate	Policy Title	SHDC Approved Date	Policy Review Cycle	SHDC Policy Review Date	Policy Status	Latest Commentary	Policy Owner
Communities and Leisure	Graffiti and Street Art Management Policy	Oct-22	3 Years	Oct-25	In review	Coming to April 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
Finance	Capital Strategy	Feb-26	1 year	Feb-27	Approved		Russell Stone
Finance	Medium Term Financial Strategy	Feb-26	1 year	Feb-27	Approved		Russell Stone
Finance	Treasury Management Strategy (Includes Statement and Clauses)	Feb-26	1 year	Feb-27	Approved		Russell Stone
Finance	Minimum Revenue Provision Policy Statement	Feb-26	1 year	Feb-27	Approved		Russell Stone
HRA	Housing Allocations Policy	Feb-25	2 Year	Feb-27	Approved		Vikki Cherry
Regulatory	Health & Safety Policy	Feb-24	3 years	Feb-27	Approved	Coming to April PDP	Christian Allen
Regulatory	RIPA 2000 Partnership Policy	Feb-24	3 Years	Feb-27	Approved		Christian Allen
HRA	ASB Policy (HRA)	Jul-25	3 Years	Jul-28	Approved	Coming to April PDP	Vikki Cherry
HRA	Damp, Condensation and Mould Policy	N/A	3 Years	Apr-27	Approved	Coming to April PDP	Vikki Cherry
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
Wellbeing and Community Leadership	Private Sector Housing Strategy	Feb-26	3 years	Feb-28	In review		Emily Spicer
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		Vikki Cherry
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 Stone
Governance	Customer Feedback Policy	Dec-24	3 Years	Dec-28	Approved	1 year review commentary - The Customer Feedback Policy, owned by Governance and implemented in January 2025, was reviewed in March 2025 and continues to provide a clear, fair, and consistent framework for managing complaints, compliments, and other customer feedback in line with national oversight standards. The policy has already been reviewed as part of commissioned work linked to the wider customer feedback project, with no minor amendments made under delegation, no issues raised, and no comments requiring further consideration by the Policy Development Panel. Given the recent implementation date, the alignment with national standards, and assurance gained through the commissioned review work, a deeper review is not considered necessary at this stage beyond noting the update on the Policy Register.	John Medler
Governance	Data Protection Policy	Feb-26	3 years	Feb-29	Approved		John Medler
Governance	Records Management Policy	Feb-26	3 years	Feb-29	Approved		Richard Steele
HRA	Housing Comments, Compliments	Feb-26	3 years	Feb-29	Approved		Vikki Cherry
Corporate	Pension Discretions (including Retirement - Early, Ill health normal)	Nov-25	4 Years	Nov-29	Approved		Rachel Robinson

Governance	Whistleblowing	Jan-26	4 Years	Jan-30	Approved	John Medler
Regulatory	Statement of Licensing Policy	Jan-26	5 years	Jan-31	Approved	Donna Hall

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	Proposed Action (LGR)
Communities and Leisure	Graffiti and Street Art Management Policy	Oct-22	Oct-22	Oct-22	3 Years	Oct-25	Nov-25	Dec-25	In review		Emily Spicer	
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)	
Corporate	ICT Third Party Supplier Access Policy	Apr-22	Apr-22	Apr-22	2 years	Jul-26	Jul-26	Jul-26	Approved		Jackie Wright (PSPS)	
Corporate	ICT Systems Acquisition Development and Deployment Policy	Apr-22	Apr-22	Apr-22	2 years	Jul-26	Jul-26	Jul-26	Approved		Jackie Wright (PSPS)	
Corporate	Communications Strategy	Sep-23	Sep-23	Sep-23	3 Years	Sep-26	Sep-26	Sep-26	Approved		James Gilbert	
Corporate	AI Policy	Nov-25	Nov-25	Nov-25	1 Year	Nov-26	Nov-26	Nov-26	Approved		James Gilbert	
Governance	Freedom of Information Policy	Nov-23	Nov-23	Nov-23	3 years	Nov-26	Nov-26	Nov-26	Approved		John Medler	
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
Finance	Capital Strategy	Feb-26	Feb-26	Feb-26	1 year	Feb-27	Feb-27	Feb-27	Approved		Russell Stone
Finance	Medium Term Financial Strategy	Feb-26	Feb-26	Feb-26	1 year	Feb-27	Feb-27	Feb-27	Approved		Russell Stone
Finance	Treasury Management Strategy (Includes Statement and Clauses)	Feb-26	Feb-26	Feb-26	1 year	Feb-27	Feb-27	Feb-27	Approved		Russell Stone
Finance	Minimum Revenue Provision Policy Statement	Feb-26	Feb-26	Feb-26	1 year	Feb-27	Feb-27	Feb-27	Approved		Russell Stone
Regulatory	Health & Safety Policy	Feb-24	Feb-24	Feb-24	3 years	Feb-27	Feb-27	Feb-27	Approved	Coming to April PDP	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 Management Policy (25-30)	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
Governance	Data Protection Policy	Feb-26	Feb-26	Feb-26	3 years	Feb-29	Feb-29	Feb-29	Approved		John Medler
Governance	Records Management Policy	Feb-26	Feb-26	Feb-26	3 years	Feb-29	Feb-29	Feb-29	Approved		Richard Steele
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
Governance	Whistleblowing	Jan-26	Jan-26	Jan-26	4 Years	Jan-30	Jan-30	Jan-30	Approved		John Medler
Regulatory	Statement of Licensing Policy	Jan-26	Jan-26	Jan-26	5 years	Jan-31	Jan-31	Jan-31	Approved		Donna Hall



Report To:	Policy Development Panel
Date:	21 st April 2026
Subject:	Health and Safety Policy – General Statement of Intent and Arrangements
Purpose:	To seek views from Policy Development Panel on proposed amendments to the Councils Health and Safety Policy
Key Decision:	No
Portfolio Holder:	Councillor Paul Redgate Deputy Leader and Portfolio Holder for Finance
Report Of:	Christian Allen Assistant Director Regulatory
Report Author:	Christian Allen Assistant Director Regulatory
Ward(s) Affected:	All
Exempt Report:	No

Summary

South Holland District Council is committed to the health, safety and welfare of employees and others who may be affected by Council activities. The Council are obliged to make provisions for health, safety and welfare according to the Health & Safety at Work etc. Act 1974 and subsequent regulations made under the Act.

The Council recognises that employees are a vital asset and is committed to the prevention of injury and ill health to all employees, and also to the health, safety and welfare of non-employees, who may be affected by the Council's work activities.

Amongst the explicit duties imposed on the Council as an employer, is the requirement to provide a written health and safety policy and to review the Policy from time to time to ensure that it remains compliant and fit for purpose.

Recommendations

That the Policy Development Panel considers the proposed amendments to the Health and Safety Policy (Appendix 1), together with any additional feedback received, and recommends the Policy to Cabinet for approval.

Reasons for Recommendations

It is the statutory duty of every employer to review the health and safety policy from time to time to ensure it remains fit for purpose, up to date and reflects current best practice and guidance.

Other Options Considered

None.

1. Background

- 1.1 Amongst the explicit duties imposed on the Council as an employer, is the requirement to provide a written Health and Safety Policy and to review the policy from time to time to ensure that it remains compliant and fit for purpose.
- 1.2 The last time the Health and Safety Policy was reviewed by the Council was in 2023/24.
- 1.3 As the SELCP matures, there is a need to ensure that our Health and Safety arrangements keep pace with organisational and structural change throughout our workforce and that a positive health and safety culture is sustained and prevails, across the partnership, at each council and from top to bottom of the organisation, through each department and team.

2. Report

- 1.1 The Health and Safety Policy for South Holland District Council sets out the policy framework and means by which the Council seeks to meet the health, safety and welfare obligations that it has to its workforce, contractors and those affected by the undertakings of the Council.
- 1.2 Good practice dictates that the Health and Safety Policy is reviewed regularly to ensure that it remains up to date, fit for purpose and reflects best practice and mandatory guidance.
- 1.3 The current Health and Safety Policy was reviewed by Policy Development Panel on 12th December 2023 and approved by Cabinet on 6th February 2024.
- 1.4 The current policy was reviewed by the Health and Safety Manager at PSPS in collaboration with the Assistant Director Regulatory. The output from this review is the Health and Safety Policy V5.0 attached at appendix 1 and highlighted to show the edits/amendments made from the previous version approved in 2024.
- 1.5 Policy Development Panel are invited to consider the draft Health and Safety Policy V5.0 and to recommend it to Cabinet for approval.

- 1.6 Subject to the deliberations by PDP and any adjustments considered necessary by Cabinet, edits will be adopted, highlights will be removed and the signature of the Leader of the Council and Chief Executive will be added, prior to publication.
- 1.7 Members may wish to be aware that similar changes to the Health and Safety Policies for Boston Borough Council and East Lindsey District Council have also been adopted bringing closer alignment and continuity to key policy documents across the S&ELCP.

2. Conclusion

- 2.1 To seek the views of Policy Development Panel on proposed revisions to the Health and Safety Policy, to ensure that said policy remains up to date, fit for purpose and reflects current best practice and guidance.

Implications

South and East Lincolnshire Councils Partnership

Whilst each sovereign Council is obliged to have their own Health and Safety Policy to comply with legal requirements, Health and Safety Policies for all three Councils have been aligned to ensure that there is continuity in our health and safety arrangements across the Partnership.

Corporate Priorities

Sub Regional Strategy 24.25 – 28.29. Corporate Priority; Efficiency and Effectiveness; To prepare for the future of Local Government. We Will; Prepare our Partnership / Councils for the future of Local Government; recognising that the environment we operate in continues to change.

Staffing

None

Workforce Capacity Implications

None

Constitutional and Legal Implications

Under the Health & Safety at Work etc. Act 1974 and subsequent regulations made under the Act every employer (with over 5 employees) has a duty to provide a written Health and Safety Policy and to ensure that the arrangements for managing the health, safety and welfare of staff and persons affected by the Councils undertakings are up to date and reflect best practice and guidance.

Approval of the Policy is an Executive function of the Council. The Head of Paid Service and Leader of the Council are signatories to the Health and Safety Policy. Approval by Cabinet usually follows consideration of the revised Policy by PDP.

Data Protection

None

Financial

None

Risk Management

Failure to have a fit for purpose health and safety policy in place represents a legal, financial and reputational risk for the Council. As a public body the Council should be leading the way in terms of health and safety conformance.

Stakeholder / Consultation / Timescales

Consultation has been undertaken with the Portfolio Holder Finance, Senior Leadership team, Section 151, Monitoring Officer, Director of Communities and the Partnership Health and Safety Governance Group

Contracts

None

Equality and Diversity / Human Rights / Safeguarding

None

Health and Wellbeing

The Council recognises that employees are a vital asset and is committed to the prevention of injury and ill health to all employees, and also to the health, safety and welfare of non-employees, who may be affected by the Council's work activities.

Climate Change and Environment Impact Assessment

Not Undertaken

Acronyms

S&ELCP – South and East Lincolnshire Councils Partnership

Appendices

Appendix 1

Health and Safety Policy V5.0 (changes highlighted)

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

None

Report Approval

Report author:	Christian Allen, Assistant Director Regulatory
Signed off by:	Jason King, Director of Communities
Approved for publication:	Councillor Paul Redgate, Deputy Leader and Portfolio Holder for Finance

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Health & Safety Policy

General Statement of Intent & Arrangements

(SHDC/HS/Policy)

Issue Number	Author/Approver	Issue Date	Reason for Issue
0.1	PSPS Health & Safety Team	25/03/2020	Redevelopment of previous Policy – Issued only to Sarah Shipley
0.2	SHDC SMT	15/09/2020	Revisions after consultation with SMT
0.3	PSPS Health & Safety Team	22/10/2020	Minor revisions after consultation with SHDC H & S Group
0.4	SHDC PDP	04/11/2020	No Changes
1.0	SHDC Cabinet	15/12/2020	Final Approval
2.0	PSPS Health & Safety Team	25/05/2022	Minor amendments following the formation of the Partnership
3.0	PSPS Health & Safety Team	18/12/2023	Full Review
4.0	PSPS Health & Safety Team		Review for alignment

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Health & Safety Policy – General Statement of Intent

South Holland District Council (hereafter referred to as The Council) is committed to the health, safety and welfare of our employees and others who may be affected by our activities.

We will make provisions for health, safety and wellbeing according to the Health & Safety at Work etc. Act 1974 and subsequent regulations made under the Act. As an organisation, we will comply with our legislative requirements.

We will provide, according to the Health & Safety at Work etc. Act 1974, so far as is reasonably practicable:

- Safe plant and machinery
- Safe systems of work
- Safe handling, storage and use of substances
- Information, instruction, training and supervision so that employees are trained and competent to fulfil their role safely
- Safe access and egress
- Control and maintenance of the workplace, ensuring adequate arrangements with regards to facilities and welfare
- A safe working environment.

The Council recognises that employees are a vital asset and is committed to the prevention of injury and ill health to all employees, and also to the health, safety and welfare of non-employees, who may be affected by The Council's work activities. We have developed various audit/inspection tools as our mechanism for achieving this. In doing so, we will strive for continual improvement in our management of health and safety.

The Council will:

- Recognise that safety is of paramount importance and an integral part of all its activities
- Be committed to the systematic identification of hazards, control of risk and compliance with applicable legal requirements and other requirements to which it subscribes
- Communicate and consult with employees on matters relating to the health and safety, policies, procedures guidance and performance monitoring
- Establish and maintain an effective health and safety management structure with clearly defined safety responsibilities and competencies
- Provide adequate financial, human and physical resources to provide a working environment that protects the health and safety of our employees and those using our facilities.

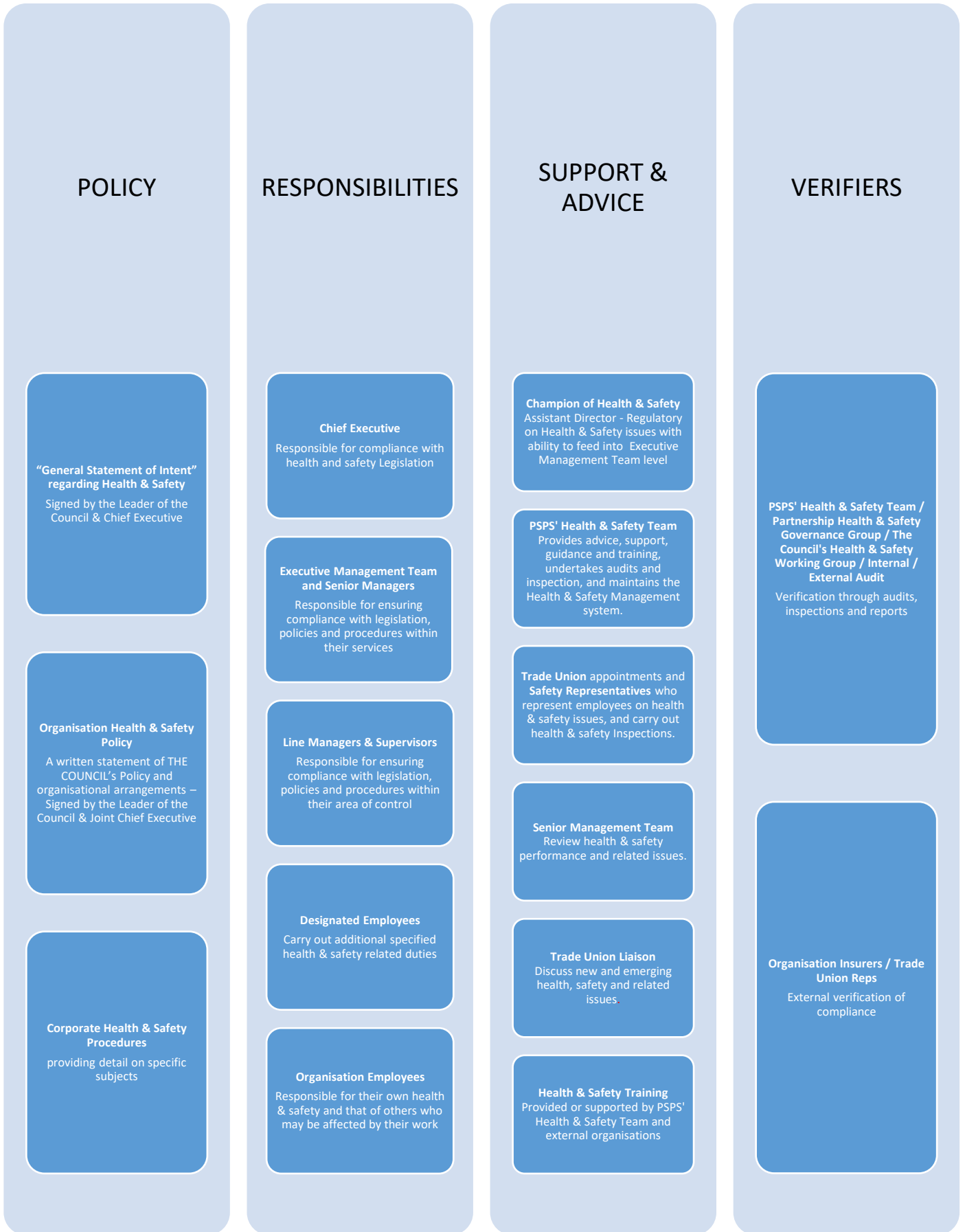
The Chief Executive, Corporate Management team, Senior Managers, Line Managers and Supervisors have defined responsibilities for the management of health and safety, as detailed in the Arrangements under "Responsibilities". Their performance and that of The Council, will be regularly monitored. Details of the management structure and the arrangements for implementing the Policy are contained within this document.

The overall responsibility for this Policy rests with the Leader of The Council and the Chief Executive. They will be assisted by the Corporate Management team and PSPS' Health & Safety Team in ensuring that the Health & Safety Policy is implemented, developed, monitored and reviewed.

Signed: _____ (Leader of The Council) Dated: _____

Signed: _____ (Chief Executive) Dated: _____

THE COUNCIL's Health & Safety Management



Policy Governance

The following table identifies who is accountable, responsible, informed or consulted with regard to this policy.

- Responsible – the person(s) responsible for developing the policy
- Accountable – the person(s) who has ultimate accountability and authority for the policy
- Consulted – the person(s) or groups to be consulted prior to final policy implementation or amendment;
- Informed – the person(s) or groups to be informed after policy implementation or amendment.

Responsible	Assistant Director - Regulatory
Accountable	Chief Executive
Consulted	Partnership Health & Safety Governance Group, The Council's Health & Safety Working Group Members (including representation from unions recognised by The Council).
Informed	ALL employees of The Council

Health & Safety Policy – Arrangements

1. Responsibilities

The Council is responsible for the health, safety and welfare of employees and others who may be affected by their activities.

The Leader of The Council & Elected Members have significant influence and responsibility for health and safety in terms of providing leadership, direction, strategy and appropriate budget setting allowing for the safe management of health and safety. They are not responsible for day-to-day management of health and safety.

Chief Executive shall have overall responsibility for health and safety across The Council, and lead in setting corporate Policy and direction.

Deputy Chief Executives and Assistant Directors (Corporate Management Team) are responsible for:

- Supporting the Chief Executive in meeting their health and safety responsibilities for The Council.
- Ensuring that robust health and safety management systems exist within The Council and that all Service Areas demonstrate compliance.

Partnership Health & Safety Governance Group partnership and are responsible for formally signing off Health and Safety Policies and Procedures, reports and guidance. It will also monitor performance and hold managers to account for non-compliance in their respective areas. These meetings will be chaired by the Assistant Director - Regulatory, who sits on the Corporate Management Team (CMT).

Health & Safety Working Group is responsible for the effective communication, and consultation in matters involving the health, safety and welfare of all those affected by the work of The Council.

Service Managers are accountable to the Deputy Chief Executives and Assistant Directors (Corporate Management Team) for ensuring that The Council's Health & Safety Policy and procedures are complied with within their Service Areas. Duties may be delegated to their Line Managers and Supervisors, but they remain responsible for:

- Being familiar with The Council's Health & Safety Policy and procedures, and any relevant risk assessments and safe systems of work

- Providing leadership on occupational health and safety
- Ensuring the availability of resources essential to establish, implement, maintain and improve the health and safety management system
- Ensure a representative from each service attends the H&S working group and allow adequate time for prior consultation with their workforce, attendance of meetings and for sharing of relevant H&S information with the workforce following meetings
- Defining roles and allocating responsibilities to facilitate effective health and safety management
- Ensuring by means of job descriptions and regular reviews that Line Managers and Supervisors understand and fulfil their specific health and safety responsibilities
- Ensuring that such measures necessary (including investigation, training, reviews, monitoring etc.) are taken to prevent, so far as is reasonably practicable, any breach of health and safety procedures or legislation
- Co-operating with trade union health and safety representatives in accordance with agreed processes
- Ensuring adequate inspections and monitoring of health and safety procedures are undertaken
- Ensuring the systematic assessment of hazards and the effective implementation of risk management systems
- Ensuring the maintenance, servicing and testing of equipment and the keeping of registers and records where necessary is undertaken
- Ensuring the necessary information, instruction, training and supervision is provided to their employees
- Keeping themselves informed of incidents or accidents within their area of control, and ensure that action is taken in order to prevent recurrence
- Report any specified workplace incidents in liaison with The Health & Safety Manager under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulation 2013 (RIDDOR)
- Ensuring the effective safety management of contractors carrying out works within their area of responsibility
- Working with Line Managers and Supervisors to provide adequate time and facilities for The Health & Safety Team to carry out Inspections and Audits and to ensure any advised remedial works are completed
- Ensuring that the necessary resources are available to employees to fulfil their health and safety obligations
- Appointing suitable, trained and qualified “designated employees” to carry out specified health and safety duties within their Service Areas
- Ensuring that emergency plans are in place for unplanned events such as Fire and Evacuation
- Ensuring that First Aid provisions are in place with regards Trained First Aiders and First Aid Equipment
- Working with Line Managers/ Supervisors to ensure staff are fit and well to carry out their duties safely or make reasonable adjustments with advice from Occupational Health, The Human Resources and Health and Safety Teams

Line Managers and Supervisors are responsible for the effective implementation of the Health & Safety Policy and procedures within their area of control. Whilst some duties may be specifically designated, those having a management or supervisory responsibility will be responsible for:

- Ensuring they are familiar with The Council’s Health & Safety Policy and procedures
- The development and review of Risk Assessments and Safe Systems of Work for their teams, tasks and sites
- Communicating and confirming knowledge of Risk Assessments and Safe Systems of Work to employees to ensure that they understand the hazards and associated control measures to carry out works safely
- The provision and delivery of Health and Safety information, instruction, training and supervision to new and existing employees under their duty of care to ensure, as far as reasonably practicable, their health and safety and that of others that may be affected by their work activity
- Line Managers ensure that a first day induction for all new employees, agency workers and contractors
- Line Managers ensure that any information, instruction and training is understood and recorded
- Reporting and investigating all accidents, incidents, near misses and violent and aggressive incidents with a view to taking such measures to prevent recurrence
- Undertaking inspections and monitoring to ensure that safety measures are being maintained and that all employees are following safety instructions, control measures and safe practices
- Ensuring that Team Meetings regularly occur and always include Health & Safety as a standing item, providing opportunities for employees to be consulted on matters which affect their health, safety and wellbeing

- Co-operating with trade union health and safety representatives in accordance with agreed processes.
- Working with the Service Manager to ensure adequate time and facilities for The Health & Safety Team to carry out Inspections and Audits and to ensure any advised remedial works are completed
- Arranging for the provision and issue of Personal Protective Equipment, where necessary. Ensuring it is to the correct standards and is used correctly
- Ensuring all training is completed in a timely manner to ensure compliance
- Ensuring, where employees work away from their normal working location, that their health and safety is suitably managed in line with the relevant Procedure or Risk Assessment for the task
- Ensuring that First Aid provisions are managed, fit for purpose and all checks recorded
- Ensuring that Emergency Plans are communicated to staff, knowledge confirmed all events are recorded and reported
- Confirming with Services Managers to ensure staff are fit and well to carry out their duties safely or make reasonable adjustments with advice from Occupational Health, The Human Resources and Health and Safety Teams

Designated Employees – Management may designate specific employees to carry out specified health and safety duties in addition to their normal duties and responsibilities. This may include for example:

- Champion of Health & Safety
- Health & Safety Working Group Members
- Fire Wardens
- First Aiders / Appointed Persons.

ALL Employees have a duty to take care of their own health and safety and that of others who may be affected by their acts or omissions at work by:

- Being familiar with, and conforming to, The Council's Health & Safety Policy, procedures and/or guidance
- Complying with all Risk Assessments, Safe Systems of Work and safety instructions given by their line management, to ensure that obligations with regards to health and safety are complied with
- Reporting any Health and Safety concerns and unsafe practices to their Line Manager/ Supervisor Reporting all accidents, incidents and near misses to their Line Manager/Supervisor
- Utilizing all tools and equipment provided by The Council in accordance with the manufacturer's, supplier's and/or installer's instructions and report any defects to their Line Manager/Supervisor immediately
- Completing any relevant health and safety training assigned to them by The Council
- Wearing/ using any PPE provided in line with any instruction or guidance given for the task, take care and maintain it and report any defects to a Line Manager/ Supervisor
- Raising concerns and/ or declining to carry out instruction if they justifiably believe it could jeopardise their own health and safety and that of others
- Informing their Line Manager/ Supervisor of any changes to their health that could compromise theirs or others health and safety while carrying out their duties, and complying with any reasonable adjustments advised by Occupational Health, The Human Resources and Health and Safety Teams

PSPS' Health & Safety Team (Competent Persons) oversees the implementation of the Health & Safety Policy and procedures on behalf of The Council, ensuring they comply with current legislation. In particular, PSPS' Health & Safety Team has a responsibility for:

- Providing advice, guidance and support to The Council on health, safety and welfare
- Informing and advising on legislative changes and updates
- Reviewing and advising on Risk Assessments and Safe Systems of Work
- Providing Health and Safety advice where requested on the management of contractors
- Developing and reviewing the corporate Health & Safety Policy, procedures and guidance which provide detail on specific health and safety requirements
- Performing regular audits and inspections on The Council's services in line with their operational risk. Report on and advise on any remedial actions required follow up with Supervisors/ Line Managers, Service Managers, Assistant Directors and Heads of Service to confirm compliance with Health and Safety Policy and Procedures.

- Maintaining an overview of fire safety within The Council by conducting Fire Risk Reviews
- Providing quarterly health and safety performance reports to the Strategic H & S Group and the Health & Safety Working Group and an annual health and safety performance report to the Chief Executive and Corporate Management team
- Attending Health & Safety Working Group meetings to highlight, report and advise on health and safety matters
- Advising on Health and Safety training requirements
- Recording, reviewing and where required investigating, accidents, incidents and near misses and advise on any remedial actions and/ or control measures to prevent reoccurrence
- Communicating any new information on health and safety matters associated to services and operations
- Taking immediate direct action in cases of imminent danger, where that action cannot be taken by Managers or Supervisors
- Liaising with, where required, the Health & Safety Executive (HSE) and other enforcement authorities and external bodies on health and safety issues.

Human Resources Team are responsible for the administration support of staff:

- Ensuring that employee information is accurate and up to date
- Regular reviews with Service Managers and Line Managers/ Supervisors regarding staff who may be required to make reasonable adjustments to carry out their duties safely
- Facilitation and allocation of training through Learning and Development

Contractors and Business Tenants are required to:

- Effectively and efficiently co-operate and communicate with The Council on all relevant health and safety matters before and during their tenure with The Council
- Meet the health and safety standards required of them in the performance of the work activities undertaken with or on behalf of The Council

Safety Representatives, both Trade Union Representatives and Safety Representatives, can exercise their rights to:

- Be in investigations for reportable accidents/incidents
- Represent the views of the employees to Managers and Health and Safety Executive Inspectors
- Undertake inspections of the workplace and formally report back to Management and PSPS' Health & Safety Team
- Attend the H&S working Group
- Be consulted on any changes to corporate and local documentation

Clients, Service Users and Members of the Public are requested to co-operate with the health and safety arrangements put in place by The Council to protect them and the people who are providing a service to them.

2. Partnership Health & Safety Governance Group

The Group oversees the Health and Safety Compliance for the Partnership and is critical to ensuring the Corporate Management Team are informed on their current standing in respect of Health and Safety.

The Group will meet:

- Once every three months
- To raise the profile of health, safety and welfare and promote a positive approach to health and safety working practices within the Partnership.
- To consider and authorise Council and/or Partnership policies, procedures and associated guidance relating to health, safety and welfare, both statutory and otherwise.
- To consider health and safety minutes from the Health and Safety Working Group.
- To monitor health and safety performance in respect of the Service Level Agreement in place with PSPSL.
- To consider the implications and implementation of new/revised health and safety legislation, approved codes of practice (ACOPS) and guidance, and provide advice to the Senior Leadership Team.

- To provide the Senior Leadership Team with a written report of assurance or decision-making requirements.
- Membership of the group will be set out in a Terms of Reference document.

The membership of the Group shall be as follows:

- Assistant Director – Regulatory (Chair)
- Health & Safety Manager (Public Sector Partnership Services Ltd)
- Head of Corporate Services (Public Sector Partnership Services Ltd)
- 3 x Chairs of respective HSWG's
- Other individuals as felt appropriate by the Chair.

3. Health & Safety Working Group

The Council's Health & Safety Working Group exists to ensure effective communication, monitoring of performance and consultation in matters involving the health, safety and welfare of all those affected by the work of The Council.

The Working Group will meet:

- Once every three months
- To raise the profile of health, safety and welfare and promote a positive approach to health and safe working practices within The Council
- To consider and advise on Council policies, procedures and associated guidance relating to health, safety and welfare, both statutory and otherwise, and monitor their effectiveness
- To consider health and safety reports relating to Council service areas, workplaces and/or activities and contribute to any improvement plan
- To note the appointment and consider the activities of Union Safety Representatives as required by the relevant legislation
- To consider, and act as appropriate on, health and safety reports from Trade Union appointed safety representatives or Health & Safety Advisors
- To monitor health and safety performance and completion of proposed recommendations for corrective action as deemed necessary
- To ensure monitoring of planned and unplanned (reactive) health and safety inspections/audits
- To promote and oversee health and safety training in The Council
- To consider the implications and implementation of new/revised health and safety legislation, approved codes of practice (ACOPS) and guidance and where appropriate approve recommended changes to existing corporate policies, procedures, guidance and/or contribute to the development of new ones
- To receive safety data relating to reportable (and non-reportable) accidents, dangerous occurrences and cases of reportable diseases and to monitor trends to ensure the effectiveness of any remedial action taken to prevent future similar incidents
- To consider reports and information provided by inspectors of the HSE under the Health and Safety at Work, etc. Act 1974, or any other relevant enforcement authority and to establish and maintain effective links with such persons
- Consider other relevant health, safety and welfare matters raised by members of the Working Group and Council employees that remain unresolved after management intervention
- To provide a consultation mechanism were employees where health and safety issues can be discussed and escalated as appropriate
- To pass any decision-making requirements up to the Partnership Health and Safety Governance Group (PHSGG)
- Membership of the group will be set out in a Terms of Reference document.

The membership of the Working Group shall be as follows:

- ~~Chair – This may be a rolling position between members of the group.~~
- ~~1 x Health & Safety Advisor(s) (Public Sector Partnership Services Ltd)~~
- ~~1 x Representatives from each Service Area~~
- ~~1 x Representative from Human Resources (Public Sector Partnership Services Ltd) – as deemed necessary~~
- ~~Elected Trade Union representation~~
- ~~Any other Elected Health & Safety representatives (non-union)~~
- ~~Contractors, partners or tenants (where applicable).~~

4. Trade Unions

The Council is committed to working with the recognised trade unions about the appointment of safety representatives, co-operation on inspections and fulfilling 'safety committee' requirements of Regulation 9 of the Safety Representatives and Safety Committees Regulations 1977.

5. Health & Safety in Partnership Working & Contracted Out Work

The responsibilities for health and safety in partnership working and contracted out work will be determined by the nature of the contract between The Council and the partner/contractor.

Construction contracts will be governed by The Construction (Design and Management) Regulations 2015 (CDM 2015), other contracts will be subject to The Council's procurement rules and the Contractor Management procedure, which is available on the intranet.

Contracting out work or services does not exclude The Council from its health and safety responsibilities or risk from prosecution.

6. Enforcements & Penalties

Enforcement and penalties for breaches of health and safety law fall under the Health & Safety Executive in conjunction with the "fee for intervention" and "sentencing" structure.

The HSE can issue a notification of contravention, an improvement or prohibition notice, or a prosecution where they believe there has been a "material breach" of health and safety legislation.

7. Policies, Procedures & Guidance

The Council's Health & Safety Policy and procedures have been developed on specific hazards encountered within The Council. These are available in The Council's Intranet.

8. Health & Safety Training/Competence

The health and safety training requirements for all employees will be identified on recruitment and at the individual's annual appraisal. Key corporate health and safety training is documented by PSPS First4Learning and the Learning and Development Team.

Advice on specialist courses is available from PSPS' Health & Safety Team.

9. Monitoring

The monitoring of this Policy will be carried out by PSPS' Health & Safety Team, actively through health and safety auditing and inspections and reactively by the investigation of accident, incidents, near miss, violent incidents and occupational diseases statistics produced and reported on a regular basis.

All monitoring activity will be reported to the Partnership Health & Safety Governance Group, Strategic, H & S Group and if necessary escalated to the Corporate Management team.

A quarterly Health & Safety Performance Report will be presented to The Council by PSPS' Health & Safety Team.

10. Review

This procedure will be subject to a review every three years by PSPS' Health & Safety Team or sooner should there be changes to health and safety legislation and guidance to/within The Council, or a change of circumstances that dictate a review.

Details of the review and any recommendation will be provided to the Partnership Health & Safety Governance Group and H & S Group.

11. References

- HSE's Website – [Health & Safety at Work etc. Act 1974](#)
- HSE's Website – [Managing for Health & Safety](#)
- [Management of Health & Safety at Work Regulations, 1999](#)

12. Document Control

Version & Approval Control

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Report To:	Policy Development Panel
Date:	Tuesday, 21 April 2026
Subject:	Final Report of the Derelict and Untidy Sites Task Group
Purpose:	To consider the Final Report of the Derelict and Untidy Sites Task Group and provide feedback prior to its consideration by the Cabinet
Key Decision:	N
Portfolio Holder:	N/A
Report Of:	The Derelict and Untidy Sites Task Group
Report Author:	Marc Whelan, Strategic & Operational Property Manager
Ward(s) Affected:	(All Wards);
Exempt Report:	NO

Summary

The Derelict and Untidy Sites Policy was introduced by South Holland District Council in 2022 to address unsightly and neglected properties across the district. The policy aimed to proactively engage with landowners, provide guidance and escalate enforcement where necessary.

At the meeting of Policy Development Panel on 23 September 2025, it was agreed that the Derelict and Untidy Sites Task Group would look at the policy effectiveness, duplication of existing powers, and lack of demonstrable outcomes, and explore what other opportunities were available for consideration.

Recommendations

1. That the members of the Policy Development Panel consider the Task Group's final report, suggest any relevant amendments and consider making recommendations to Cabinet.

Reasons for Recommendations

To ensure the Derelict and Untidy Sites Task Group recommendations are considered.

Other Options Considered

1. Amending the current document- not recommended
2. Do nothing- not recommended

1. Background

- 1.1 That the policy had originally been introduced to provide a structured approach to addressing untidy or neglected sites across the district in the post-COVID period.
- 1.2 The policy had proven largely duplicative of existing statutory powers already available to Planning, Environmental Health, Anti-Social Behaviour, and Building Control teams. Those services routinely deployed legal mechanisms independently of the policy, which had not enhanced enforcement capability.
- 1.3 The policy did not fill a gap in service delivery or governance, nor did it introduce any new powers or frameworks beyond existing procedures. Its presence had not demonstrably improved outcomes or operational efficiency and was considered hollow in practical application.
- 1.4 From a legislative standpoint, robust powers already existed under:
 - Section 215 of the Town and Country Planning Act 1990
 - Environmental Protection Act 1990
 - Anti-social Behaviour, Crime and Policing Act 2014
- 1.5 These powers provided effective routes for intervention without the need for a supplementary policy and if the Council wished to acquire a property or site, it could develop its own business case independently of the policy.
- 1.6 A Derelict and Untidy Sites Task Group was established to assess whether the policy should be retired, retained, or repurposed as an informative document.
- 1.7 The Task Group sought to seek advice from officers including Planning, Environmental Health, Anti-Social behaviour, and Building Control Teams.

2. Report

- 2.1 The Task Group explored alternative options and took on the advice and feedback from consultative bodies.
- 2.2 The Task Group identified overlaps or duplication with existing council powers, departments, or enforcement mechanisms.
- 2.3 Appendix 1 provides the overview and final report of the Derelict and Untidy Sites Task Group.

3. Conclusion

1.1 That the existing Derelict & Untidy Sites Policy should be retired and replaced with a robust guidance signpost document.

1.2 A concise 2–3-page Member and Parish Council Guidance Signpost Document would be developed, covering:

- How to identify relevant issues
- What information to gather
- Which service to contact
- Realistic expectations of timescales
- Links to public reporting methods

1.3 The guidance signpost document would be for Members and Parish Councils, not the general public.

1.4 This new guidance signpost document could enable Members and Parish Councillors to report issues regarding derelict and untidy sites to the direct department, making the process more effective and efficient. Officers would help members direct enquiries internally and provide regular updates to the Member/Parish Council who had reported the issue.

Implications

None

South and East Lincolnshire Councils Partnership

None

Corporate Priorities

None

Staffing

None

Workforce Capacity Implications

Prevents duplication if the current policy is retired and the signpost document is implemented for councillors to reference against.

Constitutional and Legal Implications

None

Data Protection

None

Financial

None

Risk Management

None

Stakeholder / Consultation / Timescales

Working group have spent considerable amount of time discussing with relevant departments to arrive at this conclusion.

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

Appendix 1

Background Papers

No background papers as defined in Section 100D of the Local Government Act 1972 were used in the production of this report.

APPENDICES	
<i>Appendix 1</i>	<i>Task Group Final Report – Untidy & Derelict Sites</i>

Chronological History of this Report

A report on this item has not been previously considered by a Council body

Report Approval

Report author: Marc Whelan, Strategic & Operational Property Manager

Signed off by: Andy Fisher, Deputy Chief Executive

Approved for publication: Councillor Paul Barnes (Chair of the Working Group)

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South Holland District Council

Review of

An Overview and Scrutiny Review undertaken by the Derelict and Untidy Sites
Task Group on behalf of the Policy Development Panel

10th April 2026

Contents

1. Introduction
2. Scope of the Review
3. Membership of Task Group
4. Background to Review
5. Method of Review
6. Summary of Findings
7. Conclusions and Recommendations
8. Financial implications of recommendations
9. Main Sources of Information and individuals contacted during the Review

1. **Introduction**

At the 23 September 2025 Policy Development Panel meeting, a discussion ensued around the potential formation of a new Task Group with the proposed aim of scrutinising the Derelict and Untidy Sites Policy.

The Derelict and Untidy Sites Policy was introduced by South Holland District Council in 2022 to address unsightly and neglected properties across the district. The policy aimed to proactively engage with landowners, provide guidance, and escalate enforcement where necessary.

However, at the Policy Development Panel meeting on 23 September 2025, concerns were raised about the policy's effectiveness, duplication of existing powers, and lack of demonstrable outcomes.

2. **Scope of the Review**

To assess the effectiveness, relevance, and future role of the Derelict and Untidy Sites Policy, and to make recommendations to the Policy Development Panel on whether the policy should be:

- Retired entirely;
- Retained and revised;

Or retained solely as an informative guidance document.

3. **Membership of Task Group**

Councillor David Ashby,
Councillor Margaret Geaney,
Councillor Mark Le Sage,
Councillor Paul Barnes,
Councillor J Reynolds

4. **Background to Review**

That the policy had originally been introduced to provide a structured approach to addressing untidy or neglected sites across the district in the post-COVID period.

The policy had proven largely duplicative of existing statutory powers already available to Planning, Environmental Health, Anti-Social Behaviour, and Building Control teams.

Those services routinely deployed legal mechanisms independently of the policy, which had not enhanced enforcement capability.

The policy did not fill a gap in service delivery or governance, nor did it introduce any new powers or frameworks beyond existing procedures. Its presence had not demonstrably improved outcomes or operational efficiency and was considered hollow in practical application.

- From a legislative standpoint, robust powers already existed under:
 - Section 215 of the Town and Country Planning Act 1990
 - Environmental Protection Act 1990
 - Anti-social Behaviour, Crime and Policing Act 2014

These powers provided effective routes for intervention without the need for a supplementary policy.

Members were informed that if the Council wished to acquire a property or site, it could develop its own business case independently of the policy.

Councillors agreed that a task group should be established to assess whether the policy should be retired, retained, or repurposed as an informative document.

The signpost document (if implemented) would also link to a robust and detailed reporting mechanism where PMP and members could track progress with the relevant department.

5. Method of Review

The task group would:

1. Review the original aims and objectives of the Derelict and Untidy Sites Policy (2022).
2. Identify overlaps or duplication with existing council powers, departments, or enforcement mechanisms.
3. Assess the policy's value as an informative tool.
4. Make clear if the policy should be retained and revised or retired entirely.

In effecting the review, the Group took evidence from the officers listed in section 9.

Exclusions

The task group will not consider private disputes over land or property unless they fall within the remit of the policy.

The task group will not review unrelated planning or enforcement policies.

6. Summary of Findings

Members of the Group unanimously felt that the current 25-page policy was overly long, technical, and not user-friendly with the Group's preference being the production of a practical guidance document, not a policy.

7. Conclusions and Recommendations

The Task Group agreed the following recommendations.

- That the existing Derelict & Untidy Sites Policy should be retired and replaced with a robust guidance signpost document.
- A concise 2–3-page Member and Parish Council Guidance Signpost Document would be developed, covering:
 - How to identify relevant issues
 - What information to gather
 - Which service to contact
 - Realistic expectations of timescales
 - Links to public reporting methods

The guidance signpost document would be for internal use only.

This new guidance signpost document would enable Members and Parish Councillors to report issues from derelict and untidy sites to the direct department, officers would direct enquiries internally and provide regularly updates to the Member/Parish Council who had reported the issue.

That the Policy Development Panel agree to the Derelict and Untidy Sites Policy being retired and recommend such to Cabinet for approval.

8. Financial Implications of Recommendations

None

9. Main Sources of Information and individuals contacted during the Review

The Strategic and Operational Property Manager
The Planning Enforcement Team Leader
The Group Manager – Building Control
The Environment Protection Team Leader
Assistant Director – General Funds Assets

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Report To:	Policy Development Panel
Date:	21 st April 2026
Subject:	Anti-Social Behaviour (ASB) and Hate Crime Policy for the Housing Landlord Service
Purpose:	To consider the Anti-Social Behaviour (ASB) and Hate Crime Policy for the Housing Landlord Service
Key Decision:	N
Portfolio Holder:	Cllr Tracey Carter, Portfolio Holder for Strategic and Operational Housing
Report Of:	Vikki Cherry, Assistant Director - Housing
Report Author:	Adel Gardner, Change and Improvement Manager (HRA)
Ward(s) Affected:	All Wards
Exempt Report:	N

Summary

This report presents the new Anti-Social Behaviour (ASB) and Hate Crime Policy for the Housing Landlord Service and provides an update on the ASB Framework that was adopted in July 2025. The report seeks the panel's views to ensure robust oversight and drive continuous improvement.

Recommendations

1. That the Policy Development Panel considers the Tenant feedback on the Anti-Social Behaviour (ASB) and Hate Crime Policy for the Housing Landlord Service.
2. That the Policy Development Panel considers and provides feedback on the Anti-Social Behaviour (ASB) and Hate Crime Policy for the Housing Landlord Service and recommends it to Cabinet for adoption.
3. That the Policy Development Panel supports the recommendation to Cabinet to delegate minor operational amendments or legislative changes to the Assistant

Reasons for Recommendations

The updated Policy reflects both strengthened regulatory requirements and tenants' aspirations for an improved service. Adoption demonstrates the Council's commitment to responding to ASB, listening and acting on tenant feedback.

Other Options Considered

1. Do Nothing - The Council could have chosen to retain the existing ASB and Hate Crime arrangements without introducing a new Policy. However, this option was discounted as it would not meet strengthened regulatory requirements under the Social Housing (Regulation) Act 2023, nor address findings from the 2025 regulatory inspection, tenant feedback or an action in the ASB Framework 2025.

1. Background

- 1.1 As per the Social Housing (Regulation) Act 2023, the Regulator of Social Housing (RSH) has placed a greater emphasis on ensuring that registered providers take a proactive and transparent approach to preventing and tackling anti-social behaviour (ASB), supporting tenants, and maintaining safe, well managed neighbourhoods.
- 1.2 The RSH, Neighbourhood and Community Standard required outcome states:
 - 2.2.1 *Registered providers must have a policy on how they work with relevant organisations to deter and tackle ASB in the neighbourhoods where they provide social housing.*
 - 2.2.2 *Registered providers must clearly set out their approach for how they deter and tackle hate incidents in neighbourhoods where they provide social housing.*
 - 2.2.3 *Registered providers must enable ASB and hate incidents to be reported easily and keep tenants informed about the progress of their case.*
 - 2.2.4 *Registered providers must provide prompt and appropriate action in response to ASB and hate incidents, having regard to the full range of tools and legal powers available to them.*
 - 2.2.5 *Registered providers must support tenants who are affected by ASB and hate incidents, including by signposting them to agencies who can give them appropriate support and assistance.*
- 1.3 In response to these strengthened regulatory expectations, the Council adopted the Anti-Social Behaviour (ASB) Framework for the Housing Landlord Service in 2025. The Framework was developed to provide a clear, consistent, and partnership

driven approach to preventing, identifying, and responding to ASB across the district.

- 1.4 In 2025, the Council was inspected under the new consumer regulation regime. The Regulator found evidence that the Council works effectively with partner organisations to deter and tackle ASB, with clear reporting routes available online and in the annual tenant report. The inspection also recognised positive tenant engagement to improve the service, while highlighting the need to strengthen reporting and tracking through better use of ASB trends and outcome data.
- 1.5 The Council's annual Tenant Satisfaction Measures (TSM) feedback aligned with national trends, where ASB consistently emerges as an area for improvement across the housing sector. Whilst the Council's results reflect this wider national pattern, the Council is committed to addressing the issue proactively. In response to these findings and to further strengthen the approach to managing ASB, the Council is now introducing a new ASB and Hate Crime Policy for the Housing Landlord Service that provides a clearer, more consistent framework for prevention, reporting, case handling and partnership working.
- 1.6 Since adopting the Housing Landlord ASB Framework in July 2025, the Council has made steady progress in delivering the priority actions set out within it. The Framework was designed to strengthen early intervention, improve case management, and enhance partnership working. Key areas of progress to date include:
 - Clearer signposting on the website and promotion of reporting routes have increased accessibility for tenants.
 - Working closely with the Safer Communities Team and wider Safer Lincolnshire Partnership, improving coordination and response times.
 - A dedicated ASB Lead Officer role within Housing has been established to provide tenants with a consistent and reliable point of contact throughout their case. The ASB Lead Officer will coordinate case activity, liaise with partners, and maintain regular contact to ensure tenants are supported and kept fully informed.
 - Tenants have contributed to the development of the new Policy, and the Framework's commitment to co design has been strengthened through the Tenant Influence Panel's early involvement in reviewing the draft.
 - Introducing new ways for tenants to provide feedback with the introduction of satisfaction surveys for ASB case handling.

Delivery work will continue throughout 2026, forming the basis for ongoing improvement. Full ASB Framework update is provided in appendix 4.

2. Report

- 2.1 The purpose of the Anti-Social Behaviour (ASB) and Hate Crime Policy is to provide a clear and consistent approach for how the Housing Landlord Service prevents, manages, and responds to ASB and hate incidents affecting Council tenants. The Policy sets out the Council's statutory responsibilities, service standards, partnership

arrangements, and expectations for tenants, residents, and perpetrators. It reflects updated legislation, regulatory requirements, and tenant feedback.

2.2 Tenants have told the Council that improvements are needed in communication, clarity of process, timeliness of updates, and visibility of case outcomes. A variety of engagement activities were held through February and March 2026 where the ASB Policy was discussed including:

- Tenancy Focus group
- Sheltered Focus groups
- Surveys (online and hard copy)
- Practice Tenant Scrutiny Panel

Tenants highlighted a need for clearer definitions of ASB, promotion of reporting routes, stronger support for victims, and more consistent case handling standards.

2.3 Although the Tenant Influence Panel has not yet formally convened for its first official meeting, members have been actively participating in ongoing training. We wanted to use these sessions as an opportunity for tenants to apply and develop their scrutiny skills using real, live policy work. As part of this approach, the Draft ASB Policy was brought to the Tenant Influence Panel's practice session on 25 March, allowing tenants to test their developing skills and provide early insight and feedback as part of the policy development process.

2.4 The Panel welcomed the fact that feedback from tenant engagement had been fully considered, particularly in relation to the revision of timescales, which was also supported by the tenant survey. They suggested that a short summary or "key facts" version of the policy would improve accessibility, and officers confirmed that summary versions are routinely produced and made available to tenants once policies are adopted. The Panel also supported the creation of a video version of the policy, and officers agreed to progress this. Discussion took place around the use of terms such as "victim" and "perpetrator," with a recommendation that Step 1 refer instead to "making initial contact with the person reporting," before transitioning to "victim" where appropriate; officers agreed with this and amended the policy accordingly. Finally, the panel proposed exploring A5 fridge magnets containing key service contacts such as ASB, Damp Condensation and Mould and Repairs to support tenant access to information, and officers would explore options and associated costs.

2.5 The Policy has been shaped jointly with tenants to reflect this feedback. Full engagement activity details are in appendix 2.

2.6 The Policy directly supports the Housing Landlord ASB Framework adopted in July 2025, which sets the strategic direction for prevention, early intervention, partnership working, victim support and tenant involvement. The Framework identified the creation of a new ASB and Hate Crime Policy as a priority action for improving service delivery and strengthening consistency across the district.

2.7 The approach set out in the Policy uses the model of the Safer Communities Team and wider Safer Lincolnshire Partnership as a base line however following tenant feedback, timescales for responding and keeping victims informed have been adjusted.

- 2.8 The Policy introduces a number of strengthened and clarified elements, including:
- A clear definition of ASB and behaviours not classified as ASB.
 - A victim-centred approach based on early risk assessment and ongoing support.
 - A structured case management model with defined timescales.
 - A single case management system shared with key partners (including the Police).
 - Strengthened reporting routes and communication standards.
 - A wider range of informal and formal tools and powers for proportionate action.
 - Clear expectations for partnership working and information sharing.
 - Improved monitoring and reporting of ASB trends and outcomes.
- 2.9 The Policy strengthens how performance is monitored, including monthly reporting through the Housing Landlord Service Compliance and Performance Clinic, quarterly reporting to the Performance Monitoring Panel, and annual reporting to tenants via the annual report. The Policy also commits to reporting trends and performance to the new Tenant Influence Panel during 2026/27.
- 2.10 The Policy will be reviewed within three years of publication or sooner if required due to legislative changes or service improvements. Minor operational amendments may be approved by the Assistant Director for Housing in consultation with the Portfolio Holder for Strategic and Operational Housing.

3. Conclusion

- 3.1. The introduction of the Anti-Social Behaviour (ASB) and Hate Crime Policy strengthens the Council's commitment to creating safe, supportive, and well managed neighbourhoods. It directly responds to the Social Housing (Regulation) Act 2023, the findings of the 2025 regulatory inspection, and consistent tenant feedback highlighting the need for clearer processes, improved communication, and more timely responses.
- 3.2. The Policy provides a clearer, more consistent and victim-centred approach for preventing, reporting and managing ASB, supported by strengthened partnership working, improved data recording, and enhanced performance monitoring. It also aligns closely with the Housing Landlord ASB Framework 2025 and the expectations of the Regulator of Social Housing and the Housing Ombudsman.
- 3.3. The Policy represents a significant step forward in delivering a more proactive, consistent, and tenant focused approach to tackling ASB and hate incidents across the district with tenants shaping the approach.

Implications

South and East Lincolnshire Councils Partnership

This policy aligns with the South and East Lincolnshire Councils Partnership's Sub-regional Strategy under the theme of Safe and Resilient Communities. It also supports South Holland District Council's local priority to engage with housing tenants to help shape how services are delivered across the district.

Corporate Priorities

The Policy aligns with:

- Housing Landlord Service Anti-Social Behaviour Framework 2025. A key action with a priority, prevention and early intervention, focusing on the creation of a new ASB and hate crime policy to be developed with tenants.
- The policy also supports the SHDC Housing Landlord Strategy 2024-27, specifically it's focus on delivering quality homes and creating connected neighbourhoods. It aligns with the strategy's goals and objectives in promoting safe, well-maintained communities and working effectively with tenants and partner organisations to reduce ASB.
- This policy also contributes to the work of the South & East Lincolnshire Community Safety Partnership by supporting collaboration with the Safer Communities Team to tackle ASB and promote the reporting of hate crime and ASB.

Staffing

None.

Workforce Capacity Implications

The Housing Landlord Service currently has a designated ASB Lead Officer responsible for leading on the ASB service offering. As this is a single Officer function, there is a minor workforce implication in ensuring service continuity during periods of absence. To mitigate this, the Senior Housing Officer will act as the designated deputy and will assume responsibility for delivering the ASB procedures, including case management and communication requirements. This arrangement ensures that all ASB reports continue to be responded to within agreed timescales and that compliance with regulatory expectations is maintained.

Constitutional and Legal Implications

None.

Data Protection

None.

Financial

None.

Risk Management

None.

Stakeholder / Consultation / Timescales

In developing this policy, the Council's Housing Landlord Service has consulted:

- Tenants via the Tenancy Focus Group and Quality Checkers workshop on 4 March 2026.
- Tenants, residents and partners (such as the police), through an online survey that was sent directly to individuals who have accessed the anti-social behaviour service.

- Texts and emails sent to all Tenants on the Tenant Forum and who registered an interest in getting involved.
- Tenant Scrutiny Panel
- Housing's ASB Lead, Housing staff, Tenant Engagement Lead, Director for Communities, Assistant Director for Housing and Portfolio Holder for Strategic and Operational Housing.
- The South & East Lincolnshire Council Partnership Safer Communities Team.

Full engagement details can be found in appendix 2.

Capsticks solicitors were engaged in developing this Policy.

Reputation

The introduction of the ASB and Hate Crime Policy strengthens the Council's reputation as a proactive, responsible, and tenant-focused landlord.

Contracts

None

Crime and Disorder

The introduction of the ASB and Hate Crime Policy is expected to have a positive impact on reducing crime and disorder across the district. By strengthening early intervention, improving access to reporting routes, and enhancing partnership working with the Police and the Safer Lincolnshire Partnership, the Policy supports a more coordinated and proactive response to ASB and hate incidents.

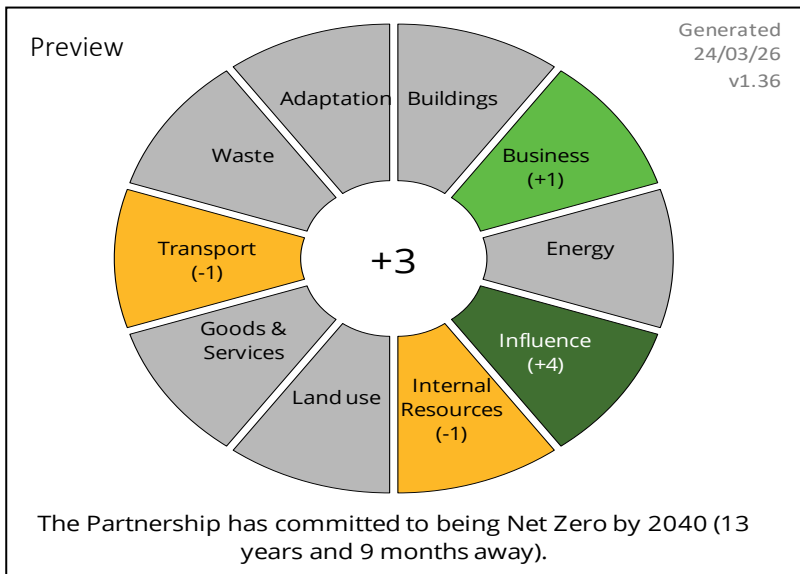
Equality and Diversity / Human Rights / Safeguarding

The Equality Impact Assessment (appendix 3) demonstrates that while some groups, particularly disabled tenants, older residents and those at risk of hate crime may be disproportionately affected by ASB, the policy contains strong and appropriate mitigation measures to ensure equitable access and support. Overall, the assessment confirms that the policy complies with equality duties and can be implemented without causing unlawful or unjustified disadvantage to any protected group.

Health and Wellbeing

The ASB and Hate Crime Policy is expected to deliver positive impacts on the health and wellbeing of tenants and communities. By strengthening early intervention, improving support for victims, and ensuring timely responses to ASB, the Policy helps reduce stress and fear experienced by people affected by ASB. Clear communication, consistent case handling, and improved partnership working also contribute to creating safer neighbourhoods where tenants feel supported and listened to.

Climate Change and Environment Impact Assessment



The Climate Impact Assessment shows that the ASB and Hate Crime Policy has minimal environmental impact overall. Positive contributions arise through improved digital communication, strengthened partnership working, and community engagement, each scoring +1 for supporting more efficient, low impact service delivery. Minor negative impacts relate to the limited staff travel required for home visits. Overall, the policy is assessed as low impact with no significant environmental risks

Appendices

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

Appendix 1	Anti-Social Behaviour (ASB) and Hate Crime Policy for the Housing Landlord Service
Appendix 2	Consultation outcome report
Appendix 3	Equality Impact Assessment
Appendix 4	ASB Framework Update

Background Papers

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

Document Title	Where the document can be viewed
RSH Neighbourhood and Community Standard	April 2024 - Neighbourhood and Community Standard FINAL.pdf
Housing Ombudsman – Learning from severe maladministration	Learning from severe maladministration – July 2025
Housing Ombudsman Spotlight report on Noise complaints	Spotlight on: Noise Complaints -October 2022

Chronological History of this Report

None.

Report Approval

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SHDC Housing Landlord Services

Anti-Social Behaviour and Hate Crime Policy

2026 - 2029

Access for All Statement:

We can provide this information in other languages and formats including large print, Braille, audio recording. Please contact us to request this:

Email: info@sholland.gov.uk

Phone: 01775 761161

Visiting our Council offices, Priory Road, Spalding, PE11 2XE

Document Control

Document Title:	SHDC Housing Landlord Services, Anti-Social Behaviour and Hate Crime Policy		
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1. Background

- 1.1 South Holland District Council (SHDC) is committed to making sure our homes and communities are safe, welcoming, and free from the negative effects of crime and Anti-social behaviour (ASB). We take a victim centred approach to all reports of ASB, working closely with our partners to provide ongoing, meaningful support to victims throughout the management of their case and, following resolution where required.
- 1.2 This policy sets out how we will prevent, tackle and manage ASB and Hate crime impacting South Holland District Council tenants and tenants of properties managed by SHDC.
- 1.3 The policy meets our statutory obligation under the Housing act 1996, Anti-Social Behaviour Act 2003 and, Anti-Social Behaviour Crime & Policing Act 2014 which requires social landlords to prepare and publish a policy and procedures in relation to ASB. It also meets the expectations of the Regulator of Social Housing Consumer Standards (Neighbourhood and Community Standard) and Code of Practice.
- 1.4 This policy was developed following extensive consultation with tenants of South Holland District Council to ensure their views were heard and reflected in the decision-making process. Elected members were also consulted as were agencies and organisations involved in tackling and managing ASB.
- 1.5 Because ASB can sometimes be viewed differently by different people, we may receive reports that do not meet our definition of ASB. When this happens, we will manage these issues under our Good Neighbourhood Guide or signpost to other agencies for support.
- 1.6 For the purposes of this document, any reference to ASB also includes Hate crimes , unless stated otherwise.

2. Who the policy applies to

- 2.1 This policy applies to all residential tenants of South Holland District Council, as well as tenants of properties that the Council manages on behalf of other landlords. Any reports of ASB that do not involve homes managed by South Holland District Council will be handled under the Council's wider policies and procedures.

3. What is ASB and Hate crime?

3.1 The Anti-Social Behaviour, Crime and Policing Act 2014 defines ASB as:

- a) conduct that has caused, or is likely to cause, harassment, alarm, or distress to any person,
- b) conduct capable of causing nuisance or annoyance to a person in relation to that person's occupation of residential premises, or
- c) conduct capable of causing housing-related nuisance or annoyance to any person.

Crime and criminal behaviour

3.2 In some cases, ASB may also amount to a criminal offence. Where this is the case, victims and witnesses will be encouraged to report the matter to the Police.

Harassment, and hate crime

3.3 Harassment is targeted, deliberate behaviour that causes someone to feel intimidated, upset, humiliated or threatened. Examples of harassment include:

- Violence or threats of violence towards a person or their property
- Abusive, insulting or offensive language or behaviour
- Intimidation, including stalking, following someone, or loitering outside their home
- Deliberate attempts to humiliate or degrade an individual
- Targeted, repeated nuisance aimed at a specific person.

3.4 Hate crime as defined by the Police and the Crown Prosecution Service is "Any criminal offence where the offender has either:

(i) demonstrated hostility based on race, religion, disability, sexual orientation or transgender identity; or

(ii) been motivated by hostility based on race, religion, disability, sexual orientation or transgender identity

The law recognises five types of hate crime on the basis of:

Race

Religion

Disability

Sexual orientation

Transgender identity

- 3.5 Hate crime legislation includes 'free speech' provisions. These recognise that certain views and opinions on political speech or speech discussing political or social issues would not, on its own, amount to a criminal offence. The provisions draw distinction between strongly held but lawful views and forms of expression which are intended to stir up hatred, and which therefore constitute a criminal offence.
- 3.6 Freedom of expression is a fundamental right protected by the Human Rights Act 1998. In most cases, expressing opinions, including those that may be controversial or cause offence, does not amount to a criminal offence.
- 3.7 For example, the mere expression of 'gender critical beliefs' (which refer to the view that biological sex is fixed and distinct from gender identity) is protected under 'philosophical belief' in the Equality Act 2010. The mere expression alone of 'gender critical' beliefs, are protected in law. While some people may find these views as offensive, causing offence alone does not amount to a criminal offence. To constitute an offence under hate crime legislation, the speech or behaviour in question must be threatening, abusive or insulting and be intended to, or likely to, stir up hatred.
- 3.8 Special regard will be given to the impact on freedom of expression. This includes, but is not limited to, debate, humour, satire and personally held views which are lawfully expressed. When responding to reports of hate crime, we will consider whether it is necessary and proportionate to limit this right, including whether it is appropriate to record personal data about the individual concerned.

Domestic abuse

- 3.9 Domestic abuse is an incident or pattern of incidents of controlling, coercive, threatening, degrading or violent behaviour, including sexual violence, in the majority of cases by a partner or ex-partner, but also by a family member or carer.
- 3.10 Behaviour is abusive if it consists of any of the following:

- Physical or sexual abuse
- Violent or threatening behaviour
- Controlling or coercive behaviour
- Economic abuse
- Psychological, emotional or other abuse

3.11 Some reports of ASB, such as frequent arguments, shouting or banging, may indicate that domestic abuse is occurring.

3.12 All cases of domestic abuse or suspected domestic abuse will be investigated. Our website (www.sholland.gov.uk/article/27862/Domestic-abuse) sets out how to report domestic abuse, our commitments as landlord and, the support available.

4. Behaviour not classified as ASB

4.1 There are some types of behaviour which, although may cause inconvenience or irritation to neighbours, are not considered to be ASB requiring remedial actions. Examples include:

- Noise or disturbance from children when they're playing at reasonable hours
- Family disputes at reasonable levels and hours
- Children crying
- Smells from cooking including BBQs
- Sounds of normal living such as opening and closing of doors, going up and down stairs, hoovering, washing machines, TV and music at a reasonable volume.
- DIY during reasonable hours.
- Minor car repairs (Car repairs carried out reasonably, without prolonged noise, obstruction, or hazardous behaviour)
- Parking lawfully outside another neighbour's home
- One-off parties such as BBQs, birthday or Christmas parties providing they don't cause an unacceptable disturbance. (A one-off event refers to occasional, infrequent activity that is not part of a continuing pattern. Single incidents will not be treated as ASB unless they cause significant and unreasonable disturbance.)
- Clashes of lifestyle, including cultural differences
- People gathering socially, unless they are being inconsiderate and intimidating to

individuals

- Smoking cigarettes
- Minor personal differences such as 'dirty looks' or fall outs between children
- Putting rubbish out on the wrong day
- Disputes regarding fencing where the fencing is within the property boundary.
(Tenants are responsible for fencing).

4.2 Where a report is not considered to be ASB, it will be passed to a Housing Officer for appropriate follow-up and resolution. The Senior Housing Neighbourhood Officer will monitor these cases and ensure that they're dealt with in accordance with the Tenancy Management Policy.

4.3 We recognise that some behaviours which appear to constitute ASB may arise as a direct result of a resident's disability, mental illness, neurodiversity, cognitive impairment, or other health-related condition. Such cases will be approached through a proportionate response, in line with safeguarding duties and equality legislation.

4.4 The Council will not take action where noise arises from normal, everyday activities, and the disturbance is due to environmental factors such as poor sound insulation or the absence of carpets, rather than unreasonable behaviour. However, in certain circumstances, including cases of financial hardship, the Council may offer support to help tenants address these environmental factors.

5. How to report ASB and Hate Crime

5.1 Tenants and residents can report ASB in a variety of ways:



by using our online form available at: <https://www.sholland.gov.uk/reportasb>



by calling us on 01775 761161



by emailing us at asbhousing@sholland.gov.uk



by speaking to a Housing Officer, attending a scheduled appointment or coming along to a Meet and Greet session (Sheltered Housing tenants)

5.2 Tenants can report Hate Crime using the options below:



Online via the [True Vision](https://www.true-vision.org.uk) national Police scheme: www.report-it.org.uk



by calling 101



by visiting a [police station](https://www.lincs.police.uk/contact/find-a-police-station/): www.lincs.police.uk/contact/find-a-police-station/

5.3 While we encourage the reporting of ASB, there are occasions when reporting may not be appropriate. This may include situations where:

- The report is malicious, false, or exaggerated.
- The reports relate to issues we have already addressed, with no new information provided.
- The frequency and volume of contact is such that it places a disproportionate strain on Council resources and impacts our ability to provide a fair and consistent service to all customers.

5.4 We will seek to understand the reasons behind this type of reporting. For example, we will consider whether the contact stems from an unmet support need, whether we have missed an opportunity to intervene, or whether a previous decision was incorrect. However, we may need to take appropriate action, in accordance with our corporate policies and procedures, including the [Council's Vexatious Policy](#), to manage instances of inappropriate reporting.

6. Our Service Standards

6.1 Our Service Standards explain how we will prevent and address ASB affecting our Council housing tenants.

We will, where possible and proportionate:

- Meet the needs of our diverse communities through a fair and consistent approach
- Work with tenants, agencies and community groups
- Take action (including enforcement action) where necessary
- Make reporting ASB easy and accessible
- Where appropriate, use mediation to prevent cases escalating
- Respond to cases within set timeframes

- Review cases where tenants request this
- Support victims and provide regular updates throughout the case
- Support and develop our workforce
- Maintain accurate records
- Sustain tenancies where appropriate
- Monitor our performance
- Prevent ASB through proactive steps and early involvement
- Develop our service using tenant feedback
- Prioritise cases based on risk and harm
- Communicate in clear, neutral and tailored language

7. Meeting the needs of our diverse communities

- 7.1 We aim to create neighbourhoods that are welcoming and safe for everyone, while recognising that some individuals or groups may be targeted or disproportionately affected by Hate crime and ASB because of one or more of their protected characteristics which can include their age, disability, gender reassignment, race, religion or belief, sex or Sexual orientation.
- 7.2 When responding to a report of ASB, we will record any information a tenant or resident provides that may indicate they are being targeted or disproportionately affected due to a protected characteristic. All personal information will be handled in line with data protection requirements and will not be shared without the resident's consent.
- 7.3 We will ensure that victims and witnesses receive an appropriate response that reflects their individual needs. This may involve adjusting our communication methods and tailoring our approach to meet each individual's specific circumstances and requirements. Where required, we will provide additional communication or support arrangements, such as access to translation services or the presence of a support worker or advocate during home visits, meetings and telephone calls.
- 7.4 To ensure that any immediate risk of harm or signs of vulnerability are identified, we will carry out risk assessments, recognising that the level of risk associated with ASB may change over time or as new information becomes available.
- 7.5 If a case involves a vulnerable adult or a child, we will act in accordance with the Safeguarding Adults or Safeguarding Children procedures, making referrals to specialist

services where concerns arise.

- 7.6 We will also adapt our communication and intervention methods to reflect the individual needs of perpetrators or suspected perpetrators.
- 7.7 When tenants and residents report ASB, we will ask for information on their protected characteristics as well as gathering the same information from perpetrators/suspected perpetrators. This information is optional.

8. Our approach to managing cases

- 8.1 The Council uses a single Case Management platform to share and record information which is accessible to partner agencies including the Police. This allows organisations and agencies to view and share information, supporting a collaborative approach to managing reports.
- 8.2 We operate a structured approach to managing reports of ASB, which includes assessing and categorising risk levels and applying defined timescales.
- 8.3 For all ASB cases, a Problem Solving Plan will be developed to determine the most appropriate response. This includes a case specific action plan with agreed actions for both the victim(s) and the perpetrator(s), where appropriate. As part of the Problem Solving Plan, risk will be monitored and reviewed throughout the case.
- 8.4 Where a case is assessed as requiring input and support from multiple agencies, including cases considered complex, it will be referred to the ASB Risk Assessment Conference (ASBRAC). ASBRAC is a multi-agency panel responsible for coordinating the management of high-risk and complex ASB cases.

8.5 Details of the risk categories and the associated response and case management timeframes are outlined below. (Welfare checks are conducted at every point of contact, with risk scoring subject to ongoing review).

Low Risk	Medium Risk	High Risk
<p>Victims whose reports indicate no immediate danger or significant vulnerability. They usually experience ASB that is isolated, low-level, and not causing serious harm to their wellbeing.</p>	<p>Victims experience ASB that causes ongoing distress, may involve repeat incidents, or shows signs of increasing severity.</p> <p>They may have additional vulnerabilities (e.g., health, disability, caring responsibilities) that could worsen the impact.</p>	<p>High-risk victims are those at significant risk of harm, for example due to:</p> <ul style="list-style-type: none"> • Serious or escalating ASB • Persistent repeat victimisation • High vulnerability (e.g., mental health concerns, disability, isolation) • Risk of harm comparable to safeguarding thresholds

8.6

Action			
Step 1: Make initial contact with the person reporting to acknowledge receipt of the report.	<p>Within 2 working days</p> <p>Undertake a risk assessment to determine any immediate risks of harm or vulnerability. (Cases categorised as high, medium and low risk).</p> <p>Advise the victim(s) how their case has been categorised and when they will next hear from us.</p>		
Action	High Risk	Medium Risk	Low Risk
Step 2: Interview the victim and draft Problem-Solving Plan (including initial action plan agreed with the victim)	Within 3 working days of ASB being reported	Within 5 working days of ASB being reported	Within 10 working days of ASB being reported
Step 3: Contact the alleged perpetrator, if appropriate to do so. (In cases of domestic abuse, this may put the victim in danger).	Within 5 working days of ASB being reported	Within 10 working days of ASB being reported	Within 15 working days of ASB being reported
Step 4: Finalise Problem Solving Plan (including action plan) and share with victim.	Within 5 working days of contacting both parties (victim and perpetrator)	Within 5 working days of contacting both parties (victim and perpetrator)	Within 5 working days of contacting both parties (victim and perpetrator)
Step 5: Review Problem Solving Plan (including action plan)	Every 5 working days, after step 4	Every 10 working days, after step 4	Every 20 working days, after step 4
Step 6: Update victim(s): ongoing	At least once Every 5 working days	Every 10 working days	Every 20 working days
Step 7: Management reviews of cases	20 working days after the initial report and every 20 working days thereafter until case closure.	20 working days after the initial report and every 20 working days thereafter until case closure.	20 working days after the initial report and every 20 working days thereafter until case closure.
Step 8: Case closure	<p>A case will only be closed once all tasks have been completed (unless exceptional circumstances apply, and closure is proportionate and justified e.g. victim stops engaging with the Council and the Council has made multiple attempts to contact them).</p> <p>Victim(s) will be informed that the case is due to be closed, including reasons for this decision. Upon closure, a letter will be issued summarising the actions taken and the outcomes achieved. The letter will also include a satisfaction survey.</p>		

9. Working with partner services and agencies

- 9.1 Effective case management relies on coordinated work between the Police, local authorities, and community partners. By collaborating in this way, we can offer stronger support to victims and deal with reports more efficiently.
- 9.2 To ensure that we effectively prevent and resolve reports of ASB, we will seek to work and collaborate with a range of partners and organisations including:
- The Police
 - Adult and Children Services
 - Community partners
 - Mental health services
 - Substance misuse services
 - The Council's Safer Communities Team
 - The Council's Environmental Protection Team

10. Supporting victims and perpetrators

- 10.1 Once a report of ASB is received, a designated officer will be assigned to the victim(s) and will act as their main point of contact throughout the case. Where the designated officer is unexpectedly absent or unavailable, the Council will ensure a clear temporary point of contact is identified so that communication remains consistent and victims do not feel unsupported.
- 10.2 If we require further information and evidence to support the report, we may:
- ask that the victim(s) keep an incident diary and/or download the Noise App.
 - contact witnesses and ask them to also keep an incident diary.
 - attempt to identify the perpetrator/suspected perpetrator if not already known.
 - visit the area where the alleged incident(s) are taking place.
 - speak to the perpetrator/suspected perpetrator (only with the victim's consent).
 - involve other agencies (such as social service, environment health).
- 10.3 We will arrange either a telephone discussion or a face-to-face meeting with tenants and residents who report ASB, to understand their experiences, explore the outcomes they are seeking, and jointly agree an action plan.
- 10.4 During our initial discussion with the victim(s), we will agree their preferred method of

communication (e.g., telephone, SMS/text, or email) and the frequency of updates. This will be recorded in our case management system, and we will adhere to the agreed contact arrangements throughout the case.

- 10.5 We will maintain regular contact with the victim(s) throughout the investigation in their preferred method of communication, providing ongoing updates until the matter is resolved and the case is formally closed.
- 10.6 Where a crime has been committed, we will encourage victims and witnesses to make a report to the Police.
- 10.7 Where we identify that the victim(s) have support needs, (with their consent) we will make referrals to the relevant support agencies. Support agencies include Victim Lincs, NHS talking therapies and wellbeing services.
- 10.8 If a resident's safety is at risk, we may offer alternative accommodation based on Police advice. We will also assess and implement appropriate safety measures within the home where required such as security lighting.
- 10.9 During an investigation, if we identify any children or vulnerable adults whose welfare may be at risk, we will record these concerns in our case management system and follow the South & East Lincolnshire Council Partnership Safeguarding policy and procedures. This applies regardless of whether the individual is directly involved in the ASB case.
- 10.10 Where the case progresses to the courts, we will refer victim(s) to Victim Lincs to provide support throughout the process.
- 10.11 Where support needs are identified, we will promptly refer or signpost the perpetrator(s) or suspected perpetrator(s) to appropriate services. If a perpetrator is already receiving support from another agency, we will attempt to work collaboratively with that agency throughout the case.

11. Tools and Powers

- 11.1 We aim to prevent ASB from occurring at the outset. This is achieved through a range of measures, including but not limited to:

- Implementing sensitive lettings in situations where there are concerns that ASB may occur, in order to promote community cohesion and safeguard tenants.
- Ensuring customers are made aware of their responsibilities at the point of moving home.
- Operating an Introductory Tenancy regime with the ability to extend tenancies where applicable.
- Providing clear advice and guidance to tenants and residents.
- Working collaboratively with partner organisations to deliver community events and participate in estate walkabouts.
- Considering environmental improvements, such as enhanced lighting.
- Promoting the Good Neighbourhood Guide

11.2 When the Council has sufficient evidence that the reported ASB has occurred, we will then consider which action is most appropriate to reduce the harm being caused. We follow an incremental approach, except where legislation requires (such as issuing a Community Protection Warning before a Notice) or where the seriousness of the behaviour demand immediate court proceedings. We will assess a range of factors including severity, risk, frequency, and individual needs to determine the most proportionate response.

11.3 In most situations, informal interventions will be the most proportionate initial response. We will seek to resolve issues through practical measures, warnings, and voluntary agreements before considering more formal action.

11.4 Where appropriate, victim(s) are required to contribute actively to a resolution, as this often produces the most constructive and sustainable outcomes for all parties. In certain circumstances, intervention by an agency may unintentionally escalate a situation that could otherwise have been resolved amicably between the victim(s) and perpetrator(s).

Where we consider it proportionate and suitable, we may therefore invite parties to:

- Communicate directly with the individual causing concern in an effort to reach an agreed resolution.
- Consider making reasonable adjustments to their own behaviour or routine to help alleviate the issue.
- Participate in mediation as a means of achieving a mutually acceptable outcome.

- 11.5 Mediation helps parties to listen to one another, address misunderstandings, and agree practical steps to move forward. It can be particularly effective for neighbour-related issues such as:
- noise concerns
 - boundary disagreements
 - disputes involving fences, trees or hedges
 - shared access or parking issues
 - disagreements about communal areas.
- 11.6 The purpose of mediation is to repair and maintain relationships, reduce the risk of escalation, avoid legal action, and support the sustainability of tenancies.
- 11.7 The Council will offer mediation to help neighbours find their own solutions in appropriate cases. Where mediation is declined and no further proportionate or reasonable action is available, the Council may close the case, taking any vulnerabilities into account.
- 11.8 We employ a range of informal approaches to resolve issues of harm in cases of ASB. These include, but are not limited to:
- practical measures such as environmental improvements
 - the issuing of advice and warning letters
 - face-to-face meetings
 - Acceptable Behaviour Agreements
 - Good Neighbourhood Agreements.
- 11.9 Legal mechanisms available including:
- injunctions to prevent nuisance and annoyance – a court order to compel a person to do something, or to prevent a particular action or behaviour that is causing ASB. (Civil order)
 - criminal behaviour orders – a court order to compel a person to do something, or to prevent a particular action or behaviour that is causing ASB. (Criminal order)
 - community protection notices – issued by the Council and Police setting out conditions expected. (A community protection warning (CPW) is issued before a community protection notice (CPN). These tools require an individual to stop behaviour that is causing harm and to comply with specific conditions. Failure to follow a CPN may lead to further enforcement action)

- closure powers – an order to close premises
- Notice to Extend Introductory Tenancies and/or Notice of Seeking Possession and/or forfeiture and possession proceedings.

11.10 A range of wider legislative powers may also be considered, including, but not limited to:

- Public Health Act 1936
- Environmental Protection Act 1990

11.11 To proceed with legal intervention, we are required to have evidence of the ASB. In many cases, this will require those experiencing ASB to provide it. This may include incident diaries, audio or visual recordings such as CCTV or video-doorbell footage, reports from other agencies, or signed witness statements. If we cannot obtain sufficient evidence to meet the legal threshold, then we are unlikely to be able to proceed.

11.12 Possession Proceedings will only be pursued where all other actions to tackle the ASB have failed or where the behaviour is serious enough to warrant it.

12. ASB Case Reviews

12.1 The ASB Case Review (formally known as Community Trigger) is a statutory provision introduced in the Anti-Social Behaviour, Crime and Policing Act 2014.

12.2 The ASB Case Review is the victim's right to request a review of their case to determine whether there are any further actions that can be taken to resolve it. The ASB Case Review is not about apportioning blame. It's focus is on problem solving the case and utilising the expertise of partner agencies.

12.3 A victim, or someone acting on their behalf, can request an ASB Case Review by completing an ASB Case Review request form, this can be completed using any of the following methods:



By visiting www.sholland.gov.uk/asbcasereview and downloading the ASB Case Review Form and returning it to asbhousing@sholland.gov.uk or by post using the address below.



by telephone: 01775 761161 - ask to speak to the Housing ASB officer.



To request a copy of the form, write to: Housing ASB officer, South Holland District Council, Council Offices, Priory Road, Spalding, Lincolnshire. PE11 2XE

13. Confidentiality

- 13.1 We may receive anonymous reports of ASB. This can make it more difficult for us to investigate, as we may not have all the information we need. We will assess anonymous reports by considering the seriousness of the behaviour described, whether there is an obvious reason the report has been made anonymously, and whether there are any ways to investigate further that do not rely on knowing who made the report.
- 13.2 Tenants and residents may request that their identity remains confidential. While we will not disclose their name, we are still required to discuss the reported behaviour with the individual alleged to be causing the harm before any action can be taken. In some cases, the nature of the report may make it apparent who has submitted it.
- 13.3 There are also circumstances where our legal responsibilities mean we cannot guarantee confidentiality. For example, if someone reports information relating to a criminal offence, or if we believe they may be at risk of harm or pose a risk to others.
- 13.4 Where legal action is required, we will work to support the person making the report and, where appropriate and legally permissible, may include anonymous reports as hearsay evidence.

14. Complaints

- 14.1 If a victim (a resident of a landlord or somebody with authority to act on behalf of a resident) is dissatisfied with the service received from the Council, they can submit a [complaint](#).
- 14.2 As per the Housing Ombudsman's Complaint Handling Code, the investigation into a complaint is not to determine if a complaint is ASB but to consider the landlords handling of a report of ASB.
- 14.3 Any complaint can be reported [online](#), or by using any of the following methods:



Post by writing to Housing Feedback, South Holland District Council, Council Offices, Spalding, Lincs PE11 2XE.



Over the telephone by calling 01775 761161

15. Workforce development

- 15.1 Managing cases of ASB can be complex and requires a broad range of skills, knowledge, and experience. We work closely with officers to identify training and development opportunities.
- 15.2 We will ensure that all staff involved in managing ASB cases receive regular training, enabling them to handle cases with confidence and competence. The Housing Services Manager will carry out routine case reviews to identify learning needs, support ongoing staff development, and drive continuous improvement in service delivery

16. Monitoring Performance

- 16.1 Delivery of our ASB service is reported on a monthly basis via the Housing Landlord Service Compliance and Performance Clinic attended by the Assistant Director for Housing, Portfolio Holder for Strategic and Operational Housing and Director for Communities. We use the following performance indicators to monitor delivery:

Performance Measure
New ASB cases opened (in month)
Percentage of cases acknowledged within 2 working days (in month)
Number of those cases that involves a hate incident (in month)
Number of ASB cases closed (in month)
Number of ASB cases closed (year to date)
Number of ASB cases opened per 1,000 homes (year to date)
Number of ASB cases that involve hate incidents opened per 1,000 homes (year to date)
Percentage of tenants reporting satisfaction with how the case was handled. (Surveyed at case closure).

- 16.2 Performance is reported to Performance Monitoring Panel (scrutiny) on a quarterly basis and published on the tenant section of our website at [About us - South Holland District Council](#)

Performance Measure
Number of ASB cases opened per 1,000 homes (year to date)
Number of ASB cases that involve hate incidents opened per 1,000 homes (year to date)

16.3 Performance on ASB case management will also be reported to our newly established Tenant Influence Panel. Frequency and content will be determined by the Panel during 26/27.

16.4 Performance and satisfaction are also monitored through the following Tenant Satisfaction Measures, reported to the Regulator of Social Housing annually and published in the Annual report to tenants:

- Proportion of respondents who report that they are satisfied with their landlord's approach to handling ASB.
- Number of ASB cases, opened per 1,000 homes.
- Number of ASB cases that involve hate incidents opened per 1,000 homes.

16.5 We also collect tenant satisfaction via our customer satisfaction survey issued once a case has been closed. This survey collects key information which is used to monitor service delivery and provide ongoing service improvements. The survey collects feedback on key areas including:

- Reporting ASB
- Satisfaction with response times
- Satisfaction with case outcome
- Satisfaction with how the case was handled and the support offered to victims.

17. Data Protection

17.1 Personal information collected as part of handling ASB reports will be used and stored in accordance with the Tenancy and Leasehold Agreement Management privacy notice, which can be found [here](#).

18. Links to Council strategies and policies

18.1 This policy has direct links to the following policies and strategies:

- Housing Landlord Service ASB Framework 2025-2027.
- SHDC Housing Landlord Strategy 2024-27
- South & East Lincolnshire Councils Partnership's Sub-regional Strategy 2024/25

– 2028/29

- Lincolnshire Hate Crime Strategy 2025-28
- Safer Lincolnshire Partnership Strategy 2025-2028
- Safer Lincolnshire Partnership Noxious Odour Procedure
- Safer Lincolnshire Partnership ASB case review policy.

19. Relevant Legislation

19.1 There is a range of legislation that governs the management of ASB and neighbour nuisance:

- The Housing Act 1985
- The Housing Act 1988
- The Environmental Protection Act 1990
- The Housing Act 1996
- The Crime and Disorder Act 1998
- The Anti-Social Behaviour Act 2003
- The Equality Act 2010
- The Localism Act 2011
- The Anti-Social Behaviour, Crime and Policing Act 2014
- The Care Act 2014
- The Homelessness Reduction Act 2017
- The Data Protection Act 2018.

19.2 The Regulator of Social Housing’s Neighbourhood and Community Standard, requires Registered Providers to work in partnership with appropriate local authority departments, the Police and other relevant organisations to deter and tackle ASB and hate incidents in the neighbourhoods where they provide social housing.

19.3 The Housing Ombudsman expects landlords to respond to ASB promptly, consistently and with a clear focus on victims. Landlords should investigate reports thoroughly, maintain accurate records, communicate regularly with those affected, and work in partnership with local authorities, the Police and other agencies to prevent and address ASB. They are also expected to learn from complaints and Ombudsman findings, particularly where maladministration has been identified, and use this learning to improve their ASB policies and practice.

20. Reviewing this policy

20.1 This policy will be reviewed no later than 3 years after the date of publication and may be reviewed earlier.

Anti-Social Behaviour and Hate Crime – Consultation outcome report and detail of proposed changes.

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Introduction

In 2025, the Housing Landlord Service adopted the Anti-Social Behaviour Framework to strengthen how the service is delivered and to tackle anti-social behaviour (ASB) more effectively.

The framework outlines our commitment to address ASB through early intervention, support and enforcement whilst also emphasising the importance of engaging tenants and ensuring they are actively involved in shaping decisions.

This document summarises the consultation on the ASB and Hate Crime service which took place between 2nd March to 20th March 2026.

The document also summarises the proposed changes to the ASB service and draft policy using the feedback received.

The aim of the consultation programme was to:

- Empower tenants to shape and support decision making on the future delivery of the service.
- Provide opportunity for residents, staff, members, external organisations and agencies to feedback on the future delivery of Anti-Social Behaviour and Hate Crime service.
- Ensure that our priorities match what matters most to our tenants.
- Demonstrate that the council acts on tenant feedback and welcomes tenant scrutiny to shape service delivery.
- Demonstrate how tenants got involved in a variety of tenant engagement activities that suit them.

Consultation programme

The consultation programme was designed to collect essential information and feedback to support decision-making regarding the future provision of the ASB and Hate Crime service.

To ensure comprehensive participation and representation, each element of the consultation programme was developed using a multi-channel engagement strategy targeting tenants, staff, and key agencies (such as the Police).

The consultation programme comprised of the following:

- **Sheltered Housing Focus Groups:** Officer attendance at various Sheltered Housing Focus Group sessions. As part of the sessions, officers consulted tenants on key themes and promoted the survey.
- **Tenancy and Quality Checkers Focus Group:** Officer attendance the Tenancy Focus Group/Quality Checkers event on 4 March 2026. As part of the event, officers consulted tenants on key themes.
- **ASB Survey:** A survey to tenants, residents, internal staff, external organisations and agencies to capture feedback on key themes and the future provision of the service. The survey ran from 6 March 2026 to 20 March 2026.

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The primary objective of the programme was to strengthen participation, aided by various engagement mechanisms. All consultation details were made available on the council's website, and for the survey, tenants were contacted directly by text and email.

Sheltered Housing Focus Group

During the consultation programme, the Housing Services Manager and ASB Lead officer attended Sheltered Housing Focus Group events to consult tenants on key themes and areas of focus. As the last 2 events took place after the survey went live, officer also used the Focus Group to promote the ASB survey. While tenants were encouraged to complete the survey on their own, officers were available to provide support when requested. Hard copies of the survey were also made available.

The table below shows the dates, times and locations of the Sheltered Housing Focus Group Events.

Location	Date	Time
Nene Court, Spalding PE11 2JT	Tuesday 3rd March 2026	11:30am – 13:00am
Hargate Close, Fleet PE12 8LU	Wednesday 11 th March 2026	11am – 12.30pm
Arthurs Avenue, Holbeach PE12 7LH	Thursday 12 th March 2026	11am – 12.30pm

Tenancy and Quality Checkers Focus Group

Both the Tenancy and Quality Checkers Focus Groups form part of the Tenant Forum which were created after the adoption of the Tenant Engagement and Influence Strategy.

Both Focus groups met on Wednesday 4th March 2026 and as part of the event, the Housing Services manager and ASB lead consulted tenants on the key themes and areas of focus including:

- Behaviours or activities tenants feel should not be treated as anti-social behaviour.
- Tenants' views on the ways they can report ASB, and whether there are any additional reporting options we should introduce.
- What tenants consider to be reasonable timescales for acknowledging reports and providing updates to victims.
- Tenants' opinions on how the Council tackles ASB, including whether there are any further approaches we should consider.
- Tenants' views on what support should be offered to victims of ASB.
- Tenants' views on the Council's service standards for handling ASB reports.

Surveys

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As covered earlier in the report, the survey ran from 6 March 2026 to 20 March 2026.

All surveys were made available on the council's website via the Tenant Events webpage using MS forms. Hard copies were available on request, including in alternative formats and large print.

The survey invited responses through a variety of question types, including closed questions, open-ended questions, and comment boxes, giving respondents the opportunity to explain their answers.

To promote broad and inclusive participation, the surveys were rolled out through a multi-channel engagement strategy aimed at tenants, staff, and key partner agencies.

The various engagement and promotion methods were as follows:

Digital and Community Based Promotion:

- Publicised via the council's Tenant Engagement and Involvement webpage and shared across official social media platforms.
- The survey was shared with all Housing staff to promote when engaging with tenants.

Internal Engagement:

- SHDC Housing staff with a professional interest in the consultation were invited to contribute via internal communications.

Engagement with External Organisations and Stakeholder Groups

The consultation was further promoted through direct outreach to a range of partner agencies and community bodies including the Police.

Accessibility and Support for Participation

- To ensure inclusivity, hard copy surveys were distributed upon request.
- Independent Living Officers provided one-to-one support to assist tenants in completing the survey where required.

Tenant Influence Panel

Although the Tenant Influence Panel has not yet formally convened for its first official meeting, members have been actively participating in ongoing training. We wanted to use these sessions as an opportunity for tenants to apply and develop their scrutiny skills using real, live policy work. As part of this approach, the Draft ASB Policy was brought to the Tenant Influence Panel's practice session on 25 March, allowing tenants to test their developing skills and provide early insight and feedback as part of the policy development process.

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- The panel was pleased to see that feedback from tenant engagement has been fully considered, particularly regarding timescales. It was positive to note that these have now been revised and that the tenant survey results supported this change.
- It was suggested that a short summary or “key facts” version of the policy would be helpful to improve accessibility and understanding. Officers noted that a summary version of Policies is created and made available to tenants once adopted.
- The idea of producing a video version of the policy similar to those created for other services was welcomed and seen as a valuable addition. Officers confirmed this will be taken forward.
- The panel discussed the terminology around “victim” and “perpetrator.” It was agreed that Step 1 should instead refer to “making initial contact with the person reporting,” with the language transitioning to “victim” only after that point. Officers agreed with the recommendation. Step 1 will be amended to reference “the person reporting” to ensure neutral and sensitive language at the first point of contact before any further classification is made.
- A proposal was made to explore providing A5 fridge magnets containing key service contact details (e.g., ASB, Damp Condensation and Mould, Repairs) so that tenants can easily find important information in one place. Officers said this is a helpful suggestion, and we will explore options and costs.

Survey Findings and Feedback

Member feedback

Informal Member Briefing held on 25th March 2025.

- Members sought clarification on how risk levels are defined within the proposed ASB approach. Officers explained that low-risk cases involve occasional noise, medium-risk cases include persistent nuisance such as blocked access or roaming pets, and high-risk cases cover threats or violent behaviour requiring police involvement.
- Question was also raised about case escalation, with assurance provided that the dedicated ASB Lead plays a key role in managing cases early to prevent risks increasing.
- Members additionally requested detail on domestic abuse case handling, and officers confirmed that the priority is always victim safety; perpetrators are not contacted directly, and officers work closely with the police.

Policy Development Panel held on 21st April 2026.

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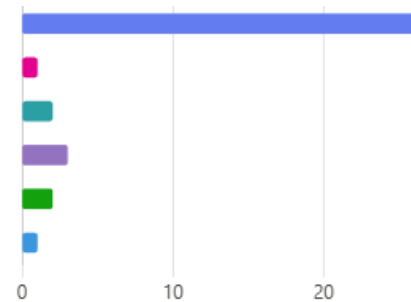
Survey Key findings

The key findings from the ASB survey are listed below. A total of 35 survey responses were received during the consultation period.

Survey responses

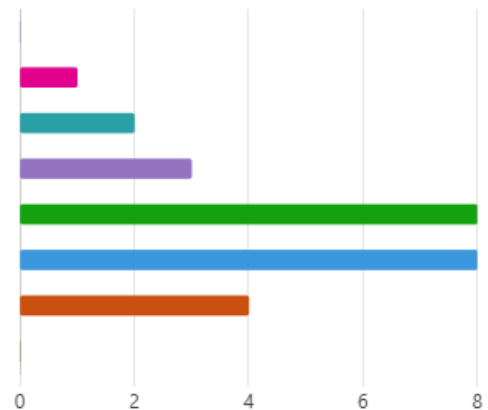
- Please tell us who you are responding as?

● SHDC Tenant	26
● Family member of an SHDC tenant	1
● Resident of South Holland	2
● SHDC Staff Member	3
● Professional body or partner agency	2
● Other	1



- What is your age group? (Only asked to anyone responding as a SHDC Tenant)

● 18-24	0
● 25-34	1
● 35-44	2
● 45-54	3
● 55-64	8
● 65-74	8
● 75+	4
● Prefer not to say	0



- What is your gender? (Only asked to anyone responding as a SHDC Tenant)

● Woman	16
● Man	10
● Non-binary	0
● Prefer not to say	0

- What is your ethnic group? (Only asked to anyone responding as a SHDC Tenant)

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● White: English, Welsh, Scottish, Northern Irish or British	24
● White Irish	0
● White: Other	0
● Mixed or multiple ethnic groups	0
● Asian or Asian British	0
● Black, African, Caribbean or Black British	0
● Other ethnic group	0
● Prefer not to say	2

Analysis is broken down into the various questions asked as part of the survey.

% calculated as whole numbers. Does not apply to multiple choice or open text box questions

Question 1: There are some types of behaviour which, although may feel annoying to neighbours, might not be ASB. Which types of behaviour do you feel should not be classed as ASB?

Feedback from respondents showed strong agreement that a range of everyday activities and minor inconveniences should not be classified as Anti-Social Behaviour (ASB). Themes identified included:

1. Normal Everyday Living

Respondents widely felt that ordinary household and day-to-day noises should not be considered ASB. Examples included:

- Opening and closing doors
- Walking up stairs
- Vacuums, washing machines, and household appliances
- Television or music at reasonable volumes
- General cooking smells, including BBQs

2. One-Off or Occasional Events

Activities that occur occasionally, without ongoing impact, were seen as normal aspects of community life rather than ASB. These included:

- One-off parties such as birthdays, BBQs, and Christmas gatherings
- Occasional bonfires
- Temporary parking inconvenience caused by visitors

3. Children

Noise associated with children playing during reasonable hours was generally considered a routine part of family life and not ASB.

4. Parking Issues

Parking outside a neighbour's property or using unallocated spaces was described as inconvenient but not ASB.

5. Car Maintenance and Home Activities

Activities such as fixing a car on a driveway or other normal outdoor household tasks were generally not seen as ASB.

6. Animals and Pets

Respondents were tolerant of:

- Occasional dog barking

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- Animal noise within reasonable hours

7. Lighting and Outdoor Equipment

Security lights and similar household equipment were also seen as part of normal living and not ASB if they did not impact neighbours.

Changes made: The feedback received supports the overall direction and content of the policy. Only minor refinements are proposed to improve clarity.

- Added to section 4 - Car repairs carried out reasonably, without prolonged noise, obstruction, or hazardous behaviour.
- Added clarity in section 4 to what is meant by a one-off event – (for clarity a “one-off” event refers to occasional, infrequent activity that is not part of a continuing pattern. Single incidents will not be treated as ASB unless they cause significant and unreasonable disturbance.

Question 2: The Council offers several ways to report ASB. Which reporting options do you find easiest and most accessible?

• Using our online form available on our website	17
• Calling us on 01775 761161	23
• Emailing us at asbhousing@sholland.gov.uk	16
• Speaking to your Housing Officer, attending a scheduled appointment or coming along to a Meet...	12

Question 3: Do you feel that there are any other reporting methods the Council should offer?

Feedback from tenants shows that the majority feel the Council already offers a sufficient range of reporting methods for Anti-Social Behaviour, and most respondents did not feel additional options were needed. A small number of suggestions focused not on creating new reporting channels but on improving the accessibility and responsiveness of existing ones, for example, ensuring phone calls are answered more consistently, reducing the need to speak to multiple departments, and providing more opportunities for face-to-face contact with Housing Officers.

A small number of respondents requested the option to report via text message or highlighted the value of anonymous reporting. Anonymous reports can already be made under the current policy; however, these reports often limit the Council’s ability to fully investigate incidents or gather sufficient evidence to build a robust case. For this reason, anonymous reporting is accepted but not actively encouraged unless there is a genuine safety concern.

Based on this feedback, no new reporting channels will be added to the policy at this time. The Council will instead focus on strengthening the visibility and responsiveness of existing reporting methods and improving communication about how current routes including confidential and face-to-face options can be accessed.

Question 4: What do you expect from the Council when it comes to responding and managing reports of ASB?

● Support victims and provide regular updates throughout	29
● Assign a dedicated officer to victims to act as their main point of contact	23
● Work with tenants, agencies and community groups	24
● Make reporting ASB easy and accessible	25
● Take action (including enforcement action) where necessary	28
● Prioritise cases based on risk and harm	27
● Review cases where tenants request this	17
● Prevent ASB through proactive steps and early involvement	23
● Other	3

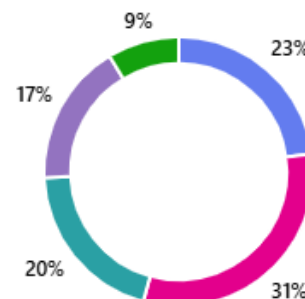
3 respondents provided additional comments under the “Other” category. These points related to:

- Other – ASB magnet for the fridge on how to report.
- Other – Support not just for the victim but for the other person too.
- Other – Take existing neighbourhood risks into account.

All the main options identified by tenants are already fully covered within the Policy, and the additional comments provided fall into minor operational considerations rather than gaps in the Policy.

Question 5: What do you think is a reasonable amount of time for the Council to let you know they’ve received your ASB report and confirm next steps?

● Within 1-2 working days	8
● Within 3 working days	11
● Within 5 working days	7
● Within 7 working days	6
● Other	3



Feedback on the expected timescale for initial contact showed that most respondents felt a response within 3 working days was reasonable, with smaller numbers suggesting between 1–2 working days or up to 5 working days. Only one respondent expected same day contact. As the Council’s current service standard commits to making initial contact within 2 working days, this already exceeds the

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expectations expressed by most. Based on this consultation feedback, the existing timescale will remain unchanged, as it is consistent with good practice and already provides a quicker response than generally expected.

Question 6: When an ASB case is high risk, how regularly should the Council contact the victim with updates?



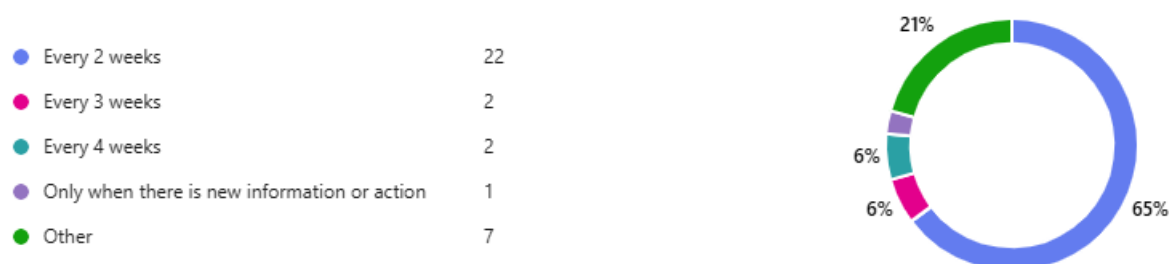
Feedback shows that tenants expect frequent and proactive contact when an ASB case is assessed as high risk. The most common response was to receive updates every few days (2–3 times per week), with a smaller proportion preferring weekly updates. Only a minority felt updates should be provided less frequently or only when new information becomes available.

Although many tenants expressed a preference for contact every few days, the existing standard of at least once every 5 working days remains appropriate as a minimum requirement, with the flexibility for Officers to provide more frequent updates where circumstances or risk levels justify it. This means the policy sets a baseline of weekly contact but does not prevent Officers from exceeding this where cases are fast moving, complex, or where victims need additional reassurance or support.

One respondent felt that contact should be as frequent as the victim personally needs to feel safe. While this was not a common view, the Council will continue to consider individual circumstances on a case-by-case basis and apply reasonable adjustments where appropriate.

To reflect this flexibility more clearly, the policy wording has been tweaked to state that ongoing contact will be at least once every 5 working days, with more frequent updates provided when required.

Question 7: When an ASB case is medium risk, how regularly should the Council contact the victim with updates?



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Most tenants said the Council should provide updates every 2 weeks for medium-risk cases. A small number suggested 3 or 4 weeks, weekly updates, or only when new information is available, and one respondent preferred a case-by-case approach.

The Council's current standard of contacting victims at least every 10 working days already aligns with a fortnightly pattern, so no policy change is required. Flexibility will continue to be applied where individual circumstances or reasonable adjustments justify more frequent contact.

Question 8: When an ASB case is low risk, how regularly should the Council contact the victim with updates?



Most felt that for low-risk ASB cases, the Council should provide updates only when there is new information or action. The next most common view was to receive updates every 4 weeks, with a smaller number suggesting updates every 3 weeks. Very few expected more frequent contact. The Council's current standard of providing updates at least every 20 working days already aligns with these expectations, so no policy change is required.

Question 9: What types of support do you feel the Council should offer victims and witnesses of ASB?

Respondents emphasised the importance of:

- Having a consistent Officer supporting the case
- Being told if their Officer was absent and who the temporary contact is
- Signposting to specialist services
- Links to external support services (mental health)
- Being listened to and taken seriously
- Support with home moves or exchanges is needed
- Ensure victims have a say in the outcomes
- Regular check ins and keeping in contact
- Clear and timely information
- Greater visibility of Officers on estates

Changes made:

The consultation feedback aligns closely with the support covered in the ASB Policy, including signposting, referrals, welfare checks, safeguarding, and risk-based support. The policy already references Officer support, but in section 10 adding "Where the designated officer is unexpectedly absent or unavailable, the Council will

ensure a clear temporary point of contact is identified so that communication remains consistent and victims do not feel unsupported”

Question 10: What kind of help do you think the Council should offer people whose behaviour is causing ASB?

Feedback suggests that tenants expect a balanced approach combining support with clear accountability. Many respondents highlighted the importance of mediation, communication, referrals to wellbeing or substance-misuse services, and helping individuals understand the impact of their behaviour. Others emphasised the need for firm warnings and enforcement where behaviour does not improve. These expectations align with the Council’s current policy, which includes early intervention, support referrals, multi-agency working, and a stepped process. No change to the policy is required, but the Council will ensure that operational procedures continue to emphasise both supportive interventions and clear boundaries for behaviour.

[Tenant Events Feedback](#)

Sheltered Housing Focus Group:

Some older tenants explained that, although normal living noise and children playing are not classed as ASB, these everyday sounds can still have a significant impact on them. While this does not change the ASB definition, the Council’s risk-assessment process already allows officers to consider how such noise affects individual tenants, particularly those who may be more vulnerable, and to offer appropriate support or reassurance where needed.

Tenants said they were unfamiliar with certain types of enforcement tools available like CPW and CPN. Added to section 11 that definition that a community protection warning (CPW) is issued before a community protection notice (CPN). These tools require an individual to stop behaviour that is causing harm and to comply with specific conditions. Failure to follow a CPN may lead to further enforcement action.

Some tenants questioned why the Council cannot evict people more quickly when their behaviour breaches the tenancy agreement. During the discussion, it was explained that eviction is always a last resort and will only be pursued once all other reasonable steps have been taken. Tenants were informed possession proceedings will only be pursued where all other actions to tackle the ASB have failed or where the behaviour is serious enough to warrant it.

Tenancy Focus Group:

The Tenant Focus Group was held at the outset of policy development and played a key role in shaping the foundations of the new ASB and Hate Crime Policy. The feedback gathered through this early engagement directly informed the structure, priorities, and approach adopted within the Policy.

All core expectations highlighted by tenants, including accessible reporting routes, clear communication standards, timely updates, partnership working, prioritisation

Appendix 2

based on risk and harm, and a victim-centred approach, have been embedded from the beginning.

Additional comments raised by tenants, such as providing service reporting magnets, offering support to all parties involved, and considering neighbourhood risks during allocations, are already addressed within existing operational practices. These therefore represent minor operational considerations rather than gaps requiring amendments to the Policy now developed.

Equality Impact Assessment

Report title	Anti-Social Behaviour (ASB) and Hate Crime Policy for the Housing Landlord Service
Completed by	Adel Gardner
Approved by	Vikki Cherry
Date	24 th March 2026

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)	
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)	

Section 3 Equality impacts

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<p>Briefly explain what the policy/service/project aims to achieve</p>	<p>The policy aims to ensure that all tenants live in safe, secure and welcoming neighbourhoods by:</p> <ul style="list-style-type: none"> • preventing and addressing anti-social behaviour and hate crime • ensuring victims receive a fair, consistent and timely response • taking a victim-centred approach that identifies and responds to risk and vulnerability • delivering accessible reporting options for all residents • ensuring that responses are proportionate, evidence-based and compliant with equality duties
<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>Consultation was carried out during policy development, including:</p> <ul style="list-style-type: none"> • consultation with SHDC tenants • engagement with elected members • consultation with agencies involved in tackling ASB (Police, environmental health, safer communities)
<p>Is there any evidence or research that demonstrates why some individuals or groups are, or are not, affected</p>	<p>Evidence used:</p> <ul style="list-style-type: none"> • Tenant Census 2023 (demographic and vulnerability data) • National Census 2021 (comparators for protected characteristics) • Crime Survey for England & Wales (domestic abuse prevalence) • Housing Ombudsman reports • Internal ASB case data

Characteristics	Positive and negative impact
Sex	<p>The tenant census (2023) reported that 56% of residents in our properties are female (compared with 51% in South Holland (national census 2021).</p> <p>Positive:</p>

	<ul style="list-style-type: none"> • Victim-centred, risk based approach particularly benefits women, who are statistically more likely to experience harassment, domestic abuse and targeted hate behaviours. • Multiple reporting channels increase accessibility for people who may feel unsafe reporting in person. <p>Negative:</p> <ul style="list-style-type: none"> • Women (56% of tenants) may be disproportionately affected by ASB relating to harassment or coercive control. • Women experiencing domestic abuse may fear repercussions from perpetrators if reporting ASB. <p>Any mitigation required: Ability to avoid contacting alleged perpetrators where this increases risk.</p>
<p>Age</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 163</p>	<p>The tenant census (2023) reported that the median age for tenants is 63 (52 in the national census for South Holland, 2021). The average age profile of residents in our properties is 48 (46 in the national census for South Holland, 2021).</p> <p>Positive:</p> <ul style="list-style-type: none"> • Older tenants (median age 63) benefit from risk-based triage, faster contact times and tailored communication. • Sheltered Housing “meet and greet” sessions improve access for older or socially isolated tenants. <p>Negative: Older residents may face barriers using online reporting.</p> <p>Any mitigation required:</p> <ul style="list-style-type: none"> • Multiple non-digital reporting routes (phone, Housing Officer, home visits). • Tailored communication and support following risk assessments.

<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 165</p>	<ul style="list-style-type: none"> • Policy explicitly recognises that behaviour may arise from disability-related conditions; response is proportionate, support-led and not automatically enforcement-led. • Adjusted communication methods (translation, support worker, alternative formats) improve access. • Risk assessments embed identification of vulnerability. <p>Negative:</p> <ul style="list-style-type: none"> • High proportion of disabled tenants (51% tenants, 40% residents) means disabled people disproportionately experience ASB and difficulty reporting it. <p>Any mitigation required:</p> <ul style="list-style-type: none"> • Recording of additional needs on case files. • Use of advocates/support workers. • Flexibility in evidence-gathering where memory or stamina issues are present. • Ensuring reasonable adjustments and accessible formats (Braille, large print, audio).
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 165</p>	<p>The tenant census (2023) reported that 8% of tenants are from ethnic minority groups consisting of 6.4% Other White (2.5% Polish, 1.4% Lithuanian, 1% Portuguese and Latvian). The 2021 census reported 9% ethnic minority groups for South Holland, with 6.7% (4% Poland, 2.6% Lithuania and 1.5% Romania). In 2021, 0.6% of South Holland residents identified their ethnic group within the "Other" category ("Arab" or "Any other ethnic group"), up from 0.1% in 2011.</p> <p>Positive:</p> <ul style="list-style-type: none"> • Clear recognition of racially motivated incidents as hate crime. • Access to translation services supports reporting and understanding of case processes. <p>Negative:</p> <ul style="list-style-type: none"> • Some tenants may fear reprisal or mistrust authorities based on previous experiences.

	<p>Any mitigation required: Anonymous and multiple reporting routes.</p>
<p>Religion or belief</p>	<p>We do not record data around religion or belief, however the National census reported 33% of South Holland residents reporting to have ‘no religion; followed by 58.9% as Christian.</p> <p>Positive: Hate crime definition covers faith-related harassment.</p> <p>Negative: none</p> <p>Any mitigation required: Optional collection of protected characteristic information at point of report.</p>
<p>Sexual orientation</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 166</p>	<p>The tenant census (2023) reported that 1.7% of tenants who identify as LGBTQ+ sexual orientation, compared with 2.8% in South Holland (National Census 2021).</p> <p>Positive:</p> <ul style="list-style-type: none"> • Explicit protection under hate crime provisions (homophobic harassment). • Multiple confidential reporting options. <p>Negative: LGBTQ+ tenants (1.7%) may under-report due to fear of discrimination.</p> <p>Any mitigation required: Strict confidentiality processes</p>
<p>Gender reassignment</p>	<p>We do not collate data regarding gender reassignment.</p> <p>Positive: Explicit inclusion under hate crime protections.</p> <p>Negative: No implications.</p>

	<p>Any mitigation required: ensure respectful communication practices</p>
<p>Pregnancy, maternity and paternity</p>	<p>We do not collate data regarding pregnancy, maternity and paternity.</p> <p>Positive: Safeguarding procedures offer protection where vulnerability is present.</p> <p>Negative: No implications.</p> <p>Any mitigation required: No.</p>
<p>Marriage and civil partnership</p>	<p>The South Holland census recorded 49.2% of residents married or in a civil partnership.</p> <p><i>Note this is a protected characteristic in employment only.</i></p> <p>Positive: No implications.</p> <p>Negative: No implications.</p> <p>Any mitigation required: No.</p>
<p>Rural isolation</p>	<p>South Holland is a rural area spanning 74,238 hectares, with limited access to public transport.</p> <p>Positive:</p> <ul style="list-style-type: none"> • Multiple access routes reduce barriers for tenants in remote areas. • Officers conduct home visits and estate walkabouts. <p>Negative: No implications</p> <p>Any mitigation required: Remote engagement options (phone/email).</p>

<p>Socio-economic factors</p>	<p>The overall income deprivation score for South Holland is 10.3%. Exploring local income deprivation (ons.gov.uk) Of the 316 local authorities in England (excluding the Isles of Scilly), South Holland is ranked 174th most income-deprived. Sutton Bridge is among the 20% of most income-deprived neighbourhoods in England.</p> <p>Positive: Support first approach helps sustain tenancies and reduces escalation.</p> <p>Negative: Income deprivation may limit ability to comply with environmental adjustments (e.g., carpets to reduce noise)</p> <p>Any mitigation required: Signposting to financial and wellbeing support.</p>
<p>Additional category: Carers</p> <p>Page 168</p>	<p>We do not hold data around tenants with caring responsibilities. The national census reported that 4.25% of South Holland residents (aged 5 years and older) provided up to 19 hours unpaid care each week (2021). In 2021, just under 1 in 50 people (1.9%) reported providing between 20 and 49 hours of unpaid care each week. Census 2021 was undertaken during the coronavirus (COVID-19) pandemic. This may have influenced how people perceived and managed their provision of unpaid care, and therefore may have affected how people chose to respond.</p> <p>Positive: flexible communication methods and home visits support those with caring responsibilities.</p> <p>Negative: None</p> <p>Any mitigation required: None</p>

<p>Additional category: Domestic abuse and ASB victims</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 69</p>	<p>117 for period 1 April - 31 March 2026. This excludes cases reported but found not to constitute ASB</p> <p>52.1% of residents surveyed in the TSMs reported being satisfied with our approach to handling complaints of ASB.</p> <p>The Crime Survey for England and Wales estimated that 3.8 million people aged 16 years and over experienced domestic abuse in the year ending March 2025. During 2024/25, 15 households were housed in social housing following fleeing domestic abuse.</p> <p>Positive:</p> <ul style="list-style-type: none"> • strong multi-agency working. • Safety based decisions (not contacting alleged perpetrator if required). • Risk led timescales for urgent cases. <p>Negative: None</p> <p>Any mitigation required: Regular checks for safety and welfare.</p>
<p>Overall, if there is a potential adverse impact after the mitigation, please state why and whether this is justifiable.</p>	<p>Some groups, particularly disabled residents, older tenants, women, and ethnic minorities experience higher exposure to ASB and barriers to reporting.</p> <p>However, the policy includes robust mitigation, including flexible communication, safeguarding, risk-based triage and tailored support.</p> <p>Residual risk is low, proportionate and justified given the support framework in place.</p>
<p>How will you monitor this to ensure there is no adverse effect in the future?</p>	<p>The following mechanisms will ensure no new adverse impact occurs:</p> <ul style="list-style-type: none"> • Monthly performance clinic and quarterly scrutiny monitoring • Tracking of hate incidents and protected characteristic linked cases • Tenant Satisfaction Measures (TSMs) for ASB case handling • Annual reporting to the Regulator of Social Housing • Ongoing review through the Tenant Influence Pane

Appendix 3

Outcome of EIA:	Mitigations in place and no unlawful discrimination identified.
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ends

Updated: 07th April 2026**Appendix A - Action Plan****Priority 1: Prevention and Early Intervention**

Action	Lead Officer	Timescale	Status	Update
Raise awareness through a communications plan of the impacts of hate crime and make it clear that hate crime, harassment and bullying in any form will not be tolerated.	Housing Services Manager	Ongoing	Complete	Communications campaign delivered
Complete a self-assessment against the Housing Ombudsman spotlight report on noise nuisance	ASB Housing Lead	August 2025	Complete	Self assessment completed
KPIs established to monitor current performance (to be reported to Housing Compliance Clinic and published online quarterly)	ASB Housing Lead	August 2025	Complete	KPIs established and included reporting arrangements in Policy
Review sign-up process for tenants and introductory visits process from an ASB perspective.	Housing Services Manager	September 2025	Pending – closure	Included in good neighbour guide which is handed out at sign up
Promote a variety of methods through which to report ASB, including via our website/email and telephone to increase accessibility to the service.	ASB Housing Lead	March 2026	Pending – closure	Communication campaign launched for April 2026
Create a good neighbour guide with information on conflict resolution of what ASB is and the services available to tenants. (Consulting tenants)	ASB Housing Lead	November 2025	Overdue	Good neighbour guide has been established and rolled out. Tenant feedback being gathered to further enhance the good

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				neighbour guide before progressing to the readers panel for seal of approval.
Create a new ASB and hate crime policy developed with tenants including enhanced suite of KPIs	ASB Housing Lead	March 2026	Ongoing	Progressing to Tenant Influence Panel and schedule for PDP 28 th April 2026
Invest in staff training focusing on legal and non-legal tools and powers to tackle ASB, ASB case management, as well as training on mental health, hate crime, substance misuse, and domestic abuse and restorative approaches.	Housing Services Manager	December 2025	Complete	Training completed

Priority 2: Working Together

Action	Lead officer	Timescale	Status	Update
Review current practices and thresholds for access to support services to ensure no one falls through the gap	ASB Housing Lead	Ongoing	Pending – closure	All cases recorded on the county wide system.
Conduct annual reviews with the Environmental Protection team to review internal procedures for noise complaints	ASB Housing Lead	Ongoing	Pending – closure	Quarterly meetings established to monitor.
Subscribe to the ASB Help Pledge	ASB Housing Lead	August 2025	Complete	The Council is subscribed to the ASB Help Pledge

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Promote ASB case reviews 'Community Trigger'	ASB Housing Lead	April 2026	Complete	Included in the social media campaign
Develop a service level agreement with the Community Safety Team and Environmental Protection Team	Housing Services Manager	April 2026	Ongoing	Community Safety SLA to be reviewed as part of wider service planning
Develop closer relationships with partners such as the local police, adult and children services, mental health services and probation teams.	ASB Housing Lead	April 2026	Complete	Picked up by ASB Lead Officer in 121s and Annual Review.

Priority 3: Risk management and Victim Support

Action	Lead officer	Timescale	Status	Update
Invest in noise recording equipment, review approach to supporting tenants using Noise App.	ASB Housing Lead	August 2025	Complete	Letter template updated with more support on how to use the noise app.
Review the current service provision around tenancy support and the support provided to alleged perpetrators of ASB. Promoting this with tenants, Members and staff.	Housing Services Manager	September 2025	Complete	Included in new Policy and sharing with Officers.
Work in partnership with Victim Support, ASB Help and Resolve, sign up to ASB Help Pledge	ASB Housing Lead	September 2025	Complete	Duplicate action
Determine approach to risk assessments to support victims and understand impact ASB is having	Housing Services Manager/ASB Housing Lead	March 2026	Complete	Included in new Policy and training to be rolled out to staff when adopted
Conduct regular sample audits of ASB cases to ensure case management is reflecting	Housing Services	November 2025	Complete	Sample audits reported to Housing Performance and

Appendix 4

procedures and policy.	Manager			Compliance Clinic
Review internal processes for recording tenant vulnerabilities	Housing Services Manager	April 2026	Complete	Reasonable Adjustments Policy adopted. Training rolled out on recording and locating vulnerabilities on housing software.
Implement training sessions for Officers on the ASB procedures.	ASB Housing Lead	April 2026	Complete	Training on new system
Review responsive repairs timescales for victims of ASB.	Housing Transformation Programme Manager	April 2026	Complete	Picked up in Housing Repairs project – asking tenants what they would like to see in terms of prioritisation.

Priority 4: Putting Tenants first

Action	Lead officer	Timescale	Status	Update
Review language used in communications with tenants including “victim” and “perpetrator”	Tenant Engagement and Influence Lead	September 2025	Complete	Focus group held with tenants who supported the use of victim and perpetrator language for ASB.
Review web content and letter templates with tenants	ASB Housing Lead	March 2026	Overdue	Delayed, doing this with Tenants once the new policy has been adopted.
Implement an ASB tool kit for tenants which outlines what the Council can do, what tenants can do and what other agencies can do when it comes to responding to ASB.	Housing Services Manager	March 2026	Overdue	Delayed, doing this with Tenants once the new policy has been adopted.
Involve tenants in developing policies and procedures on our approach to responding to	ASB Housing Lead	February 2026	Complete	Tenants have been involved in shaping the Policy through

Appendix 4

ASB, hate crime and neighbour disputes.				focus groups, surveys and the new tenant influence panel.
Improve data reporting on ASB to tenants, Members and Senior Officers	ASB Housing Lead	April 2026	Complete	ASB performance reported to Housing Performance and Compliance Clinic. ASB performance reported to the complaints and performance focus groups.
Introduce mechanism for victims to be able to provide feedback on the service they experienced.	Tenant Engagement and Influence Lead	April 2026	Complete	Satisfaction survey developed and rolled out as business as usual.

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Report To:	Policy Development Panel
Date:	Monday, 21 April 2026
Subject:	Housing (HRA) Damp Condensation and Mould Policy
Purpose:	To consider the updated Damp, Condensation and Mould Policy 2026 (Appendix 2)
Key Decision:	N
Portfolio Holder:	Councillor Tracey Carter, Portfolio Holder for Strategic and Operational Housing
Report Of:	Vikki Cherry, Assistant Director - Housing
Report Author:	Adel Gardner, Change and Improvement Manager HRA
Ward(s) Affected:	All Wards
Exempt Report:	N

Summary

This report outlines the development of the Damp, Condensation and Mould Policy, confirming that the required legislative amendments were completed in September 2025. It now focuses on the next phase of integrating tenant feedback to strengthen the policy further. The report seeks the panel's views to ensure robust oversight and drive continuous improvement beyond statutory compliance.

Recommendations

1. That the Policy Development Panel considers the Tenant feedback on the revised Housing Damp Condensation and Mould (DCM) Policy 2026.
2. That the Policy Development Panel considers and provides feedback on the revised Housing Damp Condensation and Mould (DCM) Policy 2026 and recommends it to Cabinet for adoption.
3. That the Policy Development Panel supports the recommendation to Cabinet to delegate minor operational amendments to the Assistant Director for Housing in consultation with the Portfolio Holder for Strategic and Operational Housing

Reasons for Recommendations

Incorporating tenant feedback strengthens the policy's relevance and effectiveness, improving trust and satisfaction.

Other Options Considered

Do Nothing: This was considered but dismissed because it would undermine the Council's commitment to tenant involvement and could result in a policy that does not fully address tenant needs.

1. Background

- 1.1 Policy Development Panel considered and feedback on the Housing Damp Condensation and Mould Policy on 6th February 2024. The Policy was then formally adopted by Cabinet on 26th March 2024. This Policy was focused on the learnings from the death of Awaab Ishak and recommendations of the Housing Ombudsman Spotlight Report of Damp and Mould.
- 1.2 On 20th May 2025 a report was presented to Performance Monitoring Panel on the performance of the Damp and Mould service and amendments were made to the Key Performance Indicators to provide robust oversight and assurance to members.
- 1.3 On 25th June 2025 MHCLG (Ministry of Housing, Communities and Local Government) published draft guidance on the Phase 1 implementation of Awaab's Law, marking a significant step forward in improving the safety and accountability in social housing.
- 1.4 To ensure compliance with the new legislation it was necessary to make urgent amendments to the Damp Condensation and Mould Policy. On 16th September 2025 Cabinet adopted amendments to this policy. The Council recognised that our tenants aspire to go further than the minimum standards, and we are committed to ensuring they have an opportunity to enhance the Damp Condensation and Mould Policy.
- 1.5 Since these amendments were adopted, the Council has actively engaged with tenants to ensure the policy is clear, practical, and meets their needs. In addition, the Council wanted to provide both tenants and Members with the opportunity to scrutinise the policy and contribute to its ongoing development.
- 1.6 This report presents the findings from tenant engagement and outlines how their feedback has informed improvements to the Damp, Condensation and Mould Policy. It also seeks to provide assurance to members that the policy remains robust, compliant with legislation, and aligned with tenant aspirations.

2. Report

2.1 On 18th November 2025, the Housing Transformation Manager and the Housing Repairs and Compliance Manager hosted a tenant presentation at the Property Focus Group focused on Awaab’s Law and its meaning to tenants. The session aimed to:

- Explain what Awaab’s Law means for social housing tenants
- Provide clarity on the Councils Damp, Condensation and Mould Policy following recent amendments.
- Share a summary version of the policy in plain language
- Share a video version of the policy for feedback
- Gather feedback through a series of questions to understand the following:
 - How the policy is understood
 - Whether the policy meets tenants needs and expectations.
 - Opportunities for improvement or additional support.

2.2 Officers then attended existing tenant engagement events between January – March 2026 across the district to provide tenants with opportunities to shape the policy further.

2.3 Tenant Feedback from Focus Groups

2.4 Tenant feedback highlighted practical opportunities for improvement in the policy and process:

Tenant Feedback	Changes
Tenants want follow-up communication, such as phone calls after initial contact and updates at each stage.	<p>Policy to specify the key stages where updates to tenants must occur (e.g. case reported, survey booked, findings shared, works scheduled, works completed, follow up).</p> <p>Policy to specify that tenant communication preference will be captured and endeavour to use this for updates.</p>
Clear expectations should be set during triage, e.g., “We will do this within 24 hours” or “within 5 working days.”	Policy and process updated to make this clear that Service Level Agreements will be communicated with tenants at triage and tenants to be informed there is a Policy.
Greater performance transparency, including publishing compliance statistics (e.g., Awaab’s Law) on the Council website.	<p>Adding performance information to newsletters and annual reports and advertising frequently that this information is also available on the website which can be accessed by tenants at any time.</p> <p>Improving the access to performance for non-digital tenants by presenting performance information at in-person focus groups. (First set of performance information shared at Tenant Property Focus group on 20th January 2026).</p>

	Easy to understand Awaab's Law performance information being developed with tenants.
Non-digital communication options were suggested, such as promoting the need to report damp and mould in newsletters or the annual report.	<p>Inclusion that guidance to tenants will be published in the annual report which is posted to all tenants.</p> <p>Inclusion in the policy that performance information will be shared regularly at focus groups through face to face sessions to ensure accessibility for tenants who prefer non digital engagement.</p>
Tenants reported communication gaps, such as not knowing what jobs have been raised after a damp survey and contractors arriving without notice.	<p>Policy requires a written summary within 3 working days and to provide updates at agreed intervals. Updates to the process to ensure tenants are told what jobs have been raised and that any contractor will give notice before arrival.</p> <p>Contractor code of conduct developed with the requirement to notify before arrival.</p>
Improvements requested include informing tenants what work will be carried out and notifying them promptly if repairs are cancelled or rescheduled.	Update to the process to ensure tenants are told what jobs have been raised and that any contractor will give notice before arrival
Tenants noted that 'managing condensation' advice should be tailored to individual circumstances.	Include in the process that Officers will provide tailored advice that considers the tenant circumstances. This may also include referring tenants to support services for cost-of-living assistance where needed (included in policy).
Tenants are not sure what is their responsibility and what is the Councils responsibility as a landlord for damp and mould.	Inclusion of a Landlord Responsibilities section in the Policy
Communicate in tenants requested preference. (i.e. send emails where possible to save money on printing and posting)	Include in the Policy the requirement to communicate in tenants required preferences where possible.
Tenants didn't know there would be a 6 month follow up to check if the Damp and Mould had returned.	Ensure its clear in the procedure that tenants are informed there will be a 6 month follow up call to check if the Damp and Mould has returned, but also to explain to tenants they need to report any reoccurring DCM as soon as possible rather than waiting for the 6 month call back.

2.5 Tenant Feedback from Survey

The survey was sent to tenants who had reported Damp Condensation and Mould since Awaab's Law went live on 27th October 2025. 213 tenants were contacted, and 30 Tenants completed the survey.

The findings strongly echoed the themes raised during the tenant focus groups. The concerns highlighted through the focus groups such as the need for clearer communication, timely updates, follow-up after works, understanding what repairs are being carried out, and better coordination with contractors were consistently reflected in the survey responses. This alignment confirms that the changes proposed in the table above are directly grounded in tenant experience and represent the right areas for improvement.

Full survey findings can be found in Appendix 3.

2.6 Tenant influence Panel Involvement

Although the Tenant Influence Panel has not yet formally convened for its first official meeting, members have been actively participating in ongoing training. We wanted to use these sessions as an opportunity for tenants to apply and develop their scrutiny skills using real, live policy work. As part of this approach, the Draft DCM Policy was brought to the Tenant Influence Panel's practice session on 25 March, allowing tenants to test their developing skills and provide early insight and feedback as part of the policy development process.

The panel asked about how vulnerable residents can confidently report issues such as damp and mould. Officers confirmed the Council continues to actively promote the importance of reporting damp and mould through multiple channels, including tenant communications, visits, and support services. Alongside this, the Council carries out a rolling programme of stock condition surveys and tenancy audits, which help identify issues early and ensure that vulnerable tenants are engaged and supported to report concerns.

Concerns were also raised about contractor accountability, especially short notice appointment cancellations, with officers advising that contractor performance is regularly monitored through contractor meetings which have been strengthened and through the Capital Programme Clinic.

A detailed discussion took place regarding the responsibility to make internal surfaces good after works. The panel were however satisfied with the section overall and this wording has since been reviewed by Capsticks solicitors and amended accordingly.

Tenants were supportive of the Policy progressing to the Policy Development Panel.

Full feedback can be found in Appendix 3.

2.7 Learning from Stock Condition Reports and Complaints

To strengthen assurance and ensure the Damp, Condensation and Mould (DCM) Policy is effective in practice, the Council has triangulated data from multiple sources:

Stock Condition Reports

- The data showed that damp and mould may be under reported by ethnic minority groups, indicating potential barriers to engagement and reporting. This is being addressed through the Access to Services action plan report which was presented

to Performance Monitoring Panel on 10th March 2026, which will ensure promotion of translation and interpreter services and developing a communications plan to target different groups.

Complaints Analysis

- During 2025/2026 complaint themes relating to damp and mould cite delays in communication, lack of clarity on repair timescales and contractor issues.
- This mirrors feedback from the focus group and highlights the importance of transparent communication, proactive updates and contractor management.

Triangulation

- By comparing tenant feedback, stock condition data, and complaints trends, the Council has identified priority areas:
 - Improving communication campaigns and follow-up processes.
 - Addressing systemic property issues (e.g., faulty extractor fans) and extractor fan cleaning being added as standard at void.
 - Enhancing monitoring and reporting to ensure compliance with Awaab's Law.

3. Conclusion

- 3.1. The review of the DCM Policy demonstrates that the Council has taken proactive and meaningful steps to exceed minimum statutory requirements and strengthen its approach following the introduction of Awaab's Law. The engagement carried out with tenants alongside insights from complaints data and stock condition surveys has provided valuable evidence that the updated policy is more transparent, responsive, and aligned with tenant expectations.
- 3.2. The findings highlight that communication, clarity of processes, and the accessibility of information remain central to improving tenant confidence and service outcomes. The proposed amendments directly address these areas, ensuring that operational practices support both legal compliance and a more tenant centred approach.
- 3.3. Beyond tenant feedback, the Council undertook a best practice review to modernise the policy in line with sector expectations. The policy has been reorganised and restructured to ensure improved readability, clearer responsibilities and a more consistent approach to service delivery.

Implications

South and East Lincolnshire Councils Partnership

The revised Damp, Condensation and Mould Policy supports a consistent and robust approach across the Partnership by strengthening compliance, enhancing tenant engagement, and improving performance transparency.

Corporate Priorities

The policy directly supports priorities relating to:

- Providing safe, warm and high-quality homes.
- Protecting the health and wellbeing of residents.
- Strengthening customer experience and transparency in service delivery.
- Ensuring legal compliance and maintaining high housing standards.

Staffing

No implications.

Workforce Capacity Implications

The enhanced requirements for tenant updates, monitoring of Awaab's Law compliance, and increased performance reporting may place additional pressure on existing teams. These impacts are expected to be manageable as additional resource had already been introduced to support compliance with Awaab's Law.

Constitutional and Legal Implications

The updated Policy supports the Council to act in accordance with legislative requirements and government guidance. Specific details are contained within the Policy.

Data Protection

No implications.

Financial

No implications.

Risk Management

No implications.

Stakeholder / Consultation / Timescales

Extensive consultation has been undertaken with tenants through tenant forum groups, a survey, and ongoing engagement via property focus groups. Feedback directly informed amendments to the policy, particularly around communication, clarity of process, and accessibility. Portfolio Holder for Strategic and Operational Housing, Assistant Director for Housing and Director of Communities have been consulted.

Reputation

Strengthening the Damp, Condensation and Mould Policy, incorporating tenant feedback, and improving transparency will enhance the Council's reputation for being proactive, responsive and tenant-focused. The policy also mitigates reputational risk associated with damp and mould cases.

Contracts

No implications.

Crime and Disorder

No implications.

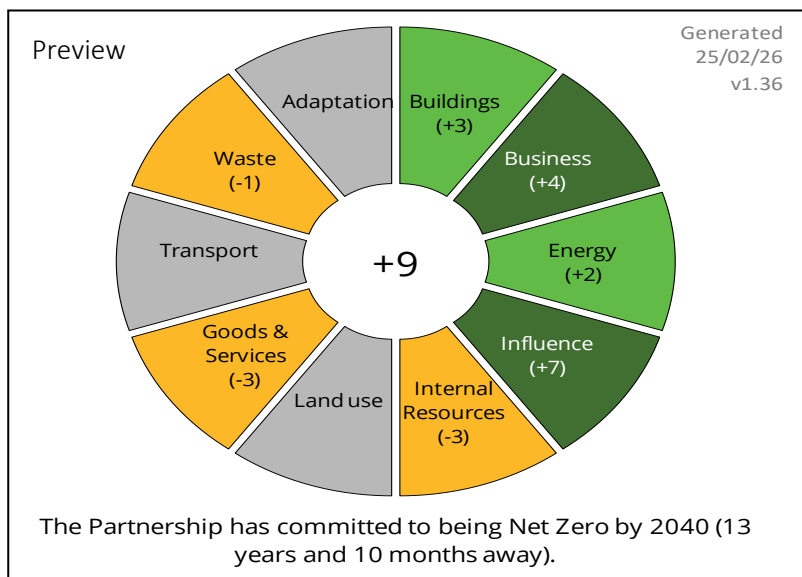
Equality and Diversity / Human Rights / Safeguarding

The policy supports fair and consistent treatment of all tenants. It strengthens safeguarding by recognising the health impacts of damp and mould, especially for vulnerable tenants. No negative impacts identified.

Health and Wellbeing

The policy has a positive impact on health and wellbeing by improving the Council’s ability to identify, address, and prevent damp, condensation and mould, which are linked to respiratory conditions and other health risks.

Climate Change and Environment Impact Assessment



Repairs to structural defects and improvements to ventilation and heating help prevent deterioration and reduce long-term resource use. Staff and contractor training, alongside investment in Energy Performance improvements and better asset management, support more sustainable housing performance. Addressing poor thermal efficiency reduces unnecessary energy demand, while strong communication, clear guidance and support for vulnerable tenants improve climate related behaviour and resilience. However, frequent inspections, in person visits and follow up checks increase resource use and travel emissions, and damp related repairs generate waste much of which cannot be recycled due to contamination.

Acronyms

- DCM – Damp Condensation and Mould
- MHCLG - Ministry of Housing, Communities and Local Government
- HRA – Housing Revenue Account

Appendices

- Appendices are listed below and attached to the back of the report:
- Appendix 1 Summary of Changes made to the Policy
- Appendix 2 Damp Condensation and Mould Policy 2026

Background Papers

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

Document title	Where the document can be viewed
Preparedness to deliver the Social Housing (Prescribed Requirements) (England) Regulation 2025 (Awaab's Law)	Preparedness for Awaabs Law update.pdf
Housing Damp Condensation and Mould Policy (DC&M)	DCM_policy_for_website.pdf
Awaab's Law: Guidance for social landlords	Awaab's Law: Guidance for social landlords - GOV.UK

Chronological History of this Report

Name of Body

None

Date

Report Approval

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Approved for publication:

Councillor Tracey Carter, Portfolio Holder for Strategic and Operational Housing

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Appendix 1

Summary of changes to policy

General

- Styling updated to improve readability, including reordered sections and redesigned layout.
- Document date updated to 2026.

Legislation and Policies

- Added references to related policies.

Responsibilities

- New section added outlining Landlord Responsibilities.
- Under Tenant Responsibilities, added advice on using heating systems and extractor fans provided.

Definitions of Damp, Condensation and Mould

- Updated in line with government descriptions and best practice.
- Added Traumatic Damp category, reflecting updated national terminology.

The Council's Housing Stock

- New section included covering the Council's Housing Stock, Asset Management Strategy, and the HRA Business Plan.

Investigations

- Added commitment to keeping accurate records of communication with tenants, including making tenants aware of next steps and keeping them informed throughout.

Communication Strategy

- Added information about communicating Service Level Agreements at initial triage and informing tenants that there is a Damp Condensation and Mould Policy.
- Added detail on when and how tenants will be updated throughout the process.
- Included reference to tenant communication preferences.

Work assigned to contractors

- Updated reports section to change team from Property Services to Damp and Mould Team

Guidance to Tenants

- Added that relevant information will be included in the annual report sent to all tenants.

Monitoring Our Performance

- Key Performance Indicators updated to reflect reporting that goes to Housing Compliance and Performance Clinic.

Appendix 1

- Housing Compliance Clinic renamed to Housing Compliance and Performance Clinic, aligning with the HRA Governance Framework (adopted October 2025).
- Updated explanation of performance reporting:
 - Quarterly updates to be published on the tenant webpage.
 - Annual report publication.
 - Regular updates delivered through Property Focus Groups via face-to-face sessions to support non-digital engagement.



SHDC Housing Landlord Service: Damp, Condensation and Mould Policy 2026

Access for All Statement:

We can provide this information in other languages and formats including large print, Braille, audio recording. Please contact us to request this:

Email: info@sholland.gov.uk

Phone: 01775 761161

Visiting our Council offices, Priory Road, Spalding, PE11 2XE.

Introduction

The purpose of this document is to set out the Council's approach to addressing the risks of damp, condensation or mould (DCM) within our properties and communal areas and how we will respond to reports of DCM from our tenants, staff, agencies or by any other means.

We will:

- Manage our homes and train our staff to ensure that we proactively identify and react to instances of damp, condensation or mould. We have procured a specialist contractors service to assist with surveys and repairs.
- Risk assess our assets and the potential impact of works on our customers, especially where vulnerabilities are present. See risk assessment sheet at appendix A.
- Respond, inspect and report on all cases of DCM brought to our attention and use intelligence to identify property types at risk.
- Treat tenants reporting DCM with empathy and respect, without any prejudice and communicate with tenants clearly and regularly regarding any actions we plan to take and any actions our tenants are advised to take.
- Ensure that investigations are conducted by competent individuals and appropriately qualified contractors of whom possess the necessary skills and experience to assess whether the home is subject to significant or emergency hazards. We will engage suitably qualified specialists for investigations when relevant.
- We will implement all reasonable remedial repair solutions and improvements to eradicate damp and mould, including controlling condensation.
- Ensure that customers have access to and/or are provided with comprehensive support, advice and guidance on managing and controlling DCM and reduce the risk of it re-occurring.
- Be supportive and responsive to customer vulnerabilities to ensure all customer needs are considered, addressed and solutions are agreed with customers.
- Comply with statutory requirements and good practice relating to DCM including Awaab's law.
- Protect the fabric of the property from deterioration and damage resulting from DCM
- Work with staff and contractors, together with our tenants to deliver this policy.

This policy should be read in conjunction with the Council's Repairs and Fitness for Habitation Policy available at <https://www.sholland.gov.uk/Housing-policies>. This policy will be reviewed as each stage of Awaab's law is implemented.

Policy Scope

This policy explains how we will respond, inspect and report on DCM, including but not limited to:

1. Who the policy applies to:
 - Tenants who rent their home under a tenancy agreement.
 - Customers in alternative tenure where SHDC has a repairing obligation.
 - All property communal areas.
 - Emergency or temporary accommodation.
2. How we will work with our tenants, staff and contractors to manage and eradicate DCM. This includes:
 - Proactively identifying property types at highest risk of DCM so that we can

undertake proactive measures to eliminate DCM before it becomes a problem for our customers.

- Interrogating data and reports of DCM to understand trends and investigate those similar property types where no reports have been received.
- Risk assessing the vulnerabilities and needs of the household, implementing reasonable adjustments within our process to support them.
- Risk assessing the severity of the DCM along with the household vulnerabilities to identify acceptable response times.
- Identifying the types of DCM and remedies to eradicate these.
- Delivering clear lines of communication and plans to tenants to remedy any issues
- Following up completed repair works within six months completion to check there are no issues.

Legislation and Associated Policies

The policy is aligned with the Consumer Standards proposed by the Regulator of Social Housing, specifically: - Safety and Quality Standard, registered providers shall: ensure that customers' homes meet the standard set out in section five of the Governments Decent Homes Guidance and continue to maintain their homes to at least this standard.

The policy is also aligned to the follow legislation:

- Housing Act 2004 Part 1 – Housing Condition
- Housing Act 2004 - Housing Health and Safety Rating System (HHSRS)
- Decent Homes Standard 2006
- The Homes (Fitness for Human Habitation) Act 2018
- Social Housing (Prescribed Requirements) (England) Regulations 2025 (Awaabs Law)
- Defective Premises Act 1972
- Health and Safety at Work Act 1974
- Environmental Protection Act 1990
- Secure Tenants of Local Housing Authorities (Right to Repair) (Amendment) Regulations 1994
- Building Regulations 2010
- The Building Safety Act 2022
- Regulator of Social Housing – Safety and Quality Standard 2024
- Landlord and Tenant Act 1985.

The following Policies may impact and inform the delivery service set out in this Policy:

- Tenancy Management Policy
- SHDC Housing Landlord Service: Repairs and Fitness for Habitation Policy September 2025
- Comments, Compliments and Complaints Policy
- Reasonable Adjustments Policy

Responsibilities

The Council will work with tenants where damp and/or mould is present and identify solutions and actions to resolve the problem, some of these will need to be undertaken by the Council and some will be for residents to implement.

Landlord Responsibilities

The Council is responsible for the maintenance, repair and replacement of the structure, exterior and communal parts of its properties, as well as internal repairs, in accordance with

Section 11 of the Landlord and Tenant Act 1985 and the Tenancy Agreement. This includes, but is not limited to:

- Investigation and completion of remedial works to treat leaks, damp, mould and/or condensation.
- Investigation and completion of remedial works to treat leaks, damp, mould and/or condensation in properties involved in the mutual exchange process.
- Accurate diagnosis of the root cause of damp and implementation of effective long-term solutions, not just treatment of symptoms.
- Employment of competent, qualified and skilled contractors to carry out all required works.
- Clear and timely communication with tenants, including details of identified works, expected timelines and next steps.
- Making reasonable adjustments where households include vulnerable members.
- Make good internal surfaces following remedial works, including repairing plaster, preparing surfaces, and carrying out any necessary local redecoration to restore the affected area to a reasonable matched finish.
- Arranging suitable temporary alternative accommodation where works mean a property is temporarily unsafe for occupation.

Tenant Responsibilities

- Immediately report any evidence of rising damp, penetrating damp, or any faults that may affect the management of humidity and moisture in the home, including issues with extractor fans, windows that cannot be opened, or heating system failures.
- Not tamper with, disable, or interfere with any specialist equipment installed by the Council to assist in controlling damp, condensation and mould.
- Allow access for inspections and for all remedial works required to address damp, condensation or mould, in accordance with their tenancy agreement.
- Seek advice and obtain written permission from the Council before carrying out any alterations to the property, including combining rooms, adding extensions, or converting non-habitable spaces into habitable rooms, to ensure such changes do not contribute to damp, condensation or mould and comply with planning and building control requirements.
- Where possible and appropriate, use the heating system and extractor fans provided to help ensure the property is suitably heated and ventilated.

Definitions of Damp, Condensation and Mould

Condensation Damp

Condensation damp happens when moisture generated inside the home cools and condenses onto colder parts of the buildings (for example window frames, corners and low points on walls behind sofas or wardrobes). This is the most common form of damp.

The conditions that may increase the risk of condensation are:

- Lack of ventilation within the property
- Inadequate heating or draught proofing
- Inadequate loft insulation.
- High humidity
- Overcrowding
- Poor building design construction, cold areas (bridging) which are integral with the building construction.
- Moisture from the construction stage in new build properties.

Penetrating Damp (including internal leaks)

Penetrating damp is water that gets into the building from outside due to defects in the walls, roofs, windows or floors.

Rising Damp

Rising damp occurs when moisture from the ground travels upwards through building components in contact with the ground, such as walls and floors. This issue is commonly found in older properties.

Traumatic Damp

Traumatic damp can be caused by leaking water from waste and heating pipes, overflowing baths or sinks, burst pipes or defective water storage vessels inside the building. Traumatic damp can also originate from outside the property, for example from another building or from environmental flooding

Mould

Mould is a type of fungus which grows in moist environments. Mould can cause adverse health effects as well as damage to buildings.

It is important to recognise that not all damp and mould presents the same level of risk to our tenants. The most immediate risk relates to severe mould growth of certain types of mould which may cause airborne toxicity and is therefore especially dangerous to some of our vulnerable tenants. We will not undertake any tests to identify specific mould types but deal with all mould types and remove the hazard.

Definitions of Awaabs Law

Part 1, Regulation 3 of Awaab's Law sets out definitions for key terms including "significant hazard," "significant risk of harm," "emergency hazard," and "imminent and significant risk of harm." These definitions apply not only to tenants but extend protection to all occupiers of the social home.

Emergency hazard

A hazard that poses 'an imminent and significant risk of harm' to the health or safety of an occupier in the social home. An 'imminent and significant risk of harm' is defined as 'a risk of harm to the occupier's health or safety that a reasonable social landlord with the relevant knowledge would take steps to make safe within 24 hours.

Significant hazard

A hazard that poses a 'significant risk of harm' to the health or safety of an occupier of the social home. A 'significant risk of harm' is defined as 'a risk of harm to the occupier's health or safety that a reasonable lessor with the relevant knowledge would take steps to make

safe as a matter of urgency’.

Action

Any follow up investigations, relevant safety work, supplementary preventative works and provision of temporary alternative accommodation in circumstances where relevant safety work cannot be completed to timeframes.

The Councils Housing Stock

Poor thermal performance is a contributing factor in the occurrence in damp and mould, which can create difficulties for tenants to provide sufficient heating and ventilation, creating ideal conditions for condensation and mould growth.

Building ‘defects’ can also be a problem e.g., leaking pipes or roofs, blocked gutters, or down pipes, defective damp courses, etc and this type of repair is designated as responsive repairs and generally carried out by the repairs service.

The Council has a council housing portfolio of just over 3,800 homes. Through our Asset Management Strategy, we are committed to maintaining our properties to the Decent Homes standard and providing homes that are ‘fit for human habitation’ both at the start and during any tenancy. As part of this, addressing damp and mould issues is a priority for the Council and we have been fundamentally reviewing our response so that there is a stronger relationship between what we know is required to address damp and mould on a day-to-day basis alongside identifying where this has a structural or capital investment led requirement to prevent damp and mould occurring long term.

The HRA Business plan has set aside significant investment over the next 30 years for improvement works with investment requirements reviewed on an annual basis. This includes work to bring properties up to a minimum EPC level C. Additionally, we use the Housing Health and Safety Rating System (HHSRS) to assess the condition of our stock and identify existing hazards that need addressing

Scale and Scope of DCM

All homes are affected by condensation at some point, however certain activities can increase the problem and good practices can eliminate this from becoming a bigger problem. It is also important to recognise that DCM presents different risks to different customers, with more severe cases of damp and mould especially in living areas presenting more of a risk. Minor instances of mould, such as around window frames and in silicone is a lower risk than mould appearing on ceilings, walls and soft furnishings.

To respond appropriately and effectively with all reports the severity of the DCM needs to be established, as quickly as possible. This is done using the risk assessment tool at appendix A which includes detailing any vulnerabilities of the occupants of the household.

Vulnerability Factors – Centre for Disease Control and Prevention

Those who are most vulnerable to the effects of instances of DCM are those:

- Who suffer or are susceptible to allergies.
- With immune suppression diseases – (e.g. cancer, HIV)
- With underlying lung disease
- With chronic respiratory disease – (e.g. COPD, Asbestosis)
- With asthma

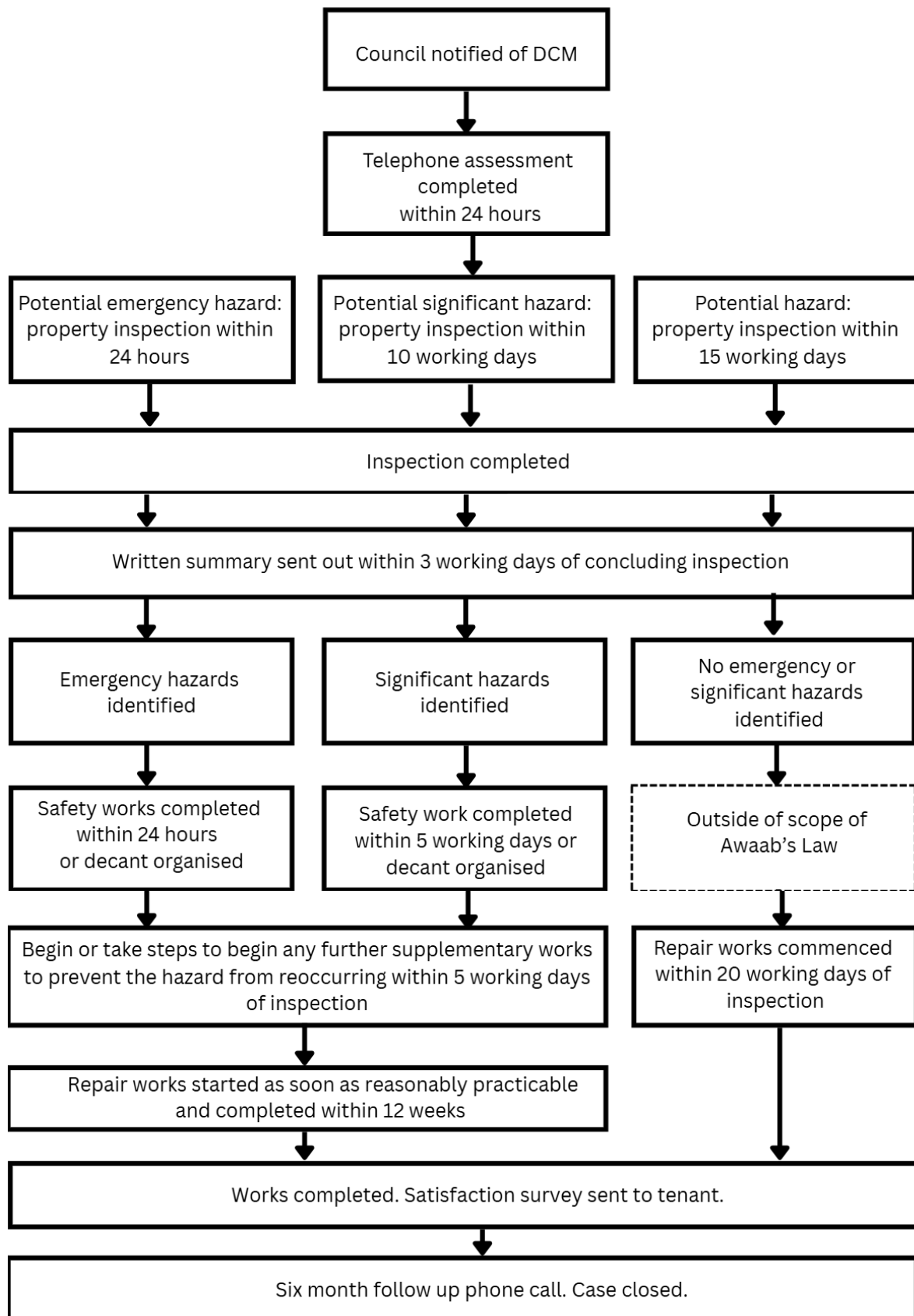
- Young children – under the age of 5
- Older people – over the age of 70
- Pregnant women

Those who may need additional help and support when experiencing DCM are those:

- Who are living with mental illness conditions, especially autism, asperger's, dementia, psychosis.
- Older people who are not able to respond to some of the recommendations.
- Those with disabilities such as sight impairments or physical disabilities that could restrict any cleaning required.

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Summary of response



Assessment of hazards

All reports of damp and mould will be assessed using our risk assessment tool and categorised into response time frames **within 24 hours** of the DCM report being made. (Assessments are conducted during and outside of office hours).

As part of this assessment, the Council will factor in individual circumstances, including the age and physical and mental health of the household to assess the likelihood of harm materialising and the potential severity of that harm in the specific circumstances. The assessment will also consider whether any reasonable adjustments are required, for example relating to languages or support needs.

A tenant (or their household) does not necessarily have to have a specific vulnerability for a hazard to be deemed a significant hazard: some hazards can pose a danger to anyone. A tenant does not need to provide medical evidence, however the Council will take this into account if it is provided.

If the risk assessment indicates and emergency response is required, a physical inspection will be carried out within 24 hours to establish the extent of the DCM.

Potential Emergency Hazard(s)	<p>Description: Extensive damp and mould in multiple living areas, highly vulnerable residents, very young or elderly with chronic health and/or vulnerability factors. Prevalent damp and/or mould that is having a material impact on a tenant's health, for example their ability to breathe.</p> <p>Response: Physical inspection carried out within 24 hours of the assessment to investigate and take action to make the property safe.</p>
Potential significant Hazard(s)	<p>Description: multiple areas of extensive damp and/or mould growth in main living areas of bedrooms, living rooms, bathroom mould growth, and/or dampness highly visible on surfaces, levels of vulnerability present, young or elderly residents with known vulnerabilities that exacerbate risk.</p> <p>Response: Physical inspection carried out within 10 working days.</p>
Potential hazard(s)	<p>Description: multiple areas of damp isolated by area and location (e.g., under stair cupboard i.e., non-habitable space.) Customer risk factor such as very young or elderly with no specific vulnerabilities may exist.</p> <p>Response: Physical inspection carried out within 15 working days.</p>

Investigations

Investigations will:

- be physical inspections, conducted on site, with photos taken;

- confirm whether or not there is a significant or emergency hazard;
- identify the required work to make a property safe and prevent the hazard from recurring.

While physical inspections are preferred by the Council, it may conduct remote inspections if convenient for all parties.

Emergency Hazard(s) identified	<p>A hazard that poses ‘an imminent and significant risk of harm’ to the health or safety of an occupier in the social home. An ‘imminent and significant risk of harm’ is defined as ‘a risk of harm to the occupier’s health or safety that a reasonable social landlord with the relevant knowledge would take steps to make safe within 24 hours’.</p> <p>Response:</p> <ul style="list-style-type: none"> • Within 24 hours, the Council will take action to make the property safe. • Within 5 working days, the Council begin or take steps to begin any further supplementary works to prevent the hazard from reoccurring. <p>If the property cannot be made safe, alternative accommodation will be arranged as per the Council’s Repairs and Fitness for Habitation Policy until the required safety works are completed.</p> <p>Where the property is attended to out of hours, a follow up investigation appointment may be required to identify the required work to prevent the hazard from recurring. The tenant will be contacted the next working day.</p>
Significant hazard(s) identified	<p>A hazard that poses a ‘significant risk of harm’ to the health or safety of an occupier of the social home. A ‘significant risk of harm’ is defined as ‘a risk of harm to the occupier’s health or safety that a reasonable lessor with the relevant knowledge would take steps to make safe as a matter of urgency’.</p> <p>Response: Within 5 working days, the Council will</p> <ul style="list-style-type: none"> • complete safety works; and • begin or take steps to begin any further supplementary works to prevent the hazard from reoccurring. <p>If further supplementary works are required and the Council is unable to begin them within 5 working days, the works will commence as soon as reasonably practicable and within 12 weeks of the investigating concluding.</p> <p>If the property cannot be made safe, alternative accommodation will be arranged as per the Council’s Repairs and Fitness for Habitation Policy until the required safety works are completed.</p>

Hazards identified	<p>No emergency or significant hazards identified. Outside of scope of Awaabs Law.</p> <p>Response: Repairs will be completed as per the Council's Repairs and Fitness for Habitation Policy, completed where practicable within 20 working days.</p>
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There may be circumstances where the investigation is unable to determine the extent of, or underlying cause of, DCM. In this circumstance a further investigation such as a structural survey will be completed as soon as reasonably practicable to determine what work is required to make the property safe and prevent the hazard from reoccurring.

If a tenant later reports a material change relating to the hazard, or the Council becomes aware of a material change through other routes it will complete a further inspection within **10 working days**. (A material change could include a change to the severity of the hazard or a change to the effect it is having on the tenant's health. For example, if a tenant reports new symptoms or worsening symptoms that may be associated with the hazard, or if they report that the hazard has worsened since the time of investigating.)

We will keep accurate records of communication with tenants and ensure tenants are aware of the next steps and kept informed during the repair process.

Making the property safe

Where emergency or significant hazards are identified, the Council will conduct works to make the property safe. Safety work is likely to include undertaking a mould wash to remove the immediate hazard and completed within **24 hours** for emergencies and **5 working days** for significant hazards. After the relevant safety work is completed, the Council will ensure that the property remains in its safe current condition until relevant supplementary preventative work is completed.

Supplementary preventative works

If the investigation concludes repairs are required, the Council will begin relevant supplementary preventative works to prevent the hazard from recurring as far as possible within **5 working days** of the investigation concluding.

Where it is not reasonably practicable to begin the relevant supplementary preventative work within **5 working days**, the Council will take steps to arrange the completion of the relevant supplementary preventative works as soon as reasonably practicable and **within 12 weeks**. For example, by securing an appointment for further specialist investigation or securing specialist contractors for works. As soon as reasonably practicable means that action must be taken as quickly as it reasonably can be, taking into account relevant circumstances such as the availability of materials and labour.

All cases of DCM are followed up six months after completion of works to ensure issues have been fully resolved.

Works Assigned to Contractors

The Council acknowledges that it retains full responsibility for ensuring compliance with Awaabs Law and any other legal obligations when assigning works to contractors.

Inspections

Where surveys are assigned to a contractor, the Property Services team will ensure that physical inspections are carried out within the contracted timescales.

Reports

All reports completed by contractors are to be returned by the contractor to the Housing Compliance team within 3 working days of the appointment date.

Remedials

All remedial works assigned to a contractor will be monitored by the Property Services team.

Monitoring Our Performance

All reports of damp and mould will be logged at an individual property level, recorded on NEC Housing.

We report against two sets of KPIs: the nationally standardised Housemark indicators used for external benchmarking, and our own internal Awaab's Law KPIs which provide a more detailed view of operational compliance with the new legal requirements. While some indicators cover similar stages of the process, they serve different purposes

The following KPIs will be reported at:

- Housing Compliance and Performance Clinic (monthly)
- Senior Leadership Team (quarterly)
- Scrutiny - Performance Monitoring Panel (quarterly).
- Tenant Influence Panel (Quarterly)
- Tenants Complaints and Performance Focus Group (2 monthly)

Performance information will be uploaded to the tenant webpage on a quarterly basis and published in the annual report. In addition, performance updates will be shared regularly at Property Focus Groups through face-to-face sessions to ensure accessibility for tenants who prefer non-digital engagement.

HouseMark

- New 'Emergency Hazards' reported per 1,000 properties (All emergency hazards including Damp Condensation and Mould)
- New 'Significant Damp and Mould Hazards' reported per 1,000 properties
- % Emergency hazards resolved within 24 Hours
- % of Significant Damp & Mould hazards investigated within 10 working days
- % of Significant Damp & Mould repairs initiated within 5 working days

Landlords own KPIS

- AWAAB01 - Total AWAABS cases ('DCM' & 'Other Emergencies')
- AWAAB02 - Number and % of 'Emergency cases made safe within 24 hours
- AWAAB03 - Number and % of 'Potential Significant' Cases inspected within 10

working days

- AWAAB04 - Number and % of 'Potential Hazards' Cases inspected within 15 working days
- AWAAB05 - Number and % of Damp & Mould cases made safe within 5 days
- AWAAB06 - Number and % of Written Summaries Sent within 3 working days
- AWAAB07 - Number and % of Damp & Mould cases completed (Soft close)
- AWAAB08 - Number and % of Damp & Mould cases closed after 6-Month follow up
- AWAAB09 - Number and % of cases prior to AWAABs law closed

Communications Strategy

Written summary following investigation

Following the conclusion of an investigation, the Council will produce a written summary of its findings and issue this to the named tenant within **3 working days**. Day one of the timeline is the day after the investigation concludes. Where multiple investigations are required for one issue, the Council will issue a written summary after each investigation.

The written summary will be in the name of the tenant and include the following information:

- whether or not the investigation identified a significant or emergency hazard, and what the hazard is
- if action is required: the summary will specify
 - the action required; and
 - a target timeframe for beginning and completing that action.
- if no action is required: the written summary will specify
 - that there is no action required; and
 - the reasons why there is no action required.
- information on how to contact the Council and the Housing Ombudsman.

Awaab's law defines 'Action' as any follow up investigations, relevant safety work, supplementary preventative works and provision of temporary alternative accommodation in circumstances where relevant safety work cannot be completed to timeframes.

Written summaries will be sent to the named tenant within **3 working days** in one of the following ways:

- hand delivered to the home
- sent by first class post; or
- being sent electronically.

Note that the timeframe is for the summary to be sent by the Council, rather than received by the tenant.

As part of the assessment of damp, the Council will record the diverse needs of tenants, including accessibility and/or language needs of the tenant. This information will be factored into ensuring that the summary of findings can be understood.

Keeping the tenant updated

At initial triage, tenants will be informed of the relevant Service Level Agreements (SLAs) for their case, including timeframes for inspection, safety works, and supplementary works, so expectations are clear from the outset. Tenants will be informed of the Damp Condensation

and Mould Policy and how to access it.

We will maintain contact with tenants with an open case at agreed intervals. We will also work with other council departments and agencies to ensure that the tenant is kept safe and informed during any works that need to take place:

- If it is unsafe for the occupants to remain in the property while the works are carried out, alternative accommodation arrangements will be made. See the Council's Repairs and Fitness for Habitation Policy for more information.
- In some cases, it may be necessary to re-house a family on a permanent basis if a medical professional advises that re-housing is the most suitable option. This will be considered in accordance with SHDC Allocations Policy and local arrangements.
- Where a tenant has been assessed as having vulnerability factors that could affect how they react to damp and mould the Property Services team will work with the tenant to ensure that the tenant gets all the help and support required to eradicate the DCM.

The Council will provide updates at the following stages of the DCM process:

- When the case is logged and triaged
- When a survey is booked
- After the survey, confirming findings and works raised
- When works are scheduled and confirmed
- When works are completed
- At the six-month follow-up

Tenant Communication Preferences:

At first contact, the Council will record the tenant's preferred communication method (phone call, email, letter) and endeavour to use this for updates where possible. Where phone calls are requested, the Council will attempt direct contact and record outcomes of the calls.

This approach is in addition to, and does not replace, the legislative requirement for the Council to issue a written summary. All statutory written notifications will continue to be provided in writing.

Access Issues

Regulation 20 of Awaab's Law introduces an implied covenant within social housing tenancy agreements, requiring tenants to permit access to their homes when necessary.

Where DCM has been identified either by a tenant or by SHDC or a property has been assessed as high risk through SHDC data insight, tenants will be required to allow access for inspections and for the carrying out of remedial works (in accordance with their tenancy agreement). All attempts and contact are recorded.

Where access issues arise, the Council will work together with tenants to agree on a suitable time for access to the property. Tenants are expected to actively engage with the Council to arrange a convenient appointment. The Council will clearly communicate that any delays in gaining access may lead to delays in completing the necessary safety work.

SHDC do consider this to be a health and safety concern for tenants and will consider alternative methods of gaining access, such as seeking an injunction where access is refused.

All properties identified as hard to access or refusal of access will be managed through the Council's standard "no access" process. See the Council's Repairs and Fitness for Habitation Policy for more information.

Guidance to Tenants

We will offer the following advice and information to all tenants via our website, leaflets, social media and annual report to help them reduce the conditions that lead to condensation dampness:

- Keeping the presence of moisture to a minimum e.g., covering pans when cooking, drying laundry outside (where possible), where it is safe to do so, keeping the kitchen or bathroom door closed when cooking or bathing.
- Adequately heating rooms – The World Health Organisation recommends 18°C. Any tenant who is experiencing fuel poverty or debt related problems will be referred to our Cost of Living Response Officers (COLRO) to help support them with these issues.
- Keeping the house well-ventilated e.g., opening windows during cooking/bathing, turning on and ensuring that the extractor fan or ventilation system installed in their home is regularly cleaned and working, keeping trickle vents in windows open and allowing air to circulate around furniture.
- Following all advice and guidance issued by us on managing humidity and moisture in the home which can lead to condensation. This information can also be found on the SHDC website.

If all reasonable efforts have been made to manage and control the presence of condensation and mould and there is still an issue, then the tenant should contact SHDC immediately to report the problem.

The tenancy agreement, licenses and long leases recommends that the tenant arranges adequate household contents insurance for the home that they occupy.

Complaints

If a tenant is not satisfied by the way in which our approach to DCM has been dealt with, or in the way in which the work has been carried out, a formal complaint may be raised in line with our Complaints Policy.

The written summary will include reference to the Housing Ombudsman and how to contact them.

Monitoring

SHDC will use a range of mechanisms to monitor and scrutinise performance, these could include the following:

- Reviewing Tenant feedback and identify areas for service improvement on a continuous basis in order to improve performance and to prioritise our work.
- We will ensure our Housing Landlord Board are provided with updates on the delivery of this policy on a quarterly basis and invite them to scrutinise performance.
- Inviting Tenants to scrutinise the performance of this policy.

Review

The Policy will be reviewed every three years and also in response to:

- Legislative Changes
- Regulatory Changes
- Government strategy or policy changes.

From time to time the council may invite tenants to scrutinise performance of this policy.

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SHDC Housing Landlord Service – Damp and Mould Policy outcome report and detail of changes made.

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Introduction

This document provides a summary of tenant feedback gathered during engagement on the proposed enhancements to the Housing (HRA) Damp, Condensation and Mould Policy.

The aim of the engagement was to:

- Provide tenants with an opportunity to share their views on what should be enhanced within the Housing (HRA) Damp Condensation and Mould Policy.
- Give tenants and members an opportunity to shape and make changes to the Policy that had been adopted in September 2025 following the introduction of Awaab's Law.
- Demonstrate the Council's commitment to acting on tenant feedback and supporting tenant-led scrutiny in shaping housing policy.

To encourage open and targeted meaningful contribution, the programme of engagement consisted of print, online and face to face communication.

The engagement sought to encourage a broad range of responses from across the tenant group. The programme of engagement took place in person and online. Both online and offline communication channels were adopted to ensure equity to access. All information about the engagement was posted on the Council website. Texts and emails were sent to tenants directly on 2nd March 2026.

Face to Face Engagement

Existing Tenant engagement events were attended across the district in a variety of Council estates attended by Officers of the Housing Landlord Service and members of the Tenant Forum.

The sessions offered the opportunity for tenants to engage with Officers and discuss the engagement.

Officers attended the following existing events on dates shown below to discuss the Housing (HRA) Damp Condensation and Mould Policy and tenants experiences and aspirations.

Event	Location	Date	Time	Tenants in attendance
Tenant Forum	Sezanne Walk Community Centre, Spalding	16 th December 2026	10-12pm	9
Property Focus Group	Fleet Hargate Community Centre, Fleet	10 th February 2026	2-4pm	7
Complaints and	Lyndis Walk Community	11 th March 2026	2-4pm	5

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Performance Focus Group	Centre, Holbeach			
Tenant Influence Panel	Sezanne Walk	25 th March 2026	1.30pm-4.30pm	7

Officers spoke with 28 tenants face to face.

Tenant Feedback	Changes
Tenants want follow-up communication, such as phone calls after initial contact and updates at each stage.	<p>Policy to specify the key stages where updates to tenants must occur (e.g. case reported, survey booked, findings shared, works scheduled, works completed, follow up).</p> <p>Policy to specify that tenant communication preference will be captured and endeavour to use this for updates.</p>
Clear expectations should be set during triage, e.g., “We will do this within 24 hours” or “within 5 working days.”	Policy and process updated to make this clear that Service Level Agreements will be communicated with tenants at triage and tenants to be informed there is a Policy.
Greater performance transparency, including publishing compliance statistics (e.g., Awaab’s Law) on the Council website.	<p>Adding performance information to newsletters and annual reports and advertising frequently that this information is also available on the website which can be accessed by tenants at any time.</p> <p>Improving the access to performance for non-digital tenants by presenting performance information at in-person focus groups. (First set of performance information shared at Tenant Property Focus group on 20th January 2026).</p> <p>Easy to understand Awaabs Law performance information being developed with tenants.</p>
Non-digital communication options were suggested, such as promoting the need to report damp and mould in newsletters or the annual report.	<p>Inclusion that guidance to tenants will be published in the annual report which is posted to all tenants.</p> <p>Inclusion in the policy that performance information will be shared regularly at focus groups through face to face sessions to</p>

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	ensure accessibility for tenants who prefer non digital engagement.
Tenants reported communication gaps, such as not knowing what jobs have been raised after a damp survey and contractors arriving without notice.	Policy requires a written summary within 3 working days and to provide updates at agreed intervals. Updates to the process to ensure tenants are told what jobs have been raised and that any contractor will give notice before arrival. Contractor code of conduct developed with the requirement to notify before arrival.
Improvements requested include informing tenants what work will be carried out and notifying them promptly if repairs are cancelled or rescheduled.	Update to the process to ensure tenants are told what jobs have been raised and that any contractor will give notice before arrival
Tenants noted that 'managing condensation' advice should be tailored to individual circumstances.	Include in the process that Officers will provide tailored advice that considers the tenant circumstances. This may also include referring tenants to support services for cost-of-living assistance where needed (included in policy).
Tenants are not sure what is their responsibility and what is the Councils responsibility as a landlord for damp and mould.	Inclusion of a Landlord Responsibilities section in the Policy
Communicate in tenants requested preference. (i.e. send emails where possible to save money on printing and posting)	Include in the Policy the requirement to communicate in tenants required preferences where possible.
Tenants didn't know there would be a 6 month follow up to check if the Damp and Mould had returned.	Ensure its clear in the procedure that tenants are informed there will be a 6 month follow up call to check if the Damp and Mould has returned, but also to explain to tenants they need to report any reoccurring DCM as soon as possible rather than waiting for the 6 month call back.

Tenant Influence Panel

Although the Tenant Influence Panel has not yet formally convened for its first official meeting, members have been actively participating in ongoing training. We wanted to use these sessions as an opportunity for tenants to apply and develop their scrutiny skills using real, live policy work. As part of this approach, the Draft DCM

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Policy was brought to the Tenant Influence Panel's practice session on 25 March, allowing tenants to test their developing skills and provide early insight and feedback as part of the policy development process.

Encouraging Reporting of Damp and Mould:

The panel asked about how vulnerable residents or those who fear repercussions can confidently report issues such as damp and mould. They emphasised the need for clear and proactive reporting routes to ensure these issues are identified and resolved promptly.

Officers confirmed the Council continues to actively promote the importance of reporting damp and mould through multiple channels, including tenant communications, visits, and support services. Alongside this, the Council carries out a rolling programme of stock condition surveys and tenancy audits, which help identify issues early and ensure that vulnerable tenants are engaged and supported to report concerns. The Council also carried out an Access to Services Analysis which is being acted upon to improve relationships with different groups to encourage early reporting.

Contractor Accountability:

The panel stressed the importance of holding contractors to account, particularly when they cancel appointments at short notice. They highlighted the impact this has on tenants and the importance of ensuring contractors meet expected service standards.

Officers confirmed the Council is monitoring contractor performance closely through our regular contractor management meetings, which have recently been strengthened. Missed or short-notice cancellations are reviewed, and contractors are challenged where performance does not meet agreed standards. Cancellations made by contractors are also taken to the Capital Programme Clinic, which has an increased focus on contractors, and this information is considered as part of decisions relating to contract extensions.

Landlord Responsibilities – Clarity in Wording:

A detailed discussion took place regarding the responsibility to make internal surfaces good after works. The panel were however satisfied with the section overall.

Tenants were supportive of the Policy progressing to Policy Development Panel.

Member Consultation

Informal Member briefing – 25th March 2026

Members were informed that a revised DCM Policy was being developed with tenant feedback.

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Members asked about issues such as drying clothes on radiators. Officers explained that guidance and support are provided to tenants to help them manage condensation effectively in their homes.

Policy Development Panel – 21st April 2026

To be inserted

Readers Panel

The Policy will go through the readers panel after feedback from Policy Development Panel to receive the tenant seal of approval.

Survey

The survey was a questionnaire which was made available in hard copy or via MS forms. The survey ran from 1st March – 13th March 2026 and was text, emailed and phoned through to tenants who had reported Damp and Mould since Awaabs Law went live on 27th October. The survey was also advertised on our website and through focus groups. The questionnaire was available on request in alternative format and large print. All open-ended questions in the consultation survey were reviewed and grouped into themes to summarise. 30 tenants responded to the survey.

Q1 When did you last report a damp or mould issue?

Within the last month	4
1-3 Months ago	14
3-6 Months ago	7
More than 6 months ago	5

Q2 How did you report the issue?

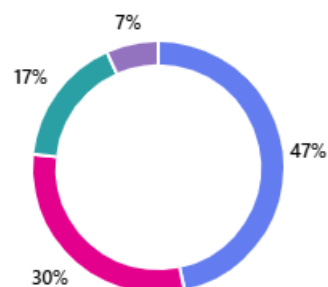
Phone	18
Email	2
In person	3
Through someone else (family, support worker etc)	4
Other	3

Q3 How clear were you about what would happen next and the expected timescales?

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Very clear	14	47%
Mostly clear	9	30%
Not very clear	5	17%
Not very clear at all	2	7%



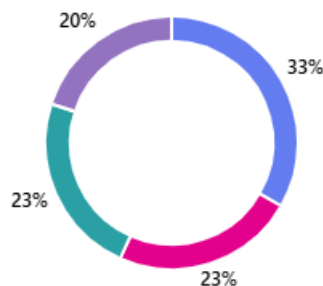
Changes proposed:

Policy and process updated to make this clear that Service Level Agreements will be communicated with tenants at triage and tenants to be informed there is a Policy.

Policy to specify the key stages where updates to tenants must occur (e.g. case reported, survey booked, findings shared, works scheduled, works completed, follow up).

Q4 Did you receive updates at the key stages (survey booked, findings shared, works booked, works completed)?

Yes all of them	10	33%
Some updates	7	23%
Very few updates	7	23%
No updates	6	20%
I don't recall	0	

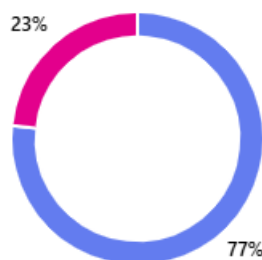


Changes proposed:

Policy to specify the key stages where updates to tenants must occur (e.g. case reported, survey booked, findings shared, works scheduled, works completed, follow up).

Q5 Did we communicate with you using your preferred methods?

Yes	23	77%
No	7	23%



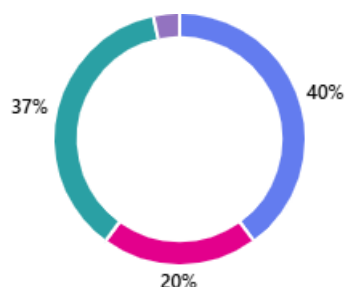
Changes proposed: Policy to specify that tenant communication preference will be captured and endeavour to use this for updates.

Q6 Was the advice you were given realistic and appropriate for your situation?

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Yes	12	40%
No	6	20%
Maybe	11	37%
Not applicable	1	3%



Changes proposed: Include in the process that Officers will provide tailored advice that considers the tenant circumstances. This may also include referring tenants to support services for cost-of-living assistance where needed (included in policy).

Q7 Were any repairs or works explained clearly before they happened?

Yes	20	67%
No	5	17%
Partly	5	17%

Q8 Why do you feel this way?

10 responses were provided to this question. Summary below:

- Tenants raised concerns about timescales.
- Some say works remain outstanding.
- Repairs that were carried out were described as incomplete, or low quality.
- Some repairs may have made the problem worse.
- Comments mention mould returning after treatment.
- One resident reports the issue has been ongoing for a substantial amount of time despite repeated visits.
- Tenants report being told conflicting information or that messages were not passed on.
- One response stated: “No problem.”

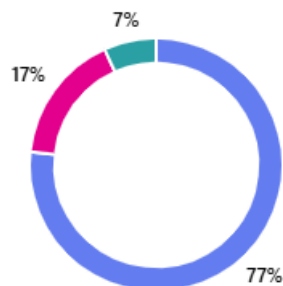
Where identifiable information has been provided tenants have been contact by the Damp and Mould Team to follow up on queries raised.

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Q9 If contractors visited, did they give you notice before attending?

Yes	23	77%
No	5	17%
Not applicable	2	7%



Changes proposed:

Policy to specify the key stages where updates to tenants must occur (e.g. case reported, survey booked, findings shared, works scheduled, works completed, follow up).

Contractor code of conduct has also been recently introduced to ensure contractors notify tenants in advance of a visit.

Q10. Is there anything you think should be improved in the policy or the way we manage damp and mould?

30 responses were provided to this question. Summary below:

Communication is the strongest and most repeated theme. Tenants would like:

- Clear, consistent updates throughout the process
- Notification of visits in advance
- Better communication between internal teams (damp & mould team and housing repairs)
- Information to be passed from one operative/team to another without the tenant repeating themselves.
- Consistent messaging

Changes proposed: Policy to specify the key stages where updates to tenants must occur (e.g. case reported, survey booked, findings shared, works scheduled, works completed, follow up).

Several tenants asked for improved follow up and monitoring.

- Checks to ensure damp/mould isn't returning
- Confirmation that repairs have been completed.

Changes proposed: Policy had been updated with 6 months call back to check damp and mould isn't returning. Tenants will benefit from this going forward. Communication with tenants to advise not to wait for the follow up call if damp and mould has returned to report to the team.

Comments that repairs aren't completed.

- Works not complete
- Works being passed between operatives and contractors

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- Repairs not done to the right quality

Change proposed: Awaabs Law requires written summaries and works to be completed within set timescales and for tenants to be kept updated on the progress of the works. This will be made more explicit in procedures to ensure staff keep tenants informed.

Provide preventative measures, several tenants said.

- Mould is returning
- Root-cause fixes needed
- Cleaning alone is ineffective

Changes proposed: Inclusion of “accurate diagnosis of the root cause of damp mould of effective long-term solutions, not just treatment of symptoms” in the policy.

Neutral feedback.

- Many tenants said no or nothing else to add.
- Operative was good.
- Everything was fine.

Q11 Before completing the survey, were you aware the Council had a Damp, Condensation and Mould Policy?

Yes	13
No	15
Maybe	2

Changes proposed:

Policy and process updated to make this clear that SLAs will be communicated with tenants at triage and tenants will be informed there is a Policy.

Inclusion that guidance to tenants will be published in the annual report which is posted to all tenants.

Q12 Would you like us to contact you about other ways to get involved to help improve the services tenants receive?

Yes	13
No	17

Tenants who indicated yes have been passed onto the Tenant Engagement and Influence Lead to make contact and share tenant forum information.



Report To:	Policy Development Panel
Date:	21 st April 2026
Subject:	Graffiti and Street Art Management Policy
Purpose:	To present to members an updated Street Art Management Policy and outline the rationale for separating graffiti from street art within the Council policy
Key Decision:	No
Portfolio Holder:	Councillor Gary Taylor, Portfolio Holder for Communities
Report Of:	Emily Spicer, Assistant Director – Housing and Communities
Report Author:	Nichola Holderness, Group Manager Community Leadership
Ward(s) Affected:	All
Exempt Report:	No

Summary

This report sets out a review of the existing combined Graffiti and Street Art Management Policy. It proposes separating the document into two distinct areas of governance: -

1. A standalone Street Art Management Policy, owned and administered by the Community Leadership Team.
2. Graffiti enforcement, which remains fully covered within the Corporate Enforcement Policy

This approach removes duplication, provides clarity for internal teams and the public. It also ensures a consistent and transparent framework for both enforcement and creative activity.

Recommendations

It is recommended that Policy Development Panel:

1. Provide feedback on whether the Street Art Management Policy should be separated from the Graffiti Policy
2. Note a separate Graffiti Policy is not required, as graffiti is an act of criminal damage and is already governed by national legislation and the Corporate Enforcement Policy.
3. Provide any other feedback for consideration

Reasons for Recommendations

Graffiti constitutes criminal damage under national legislation and therefore sits firmly within the Corporate Enforcement Policy, administered by the Public Protection Team. A separate graffiti policy is duplication for existing arrangements.

Street Art requires governance and an approval process

Separating the policy provides clarity for residents, artists, officers and members, ensuring robust enforcement against graffiti while supporting high quality legitimate street art.

Other Options Considered

- Do nothing – retaining a combined policy was considered but discounted. Feedback from services and partners shows that combining enforcement and creative activity results in operational uncertainty and results in an inconsistent approach.

1. Background

- 1.1 Policy Development Panel formed a Task Group over the period 20 January 2022 to 2 March 2022 to explore and develop a governance framework to support the opportunity for street art in South Holland
- 1.2 A single combined policy was developed and signed off through the committee process in 2022
- 1.3 Operational teams, including Community Leadership, Public Protection and Community Safety have all provided consistent feedback that a combined policy creates confusion.

- 1.4 Graffiti is already regulated through government legislation and the Corporate Enforcement Policy, adopted in December 2021, which is overseen by the Public Protection Team.
- 1.5 The review has identified the need for a clearer and more supportive framework for street art, separate from enforcement activity.

2. Report

2.1 The proposed amended policy for Street Art is set out in appendix 1, this document becomes a standalone document owned by the Community Leadership Team. Its purpose is to:

- Provide a consistent and transparent approach to managing street art within the district.
- Support high-quality, authorised street art that contributes positively to the local area.
- Set out a fair process for considering applications from property owners, community groups, artists, and partner organisations.
- Protect the local environment, heritage assets, and community sensitivities.

2.2 Graffiti enforcement remains wholly governed through the Councils Enforcement Policy with no separate Graffiti Policy required.

2.3 By having a dedicated Street Art policy led by the Community Leadership Team, this will allow: -

- Clarify on what is permitted and constitutes street art
- Clear application process
- Clear and transparent approval process
- Clear roles, responsibilities and ownership
- Distinction between illegal graffiti and authorised artwork

2.4 A combined policy makes it difficult for the public to distinguish between illegal graffiti and authorised creative community art.

3. Conclusion

3.1. This proposed policy has been thoroughly reviewed. It is recommended that the policy be separated, and the new Street Art Policy be adopted to continue to support street art in South Holland. Graffiti enforcement will remain solely within the remit of the Corporate Enforcement Policy.

3.2. This approach enhances clarity, governance and operational effectiveness which will support community creativity and allowing for robust enforcement.

Implications

South and East Lincolnshire Councils Partnership

None

Corporate Priorities

Graffiti and Street Art Management Policy supports the following Sub-Regional South and East Lincolnshire Council Partnership priorities:

- Healthy Lives
- Safe and Resilience Community

Staffing

There are no additional staffing implications resulting in this recommendation. The policy is coordinated by the Community Leadership Team.

Workforce Capacity Implications

None

Constitutional and Legal Implications

As set out in the Policy, South Holland District Council has various statutory powers under which it can enforce against illegal graffiti – including as a landowner and under its enforcement powers. As a landowner the Council can also choose to permit street art.

The proposed policy does not form part of the Policy Framework of the Council and is therefore an executive function to be determined by the Leader, Portfolio Holder or Cabinet.

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

There are no additional risk arising from this report.

Chronological History of this Report

Name of Body	Date
Performance and Development Panel	23 rd March 2022

Report Approval

Report author: Nichola Holderness, Group Manager – Community Leadership. nichola.holderness@boston.gov.uk

Signed off by: Emily Spicer, Assistant Director – Housing and Communities
emily.spicer@sholland.gov.uk

Approved for publication: Councillor Gary Taylor, Portfolio Holder for Community Development



Corporate Enforcement Policy

December 2021

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Policy Updates

First Approval	South Holland Cabinet	29/5/2018
Review	Led by Head of Public Protection. Managers of Enforcement services and legal services consulted.	Sept/Oct 2021
Consideration	Policy Development Panel	16 th Nov 2021
Approval	South Holland Cabinet	14 th Dec 2021

South Holland District Council

Enforcement Policy

1.0 Introduction

The Council carries out a wide range of regulatory roles in meeting its many statutory duties of protecting the public, individuals and the environment.

These duties are met by carrying out a range of activities, including carrying out programmed inspections of premises, responding to complaints, issuing licences and offering advice. This Policy outlines the approach it takes when considering enforcement action.

This policy is an overarching policy that applies to all the Council's Services with enforcement duties, although it should be noted that some services also have more specific enforcement requirements, as defined by specific legislative guidance and regulations.

The appropriate use of the full range of enforcement powers, including prosecution, is important, both to secure compliance with the law and to ensure that those who have duties under it are held to account for failures to safeguard health, safety, welfare and environment or breach of regulations enforced by the Council.

In deciding on the most appropriate course of action officers should have regard to the principles set out in this policy and the need to maintain a balance between enforcement and other activities, including inspection, advice and education.

1.1 Principles of Good Regulation

Regulatory activities undertaken by the Council will be exercised in a way that are:

- i. **Proportionate** – activities will reflect the level of risk to the public and enforcement action taken will relate to the seriousness of the offence;
- ii. **Accountable** – activities will be open to public scrutiny, with clear and accessible policies, and fair and efficient complaints procedures;
- iii. **Consistent** – advice given to those regulated will be robust and reliable and officers will respect advice provided by other regulators. The Council shall seek to ensure consistency of enforcement; however the Council realises that consistency is not a simple matter of uniformity. Officers will need to exercise their professional judgement and discretion according to the circumstances of each individual case and the relevant responsibilities and intervention systems maintained by the Council;
- iv. **Transparent** – Officers will ensure that those they regulate are able to understand what is expected of them and what they can anticipate in return, and

- v. **Targeted** – Resources will be focused on higher risk enterprises and activities, reflecting local need and national priorities and where the Council believes its efforts are able to have an impact.

1.2 Statute and Guidance

The Council will have consideration to the following as appropriate:

a) **Regulators' Code¹**

The Council has had regard to the Regulators' Code made under section 23 of the Legislative and Regulatory Reform Act 2006 in the preparation of this policy. In certain instances it may conclude that a provision in the Code is either not relevant or is outweighed by another provision. Where statutory guidance and legislation specifies the action to be taken this legislation takes precedence.

b) **Human Rights Act 1998**

The Council is a public authority for the purposes of the Human Rights Act 1998. It therefore applies the principles of the European Convention for the Protection of Human Rights and Fundamental Freedoms. This Policy and all associated enforcement decisions take account of the provisions of the Human Rights Act 1998. In particular, due regard is had to the right to a fair trial and the right to respect for private and family life, home and correspondence.

c) **General Data Protection Regulation and Data Protection Act 2018**

Officers will comply with all relevant data protection laws and any associated statutes, regulations and guidance.

d) **The Code for Crown Prosecutors²**

When deciding whether to institute criminal proceedings the Council has regard to the provisions of The Code for Crown Prosecutors as issued by the Director of Public Prosecutions.

The Code for Crown Prosecutors is a public document that sets out the general principles to follow when decisions are made in respect of prosecuting cases. The Code sets out two tests that must be satisfied commonly referred to as the 'Evidential Test' and the 'Public Interest Test':

- (i) Evidential Test - is there enough evidence against the defendant? When deciding whether there is enough evidence to prosecute, the Council will consider what evidence

¹ The [Regulators' Code](#) which came into statutory effect in 2014 provides a clear, flexible and principles-based framework for how regulators should engage with those they regulate.

² The [Code for Crown Prosecutors](#) as issued by the Director of Public Prosecutions sets out the general principles to follow when investigating and making decisions in prosecution cases.

can be used in court and is reliable. It must be satisfied there is enough evidence to provide a "realistic prospect of conviction" against each alleged offender.

(ii) Public Interest Test - is it in the public interest for the case to be brought to court? The Council will balance factors for and against prosecution carefully and fairly, considering each case on its merits. The public interest factors that we will take into account are detailed under the enforcement options available to us in Section 6.

e) **Regulatory Enforcement and Sanctions Act 2008**

The Regulatory Enforcement and Sanctions Act 2008, as amended, established Primary Authority Partnerships³. The Council will comply with the requirements of the Act when it is considering taking enforcement action against business or organisation that has a Primary Authority Partnership, and will have regard to guidance issued by the Secretary of State in relation to Primary Authority.

1.3 Policy Status

This Policy was first approved at the Cabinet meeting of South Holland District Council on 29 May 2018, following an open public consultation between 9 and 23 March 2018.

2.0 Purpose of this Policy

One of the functions of the Council is to act as a regulator and an enforcement agency for a large range of legal duties and powers applied by Acts of Parliament and the Regulations and Orders made under them (including various byelaws).

This policy sets out standards that will be applied across the Council when acting in its role as regulator and enforcement agency and what residents, businesses, consumers, and workers can expect from the Council.

It is supplemented in some cases by more specific and detailed service-based procedures. These procedures also set out the approach to be followed by authorised officers when making decisions in respect of the Council's compliance and enforcement activities. The Council is committed to ensuring that all authorised officers will act in accordance with this policy.

3.0 Scope of the Policy

This policy is the overarching enforcement policy for the Council. It outlines the approach to enforcement and lays down the principles that will be followed in deciding upon and taking action.

³ [Primary Authority Partnership](#) is a scheme which enables businesses to form a legal partnership with a local authority regulator, and receive advice which other local regulators must respect.

Enforcement includes any criminal or civil action taken by the Council aimed at ensuring that individuals or businesses comply with the law.

This policy has been set in accordance with the Regulators' Code. This means that the Council will be open, helpful, fair and careful to ensure that any action required by the Council is proportionate to the risks.

Council services will work with and consult other agencies, and other service areas within the Council, as necessary, where there is a shared or complementary enforcement role.

Officers will take reasonable steps to assist businesses and individuals to comply with the law. However officers will be prepared to ensure compliance by exercising the formal powers delegated to them in the Council's Scheme of Delegation including, where appropriate, prosecution.

In certain circumstances the Council will seek to raise awareness and increase compliance levels by publicising unlawful trade practices or criminal activity. Where appropriate the results of specific hearings or court cases may also be published, and consideration will be given to the Publicising Sentencing Outcomes Guidance⁴ for public authorities on publicising information (including via the internet) about individual sentencing outcomes within the current legal framework.

In exceptional circumstances it may be necessary for Officers to deviate from this policy. Where this is justifiable the decision will be taken by a Senior Manager and reasons for doing so will be fully documented.

4.0 Non-Compliance

4.1 Approach to Dealing with Non-Compliance

An open, fair and proportionate approach will be taken in dealing with breaches of legislation that are regulated and enforced by the Council. Raising awareness and promoting good practice in regulated areas is the first step in preventing breaches, and officers of the Council will signpost to guidance on aspects of the law where requested to do so.

Best efforts will be used to resolve any issues where the law may have been broken without taking formal action, or referring the matter to the courts when the circumstances indicate that a minor offence may have been committed and the Council is confident that appropriate corrective action will be taken.

However, there may be occasions when the breach is considered to be serious and/or where informal action is not appropriate. In such cases, immediate enforcement action

⁴ The [Publicising Sentencing Outcomes](#) guidance sets Government policy that all criminal justice services be open, transparent and accountable. It states that there should be a presumption in favour of the police, local authorities and other relevant criminal justice agencies publicising outcomes of criminal cases and basic personal information about convicted offenders.

may be taken without prior notice and, as noted above, some services have specific legislative guidance and regulations that set out the enforcement requirements in these services.

Advice regarding the non-compliance, the actions required and decisions taken at the time of the intervention, along with the reasons for these will be clearly explained. An opportunity to discuss the Council's course of action will be provided to ensure actions are proportionate and consistent. As stated in the previous paragraph, where immediate enforcement action is required, the opportunity for discussion may not be given where there is a serious breach or public health or safety is at risk.

Officers investigate potential breaches of legislation and they are responsible for managing investigations and making decisions on enforcement action. As part of this process, they may consult with colleagues and managers in determining the best and most appropriate course of action. Officers have the power to use a variety of legislation in the course of their duties, and these have been delegated to them in accordance with the Council's Scheme of Delegation. In relation to prosecutions, where relevant, officers' cases are reviewed by a service manager and approved following a case conference involving key officers, as defined in the Scheme of Delegation.

In some instances, the Council may have shared responsibilities or a complementary role with another enforcement agency. In these circumstances, officers will liaise with that other agency to ensure effective co-ordination, to avoid inconsistencies and to ensure that any proceedings taken are proportionate and appropriate.

The Council will be fair, objective and consistent in its approach to enforcement by following the criteria and guidance set down in relevant legislation and codes of practice.

The Council may publicise information about enforcement action in line with the Criminal Justice System document entitled 'Publicising Sentencing Outcomes'. This will usually occur once an investigation has been brought to a conclusion via a successful prosecution in Court. Any news releases of this nature are normally sent electronically by the Communications Team to newspapers and broadcast media to use in their news bulletins. Such information may also be publicised on the Council's website and via other social media.

4.2 How Action is Determined

Where evidence is found that a business or other regulated person is showing flagrant disregard for the law by deliberately or persistently failing to comply with advice or requests made by the Council, it may be deemed that informal action is not appropriate. Under these circumstances enforcement action may be escalated directly to prosecution or other more severe sanctions where available.

Where there is specific legislative guidance and regulations that set out the enforcement requirements these will be followed.

Where a business or other regulated person contacts the Council to ask for advice and it transpires that a breach of legislation is present at the premises, the most appropriate course of action will be determined based on the factors outlined in section 6 below.

If it is clear that the business or regulated person is keen to resolve the non-compliance quickly, taking on board and completing the steps recommended by the Council, an informal approach is likely to be taken as opposed to triggering enforcement action. However, if there is a serious breach and/or there is an imminent risk to public health or safety, enforcement action may still have to be taken but the Council will seek to work with the business or regulated person to resolve the problem as quickly as possible.

4.3 Factors that Influence our Response to Breaches

Where a breach of legislation is being investigated the approach taken will be proportionate and will take into account factors such as business size and capacity.

If the Council has provided advice or guidance to a business or regulated person, officers will make the necessary checks to ensure that, where this relates to a legal requirement rather than best practice, the non-compliance has been rectified.

The Council may receive referrals from other enforcement bodies that require investigation. These referrals will typically be as a result of the other bodies' inspections or investigations, or intelligence that they have received. The Council will also refer to other enforcement bodies where breaches of legislation that are dealt with by that body are found.

4.4 Approach to Complaints Regarding Non-Compliance

Where a complaint of non-compliance relating to a business, or other regulated person, is received, the officers investigating this breach will assess the information received and may make further enquiries to determine whether a complaint requires investigation. In assessing a complaint, officers may consult colleagues and managers to help assess what risk may be involved and this will determine what action is taken.

5.0 Conduct of Investigations

Enforcement action may result in either civil or criminal proceedings being instituted by the Council. The process that will be followed by officers in the investigation of alleged breaches of the law will depend on which branch of law the investigation is being conducted under. As the enforcing authority in any proceedings it instigates, the burden of proof falls to the Council.

Investigations will be carried out in compliance with the following legislation and their guidance, and any other legislation as may be applicable at the time and in so far as they relate to the Council.

Police and Criminal Evidence Act 1984 (and Codes of Practice)

Criminal Procedure and Investigations Act 1996

Human Rights Act 1998

Regulation of Investigatory Powers Act 2000

Criminal Justice and Police Act 2001

Legislative and Regulatory Reform Act 2006

Regulatory Enforcement and Sanctions Act 2008

These Acts and associated guidance control how evidence is collected and used and give a range of protections to citizens and potential defendants.

The authorised officers of the Council will also comply with the requirements of the particular legislation under which they are acting, and with any associated guidance or codes of practice.

5.1 Powers of Authorised Officers

There are numerous pieces of legislation which the Council as a local authority either has a duty to enforce or adopts or chooses to enforce. The powers available to officers under these different pieces of legislation vary considerably and it is not the purpose of this document to provide an exhaustive list of those powers.

If officers come across situations where they believe they are being obstructed in carrying out their duties they will always explain the provisions of the relevant legislation in order to resolve the issue. In some circumstances it is an offence to obstruct an authorised officer, which could lead to prosecution.

The Council recognises the Primary Authority scheme and where appropriate will communicate with any identified primary authority as part of the enforcement/compliance process.

In some cases powers of seizure are used for safety and evidence gathering purposes. Where articles are removed for any of these purposes a receipt or notice will be given at the time of the inspection or as soon as is practicably possible afterwards

Officers do not have the power of arrest; however joint working is undertaken with the Police and other agencies. Instances may arise where the Police or other agencies consider that an arrest should be made in connection with an authorised officer's investigation.

Officers will carry out formal interviews in line with this policy and the Police and Criminal Evidence Act 1984.

In respect of legislation in England that contains criminal offences, there are strict time limits beyond which the law prevents proceedings being instituted. These time limits vary and are stated in the relevant legislation.

In relevant cases where it is proposed that either criminal or civil proceedings are to be brought by the Council a report will be prepared containing all relevant evidence that has been gathered during an investigation. This report will be reviewed by a Senior manager and a case conference may be called to consider the matter, following which a decision will be made in accordance with the Council's Scheme of Delegation. The evidence will usually also be reviewed by a solicitor before any proceedings are instigated.

5.2 Progress of Investigations

Officers carrying out investigations will keep alleged offenders and witnesses informed about the progress of any investigation as far as their involvement in the process is concerned.

5.3 Training and Appointment of Officers

All officers undertaking enforcement duties will be suitably trained and qualified to ensure they are competent to undertake their enforcement activities.

The Council supports the principle of continuing professional development and will ensure that officers are given the necessary support to achieve this, particularly where there are statutory requirements to do so.

Officers may have a variety of delegated powers to assist them in carrying out investigations. In the event of any doubt as to an Officer's powers, confirmation can be obtained from their senior manager at the Council. Officers will carry identification and proof of authorisation with them when they are carrying out regulatory work.

6.0 Decisions on Enforcement Action

6.1 Range of Actions Available

There are a range of actions that are available to the Council as set out in the different legislation the Council enforces. Examples of the main types of actions that may be considered are set out below:

a) Compliance Advice, Guidance and Support

The Council uses compliance advice, guidance and support as a first response in the case of many breaches of legislation that are identified. Advice is provided, sometimes in the form of a warning letter to assist individuals and businesses in rectifying breaches as quickly and efficiently as possible, avoiding the need for further enforcement action. A warning

letter (sometimes called an ‘informal caution’) will set out what should be done to rectify the breach and to prevent re-occurrence. If a similar breach is identified in the future, this letter will be persuasive in considering the most appropriate enforcement action to take on that occasion. Such a letter cannot be cited in court as a previous conviction but it may be presented in evidence.

Where more formal enforcement action, such as a simple caution or prosecution, is taken, the Council recognises that there is likely to be an ongoing need for compliance advice and support, to prevent further breaches.

b) Voluntary Undertakings

The Council may accept voluntary undertakings that breaches will be rectified and/or recurrences prevented. The Council will take any failure to honour voluntary undertakings very seriously and enforcement action is likely to result.

c) Statutory (Legal) Notices

The Council has powers to issue statutory notices in respect of many breaches. These include: ‘Stop Notices’, ‘Prohibition Notices/Orders’, ‘Emergency Prohibition Notices/Orders’, and ‘Improvement Notices’. Such notices are, subject to any appeal, legally binding. Failure to comply with a statutory notice can be a criminal offence and may lead to prosecution and/ or, where appropriate, the carrying out of work in default.

A statutory notice will clearly set out actions that must be taken and the timescale within which they must be taken. It is likely to require that any breach be rectified and/or prevented from recurring. It may also prohibit specified activities until such time as prescribed works/safeguards have been carried out to the satisfaction of the authority. Where a statutory notice is issued, an explanation of the appeals process will be provided to the recipient.

Some notices issued in respect of premises may be affixed to the premises and/or registered as local land charges.

d) Financial Penalties

The Council has powers to issue fixed penalty notices or penalty charge notices in respect of some breaches. A fixed penalty notice or penalty charge notice is not a criminal fine, and does not appear on an individual’s criminal record. If a fixed penalty/penalty charge notice is not paid, the Council may commence criminal proceedings in respect of the breach or take civil enforcement action to recover the penalty charge subject to the provisions of the relevant legislation.

If a fixed penalty/ penalty charge notice is paid in respect of a breach the Council cannot take any further enforcement action in respect of that breach. Payment of a fixed penalty does not provide immunity from prosecution in respect of similar or recurrent breaches.

The Council is only able to issue fixed penalty notices where it has specific powers to do so. If fixed penalty notices are available, their issue is at the Council’s discretion.

In some circumstances, in particular where breaches are serious or recurrent, it may be that prosecution is more appropriate than the issue of a fixed penalty notice.

e) Injunctive Actions, Enforcement Orders etc.

In some circumstances the Council may seek a direction from the court (in the form of an order or an injunction) that a breach is rectified and/or prevented from recurring. The court may also direct that specified activities be suspended until the breach has been rectified and/or safeguards have been put in place to prevent future breaches.

Failure to comply with a court order constitutes Contempt of Court, a serious offence that may lead to imprisonment.

The Council is required to seek enforcement orders after issuing some enforcement notices, providing the court with an opportunity to confirm the restrictions imposed by the notice. Otherwise, the Council will usually only seek a court order if it has serious concerns about compliance with voluntary undertakings or a notice.

f) Simple Caution

The Council has the power to issue Simple Cautions (previously known as 'Formal Cautions') as an alternative to prosecution for some less serious offences, where a person admits an offence and consents to the Simple Caution. Where a Simple Caution is offered and declined, the Council is likely to consider prosecution.

A Simple Caution will appear on the offender's criminal record. It is likely to influence how the Council and others deal with any similar breaches in the future, and may be cited in court if the offender is subsequently prosecuted for a similar offence. If a Simple Caution is issued to an individual (rather than a corporation) it may have consequences if that individual seeks certain types of employment.

Simple cautions will be used in accordance with Ministry of Justice document 'Simple Cautions for Adult Offenders'.

g) Prosecution

The Council may prosecute in respect of serious or recurrent breaches, or where other enforcement actions, such as voluntary undertakings or statutory notices have failed to secure compliance. When deciding whether to prosecute the Council has regard to the provisions of The Code for Crown Prosecutors as issued by the Director of Public Prosecutions.

Prosecution will only be considered where the Council is satisfied that it has sufficient evidence to provide a realistic prospect of conviction against the defendant(s).

If the evidential test is satisfied a prosecution will usually take place unless there are public interest factors tending against prosecution that outweigh those tending in favour. The more serious the offence or the offender's record of breaches/ criminal behaviour, the more likely it is that prosecution will be required in the public interest.

Assessing the public interest is not merely a matter of adding up the number of factors on each side and seeing which has the greater number. The public interest must be decided on the merits of each individual case and making an overall assessment. It is quite possible that one factor alone may outweigh a number of other factors that tend in the opposite direction.

A successful prosecution will result in a criminal record. The court may impose a fine and in respect of particularly serious breaches a prison sentence. The court may order the forfeiture and disposal of non-compliant goods and/or the confiscation of any profits that have resulted from the breach. Prosecution may also lead, in some circumstances, to the disqualification of individuals from acting as company directors.

h) Refusal/Suspension/Revocation of Licences

The Committee of the Licensing Authority meets to discharge the duties of the Licensing Authority under the Licensing Act 2003 and Gambling Act 2005. All other Licensing Matters are governed by the Licensing Committee. Sub-Committees are appointed to determine licenses or registrations where the matter could not or should not be determined by Officers under delegated authority.

The Council issues a number of different licences, consents, registrations and permits. They are applied for by submission of an application, the form and content of which is sometimes specified in law. Applications are generally granted for a limited defined period and will be required to be renewed annually unless otherwise specified.

The Council may be permitted to ask supplementary questions on an application form in order to assist it in reaching a decision on whether the applicant is a fit and proper person to hold such a licence.

In some cases applications are subject to either a public or interested party consultation process and any application that attracts adverse comment or objection or does not meet Council policy requirements will be referred to an internal civil hearing forum to determine the application.

Most licences and other permissions have conditions attached, which can be standard conditions or specific conditions or a combination of both. These conditions form part of the licence and lay down requirements that a business or individual must have regard to when trading. Breach of a condition may be a civil or criminal matter.

When considering applications information supplied with the application together with any previous enforcement action and compliance record can be taken into account when reaching a decision.

i) Proceeds of Crime

Where appropriate the Council will consider the use of the Proceeds of Crime Act 2002 which allows local authorities to recover assets that have been accrued through criminal activity. Applications are made after a conviction has been secured.

6.2 How Decisions are Made on Enforcement Action

In assessing what enforcement action is necessary and proportionate consideration will be given to, the following principles for enforcement set out in the 'Macrory Review':

- Aim to change the behaviour of the offender;
- Aim to eliminate any financial gain or benefit from non-compliance;
- Be responsive and consider what is appropriate for the particular offender and regulatory issue, which can include punishment and the public stigma that should be associated with a criminal conviction;
- Be proportionate to the nature of the offence and the harm caused;
- Aim to restore the harm caused by regulatory non-compliance, where appropriate; and,
- Aim to deter future non-compliance.

Where appropriate decisions about what enforcement action is to be taken may involve consultation between:

- Investigating Officer (s)
- Senior Managers
- Solicitors appointed to act for the Council
- Portfolio Holder

The decision to prosecute a case will be taken by those with the authority to do so in accordance with the Council's Scheme of Delegations.

6.3 How Decisions are Communicated

The Council will provide a timely explanation in writing of the decision including any rights to representation or appeal and information on the process involved.

7.0 Safeguarding

Consideration will be given to the Council's Safeguarding Policy when carrying out investigations. This is available on the intranet to all staff, who will also receive updates and training where relevant to their role.

Where an investigation highlights safeguarding concerns for a child or vulnerable adult, these will be shared with the relevant agency in line with the Safeguarding Policy and Procedures. The Council's Designated Safeguarding Officer oversees this.

8.0 Information Sharing

On occasion it will be necessary for this Council to share information with other Agencies. Section 5 of the Crime and Disorder Act 1998 places a duty on us to do all we can to reasonably prevent crime and disorder. The Council will fulfill this obligation by sharing information with other Council services and partner agencies as required. All disclosures will be in accordance with the provisions of the General Data Protection Regulations (GDPR) 2018.

9.0 Review of this Policy

This policy will be reviewed periodically or in line with changes in relevant legislation, or the Regulators' Code.

10.0 Comments and Complaints

All appeals in relation to enforcement action taken should be via the statutory appeals process outlined in the relevant legislation.

Complaints about the conduct of officers should be made via the Council's corporate complaints procedure which is available he



APPENDIX 1

Street Art Management Policy 2026

Contents

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Introduction

South Holland District Council is committed to providing safe and welcoming public spaces and supporting its artists and broader creative community.

Unwanted graffiti can negatively impact the appearance of our towns and villages, shaping how both residents and visitors perceive local areas. South Holland District Council is committed to tackling illegal or antisocial graffiti while taking a balanced, positive approach to legal street art that enhances local environments. South Holland District Councils general approach towards graffiti enforcement is covered within the Corporate Enforcement Policy

This policy supports the priorities of the Council as set out in the Sub Regional Strategy 2024/25 to 2028/29 and provides a clear framework for how street art proposals will be assessed, approved and managed. It is intended to support creatively while ensuring high-quality, responsible and appropriate use of public and private spaces.

For enforcement matters, this policy should be read alongside the Corporate Enforcement Policy [Appendix A Revised Corporate Enforcement Policy.pdf](#).

Purpose

This policy aims to:

- Provide a consistent and transparent approach to managing street art within the district.
- Support high-quality, authorised street art that contributes positively to the local area.
- Set out a fair process for considering applications from property owners, community groups, artists, and partner organisations.
- Protect the local environment, heritage assets, and community sensitivities.

The policy applies to all street art proposals visible from public spaces, regardless of whether they are on public or privately owned land.

Definitions

This policy defines Street art as:

Street art: *“Any work of art on building facades or infrastructure with permission that complements the public space in which it is situated”. “Such a work will not detract, defame or depreciate the area. It could be a painting, land art, sculpture, etc.”*

Graffiti: *“Unauthorised markings, writing, symbols, or drawings applied to any surface without permission. Graffiti is subject to removal under the Council’s Corporate Enforcement Policy”*

Approach to Legal Street Art

South Holland District Council recognises the importance of legal street art in contributing to a vibrant local community. When appropriately designed and authorised, street art can enhance the appearance and amenity of public spaces in the district that people can visit and enjoy.

In recognition of this the Council may support street art proposals where they meet the acceptance criteria and do not negatively impact the environment or local community.

If a property owner wishes to apply an artwork to their property they must inform the Council at the earliest opportunity. Where graffiti has already been applied to a property, but the owner of the property considers the graffiti to be street art the property owner must notify the Council that they would like to keep the work. In both circumstances a decision not to remove the work will be based upon a test of whether street art or graffiti are considered to be detrimental to the local environment and enjoyment of the location by users and therefore the final decision will rest with the Council at all times.

The list below highlights **key considerations**:

- Can Street Art be seen from areas the public are entitled to frequent?
- Is the “Street Art” offensive in its nature, gang related, racially, politically or religiously aggravating, insulting and against public interest?
- Are the images considered to be contextually detrimental including but not limited to: Encouraging illegal graffiti proliferation, inappropriate for the location e.g. near schools, out of keeping with surrounding area?
- Saturation (Consideration of the number of images already present in the area)
- Risk of encouraging illegal graffiti or tagging
- Complaints received.
- Alignment with other council policies
- Whether the artwork is intimidating, explicit or defamatory
- Whether the building is listed or protected

This list is not exhaustive. Officers must apply judgement based on the specifics of each proposal.

The Council reserves the right to remove any street art at any time.

Approval

There may be occasions when it is difficult to make a clear decision whether a piece is street art and for this reason the following approval process supports this policy.

- If South Holland District Council owns the land on which the street art is to be completed, application should be made to Assistant Director – Housing and Communities who will nominate a contact officer for the project. The application should state the proposed location of the work, the nature and duration of the project and the persons or body responsible for carrying it out. The contact officer will also offer advice on the policy as required. You can contact the Community Leadership team at community@sholland.gov.uk

- The contact officer will notify the following:
 - The Neighbourhoods team who will in turn notify the local parish, town council or Spalding Town Forum and the relevant South Holland District Council Ward Members.
 - The Senior Planning Officer
 - Group Manager for Safer Communities
- In the case of land owned privately or by other agencies, South Holland District Council cannot insist upon compliance with this policy statement, although such compliance will be encouraged. In this case the owner of the land would be invited to co-operate with the contact officer throughout the process.
- The local community, Ward Members and the relevant Parish, Town Council or Spalding Town Forum must be consulted prior to any work being done under this policy. Consultation need not be laborious. It is designed to ensure that the community has an opportunity to “own” the project as far as possible.
- At a minimum, residents in the immediate vicinity or within sight of the proposed project should be contacted, and as far as possible their opinions should be taken on board. It will be the responsibility of the applicant to carry out the consultation, although assistance may be given by the contact officer in conjunction with Neighbourhoods team and the relevant Parish, Town Council or Spalding Town Forum. Evidence of the consultation and its result must be provided at the request of the contact officer.
- Local people should be engaged as fully as possible in the street art project. This could, for instance, involve them working in a group with a specific artist in order to design and complete the project. It will be the responsibility of the applicant to involve local people in the project, although the contact officer may offer advice and assistance when appropriate.
- The work of art should be designed by a recognised artist(s) to be attractive and a positive addition to the locality. Its design should minimise the risk of attracting offensive material and must not glorify or promote tagging. The work may be signed by the artists.
- Before the work can be carried out, the design should be approved by the contact officer in conjunction with other stakeholders. These stakeholders will be the Assistant Director – General Fund Assets representing the owner of the land, the relevant Parish, Town Council or Spalding Town Forum or those delegated to act on their behalf. This is not intended to be a laborious process and nor should it stifle creativity. The purpose is to ensure that the policy works well.
- The Applicant may prepare the surface in advance and may treat the completed artwork with an anti-graffiti coating.
- The work is unlikely to be permanent. In time it may be painted over or renewed according to the needs of the next generation of young people or local residents and businesses.
- Requests for decommissioning should be handled in the same way as applications for producing works of art. Initial referrals should be made to the Assistant Director – Housing and Communities who will follow this policy document.

Key Steps

The following key steps provide an overview of this policy in relation to Street Art:

Submit Application - Application for Street Art proposal to South Holland District Council

Community and stakeholder consultation – Consultation with local community, Ward Members and the Parish/Town Council or Spalding Town Forum

Approval decision – Council Officers review the application, ownership and responsibility and design proposal and approve or reject.

Maintenance – Agreed maintenance and ownership responsibility

Delivery of artwork – Approved artwork is delivered in the agreed timeline

Disclaimer

This report is provided for information and it does not purport to be complete. While care has been taken to ensure the content in the report is accurate, we cannot guarantee it is without flaw of any kind. There may be errors and omissions or it may not be wholly appropriate for your particular purposes. In addition, the publication is a snapshot in time based on historic information which is liable to change. South Holland District Council accepts no responsibility and disclaims all liability for any error, loss or other consequence which may arise from you relying on any information contained in this report.



Report To:	Policy Development Panel
Date:	Tuesday 21 April 2026
Subject:	Policy Development Panel Work Programme
Purpose:	To set out the Work Programme of the Policy Development Panel
Key Decision:	No
Portfolio Holder:	n/a
Report Of:	John Medler, Assistant Director - Governance (Monitoring Officer)
Report Author:	Andrea Tait, Democratic Services Team Leader
Ward(s) Affected:	None
Exempt Report:	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 (and indicative 2026/27)
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 Team Leader
atait@sholland.gov.uk

Signed off by: Assistant Director - Governance (Monitoring Officer)
John.medler@e-lindsey.gov.uk

Approved for publication: N/A

CALENDAR OF WORK PROGRAMME ITEMS 2025/26 SHDC POLICY DEVELOPMENT PANEL

21 Apr 2026	<ul style="list-style-type: none"> • SHDC and S&ELCP Policy Registers - Corey Gooch • Housing (HRA) Damp, Condensation and Mould Policy - Adel Gardner • Graffiti and Street Art Management Policy - Emily Spicer / Nichola Holderness • Debt Write Off Policy - Russell Stone/Sharon Hammond • Final Report of the Derelict and Untidy Sites Task Group – Marc Whelan • Anti-Social Behaviour(ASB) and Hate Crime Policy for the Housing Landlord Service - Adel Gardner • Health and Safety Policy – General Statement of Intent and Arrangements – Christian Allen
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PENDING WORK PROGRAMME ITEMS SHDC POLICY DEVELOPMENT PANEL

2 June 2026 provisional	<ul style="list-style-type: none"> • Tenant Engagement and Influence Strategy 2025-2027 Adele Gardner <i>Update be presented to the Policy Development Panel one year from adoption at Cabinet – due to be received by Cabinet in June 2026.</i> • Carbon Footprint Update FY24/25 – Dean Hempsall • Housing Complaints Policy – Beverley Chapman • Employee Policies – Rachel Robinson
Special Joint PMP/PDP Date tbc	<ul style="list-style-type: none"> • Destination Management Plan – Maria Cotton
9 Sept 2026 provisional	<ul style="list-style-type: none"> • ICT Policies – Corey Gooch <i>Review of ICT Policies 2 years from adoption.</i> • Communications Strategy – Corey Gooch <i>Review of Communications Strategy 3 years from adoption.</i> • PSPS Transformation and Service Modernisation Programme James Gilbert / Lewis Ducket <i>Review of delivery of the programme 18 months from adoption – approved by Cabinet January 2025.</i>

<p>4 November 2026 Provisional</p>	<ul style="list-style-type: none"> • Vulnerable Person and Reasonable Adjustment Policy – Housing Landlord Service 2025 – 2029 <i>review of new policy one year from adoption</i> Adel Gardner • Disabled Aids and Adaptations Policy: Housing Landlord Service <i>review of new policy one year from adoption</i> Louis Humphreys • AI Policy Corey Gooch <i>Policy Development Panel requested to review the policy in November 2026</i>
<p>23 March 2027 Provisional</p>	<ul style="list-style-type: none"> • South and East Lincolnshire Councils Partnership Safeguarding Policy <i>review of new policy one year from adoption</i> David Postle • Social Media Policy Shaun Gibbons – <i>review of new Policy one year from its adoption at Cabinet January 2026</i>
<p>2028/29</p>	<ul style="list-style-type: none"> • Partnership Environment Policy Sarah Baker <i>Request to review policy 2028/29</i> • Housing Standards Policies Jon Challen / Luke Settle <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>

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. Final report presented to PDP on 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



Report To:	Policy Development Panel
Date:	21 April 2026
Subject:	Debt Write Off Policy
Purpose:	To review the Debt Write Off Policy
Key Decision:	N/A
Portfolio Holder:	Councillor Paul Redgate, Portfolio Holder for Finance
Report Of:	Russell Stone, Director of Finance and Section 151 Officer
Report Author:	Sharon Hammond, Head of Revenues and Benefits
Ward(s) Affected:	All
Exempt Report:	Partially Exempt. Appendix 1 of this report is exempt by virtue of paragraph 3 of Schedule 12A of the Local Government Act 1972. (Information relating to the financial or business affairs of any particular person (including the authority holding that information))

Summary

Efficient and well administered debt management is crucial to the Council, and the Debt Write Off Policy supports effective processes for occasions where debt is considered irrecoverable and recommended for write off.

Recommendations

That the Policy Development Panel reviews the Debt Write Off Policy and submits any observations or recommendations to Cabinet.

Reasons for Recommendations

To ensure the Council has robust policy and procedures to deal with debt write off.

Other Options Considered

Not to review the policy.

1. Background

- 1.1 Efficient and well administered debt management is crucial to the Council, and to this end the Council has a Debt Management Policy, and an Operational Debt Write Off Policy in place that enable effective management of debt, and in particular the processes for identification and recovery of debt owed to the council, and for those occasions where debt is deemed irrecoverable.
- 1.2 The Policy Development Panel first reviewed the Debt Write Off Policy in May 2017, and Cabinet officially adopted it in July 2017. This operational policy is reviewed periodically and has largely stayed the same, since there have been no major changes in the laws governing debt collection, recovery, or enforcement.
- 1.3 On 20 January 2026, Cabinet approved an increase in the level of write off delegated to the Section 151 Officer to £5,000. This decision recognised the pre-existing level of delegation at £1,050 had become out of step with the wider sector and had not kept pace with changes in individual debtor levels. For context, the limit represented less than 6 months of one annual Band D Council Tax bill, which in 2026/27, including average parish precepts, is just over £2,278.

Whilst only used once all other reasonable routes have been exhausted, this increase in delegation supports an efficient mechanism to move irrecoverable debt through the authorisation process.

- 1.4 Comparison against other Lincolnshire authorities* demonstrates that despite the recent increase, the delegation for SHDC remains relatively low, as shown in the table below: -

BBC	ELDC	SHDC	NKDC	SKDC	CoL	WLDC
£5,000 and all Bankruptcies / insolvencies unlimited	£75,000	£5,000	£10,000	£50,000	£5,000 ⁽ⁱ⁾	up to £25,000 ⁽ⁱⁱ⁾

(i) CoL delegation to Assistant Directors

(ii) WLDC delegation up to £2,500, and to £25,000 in consultation with Policy and Resources Chairman

* Source: constitutions published on websites

- 1.5 The Debt Write Off Policy is not for publication, due to its sensitive nature, setting out the approach South Holland will take in respect of debt write off.
- 1.6 At the request of this Committee, the Debt Write Off Policy, at Appendix 1, is presented for review.

2. Report

- 2.1 It is acknowledged that while most funds owed to the Council will be effectively collected and recovered, and in many instances recovery and enforcement measures will remain appropriate for ensuring successful collection, there are circumstances where debts may be deemed irrecoverable for various reasons. In such cases, recommendations will be made for write-off.
- 2.2 The Debt Write Off Policy offers detailed guidance on the procedures for debt recovery and outlines the circumstances under which debt may be deemed irrecoverable and proposed for write-off.
- 2.3 Regular review of the policy ensures that it continues to meet requirements and the processes function effectively.
- 2.4 Should this Committee have any suggestions for improvement, these can be recommended for consideration by Cabinet.
- 2.5 The Debt Management Policy is provided at Appendix 2 for information.

3. Conclusion

- 3.1. The Debt Write Off Policy provides the basis and principles for consideration before any recommendation for debt write off. Through regular review this policy remains current and continues to function effectively.
- 3.2. Any suggestions for improvement emerging from this review would be recommended to Cabinet for consideration.

Implications

South and East Lincolnshire Councils Partnership

None

Corporate Priorities

None

Staffing

None

Workforce Capacity Implications

None

Constitutional and Legal Implications

Recovery and enforcement procedures are regulated by statutory provisions, and operational activities will be conducted in compliance with these requirements. Delegated authority for debt write-off is specified within the constitutional framework.

Data Protection

None

Financial

Having clear procedures for writing off debts that cannot be recovered is a sign of good financial management.

South Holland District Council as the billing authority, manages the billing, collection, and recovery of various revenue sources. For both Council Tax and Business Rates, these tasks are regulated by collection fund accounting, with income and losses shared among major precepting bodies: Lincolnshire County Council and the Lincolnshire Police and Crime Commissioner.

The council receives about 11% of Council Tax and 40% of Business Rate revenue, but it also absorbs a matching portion of losses caused by irrecoverable debts that are written off.

Council accounts include provisions for bad debt, which are regularly reviewed.

Risk Management

Some annual council revenue will inevitably be uncollectable and recommended for write-off after all recovery efforts fail.

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 Environment Impact Assessment

Not undertaken

Acronyms

None

Appendices

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

Appendix 1	Debt Write Off Policy (Exempt)
Appendix 2	Debt Management Policy

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:	Sharon Hammond, Head of Revenues and Benefits sharon.hammond@pspsl.co.uk
Signed off by:	Russell Stone, Director of Finance and Section 151 Officer
Approved for publication:	Councillor Redgate, Portfolio Holder for Finance

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South Holland District Council

Debt Management Policy

Document Title	Debt Management Policy
Version	1.3
Policy Owner	Head of Revenues and Benefits
Policy Issue Date	February 2026
Review Period	Every two years
Date of Next Review	February 2028

The Revenues and Benefits service is delivered by Public Sector Partnership Services Limited on behalf of South Holland District Council.

Document Control

Version Control

Issue No.	Author	Status	Issue Date	Reason for Issue
Final V1.0		Final	25/07/2017	New Policy adopted
V1.1	Head of Revenues and Benefits		04/2022	Policy review
V1.2	Head of Revenues and Benefits		07/2024	Policy review
V1.3	Head of Revenues and Benefits		01/2026	Added: - Service Delivery clarifying PSPS. Reference to use of external specialist legal services. Vulnerability - to include any organisation acting on behalf of the council, and to place a hold on action.

Approval Control

Issue No.	Approval Authority	Approval Date	Due for Review
Final V1.0	Cabinet	25/07/2017	
V1.1	Cabinet	19/07/2022	July 2024
V1.2	S151 and PFH Finance	07/2024	July 2026
V1.3	S151 and PFH Finance	23/02/2026	February 2028

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Introduction

South Holland District Council has a duty to ensure cost effective billing, collection, and recovery of all sums due to the Council.

This policy covers debt recovery activities in respect of: -

- Council Tax
- Business Rates (Non-Domestic Rates)
- Overpaid Housing Benefit
- Sundry Debt
- Business Improvement District (BID) Levy

Efficient and well administered debt management is crucial to the council. A consistent and fair approach to debt management will be taken to ensure the council's interests are protected whilst residents who are struggling financially are supported to pay through the provision of appropriate advice and early intervention.

Whilst the majority of income due to the council is collected in a routine manner, unpaid charges and debts arise for a variety of reasons. This policy sets out the principles that will apply in the recovery and enforcement of debts.

Legislation

We will act in accordance with relevant legislation and policy including: -

Council Tax	<ul style="list-style-type: none">• Local Government Finance Act 1992• Local Government Finance Act 2012• The Council Tax (Administration and Enforcement) Regulations 1992 (as amended) South Holland District Council, Council Tax Support Scheme
Business Rates	<ul style="list-style-type: none">• Local Government Finance Act 1988• Local Government Finance Act 2012 The Non-Domestic Rating (Collection & Enforcement) (Local Lists) Regulations 1989 (as amended)
BID Levy	<ul style="list-style-type: none">• The Non-Domestic Rating (Collection & Enforcement) (Local Lists) Regulations 1989 (as amended)
Housing Benefit Overpayments	<ul style="list-style-type: none">• Housing Benefit Overpayments Housing Benefit Regulations 2006• Housing Benefit (Pension Credit) Regulations Council Tax Benefit Regulations 2006 (up to 31.03.13)
Sundry Debt	<ul style="list-style-type: none">• The Late Payment of Commercial Debts Regulations 2002• The Late Payment of Commercial Debts Regulations 2013

	<ul style="list-style-type: none"> • The Late Payment of Commercial Debts (Interest) Act 1998 • Sundry debts are collected within the relevant framework up to the point that legal action is required, and the debt may be passed to legal representative for further recovery action
All Debts	<ul style="list-style-type: none"> • The Debt Respite Scheme (Breathing Space Moratorium and Mental Health Crisis Moratorium) Regulations 2020

South Holland District Council appoints Enforcement Agents to recover Council Tax and Non-Domestic Rate arrears when a debt reaches a certain point in the recovery process. These arrangements are governed by: -

- The Tribunal Courts and Enforcement Act 2007
- The Taking Control of Goods Regulations 2013 and
- The Taking Control of Goods (Fees) Regulations 2014.

The Council will also instruct external specialist legal services as necessary in its objectives to enforce debt.

Policy Aims

It is essential that the council undertakes the administration and recovery of all debt in an efficient and effective manner. We have a legal duty to ensure cost effective billing, collection, and recovery of all sums due to the authority.

As such, we will: -

- Ensure a professional, consistent, and timely approach to recovery action.
- Take enforcement action against deliberate non-payers or late payers.
- Take positive action to prevent arrears occurring, for example by maximising income and providing a range of payment methods.
- Promote a co-ordinated approach towards sharing debtor information and managing multiple debts owed to the council.
- Ensure that debts are managed in accordance with legislative provisions and best practice.

This policy will: -

- Be a guide to all officers involved in the recovery of monies.
- Set out clear strategy.
- Demonstrate commitment to the delivery of quality services to our customers.
- Provide revenue to the council and help reduce the loss from eventual debt write off.
- Fulfil the Councils statutory obligations to collect Council Tax, Business Rates and excess Housing and Council Tax Support.

Policy Objectives

To ensure that all income due to the council is collected, with minimum avoidance and in the interest of residents and businesses in the district.

To achieve our objectives, we will ensure the following principles are adhered to: -

- Consider that customers have a responsibility to pay.
- Aim to identify those who can pay but won't or who deliberately delay payment, so that recovery action can be taken accordingly.
- Actively encourage customers to engage at every stage of the collection and recovery process.
- Aim to help individuals to maximise their income.
- Acknowledge the need to provide a service that is effective but, when necessary, sensitive to individual's needs.
- Ensure that payment arrangements reflect the level of debt owed as well as the ability to pay.
- Expect 'priority' debts to be given priority over other debt owed.
- Acknowledge the role of recognised advice agencies, signpost, and encourage contact with such agencies where appropriate.

Communication

We will provide our customers with clear and prompt information about the amounts they are being asked to pay. Our correspondence and information will show: -

- What the bill or invoice is for
- The total amount due
- The date by which payment is due
- How and where to make payments
- Contact details for enquiries
- Correspondence clearly written, without the use of jargon where possible
- Any penalty charges applicable for late payment

We will advise Debtors promptly about the existence of their debt and, where appropriate, they will be advised of their right to appeal in line with legislation.

We will deal with all debtors in a courteous, yet firm and fair manner.

We will provide appropriate support and signposting to improve communications with those customers for whom English is not their first language.

Recovery of money due

Whilst there are set processes and steps to follow in the collection and recovery of monies owed to the council, each case is treated individually to take into account various factors such as the circumstances of the debtor.

Some enforcement actions will incur additional costs, which are payable by the debtor. We will levy and seek to recover costs/fees that are legitimately due from the debtor. Only in exceptional circumstances will consideration be given to costs/fees being waived.

Any requests for cancelling or writing off debts will be dealt with in accordance with the Council's financial rules.

All debtors will be advised of the consequences of non-payment and the courses of action that could result from non-payment. These include: -

Council Tax (including excess Council Tax Support)	
Possible Action	Final Sanction
<ul style="list-style-type: none"> • Summons • Magistrates Court hearing • Liability Order • Payment Arrangement • Attachment of Benefit • Attachment of Earnings • Attachment of Members Allowances 	<ul style="list-style-type: none"> • Enforcement Agent Action • Bankruptcy / Insolvency • Charging Order • Committal to Prison
National Non-Domestic Rates (Business Rates) and BID Levy	
Possible Action	Final Sanction
<ul style="list-style-type: none"> • Summons • Magistrates Court hearing • Liability Order • Payment Arrangement • Court of competent jurisdiction County Court (as an alternative to Magistrates Court) • Security of unpaid rates 	<ul style="list-style-type: none"> • Enforcement Agent Action • Bankruptcy / Insolvency • Charging Order • Committal to Prison
Housing Benefit Overpayments	
Possible Action	Final Sanction
<ul style="list-style-type: none"> • Direct deductions from on-going benefit entitlement • Payment Arrangement • Deduction from Earnings 	<ul style="list-style-type: none"> • County Court Judgement • Charging Order • Removal of goods through County Court Enforcement Agent • Debt Collection Agency
Sundry Debt	

Possible Action	Final Sanction
<ul style="list-style-type: none"> • Payment Arrangement • Cessation of service 	<ul style="list-style-type: none"> • County Court Judgement • Attachment of Earnings Order • Charging Order • Removal of goods through County Court Enforcement Agent • Debt collection Agency • Bankruptcy / Insolvency

Where liability is continuous, (for example Council Tax) any arrangement made will normally require payments to be over and above the on-going monthly liability. Future instalments must be paid when due as a condition of the arrangement.

Where a debtor is not able to repay the debt completely, either immediately or within a reasonable timescale, then each case will be treated individually in respect of an arrangement for repayment over a specific period of time. In such circumstances, a review of the person's income and expenditure will be carried out to help establish that the proposed level of repayment is appropriate given the debtors financial circumstances.

Where a payment arrangement is made, failure to make regular payments in a timely manner will result in further recovery action and reasonable costs will be added to the debt.

Our Approach to Enforcement of Debt

We will follow the principles outlined below: -

Our action will be proportionate.

We will: -

- Consider the balance to be struck between the potential loss of income and the cost of collecting the debt.
- Have regard to the effect of enforcement on the debtor.

Our action will be consistent.

We will take a similar approach in similar circumstances to achieve similar ends. This relates to: -

- The advice we provide.
- The use of legislative powers.
- The recovery procedures used.

We recognise that consistency does not mean simple uniformity in its treatment of debt. Consideration will be given to the individual's personal circumstances and will take account of factors such as: -

- The social circumstances of the debtor.
- The debtor's payment history.
- The debtor's ability to pay.

Our action will be transparent.

We recognise it is important to maintain public confidence. We will help people to understand what is expected of them and what they should expect from us. It also means explaining clearly the reasons and justification for taking recovery/enforcement action. If action is required, we will:

- clearly explain the reasons why,
- clearly state the time scales
- Ensure the distinction is made between advice being provided and actual legal requirements.

We will advise debtors of the consequences of non-payment and the courses of action that could result from non-payment.

Multiple Debts

Where we know that a person has more than one debt, we will: -

- Identify and have consideration to the action being taken against the debtor and
- Establish which debt should have the greatest priority for repayment,
- Ensure that repayments plans are realistic in light of other debts owed.

We will consider: -

- The amount involved.
- The length of time that the debt has been outstanding.
- Whether there is a court order in place to enforce the debt.

Advice and Assistance

We welcome the involvement of trained or licensed welfare and advice agencies in connection with debts due to the Council and recognise the benefits that such organisations can offer both to the debtor and to the Council in prioritising repayments to creditors and maximising income for the debtor.

We will encourage debtors to obtain specialist advice and help where it is apparent they are in severe financial difficulty. This will include signposting to local and national free debt and money advice agencies such as Citizens Advice, Money Advice & Pensions Service and National Debtline.

Where the potential for a statutory or discretionary benefit or discount exists in relation to a particular debt, efforts will be made to make the debtor aware of such opportunities and they will be encouraged to apply for these.

Debtors will be advised of the importance of paying priority debts before non-priority debts.

Vulnerability

We recognise that the Council, our staff, contractors and agents each have a role in ensuring that the vulnerable and socially excluded are protected.

We will support and signpost individuals to seek appropriate advice and guidance where we recognise possible vulnerability.

Where we, or any organisation acting on behalf of the council in debt enforcement, identify individual(s) as vulnerable, we will review the recovery action being taken to determine whether it is still appropriate, based on the circumstances. During this review period we will place a hold on any further action.

The appropriate use of discretion is essential in every such case.

Complaints

We aim to provide high service standards.

However, if someone is not satisfied with the service provided, they have the right to make a complaint in line with our complaint procedure which can be found on our website at www.sholland.gov.uk.

Equality Statement

South Holland District Council is committed to equality and fairness. Equality is about ensuring people are treated fairly and given fair chances. It is also about ensuring that people receive fair outcomes in the standard of service they receive from the Council. This includes everyone, regardless of their race, gender, age, religion or belief, sexual orientation and/or disability.

Policy Management and Review

This policy will be reviewed every two years, and as necessary in line with changes in relevant legislation. Approval for review and revision is delegated to Section 151 Officer and Portfolio Holder for Finance.

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.

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