

Guildhall Gainsborough
Lincolnshire DN21 2NA
Tel: 01427 676676 Fax: 01427 675170

AGENDA

This meeting will be webcast live and the video archive published on our website

Corporate Policy and Resources Committee
Thursday, 16th April, 2026 at 6.30 pm
Council Chamber - The Guildhall, Marshall's Yard, Gainsborough, DN21 2NA

Members:

- Councillor Owen Bierley (Chairman)
- Councillor Paul Swift (Vice-Chairman)
- Councillor Matthew Boles
- Councillor Frazer Brown
- Councillor Ian Fleetwood
- Councillor Paul Key
- Councillor Jeanette McGhee
- Councillor Tom Smith
- Councillor Baptiste Velan
- Councillor Moira Westley
- Councillor Trevor Young

1. Apologies for Absence

2. Public Participation Period

Up to 15 minutes are allowed for public participation. Participants are restricted to 3 minutes each.

3. Minutes of Previous Meeting/s

i) For Approval

To confirm and sign as a correct record the Minutes of the Meeting (PAGES 3 - 14) of the Corporate Policy and Resources Committee held on Thursday, 12 February 2026

ii) For Noting

To note the Minutes of the Joint Staff Consultative Committee (PAGES 15 - 18) meetings held on Thursday, 22 January 2026 and Thursday, 3 March 2026.

Agendas, Reports and Minutes will be provided upon request in the following formats:

Large Clear Print: Braille: Audio: Native Language

4. **Declarations of Interest**

Members may make declarations of Interest at this point or may make them at any point in the meeting.

5. **Matters Arising Schedule**

(PAGE 19)

Setting out current position of previously agreed actions as at 8 April 2026

6. **Public Reports for Approval:**

- i) Building Safety Levy (BSL) (PAGES 20 - 26)
- ii) Good Homes Alliance (PAGES 27 - 45)
- iii) Recommendation from JSCC: Review of the Anti-Money Laundering and Financial Crime Prevention Policy (PAGES 46 - 86)
- iv) Community Asset Transfer Policy (PAGES 87 - 99)
- v) Committee Timetable 2026/27 for Approval (TO FOLLOW)
- vi) Committee Work Plan

Please note, the work plan will be generated subject to approval of the Committee Timetable.

7. **Exclusion of Public and Press**

To resolve that under Section 100 (A)(4) of the Local Government Act 1972, the public and press be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in paragraphs 3 & 5 of Part 1 of Schedule 12A of the Act.

8. **Exempt Report(s)**

- i) Surestaff/WLDC Staffing Services Business Plan (PAGES 100 - 120) 2026/2027
- ii) Thurrock/APSE Litigation Update (PAGES 121 - 127)

Paul Burkinshaw
Head of Paid Service
The Guildhall
Gainsborough

Wednesday, 8 April 2026

Corporate Policy and Resources Committee – 12 February 2026
Subject to Call-in. Call-in will expire at 5pm on 19 March 2026

WEST LINDSEY DISTRICT COUNCIL

MINUTES of the Meeting of the Corporate Policy and Resources Committee held in the Council Chamber - The Guildhall, Marshall's Yard, Gainsborough, DN21 2NA on 12 February 2026 commencing at 6.30 pm.

Present: Councillor Owen Bierley (Chairman)

Councillor Matthew Boles
Councillor Frazer Brown
Councillor Ian Fleetwood
Councillor Paul Key
Councillor Jeanette McGhee
Councillor Tom Smith
Councillor Moira Westley
Councillor Trevor Young
Councillor Stephen Bunney
Councillor Mrs Lesley Rollings

Also Present: Councillor Jackie Brockway

In Attendance:

Paul Burkinshaw	Chief Executive
Peter Davy	Director of Finance and Assets (Section 151 Officer)
Sally Grindrod-Smith	Director Planning, Regeneration & Communities
Lisa Langdon	Assistant Director People and Democratic (Monitoring Officer)
Ellen King	Policy & Strategy Officer – Corporate Strategy & Business Planning
Lynne Thomsett	People Services Manager
Sue Leversedge	Financial Services Manager (Deputy Section 151)
Cara Markham	Commercial, Cultural and Leisure Development Manager
Ele Snow	Senior Democratic and Civic Officer

Apologies: Councillor Paul Swift
Councillor Baptiste Velan

Membership: Councillor S Bunney was appointed substitute for Councillor P Swift
Councillor L Rollings was appointed substitute for Councillor B Velan

90 PUBLIC PARTICIPATION PERIOD

There was no public participation.

91 MINUTES OF PREVIOUS MEETING/S

RESOLVED that the Minutes of the Meeting of the Corporate Policy and Resources Committee held on Thursday, 15 January 2026 be confirmed and signed as a correct record.

92 DECLARATIONS OF INTEREST

There were no declarations of interest as this point in the meeting.

93 MATTERS ARISING SCHEDULE

With no comments or questions, the Matters Arising Schedule, setting out the position of previously agreed actions as at 4 February 2026, was **DULY NOTED**.

94 WLDC CORPORATE PLAN

The Committee gave consideration to a report presented by the Chief Executive, regarding the Council's draft Corporate Plan ('Our West Lindsey, Our Future') and the corresponding Thematic Business Plans covering the period 2026-2030. Members were asked to approve the draft documents for onward recommendation to Full Council. It was explained that based on the recommendations of the Peer Review, the upcoming Local Government Reorganisation (LGR), and the change in political administration at the Council, a review and refresh of the Corporate Plan had been undertaken to ensure it was reflective of the Administration's priorities, was cognisant of the requirements placed upon the Council by LGR, and responded effectively to the recommendations of the Peer Challenge.

It was highlighted that alongside the draft Corporate Plan, the corresponding draft Thematic Business Plans set out the key deliverables and performance measures aligned to delivering the Corporate Plan. Members were asked to review the draft documents and make a recommendation to Full Council that they be formally approved at the meeting scheduled for 3 March 2026, alongside the Council's budget and Medium Term Financial Plan (MTFP), to ensure an alignment of priorities and resources to enable delivery.

The Chairman thanked the Chief Executive and invited Members of the Committee to comment.

Members of the Committee expressed their support for the suite of documents, and the vision for the district, whilst others questioned whether the Plan went far enough in terms of expanding and improving on previous plans. It was enquired as to whether there was sufficient focus on deliverable and measurable outcomes, rather than the internal processes of the Council.

In response, the Chairman noted that the Plan was developed with due consideration given to Local Government Reorganisation (LGR), meaning plans encompassed longer term visions with shorter term actions. The Chairman also acknowledged comments from a Member of the Committee regarding the importance of assuring residents of the Council's

commitment to the district, and highlighted the unparalleled Member involvement, not only with the internal governance processes by way of a new delivery panel structure, but also in the development of the Plan, with a number of sessions having been held with Councillors. He highlighted that a number of consultations had been taking place with residents, the outcomes of which had also been used to inform the development of the presented Plan.

In response to further comments regarding the delivery of change, and how to affect visible improvements across the district, the Chairman highlighted the need to focus on areas over which the Council had direct influence, whilst using lobbying opportunities to encourage change elsewhere. The Chief Executive added that delivery of the Corporate Plan would be overseen closely by Members, with involvement in the internal governance structure and frequent reporting through the committee meetings.

In drawing the debate to a close, the Chairman expressed his thanks to those Officers involved in the creation of the Corporate Plan, and welcomed the Member involvement. Having been proposed, seconded, and voted upon, it was

RESOLVED that

- a) the draft Corporate Plan ‘Our West Lindsey, Our Future’, which covered the period 2026 – 2030 as set out in Appendix 1, be **RECOMMENDED** to Full Council for approval; and
- b) the corresponding ‘Thematic Business Plans’, which set out key deliverables and key performance indicators assigned to each Corporate Plan theme as set out in Appendix 2, be **RECOMMENDED** to Full Council for approval alongside the Corporate Plan; and
- c) it be **RECOMMENDED** to Full Council that the draft Corporate Plan and Thematic Business Plans be subject to annual review and approval by Council alongside the annual budget; and
- d) the new governance arrangements as outlined in paragraph five of the report, to ensure effective and efficient delivery of the council’s priorities, be noted.

95 WORKFORCE PLAN

The Committee heard from the People Services Manager regarding the Workforce Plan 2026 – 2030. It was explained that the Workforce Plan had been developed alongside the Corporate Plan for 2026 – 2030 and set out how the council would attract, retain and develop staff to deliver the best possible outcomes for residents. A key component of this was the agreed core values and behaviours required of every individual to ensure that the positive culture in the council was maintained and developed into the future.

Members heard that the themes within the Workforce Plan were developed from engagement events with staff and councillors. A series of workshops were held during September 2025 to which all staff and councillors were invited to attend. It was explained that the Workforce Plan was intended to reinforce the positive culture at West Lindsey

District Council based on shared values, positive behaviours and a commitment to supporting the workforce into the future.

In response to questions from Members of the Committee, it was explained that whilst the document presented to the Committee had not been seen by the Joint Staff Consultative Committee, the workforce development plan had been, and the full process had been undertaken by engaging with all staff. Additionally, in order to aid the re-energised recruitment process, the Workforce Plan would be used to demonstrate the ethos of the council, and as a reflection of the calibre of people already working for the council, and being recruited.

Members expressed their support and appreciation for the Plan, noting the positive comments made regarding staff during the Peer Review in 2025, and citing the recent recruitment exercise at the Caenby Corner Depot as a live example of the positive recruitment processes.

With Members of the Committee expressing their thanks to all council staff, and sharing examples of behaviours and attitudes which demonstrated the positivity, helpfulness, and dedication of the council's employees, the Chief Executive echoed their praises, and highlighted the use of the Workforce Plan to be a key tool in demonstrating those positive attributes within the workforce.

Having been proposed and seconded, the Chairman called the vote and it was unanimously

RESOLVED that the Workforce Plan 2026 – 2030 be approved.

96 PRIDE IN PLACE FUNDING

Members heard from the Director of Planning, Regeneration & Communities, with a report seeking to set out the funding available for the Pride in Place programme and secure approval for the expenditure of the first tranche of revenue investment and how the programme would be managed. She explained that further to the announcement of the Pride in Place funding allocation for Gainsborough West, more detailed guidance was issued by the government in December 2025. An early capacity payment of £150,000 had been received, with the purpose of the funding being to support the establishment of a Neighbourhood Board, including the recruitment of a Chairperson, commencement of meaningful local community engagement, and beginning work to move forward with the requirement to prepare a 10 year vision and four year investment plan.

It was also explained that the report presented an initial Business Case for the programme which supported the resourcing requirements, and set in place the thinking around how the council would manage the requirements of the programme in its role as accountable body. Further detail on future tranches of funding was also included, with early thinking around next steps and future decisions for the council.

Members expressed their widespread support for what was considered to be an exciting opportunity, not just for the town of Gainsborough, but also for the district, in bringing increased investment and opportunity into the area. In response to questions regarding the involvement of the Council in the establishment of the Neighbourhood Board, it was

explained that there would be Councillor membership on the Board, and there would be early oversight through feedback and details shared via reports through the Council's committee structure. It was also highlighted that the involvement of local Councillors would be crucial when considering the level of community involvement and ensuring a sense of ownership within the community.

With regard to the appointment of a Chairperson, it was explained that the government had provided a job description, against which any Expressions of Interest would be tested. The membership of the Board would also need to comply with the usual expectation of declaring interests and ensuring no conflicts arose. It was highlighted that the Monitoring Officer and the S151 Officer would be involved with ensuring due diligence was undertaken. Additionally, it was highlighted that membership of the Board needed to include a Police representative, as well as local Councillors, meaning there would be cross-organisation involvement.

Further discussion ensued with Members enquiring as to the boundary of the area covered, options for changing the boundary, and how that would impact the local communities. It was explained that, as an example, if a school was served by the area but not within the boundary, the school could be involved with the work but monies had to be spent within the designated area.

With regard to the financial details, it was explained that funds could be saved or borrowed against, in order to fund larger projects, however the investment plan would be used to guide that.

The Chairman thanked Members for their comments, and acknowledged the work undertaken by Officers, thanking them for the work which had already gone into the project.

Having been proposed and seconded, the Chairman took the vote and it was unanimously

RESOLVED that

- a) the expenditure of the initial £150,000 of revenue funding be approved to support the establishment of the Pride in Place Programme and the required workstreams as set out in the table at paragraph 3.3. Income and expenditure budgets to be created to reflect the grant being received and spend activity; and
- b) the draft Business Case at appendix 1 which set out the proposed Project Management Office arrangements to be established to support the council's role as accountable body, be approved.

Note: Councillor J. McGhee left the Chamber at 7.55pm

97 BUDGET AND TREASURY MONITORING QTR. 3 2025/2026

The Committee heard from the Financial Services Manager regarding the quarter three Budget and Treasury Monitoring report for 2025/26, for the period ending December 2025. It

was explained that in relation to revenue budgets, the forecast outturn position was a net contribution to reserves (or underspend) of £387,000, which was an increase of £210,000 from the forecast position reported at quarter two. The increase from the quarter two position was due to the following changes in forecast against expenditure budgets:

- Salary underspend had increased by £20,000
- Hire of street cleansing sweepers was a saving of £75,000 in the current year due to a change in how the council was required to account for the hire of equipment. From 1 April 2025 the council was required to treat leases as a council asset and the cost of this impacted on the revenue accounts from next year. This had been reflected in the MTFP for 2026/27
- The underspend against fuel budgets had decreased by £12,000 due to an increase in fuel price from December

The movement in significant variances against income budgets included:

- An increase in net interest receivable forecast of £134,000 due to slightly higher base rates than those forecast at the time of budget setting
- Property rent reviews had resulted in increased income of £27,000
- Planning fee income was forecast to be £95,000 above budget due to the expected completion of a number of large applications
- Crematorium income was forecast to be £69,000 below target, partly due to an increase in direct cremations and farewell services,
- Housing Standards income was forecast to be £32,000 below budget. This was mainly due to £25,000 being built into the base budget for income from the selective licensing scheme which did not proceed.
- Land charges search fee income was forecast to be £14,000 below budget
- The forecast pressure on housing subsidy income had reduced by £17,000 due an increase in ad hoc admin grants received to offset that pressure.

Members heard that any reported variances which had been identified as ongoing had been reflected in the Medium Term Financial Plan from 2026/27.

In relation to the capital programme, Members were advised that £5.148m was forecast to be carried forward into next year, and there was a reported net underspend of £0.052m. It was explained that £0.017m for member ICT equipment was to be moved to revenue budgets due to the low value of the purchases. These movements would be reviewed and actioned through the final outturn report presented to the Committee in June 2026.

Members were directed to section 2.3.2 of the report, where it was requested for the Committee to approve the amendment to the fees and charges schedule for 2026/27 to

include a new line relating to the Animal Welfare (Primate Licenses) which would come into force on 1 April 2026.

The Financial Services Manager concluded by advising that the treasury management activities during the reporting period were disclosed in the body of the report, and there had been no breaches of treasury or prudential indicators during the period.

Note: Councillor J McGhee returned to the Chamber at 7.59pm

The Chairman thanked the Financial Services Manager for a detailed and well-presented report. With no comments or questions, the recommendations contained within the report were duly proposed, seconded, and voted upon. It was unanimously

RESOLVED that

REVENUE

- a) the forecast out-turn position of a £0.387m net contribution to reserves as of 31 December 2025 (see Section 2) relating to revenue activity, be accepted; and
- b) the use of Earmarked Reserves approved by the Chief Finance Officer using Delegated powers (Section 2.4.1) be accepted; and
- c) the contribution to Earmarked Reserves (2.4.2) be accepted; and
- d) the amendment to the fees and charges schedule for 2026/2027 be approved and **RECOMMENDED** to Full Council for approval and inclusion within the 2026/2027 Revenue Budget (2.3.2).

CAPITAL

- e) the current projected Capital Outturn position of £8.757m (Section 3) be accepted; and
- f) the variances to the Capital Schemes as detailed in 3.2 be noted, with any amendments to be actioned at year end.

TREASURY

- g) the report, the treasury activity and the prudential indicators (Section 4) be accepted.

98 CORPORATE POLICY AND RESOURCES COMMITTEE DRAFT BUDGET 2026/2027 AND ESTIMATES TO 2030/2031

The Committee heard again from the Financial Services Manager who explained the report being presented detailed the draft controllable service budgets for 2026/27 for the Committee, and estimates for the following four years, as well as those recommended by the

Prosperous Communities Committee in January. She explained that for services within the Corporate Policy and Resources Committee, the net base budget had decreased by £0.226m from 2025/26 to 2026/27. Details of the significant movements were provided at Appendix 3.

Members were advised that the main reasons for the net decrease included:

- The actuarial review of the pension fund was completed in October and set the employer contribution amounts payable for the three years from 2026/27. The results had been favourable for the council in budgetary terms, which reflected the national position in relation to the local government pension scheme. For the Committee this had resulted in a reduction in salary costs of £577,000.
- Contractual reviews of rental agreements for properties had resulted in an increase in income of £43,000,
- These reductions were offset by an increase in salary costs, with the council assuming a pay award of 3% for 2026/27. For the Committee this increased the salary costs by £102,000.
- Contractual Increases totalled £271,000 with the largest being insurance premiums at £73,000 due to changes in property values and increase in fleet numbers for the food waste collection service. Other contractual increases applied to audit services, legal services, and software development and licences.
- There was an ongoing Housing benefits subsidy pressure of £87,000 mainly due to placements in unregistered supported accommodation as reported in the previous outturn report for the current financial year
- There was an ongoing repairs and maintenance budget of £10,000 for the changing places facility as previously approved by Members
- There were also inflationary increases applied across all services which totalled £30,300, against utilities, ongoing contracts, subscriptions and memberships where inflationary increases were included within the agreement.

Members were directed to appendix 7 which provided details of significant movements across both committees.

Furthermore, the Financial Services Manager explained that the final finance settlement had been announced earlier in the week, and had included an increase to the Homelessness grant. The amount relating to this grant included at appendix 7 had increased by £52,800 to £615,200. There was no impact on the bottom line for the MTFP as the corresponding income had been increased within the funding section of the MTFP.

Following the confirmation of the three year settlement from Government, Officers were able to report that the proposed service budgets contained within the report contributed towards a balanced budget for 2026/27. Members were asked to recommend the budgets for both committees to Full Council for inclusion in the medium term financial plan.

Members of the Committee expressed their thanks to the Finance Team for their commendable work, acknowledging the amount of effort required to achieve a balanced budget, calling it a remarkable achievement.

With no further comments or questions, and having been proposed and seconded, the Chairman took the vote and it was unanimously

RESOLVED that

- a) the Corporate Policy and Resources Committee budget 2026/2027 be accepted and **RECOMMENDED** to Full Council for inclusion in the overall Council budget 2026/2027; and
- b) the Prosperous Communities Committee Budget 2026/2027 be accepted and **RECOMMENDED** to Full Council for inclusion in the overall Council budget for 2026/2027; and
- c) any minor changes be delegated to the Chief Finance Officer in consultation with the Chairman of the Corporate Policy and Resources Committee; and
- d) the 2027/2028 to 2030/2031 estimates for both this Committee and those of Prosperous Communities Committee be **RECOMMENDED** to Full Council for inclusion in the Medium Term Financial Plan 2026/2027 to 2030/2031 (as amended by any decisions taken on this agenda).

99 MEDIUM TERM FINANCIAL PLAN 26/27-30/31, THE BUDGET 26/27, CAPITAL PROGRAMME 26/27-30/31

The Committee gave consideration to the Medium Term Financial Plan 26/27-30/31, the budget 26/27, capital programme 26/27-30/31. The Director of Finance and Assets (Section 151 Officer) explained that the report set out the Medium Term Financial Plan for 2026/27 onwards. The purpose of the Medium Term Financial Plan was to set a robust overall framework for the Council's Financial Strategy and spending plans over the next five years. The report set out the revised financial plans within the Financial Analysis for changes in Government Funding, the economic environment and local engagement. The plan reflected the revisions to previous estimates and covered the period 2026/27 to 2030/31. The Medium Term Financial Analysis included the draft budget for 2026/27 for scrutiny and consideration prior to recommending to Full Council.

Members heard that the government conducted a spending review during 2025 and, this combined with the first reset of the business rates system, had been incorporated into the provisional local government finance settlement announced in December. At the time of writing the report, the final settlement had not been announced, this was subsequently announced on Monday prior to the meeting. It was explained that this was a three year settlement and the government had tried to simplify the funding landscape by removing a number of specific grant streams and combining them into a much smaller number. The draft settlement outlined that the Council had received small, below inflation rises, in core spending power, however the Council was then informed late in the previous week that, due

to incorrect business rates data being used in the provisional settlement, the Council would receive substantially less funding in the final settlement which was a similar situation to a significant number of district councils.

Although the government had mitigated this in the 2026/27 funding figures, the Council had lost circa £730k over the last two years of the settlement between provisional and final settlements and therefore the report would need to be updated prior to going to Full Council. Due to the final settlement coming so late there was no option at this stage but to use reserves in 2028/29 to cover the shortfall. It was hoped that the government would reconsider this position in December when the final year two allocations were to be released.

Members heard that the government had delivered on its promise to deliver a three year settlement and so there was now more certainty of three years funding allocations making it easier to plan over the medium term. The spending power assumptions made by government were predicated on the Council increasing Council Tax by the maximum amount permitted. The Council had planned for this situation and therefore the Section 151 was pleased to present a balanced budget for the next three years with a small draw on reserves for 2028/29.

It was highlighted that the budget was predicated on Council Tax rises of 2.97% in 2026/27 and 2.99% thereafter which was included in the spending power assumptions. This meant for 2026/27 a Band D property would pay £256.14 per year, which was a rise of £7.38 from 2025/26. As part of the settlement the government announced a further year of assistance to authorities such as West Lindsey who were affected by drainage board levies, however the exact amount the council would receive would not be known until the spring.

The Section 151 Officer continued that the 2026/27 Draft Budget totalled £21.4m and was fully funded, and represented a balanced budget. Contributions to Earmarked Reserves totalled £2.550m with the Use of Earmarked Reserves being £0.985m. Total useable reserves were projected to be £27m at the end of 2026/27. The movement on the General Fund Balance was forecast as a reduction of £0.146m and was forecast to be £2.052m at the end of 2026/27. The Capital Programme totalled £12.164m over the Medium Term Financial Plan and was fully funded. Also included in the MTFP was a risk register at appendix 2, Pay policy statement at appendix 6 and human resources statement at appendix 7.

The Chairman and Committee Members thanked the Officers for their time and dedication to achieving the best for the Council, commenting that the delayed notice of the finance settlement from government made their job harder than it needed to be.

In response to robust questioning regarding the rate of council tax rise, whether this was inflation related, and whether alternative options had been fully considered, it was explained that whilst every department within the council had been tasked with identifying savings and efficiencies as far as possible, there had been increased costs absorbed by the Council in relation to the food waste collection service meaning savings and efficiencies had been incorporated into budgets already. Additionally, where there had been above-inflation price rises for contracted services, the Council had had to pay those increases. The Chief Executive added that the upcoming Local Government Reorganisation (LGR) changed the agenda for local authorities in needing to prepare for that but no additional funding being

available.

Members of the Committee made reference to the particular struggles faced by rural communities and authorities, with funding structures being seen as favourable to urban locations. In light of comments regarding LGR, Members were keen to highlight the financial strength of the Council, reiterating comments made in other forums that monies should be used for the benefit of the district whilst the Council still had opportunity to influence spends.

The Chairman and Members of the Committee again commended the Section 151 Officer and his team on their achievements with the short turnaround for the settlement details, and, having been proposed and seconded, the Chairman took the vote. It was

RESOLVED that

- a) the approval of the Medium-Term Financial Plan 2026/27 – 2030/31 be **RECOMMENDED** to Full Council; and
- b) the review of Reserves and the proposed use and contributions to both the General Fund Balance and Earmarked Reserves as detailed at 2.7 within the Medium-Term Financial Plan be approved; and
- c) a balanced Revenue Budget for 2026/27 (Appendix 1) had been considered and be **RECOMMENDED** to Full Council; and
- d) the Capital Programme 2026/27 – 2030/31 (Appendix 4) had been considered and be **RECOMMENDED** to Full Council; and
- e) the Statement of the Chief Finance Officer on the Robustness of Estimates and Adequacy of Reserves be accepted; and
- f) any housekeeping or changes required to the Medium-Term Financial Plan due to the final financial settlement and any approvals elsewhere on this agenda, be delegated to the Section 151 Officer in consultation with the Chairman of this Committee prior to the final consideration by Full Council on 2 March 2026.

100 COMMITTEE WORK PLAN

With no comments or questions, the Committee Work Plan was **DULY NOTED**.

101 EXCLUSION OF PUBLIC AND PRESS

RESOLVED that under Section 100 (A)(4) of the Local Government Act 1972, the public and press be excluded from the meeting for the following item of business on the grounds that it involved the likely disclosure of exempt information as defined in paragraph 3 of Part 1 of Schedule 12A of the Act.

Note: The meeting entered into closed session at 8.45pm

102 LEA FIELDS DIRECT CREMATIONS

The Committee gave consideration to the last report of the evening, presented by the Commercial, Cultural and Leisure Development Manager, regarding a review of the direct cremation fee at Lea Fields Crematorium. Members heard that, due to competitor analysis, and the increased presence of nationally based direct cremation services, it had been necessary to revisit the fees charged for direct cremation options at a local level.

Members engaged in significant discussion regarding the upward trend of direct cremation services, citing the impact of the covid pandemic, when traditional funeral services had not been permitted, alongside the cost of living crisis, and the fact that people now saw direct cremations as an acceptable alternative to traditional funerals.

In response to questions regarding the longer term strategy for the crematorium, it was explained that, whilst the work on the longer term view was already underway, it was necessary to make short-term immediate changes.

Members were accepting of the need to review the fee, acknowledging this would be recommended to Full Council for approval. There followed further discussion regarding the media coverage of direct cremation services, the approaches used by national providers in comparison to local providers, and the desire for Lea fields Crematorium to be the local choice for local people.

Having been proposed, seconded, and voted upon, it was

RESOLVED that the proposed Direct Cremation fee of £400 and termination of the Funeral Directors Incentive Scheme be **RECOMMENDED** to Full Council for approval and inclusion within the 2026/2027 Revenue Budget.

The meeting concluded at 9.25 pm.

Chairman

WEST LINDSEY DISTRICT COUNCIL

MINUTES of the Meeting of the Joint Staff Consultative Committee held in the HYBRID - Eau Meeting Room - The Guildhall & MS Teams on 22 January 2026 commencing at 4.00 pm.

Present: Councillor Paul Key (Chairman)
Councillor John Barrett
Councillor Matthew Boles
Councillor Moira Westley

In Attendance:
Lisa Langdon Assistant Director People and Democratic (Monitoring Officer)
Molly Spencer Democratic & Civic Officer
Katy Allen Corporate Governance Officer

Apologies: James Deacon (Vice Chairman)
Brad Bishell
Peter Davy

33 MEMBERS' DECLARATION OF INTEREST

There were no declarations of interest made.

34 TO APPROVE THE MINUTES OF THE PREVIOUS MEETING

With no comments, it was

RESOLVED that the minutes of the Joint Staff Consultative Committee held on Thursday, 27 November 2025, be confirmed as an accurate record.

35 MATTERS ARISING SCHEDULE

There were no matters arising to note.

36 REVIEW OF THE ANTI MONEY LAUNDERING AND FINANCIAL CRIME POLICY

It was reported that the policy had been revised following an audit, which had identified a requirement for review. The purpose of the policy was stated as providing a framework for responding to allegations of money laundering and financial crime.

It was noted that West Lindsey District Council sought to protect public funds, ensure compliance with the law, and encourage staff to report any suspicious activity relating to fraud, bribery, or financial crime. The policy was described as setting out how such matters would be reported, investigated, and addressed.

It was explained that an additional sentence had been included in Section 1, following comments from the Chairman's briefing, to acknowledge that some services were more exposed to potential financial crime due to the nature of their work. It was emphasised that, despite differing levels of exposure, the policy applied to all services and Officers were required to maintain awareness of it.

The policy content was generally accepted as standard and comprehensive. However, concern was raised that the nature and extent of the review were unclear, as no comparison with a previous version had been provided. Members requested that future policy reviews include both the former and revised documents, with changes clearly identified.

Officers explained that staff turnover had occurred during development and that the previous policy could not be located. As a result, a new policy had been drafted. Reference was made to benchmarking against other Councils to ensure appropriate coverage.

Questions were raised regarding Section 1.1, which referred to an external review of a long-standing policy, given that no earlier version could be produced. Officers advised that the audit had taken place some time ago and that supporting documentation may have been lost. Further investigation was agreed, including contacting the Officer involved in the original review.

Members requested sight of the relevant audit findings linked to the policy, rather than the full report, to provide assurance on the basis for the recommendations. Officers proposed extracting and presenting the relevant audit section at the next committee, which was supported.

It was suggested that the policy should clearly state that the issue had been identified through audit and that a new policy had been produced due to missing documentation. Further concern was raised regarding Section 8, which stated that awareness and training had been provided. Members noted that this could not be substantiated and that references to staff repercussions were inappropriate without clear training and guidance. The wording was considered insufficient and lacking detail, with potential risk to staff identified.

With no further comments, and having been proposed and seconded, it was

RESOLVED that the Review of the Anti-Money Laundering and Financial Crime Policy be deferred to enable the report to be updated and related documents to be circulated and wording in Section 8 be changed

37 WORK PLAN

With no comments the workplan was **DULY NOTED**.

The meeting concluded at 4.47 pm.

Chairman

WEST LINDSEY DISTRICT COUNCIL

MINUTES of a Meeting of the Joint Staff Consultative Committee held in the Hybrid - Trent Meeting Room, Guildhall & MS Teams on Thursday, 5 March 2026 commencing at 4.00 pm.

Members: Councillor Paul Key (Chairman)
Councillor John Barrett
Councillor Matthew Boles
Councillor Moira Westley

Staff Representatives: James Deacon (Vice-Chairman)
Brad Bishell

In attendance: Peter Davy, Director of Finance and Assets (Section 151 Officer)
Lisa Langdon, Assistant Director People and Democratic (Monitoring Officer)
Lynne Thomsett, People Services Manager
Molly Spencer, Democratic & Civic Officer

38 MEMBERS' DECLARATION OF INTEREST

There were no declarations of interest made.

39 MINUTES

With no comments, it was

RESOLVED that the minutes of the Joint Staff Consultative Committee held on Thursday, 22 January 2026, be confirmed as an accurate record.

40 MATTERS ARISING SCHEDULE

There were no matters arising to note.

41 REVIEW OF THE ANTI-MONEY LAUNDERING AND FINANCIAL CRIME PREVENTION POLICY

Members were informed that the Anti-Money Laundering and Financial Crime Prevention Policy replaced, in part, the former Anti-Money Laundering Policy, which had not been reviewed for several years. Following an internal

audit of fraud and associated matters, it had been advised that the former document should be updated and expanded to include financial crime prevention. The previous Policy had been appended to the report to allow Members to compare the earlier version with the revised document.

It was noted that all Councils were required to have such a Policy in place, and that the revisions reflected current responsibilities in relation to the prevention of financial crime and money laundering.

Members were advised that staff were expected to report any concerns to their manager, who would then report them to the Council's appointed Money Laundering Response Officer. If appropriate, the matter would then be referred to the National Crime Agency.

With no further comments or questions, it was

RESOLVED that

- a) Members reviewed the revised policy and recommended to the Corporate Policy and Resources Committee that it be approved.
- b) Minor housekeeping amendments be delegated to the Section 151 Officer following consultation with the Chairmen of the JSCC and CP&R Committees.

42 **WORK PLAN**

The Democratic and Civic Officer reported that there was currently no work plan, as committee dates for the forthcoming civic year had not yet been agreed. Members were informed that two new staff representatives for the Committee had been appointed and that training would commence in due course in readiness for the forthcoming civic year.

The Chairman queried whether a replacement representative from the depot had been identified. It was confirmed that no appointment had yet been made, and the Chairman noted the importance of maintaining a broad representation.

With no further comments the workplan was **DULY NOTED**.

The meeting closed at 4.11 pm.

Chairman

Corporate Policy & Resources Committee Matters Arising Schedule

Purpose: To consider progress on the matters arising from previous Corporate Policy & Resources Committee meetings.

Recommendation: That Members note progress on the matters arising and request corrective action if necessary.

Status	Title	Action Required	Comments	Due Date	Allocated To
Green	Estimated Cost of LGR	Estimated costs related to LGR across Lincolnshire (to date) to be shared with Members	CP&R 25.09.25: Members requested that Officers ascertain and present collective spend on LGR across the county.	ongoing	Peter Davy
Green	Working Group Membership	Membership of the Member Board for Efficiencies, Income Generation, and Savings to be confirmed	CP&R 15.01.26: "RESOLVED that ... the Committee nominate five cross-party Members to sit on the Member Board for Efficiencies, Income Generation, and Savings, with names to be provided after the meeting."	30/04/26	Ele Snow

Agenda Item 6a



Corporate Policy and Resources

Thursday, 16 April 2026

Subject: Building Safety Levy (BSL)

Report by:

Chief Executive

Contact Officer:

Rachael Hughes
Head of Policy and Strategy

rachael.hughes@west-lindsey.gov.uk

Purpose / Summary:

Seek approval to spend Building Safety Levy New Burdens Funding to develop and implement a compliant administration system.

RECOMMENDATION(S):

1. Corporate Policy and Resources Committee approves spending of £90,871 from the ring-fenced £132,900 New Burdens Funding Building Safety Levy to implement a compliant administration system using Microsoft Power Platform and Dataverse.

IMPLICATIONS

Legal: The Building Safety Levy (BSL) was introduced by Section 58 of the Building Safety Act 2022, which amended the Building Act 1984 to give the Secretary of State powers to impose the charge. The BSL is a key component of the government's response to the Grenfell Tower tragedy (2017).

The government aims to raise funding from applicable developments across the country to support the remedial works required to make a number of high-rise buildings safe for residents.

The Council is required to have arrangements in place to calculate charges, apply exemptions, issue notices, collect payments, and provide accurate reporting and audit information to central government.

(N.B.) Where there are legal implications the report MUST be seen by the MO

Financial: FIN/16/27/CPR/SL

MHCLG confirmed on the 27th of January 2026 Building Safety Levy – New Burdens funding of £132,900, payable in 2026/2027.

The revenue costs of developing the system will be met through the Governments BSL New Burdens funding. By selecting Option 2, utilising Microsoft Power Platform and Dataverse it means that it is unlikely that there will be any additional revenue costs usually associated with a new commercial system, as this will be covered under an existing professional services agreement with the Council.

However, any additional costs, including licence fees will be covered by the BSL administration fee which is calculated on a cost recovery basis and includes officer time, software subscriptions and any other activities associated with the processing and administering of the BSL.

The initial expenditure is classified as revenue spend as the system is cloud based and a SAAS (software as a service) agreement. This means, as with other cloud based systems, we will not retain ownership of the software and are therefore unable to capitalise the expenditure.

(N.B.) All committee reports MUST have a Fin Ref

Staffing: There are no staffing implications as a result of this report.

(N.B.) Where there are staffing implications the report MUST have a HR Ref

Equality and Diversity including Human Rights: None

Data Protection Implications: Full Data Protection Impact Assessment undertaken. Continued monitoring will be undertaken as part of the development and implementation of the system.

Climate Related Risks and Opportunities: None

Section 17 Crime and Disorder Considerations: None

Health Implications: None

Title and Location of any Background Papers used in the preparation of this report:

N/A

Risk Assessment :

Risk	Mitigating actions
<p>The council fails to meet the statutory deadline for implementing the Building Safety Levy (BSL) by 1st October 2026.</p>	<ul style="list-style-type: none"> • Implement phased delivery (BSL first, CIL/S106 later), as per the preferred option. • Secure early engagement with the external delivery partner (TrustMarque). • Establish a statutory focused project delivery timeline with gateway checkpoints. • Monitor national BSL guidance updates and adjust scope accordingly.
<p>Future council reorganisation may require system convergence; chosen solution must scale and align to regional direction.</p>	<ul style="list-style-type: none"> • Select technology aligned with corporate ICT vision (cloud first, Power Platform). • Document configuration decisions for future portability. • Engage regionally to ensure consistency with neighbouring authorities.
<p>Reliance on external partner (TrustMarque) in Phase 1 introduces delivery risk around timescales, cost, and quality.</p>	<ul style="list-style-type: none"> • Implement strong contract management and acceptance criteria. • Hold project delivery catch up meetings • Require early prototypes or proof-of-concept outputs.

	<ul style="list-style-type: none"> • Ensure knowledge transfer before the supplier exits. Ensure key officer involvement throughout the process
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Call in and Urgency:

Is the decision one which Rule 14.7 of the Scrutiny Procedure Rules apply?

i.e. is the report exempt from being called in due to urgency (in consultation with C&I chairman)

Yes

No

Key Decision:

A matter which affects two or more wards, or has significant financial implications

Yes

No

1 Introduction

- 1.1 The Building Safety Levy (BSL) is a new national levy on applicable new residential development, designed to contribute to the remediation of historic building safety defects of high-rise buildings across England. The levy will be collected locally by councils, reflecting their established role in building control and developer charge administration.
- 1.2 Statutory guidance was issued in July 2025, with the levy coming into force on 1 October 2026. From this date, West Lindsey District Council (“the Council”) is legally required to have arrangements in place to calculate charges, apply exemptions, issue notices, collect payments, and provide accurate reporting and audit information to central government.
- 1.3 The BSL rates charged, have been set nationally by Government. The rates covering West Lindsey are as follows:
- Standard Rate = **£18.58 per square metre**
 - Previously Developed Land (PDL) Rate (50%) = **£9.29 per square metre**
- 1.4 Further information about BSL can be found on the Council’s website by following the link below.

[West Lindsey District Council BSL FAQs](#)

- 1.5 The Council has been awarded £132,900 under section 31 of the Local Government Act 2003 to support start-up costs associated with this new duty. Further information of the mechanisms of the BSL is available on the following website: <https://www.gov.uk/guidance/building-safety-levy-guidance>

2 Current Arrangements & Limitations

- 2.1 At present, the Council does not have a dedicated system for the administration of the Building Safety Levy (BSL), as the levy is a new statutory requirement which comes into force from October 2026.
- 2.2 The Council currently administers Community Infrastructure Levy (CIL) and Section 106 (S106) developer contributions through bespoke Microsoft Access databases developed in-house.
- 2.3 The system offers a high degree of flexibility and functionality, consistently meeting statutory obligations and supporting detailed reporting, automation, and custom workflows. These systems are well-established, highly tailored to local processes, and have successfully supported statutory compliance to date.
- 2.4 There are similarities between CIL, S106 and the BSL, particularly in relation to developer charging, exemptions, notices, payment tracking and reporting.

- 2.5 The introduction of the BSL represents a new national tax with distinct statutory guidance, audit requirements, reporting obligations and central government oversight.
- 2.6 Extending the existing Access-based arrangements to accommodate BSL would increase reliance on unsupported legacy systems and exacerbate existing resilience risks, as the current solution is maintained by a single officer and sits outside of a corporately supported platform.
- 2.7 In this context, while the existing CIL and S106 systems provide a strong foundation of expertise and process understanding, they do not provide a sufficiently resilient or future-proof basis for the introduction of the BSL.

3 Work to date & Options Consideration

- 3.1 In line with the Council's agreed Project Management Office (PMO) approach, a detailed business case has been developed to explore how to implement the BSL system. This work involved consultation with ICT, finance, procurement, service leads and subject matter experts and considered 4 options.
- 3.2 The following options were appraised.
- Option 1. Continuing with existing systems (do nothing)
 - Option 2. Develop a system on Microsoft Power Platform and Dataverse using a phased approach focused on BSL compliance first, with future alignment activity opportunities for CIL and S106.
 - Option 3. In house delivery and development of a bespoke system.
 - Option 4. Procuring a full commercial system for BSL and include CIL and S106 capabilities.
- 3.3 The appraisal assessed deliverability, statutory compliance, risk, value for money and alignment with wider corporate programmes. A phased approach (option 2) was identified as the preferred option.

4 Proposed Solution

- 4.1 Phase 1 will deliver a compliant BSL administration solution through an external provider using Microsoft Power Platform and Dataverse. This will support charge calculation, exemptions, notice generation, payment tracking, reporting and audit requirements, while aligning with corporate ICT standards.
- 4.2 Phase 1 will be operational ahead of the October 2026 statutory deadline.

- 4.3 Phase 2 will consist of internally led activity to consider how existing CIL and S106 processes, data structures and monitoring arrangements align with the new platform and with related initiatives.
- 4.4 This activity will be undertaken using existing officer capacity and does not require additional funding or committee approval.

5 Financial Considerations

- 5.1 Under the New Burdens Doctrine, central government is required to fully fund new duties placed on local authorities. The Council is set to receive £132,900 in April 2026, ring-fenced funding for BSL implementation.
- 5.2 The cost of Phase 1 delivery is £82,610, with a prudent 10% contingency of £8,261 to mitigate design and delivery risk.
- 5.3 The total proposed spend is therefore £90,871, fully funded from the allocation.
- 5.4 Any underspend will remain ring-fenced for future BSL purposes in line with the section 31 agreement.
- 5.5 The administration of the BSL will be undertaken by the existing CIL officer, reflecting procedural similarities between the regimes.
- 5.6 Ongoing revenue costs associated with the system will be covered by an existing professional services agreement.

6 Procurement

- 6.1 Delivery of Phase 1 will be undertaken through a contract change under an existing compliant professional services agreement.
- 6.2 This approach ensures timely delivery ahead of statutory deadlines and represents best value, removing the need for a separate procurement exercise.
- 6.3 Due to the value of the contract extension being over £50,000, a decision from the Corporate Policy & Resources Committee is required.

7 Recommendation

- 7.1 That Corporate Policy and Resources Committee approves expenditure of £90,871 from the ring-fenced £132,900 Building Safety Levy allocation to deliver a compliant BSL administration system via Microsoft Power Platform and Dataverse.



**Corporate Policy and
Resources Committee**

Thursday 16th April 2026

Subject: Good Homes Alliance

Report by:

Director of Planning, Regeneration &
Communities

Contact Officer:

Sarah Elvin
Homes & Health Team Manager

sarah.elvin@west-lindsey.gov.uk

Purpose / Summary:

Update members on the progress of the Good
Homes Alliance work and seek approval for
funding for an extension of the project.

RECOMMENDATION(S):

1. Members acknowledge the positive impact of the Good Homes Alliance work to date.
2. Members agree to fund the Good Homes Alliance for a further 2 years to 31st March 2028 to the sum of £33,871 from the Health and Wellbeing reserve.

IMPLICATIONS

Legal:

Extension of the GHA advice and casework service is subject to local agreement and financial contributions from the participating councils.

(N.B.) Where there are legal implications the report MUST be seen by the MO

Financial : FIN REF: FIN/2/27/MT/SL

The total funding contribution required to continue the provision of GHA advice and casework activities in the West Lindsey District Council area from 1 April 2026 to 31 March 2028 is **£33,871**.

2-year extension to be funded the Health and Wellbeing Reserve:

Year 1 - 2026/2027 £14,200

Year 2 - 2027/2028 £19,700

Leaving a balance on the reserve as of 31st March 2028 of £52,200

(N.B.) All committee reports MUST have a Fin Ref

Staffing :

There are no workforce capacity or contractual implications associated with WLDC continued funding of the GHA advice and casework service due existing employment and hosting arrangements being undertaken by East Lindsey District and Boston Borough Council.

(N.B.) Where there are staffing implications the report MUST have a HR Ref

Equality and Diversity including Human Rights :

The GHA operates in accordance with the public sector equality duty as it helps advance equality of opportunity in relation to age and disability.

The advice and casework service provides an all-age, tenure-blind provision to residents and household in need of support to be able to live independently, safely, warm and well at home. The service is available to eligible residents, regardless of protected characteristic, income or individual/household means.

Data Protection Implications :

The GHA utilises the LCC Mosaic case management system (CMS) to record casework information.

Client casework data is held locally by ELDC in accordance with established data protection policies and procedures for the collection and recording of client information.

A Data Sharing Agreement has been executed between ELDC, LCC and LSE for the provision of sharing GHA data for the purpose of evaluation activities.

The GHA operates a client information and privacy statement for all referrals. GHA referrals are only accepted with client permission.

Climate Related Risks and Opportunities :****Wheel to follow****

The GHA advice and casework service works closely with a range of energy advice and efficiency providers, schemes and programmes, signposting residents to available energy improvement schemes or directly supporting households to improve the energy efficiency of their home, or mitigate impacts associated with living in energy inefficient homes.

Section 17 Crime and Disorder Considerations :

Good Homes Lincs (GHL) web-resources provide associated home safety and security content, providing information and signposting to resident to ensure their home remain safe and secure, including engaging 'trusted tradespeople'.

The GHA has liaised with Trading Standards and Community Safety officers to provide relevant information on targeted home crime – such as 'Doorstep fraud' and rouge traders.

GHA advice and casework activities have involved supporting residents impacted by rouge trader works and provides practical assistance to identify and engage 'trusted tradespeople' to undertake identified home improvement works.

Health Implications:

The Good Home Alliance advice and casework pilot is focused on improving health and wellbeing outcomes associated with or impacted by poor housing conditions or related housing condition issues.

Title and Location of any Background Papers used in the preparation of this report:

1. [Centre for Ageing Better. Good Home Inquiry 2021.](https://ageing-better.org.uk/good-home-inquiry)
<https://ageing-better.org.uk/good-home-inquiry>
2. [Good Home Lincs.](https://lincolnshire.connecttosupport/good-home-lincs/) <https://lincolnshire.connecttosupport/good-home-lincs/>
 - [A cross-county guide to Disabled Facilities Grants \(DFG\)](#)

- [An all-tenure guide to Condensation Damp & Mould](#)
 - [A 'Staying Safe Warm and Well at Home this Winter' information guide.](#)
 - [Good Home Lincs social media pack 2025](#)
3. [Good Home Lincs Better Homes, Better Lives – Interim Evaluation Report](#)
<https://ageing-better.org.uk/resources/better-homes-better-lives-interim-report>
 Report taken to O&S 24th February 2026 [IMPLICATIONS](#)

Risk Assessment :

Risk management is overseen by the Good Home Alliance Steering Group and Lincolnshire Healthy and Accessible Homes Group, and reported to the Lincolnshire Housing Health and Health Ageing delivery group as part of the overarching project governance.

Call in and Urgency:

Is the decision one which Rule 14.7 of the Scrutiny Procedure Rules apply?

i.e. is the report exempt from being called in due to urgency (in consultation with C&I chairman)

Yes

No

Key Decision:

A matter which affects two or more wards, or has significant financial implications

Yes

No

1. **Executive Summary**

- 1.1 In September 2024, Lincolnshire districts and county councils launched the Lincolnshire Good Home Alliance (GHA,) a countywide partnership, with the common aim to help residents of all ages and tenures stay safe, warm, and well in their homes.
- 1.2 Funded by Lincolnshire district and county councils for the pilot period from 1 July 2024 to 30 June 2026, the GHA is delivering accessible, practical information through the Good Home Lincs web resource, hosted on the Connect to Support Lincolnshire platform, as well as a new Healthy Home Assessment tool, empowering residents and frontline workers to identify and act on housing issues before they escalate.
- 1.3 For those needing more hands-on help, the GHA offers a dedicated Advice and Casework Service, supporting vulnerable residents with everything from finding funding and trusted tradespeople to arranging and completing essential home improvements or even helping them move to a more suitable home.
- 1.4 Professionals from across Lincolnshire, also benefit from a Professional Advice offer, helping them better support residents living in poor housing conditions.
- 1.5 This report provides detail on GHA activities, outputs and outcomes of the service since launch, and an overview of year 1 evaluation findings, undertaken by the London School of Economics (LSE), funded by the Centre for Ageing better, including:
 - Good Home Lincs web-user activity: More than 9,500 total users, 21,000 page views and average completion of 3.5 Healthy Home Assessments per week.
 - Community Engagement activity: More than 2,000 residents engaged across the county, and over 200 residents in the West Lindsey District Council (WLDC) area.
 - Advice & Casework outputs and outcomes: A total of 391 referrals across the county, and 21 referrals for WLDC residents, and the completed improvement of 40 homes with direct caseworker support.
 - Alliance Partnership activities: NHS/Children & Young People with Asthma, Lincolnshire Family Hubs, Lincolnshire Fire and Rescue, Trading Standards, voluntary and community sector services and wider providers concerned with the improvement and impact of poor housing conditions.
- 1.6 Evaluation of the first year of GHA delivery indicates that the benefits of the service and model are high. Positive effects in terms of reduced hazards and greater client wellbeing began to appear as the first cases were closed, and the flow of benefits is now accelerating.
- 1.7 In the next phase of the evaluation, LSE will collect more robust evidence on the type and magnitude of benefits, including importantly reductions in public-sector costs, to inform a more detailed cost-benefit analysis.
- 1.8 Overall, however, LSE note that the experience of the first year suggests that the advice and casework service represents good value for money.
- 1.9 GHA advice and casework officers are employed and hosted by East Lindsey District Council (ELDC) and funded via contributions from both district and county councils, inclusive of Lincolnshire County, East Lindsey, Boston Borough, City of Lincoln, North Kesteven, South Holland and West Lindsey district councils.
- 1.10 Funded for an initial two-year pilot period, this report sets out the funding contribution required from WLDC to continue the provision of GHA advice and casework service activities from the end of the current funding period on 30 June 2026 for a further 21 months to 31 March 2028.
- 1.11 The total funding contribution required to continue the provision of GHA advice and casework activities in the West Lindsey District Council area to 31 March 2028 is £33,871.

2 Introduction

- 2.1 By bringing together local expertise, funding opportunities, and practical support, Good Home Hubs aim to transform lives, reduce pressure on health and social care systems, and ensure that everyone, regardless of tenure, age or income, can live in a home that is safe, comfortable, and fit for the future.
- 2.2 Lincolnshire is now leading the way in turning this vision into reality. As a strategic partner of the Centre for Ageing Better (AB), Lincolnshire is piloting the first Good Home Hub, designed to serve as a scalable model for England and Wales.
- 2.3 In September 2024, Lincolnshire County and district councils launched the Lincolnshire Good Home Alliance (GHA), a bold, countywide partnership, aiming to help residents of all ages and tenures stay safe, warm, and well in their homes.
- 2.4 The GHA is funded by financial contributions from both district and county councils, and delivers accessible, practical information through the Good Home Lincs (GHL) web resource, a new Healthy Home Assessment (HHA) tool, empowering residents and frontline workers to identify and act on housing issues before they escalate, and for those needing more hands-on help, the GHA offers a dedicated Advice and Casework Service, supporting vulnerable residents with everything from finding funding and trusted tradespeople to arranging and completing essential home improvements or even helping them move to a more suitable home.
- 2.5 Professionals from across Lincolnshire, also benefit from a Professional Advice offer through the advice and casework team, helping them better support residents living in poor housing conditions.
- 2.6 Operating from 1 July 2024 to 30 June 2026, the 2-year pilot is being independently evaluated by the London School of Economics (LSE), funded by the Centre for Ageing Better.
- 2.7 This report sets out the key findings from the first year of operations, and the funding contributions required to continue the advice and casework pilot for a further 21 months from 1 July 2026 (when the current pilot and funding period ends) to the 31 March 2028.

3 Background

- 3.1 In 2021, the Centre for Ageing Better published the Good Home Inquiry, a landmark, evidenced-based analysis of housing in England. It revealed the urgent need to address the poor condition of millions of homes across the country, which pose serious risks to health, safety, and wellbeing, particularly for older and vulnerable residents.
- 3.2 One of its key recommendations was the creation of 'Good Home Hubs' in every area. These hubs would act as trusted, accessible one-stop centres offering:
 - Clear, tailored information and advice on home improvement.
 - Guidance on available services, schemes, grants, and products.
 - Support with planning, paying for, and commissioning works.
 - Help to navigate the often-complex process of making a home safer, warmer, and more suitable for ageing.
- 3.3 Between May 2022 and April 2023, ARK Consultancy were employed by the Centre for Ageing Better to work with a project team from LCC and district officers. The purpose of the project team was to engage with residents and organisations across Lincolnshire to understand how more residents could be supported to live in a home that meets their needs and is well maintained.
- 3.4 The process involved:
 - Reviewing existing evidence, nationally and in Lincolnshire
 - Engaging with individuals, groups and stakeholders to understand issues and barriers.
 - Developing, designing and testing out new solutions.
 - Producing a service framework for delivery in Lincolnshire and elsewhere.
- 3.5 The project engaged with stakeholders across Lincolnshire including:

- 1093 responses to community survey
- 68 responses to staff survey
- Over 40 community groups
- Over 250 individuals

3.6 This resulted in the development of the ‘Good Home Alliance’ model and identification of the key themes the services should address, including:

- Simplified access to information and services
- Advice on options
- Healthy home assessment
- Keeping warm / energy efficiency
- Finding Trusted tradespeople
- Financial solutions
- Support to commission work
- Practical support

4. Good Home Lincs resources (information & signposting)

4.1 Hosted on the [Connect to Support Lincolnshire](#) (CTSL) web-platform, [Good Home Lincs](#) (GHL) provides tenure blind information, signposting and resources to help people identify services and solutions to enable them to stay safe, warm and well at home.

4.2 The webpages aim to bring together existing information from trusted sources from across the internet and county into one place, providing residents and those supporting them with a ‘one-stop-shop’ for all housing, maintenance, repair, improvement and adaptation issues – including information on moving home and maintaining a healthy home.

4.3 Content and information contained within the on-line resources has been developed in partnership with organisations, networks and services across Lincolnshire, including:

- Lincolnshire Healthy and Accessible Homes Group
- Lincolnshire Housing Standards Group
- Lincolnshire Financial Inclusion Partnership
- Lincolnshire Trading Standards Buy with Confidence scheme
- Lincolnshire Fire and Rescue
- Greater Lincolnshire Energy Efficiency Network
- Safer Lincolnshire Partnership
- Lincolnshire ICS Children & Young People Asthma Network

4.4 To support residents and households that are less digitally included, the Lincolnshire Connect to Support platform offers a range of accessibility features, including language translation, increased text size, and an PDF booklet function, enabling content to be printed in hard copy format.

4.5 The web pages include an ‘interactive house’ image through which web-users can navigate to relevant content by clicking on the image (see Figure 1 below).

Figure 1. GHL Interactive House Tool

Click on the house below to visit our interactive Good Home tool, providing you with information about home improvements.



- 4.6 In addition, the GHA has produced printable leaflets for distribution at community events, and for those who are less able to access online information, including:
- [A cross-county guide to Disabled Facilities Grants \(DFG\)](#)
 - [An all-tenure guide to Condensation Damp & Mould](#)
 - [A 'Staying Safe Warm and Well at Home this Winter' information guide.](#)
- 4.7 Since launch of the GHG webpages, additional intersections and interactions have been identified to further the resources and access to information available between the GHA and other Lincolnshire services, including:
- 4.8 **'Money Talk Lincs' (MTL)**. Links and signposts have been established between associated CTSL sections of GHG and MTL to navigate web users to relevant content without needing to have awareness of the other section.
- 4.9 **'Wellbeing Lincs'**. Links and signposts have been established between associated CTSL sections of GHG and Wellbeing Lincs to navigate web users to relevant content without needing to have awareness of the other section.
- 4.10 **'Armed Forces Community Directory'**. Links have been established from the directory to the GHG webpages for those (veterans and military families) seeking housing related information and advice.
- 4.11 **'Lincolnshire Community Foundation' (LCF)**. Links from the LCF website have been established to navigate web users to the GHG when seeking further help and support.
- 4.12 **'Lincolnshire Alert – Office of the Police & Crime Commissioner' (OPCC)**. Lincolnshire Alert has featured links to the GHG webpages when providing relevant message alerts. E.g. 'Rogue Traders' and door-step fraud for home repair or maintenance.
- 4.13 **'Lincolnshire Community and Voluntary Partnership'**. The LCVP website has featured links to GHG and promotes GHA information sessions for wider Lincolnshire stakeholders to increase awareness of GHG.
- 4.14 **'Lincolnshire ICB - Your health and services'**. This website features links to GHG and the joint (NHS/GHA) produced 'Guide to condensation, damp and mould' downloadable PDF to provide information and advice to anyone concerned about damp and mould, or other issues in the house that can affect a child with Asthma.
- 4.15 **Healthy Home Assessment**. Accessed via a dedicated 'Healthy Home Assessment' section of the GHG webpages, the Healthy Home Assessment tool enables web visitors to fill in a questionnaire with details of their property condition and the kind of support they need and are directed to relevant information and services on the website. The HHA tool is designed to be used by residents, households and families as well as supporting professionals visiting clients in their homes, who can complete the questionnaire on clients' behalf.
- 4.16 **Social Media**. A publicly available [social media pack](#) is also available providing a series of social media posts to promote GHG. The social media pack is available to download on the GHG webpages for alliance partners and other stakeholders to promote and share across their networks.
- 4.17 In addition to the on-line Good Home Lincs resources, the Good Home Alliance Team attends **community events**, centres and activities to promote GHG, provide hard copy resources and on the spot information, signposting and advice to residents and attendees. Good Home Lincs representation at events has included:
- Local Energy Advice Demonstrator events
 - Social Prescribers Network events
 - Health & Wellbeing events
 - NHS Falls events
 - Family Hub events
 - Carers groups
 - Health watch events

- Veterans' events
- Lincolnshire Show
- Flu and Covid vaccination clinics

5 Good Home Alliance Advice and Casework Support

- 5.1 The Lincolnshire Good Home Alliance advice and casework team offers a 'professional advice' service to all professionals (paid and voluntary) working in Lincolnshire. This service element provides information and advice to enable people supporting residents and households to signpost and support residents to address any identified housing condition issues.
- 5.2 The GHA team has provided advice to a range of professionals working for organisations and teams including:
- District Councils (Housing Standards, Accessible Homes and Customer Contact Staff)
 - County Council (Early Help, Social Care and Occupational Therapy)
 - NHS Hospitals and Respiratory specialists
 - Neighbourhood Teams (NHS and Housing)
 - GP surgeries and social prescribers
 - Lincolnshire Fire & Rescue
 - Wellbeing Lincs.
 - Carers Services
 - Sensory Services
- 5.3 Anglian Water offers an Extra Care Assessment to identify whether customers are eligible for discounted tariffs, priority services and other support schemes. They will also check for ways to maximise customers income by advising what benefits a household may be entitled to and identifying additional support that may be available to support residents.
- 5.4 The GHA team works proactively with Anglian Water to ensure residents are aware of one another's services by attending joint events. In addition, the Anglian Water Extra Care Support Team has been provided with the GHA team email and phone number, to enable their staff to access the professional advice service and provide further information and advice to residents in need of support.
- 5.5 Groundworks Green Doctors offer free impartial advice to residents to help people manage bills and save energy in the home. Green Doctors can provide different kinds of support, including advice on paying off debt with energy and water companies, identifying other concerns such as damp & mould, and making referrals to other services.
- 5.6 The Green Doctors in Lincolnshire are working proactively with the GHA, taking referrals from the advice and case work service, sharing information at events and accessing the GHA professional advice service when wider housing condition related issues are identified in the home during one of their visits.
- 5.7 The GHA team operate an advice and casework pilot service, providing direct advice and support to more vulnerable residents. Advice and support provided ranges from helping residents to identify potential funding options to pay for work, finding and engaging trusted trades people, to providing practical support to arrange and complete works, and, where appropriate, supporting residents to move to a more suitable home.
- 5.8 Referrals to this service are accepted from a range of referral partners, including District and County council teams, Lincolnshire Fire and Rescue, NHS asthma & hospital discharge practitioners, the Wellbeing service, Local Energy Advice Demonstrators, and Lincolnshire Family Hub staff. Referrals are accepted for residents of all tenure and age where the following criteria is met:
- a) The household is resident of Boston Borough Council, City of Lincoln Council, East Lindsey District Council, North Kesteven District Council, South Holland District Council or West Lindsey District Council. AND

- b) The occupant has provided consent to the referral and to be contacted by a GHA caseworker; is eligible for a service provided by the referring partner and/or
 - The referring partner has identified potential housing condition issues that may place the occupant at risk of harm.
 - The referring partner has supported the occupant to complete a HHA and has identified housing condition, access or improvement issues.
 - The occupant is unwilling / unable to complete a Healthy Home Assessment form, but willing to be supported by the Advice and Casework team and has an identified vulnerability due to age, disability, health condition, financial hardship, or other factor that places them at potential risk of harm due to their housing conditions.
- 5.9 In addition to taking direct referrals from GHA referral partners, the advice and casework service has established other cross-sector partnerships to drive delivery and implementation of related strategic objectives.
- 5.10 The GHA, in partnership with NHS Lincolnshire ICB has established shared deliverables and actions to support the implementation of the National Bundle of Care for Children and Young People with Asthma. This has included:
- Developing the shared 'Guide to condensation, damp and mould'
 - Developing relevant content on the impacts of damp and mould on asthma for inclusion within the GHM web resources.
 - Establishing a direct referral route for NHS Asthma practitioners to the GHA Advice and Casework support service to support households to identify and address contributing housing condition related issues and hazards.
- 5.11 The direct referral route between NHS asthma practitioners and the GHA provides a single point of access for residents of all tenure to be signposted to the relevant district council team / housing provider or be supported directly by GHA caseworkers to address the identified contributing housing condition issue. This supports Lincolnshire to meet one of the recommendations from the National Child Mortality Database Report – Child deaths due to Asthma or Anaphylaxis (December 2024) to “ensure that all children with asthma who are living in homes with damp and mould are prioritised for housing repairs following the introduction of new Tenancy Consumer Standards”.
- 5.12 The GHA, in partnership with Lincolnshire County Council Family Hubs has established a series of joint delivery objectives and actions to support the delivery of the Family Hub and Start for Life programme minimum expectations. This has included delivering information sessions to Family Hub staff, to enable them to access and support families to access the GHM resources hosted on Connect to Support, and establishing a direct referral route for Family Hub staff to support families to identify and address potential housing related issues.
- 5.13 The GHA, in partnership with Lincolnshire Fire and Rescue has established a series of joint delivery objectives and actions to support the delivery of the LFR Prevention Strategy, including development of the GHM webpage content to provide information and signposting on Fire Safety within the home, promotion of Healthy Home Assessment to LFR Community Safety Advocates to raise awareness with residents and signpost to information and advice on environmental hazards, promotion of the LFR online Home Fire Safety Checks and supported completion by GHA caseworkers, and establishing a direct referral route for LFR to the GHA Advice and Casework support service to support families to identify and address potential housing related issues.
- 5.14 The GHA, in partnership with Lincolnshire County Council Trading Standards have developed a series of shared actions to support the development and promotion of the Lincolnshire Buy with Confidence scheme (BwC), including developing GHM web content to provide information and signposting to the Buy with Confidence scheme, identifying opportunities to cross promote the GHA and BwC activities, to support residents to identify and engage trusted traders; and promoting the BwC scheme to traders working with clients in receipt of GHA support.

- 5.15 The GHA team is working with the LCC Leaving Care Service's Participation coordinator to gain feedback on the existing GHIL resources from Care Experienced Young People, with the aim of ensuring the GHIL resources are relevant and accessible to all ages, and to coproduce 'young people – first homes' targeted information and resources for inclusion within the GHIL web pages. The response from these young people has been extremely positive, with express shown in supporting the development of simple housing related 'how to' leaflets, posters and quick reference sheets for what to do in an emergency (such as gas, or water leaks etc).
- 5.16 Working with the County and NHS representatives, the GHA Lead is supporting the development of a Lincolnshire 'Home from Hospital' Discharge Protocol. The aim of the protocol is to reduce delayed discharges, ensure patients who are medically fit for discharge can return to safe and warm homes, and provide a single consistent protocol for Lincolnshire, that brings together key NHS, County and District services and provides clear discharge pathways and escalation routes when barriers to discharge are identified.

6 LSE Evaluation Activities and GHA Outcomes

- 6.1 The Centre for Ageing Better has commissioned the London School of Economics to undertake a process and impact evaluation of the GHA pilot period (1 July 2024 to 30 June 2026) to provide internal learning to inform GHA development and decision making and deliver an external evaluation to provide a comprehensive evidence base for the development of other 'Good Home Hubs' across the country.
- 6.2 The LSE evaluation looks at impact, process and value for money, and uses a mixed methods approach of data collection, surveys, interviews, site visits and web analytics. LSE provided the first year of delivery report for internal consideration in December 2025, with a planned public document summarising the first year of delivery expected to be produced by the Centre for Ageing Better in March 2026. The final evaluation report is expected in September 2026, on conclusion of the full two-year pilot period.
- 6.3 In the first year of delivery (September 2024 to September 2025) evaluators note that:
- 6.4 **GHIL web activity**
- 6.4.1 The Good Home Lincs website was officially launched on 19 September 2024 and evaluation figures run to 29 September 2025. Over this period there were:
- 8,637 total users, of which 7,204 were new users.
 - 21,181 page views.
- 6.4.2 The GHIL web pages soft launched in April 2024 – over this period there has been a total of 9,528 users to the 29 September 2025.
- 6.4.3 The top five most visited pages (excluding the GHIL landing page and the About us page) are:
- Healthy Home Assessment
 - Paying for Works leading to: Grants and Charitable and Financial Support
 - Home Improvements
- 6.4.4 According to VPN data, just over a third of all users are from Lincolnshire, closely followed by London. However, this data is not always accurate as service providers often route IP addresses and traffic back to a physical location.
- 6.4.5 Between 8 April and 16 Sept 2025, 84 people completed the Healthy Home Assessment tool—that is, about 3.5 people a week. Two-thirds completed the assessment independently and the remainder were helped by someone else.
- 6.5 **Engagement & Outreach activity**
- 6.5.1 In total, since service launch, the GHA team has attended more than 136 events across the county, engaging with more than 2000 residents, and more than 1900 professional engagements - in addition to a further 570 engagements at mixed community and professionals' events.

6.5.2 **Table 1** below provides detail of GHA representation and attendance at WLDC events since service launch.

	Number of Sessions	Number of Attendees
West Lindsey District Council	16	366
Community Information & signposting	6	212
Caistor Community Event	1	5
Games by the Hall (Together Initiative)	1	52
National Play Day event	1	18
Social prescribers networking event	2	57
Trent Care Community Age Matters Information Fair	1	80
Professional Information & awareness	8	124
Family Hubs networking event	2	32
Frailty Meeting (NHS)	1	22
Gainsborough Walkabout (Together Initiative)	1	15
West Lindsey Voluntary Forum	1	30
WLDC briefing (Healthy and Accessible Homes)	1	10
WLDC briefing (Housing and Environmental Enforcement)	1	10
WLDC DFG Team Meeting	1	5
Mixed stakeholder session (Community & Professionals)	2	30
Health & Wellbeing Event	1	10
Social prescribers networking event	1	20

6.6 Advice and Casework activity

6.6.1 Demographics

In total, the GHA casework team handled 233 cases in the first year of delivery to September 2025, 153 of which had been closed.

- The majority of cases were female (65%), and - reflecting the demography of Lincolnshire as a whole- the majority of clients are British and are either classified as 'White' or 'White British'.
- Over a third of clients were over the age of 66. A small proportion (5%) are under the age of 18.
- Most clients (69%) had no children in their households and 43% lived alone.
- Of the 31% with resident children, more than half (16%) lived in a single parent household.
- Of the clients with no children, 12% lived with another working age adult, and 15% lived with an older adult.

6.6.2 Tenure

- The majority of clients (63%) are owner occupiers, followed by social housing (19%), and private renting (14%).
- The owner occupation figure is slightly lower than for the overall population of GHA authorities, while the proportion of social tenants is higher.

6.6.3 Health conditions

- Referrers reported that 66% of clients had some form of health condition impacted by the state of their homes. Some 22% had two conditions, and 36% had three or more.
- The most common issue was mobility (37%), followed by mental health challenges (17%) and asthma/COPD (14%).
- 31% of clients had 'other medical issues' that were not categorised.

6.6.4 Issues in the home

- The most frequently named issues were Financial Options (35%); this and the related 'support to apply for grants' usually appeared in conjunction with other physical problems.
- Some of the physical issues overlapped, such as living in a cold home and boiler replacement required.
- The most common physical issue identified was damp and mould (31%), followed by living in a cold home or lack of hot water, property disrepair/septic tank (16%), and problems with the boiler (14%).
- Referrals most often identified the need for financial or energy support and issues of cold and damp, themselves possibly related to specific types of disrepair.

The evaluators conducted a co-occurrence analysis to identify the issues that tend to be flagged together within the same referral.

- Finance options appeared alongside roof repairs 68% of the time, living in a cold home/No hot water (63%)
- Replace/Broken boiler (50%)
- Damp & Mould (30%).

Properties often have a number of related problems e.g., Property disrepair overlapped with Hoarding/Clutter (46%) and cold homes (37%), while hoarding often appeared with cleaning (46%) and finance (54%).

6.6.5 Caseworker interventions

- Caseworker interventions span a range from the very light touch (simply signposting clients to information) to the intensive (frequent, in-person support with practical actions). In the first year of delivery:
- Nearly half (48%) of closed cases had received some form of advice and guidance, which could include either helping the client access a service or investigating further options.
- The most common topic in the first instance was information about grants (54%), followed by information about how to pay for works (39%). Suggesting that at least some clients had an understanding of the work required but were unsure how to pay for it.
- Alongside providing initial information, GHA caseworkers also signpost relevant services and organisations that clients could contact. These included:
 - the Connect to Support/Good Homes Lincs website (30% of clients)
 - Charitable support (26%), and
 - Citizens Advice/trading standards (20%)
 - Seventy-one percent of clients were signposted to at least one organisation.
- In some cases, caseworkers themselves contact those organisations with referrals, in the first year 28% of closed cases had been onward referred.
- Information and advice are also the initial approaches for cases that were still open. Providing access to financial solutions (68%), finding trusted traders (64%), and commissioning works (61%) appear in most cases.
- Of the 153 closed cases, 23% (35 clients) had works delivered in their homes. These were most often related to:
 - Flooring (42%), including installation of carpet in social rented homes
 - Bathroom repairs (32%)
 - Unspecified remedial works (21%).
 - Heating systems and hot water accounted for another 16% together.
- Of the further 80 cases still open, 28 (35%) had works delivered with GHA support, and/or interventions via GHA referral at the time of analysis.
- Delivery of works was mostly concentrated in a handful of practical fixes including:
 - Bathroom/WC repairs (21%)

- Remedial works (18%),
- Flooring (18%), and
- Aids/adaptations (18%).

6.6.6 Where risks were acute, GHIL had been front-loading cleaning and decluttering or supporting stopgaps such as providing temporary heaters or dehumidifiers.

6.6.7 The table below provides a summary of the types of work delivered in the first year with caseworker support.

6.6.8 **Table 2. Types of work delivered with caseworker support**

Works delivered	% of closed cases (153 total)	% of still open cases (80 total)
Flooring	42	18
Bathroom / WC repair	32	21
Remedial works (repair)	21	18
Decluttering	11	14
Heating system/boiler	11	14
Pest control	5	6
Electrical repair	5	6
Hot water	5	6
Plumbing	5	6

6.6.9 The cost of individual interventions completed ranged from £75 (bathroom repairs) to £6000 (repairs to heating and hot water system). Two clients had work delivered at no cost (decluttering and floor repairs).

6.6.10 Some cases are closed with remaining issues for a variety of reasons, including clients' inability to access the funding needed or resistance to further works being carried out in their home.

6.6.11 Of closed cases that received caseworker support (81 cases), a minority (19%) still had outstanding issues with their homes after the case was closed. About half of such clients were unable to access the necessary finance, and about half still had outstanding disrepair issues.

6.7 Risks Reduced

- In the first year of delivery, the most common types of risk reduced were overall health and safety (22%) and damp and mould (21%), followed by a general category of poor housing conditions.
- In most cases more than one type of risk was reduced. 43% of cases saw a reduction in 1-3 risks, and one case recorded 7.
- The table below provides a summary of the types of risks reduced by GHA interventions in the first year with caseworker support (of 81 closed cases where interventions were received).

6.7.1 **Table 3. Risks reduced by caseworker interventions**

Type of risks reduced	Number	%
Health and Safety risks	18	22
Impact of damp & mould	17	21
Impact of poor housing condition	14	17
Accident/ injury	10	12
Injury /accident to child(ren) in home	8	10
Slips trips & falls	7	9
Cold home (Interim heating solution)	6	7
Fire	3	4

Clutter	3	4
Hospital stay	3	4
Improved energy efficiency	2	2
Impact of overcrowding	2	2

6.8 Service output and outcomes in year one

6.8.1 LSE evaluators note that the most obvious output of the project is the completed improvement of 40 homes with caseworker support or through referral to other agencies, with many more improvements planned or underway

6.8.2 A second important output was repairs and modernisation undertaken by clients themselves after getting information and advice from GHF staff and/or the HHA tool.

6.9 Example Advice & Casework Outcomes

- A resident being supported to return home from long-term temporary residential care, due to lack of heating and hot water in her primary residence.
- A couple living in a shared ownership property, being supported to access a replacement heating system, after being without heating and hot water for over 8 years.
- A child being deescalated from a child protection plan, due to the parents being supported to access funding and replace hazardous stair carpets.
- A family with a newborn being supported to access non-council funding to replace a broken boiler, as opposed to accessing council-funded discretionary housing assistance.
- A parent of a child with SEND being supported to access appropriate flooring in the child's bedroom to reduce associated risks.
- A family living in isolated rural social housing being supported through the process of moving to a more accessible area and enabling the children to more easily access care.
- A resident being supported to access 'pro-bono' decluttering services, following a clutter related house fire.
- A resident and spouse being supported through the hospital discharge process accessing social housing to prevent a delayed hospital discharge, due to the primary residence being in serious disrepair and an estimated works cost of approximately £60,000.
- Residents being supported to resolve issues with damp and mould, via liaison with Housing Standards, and direct provision of information, guidance and equipment to reduce immediate severity and impact.
- Providing targeted information and signposting to enable residents to address and self-implement solutions, following caseworker triage, including a veteran's spouse being signposted to and accessing funding through a SSAFA grant to undertake roof repairs that they would otherwise have been unable to afford.

6.10 Overall assessment and value for money

6.10.1 LSE evaluators noted that from year one activity, benefits are potentially high. Positive effects in terms of reduced hazards and greater client wellbeing began to appear as the first cases were closed, and the flow of benefits is now accelerating.

6.10.2 In the next phase of the evaluation, LSE will collect more robust evidence on the type and magnitude of benefits, including importantly reductions in public-sector costs, to inform a more detailed cost-benefit analysis.

6.10.3 Overall, however, LSE note that the experience of the first year suggests that the advice and casework service represents good value for money.

6.11 Casework referrals to date

6.11.1 In total between July 2024 (pre-launch) and 31 December 2025. The GHA has received a total of 391 referrals for advice and support.

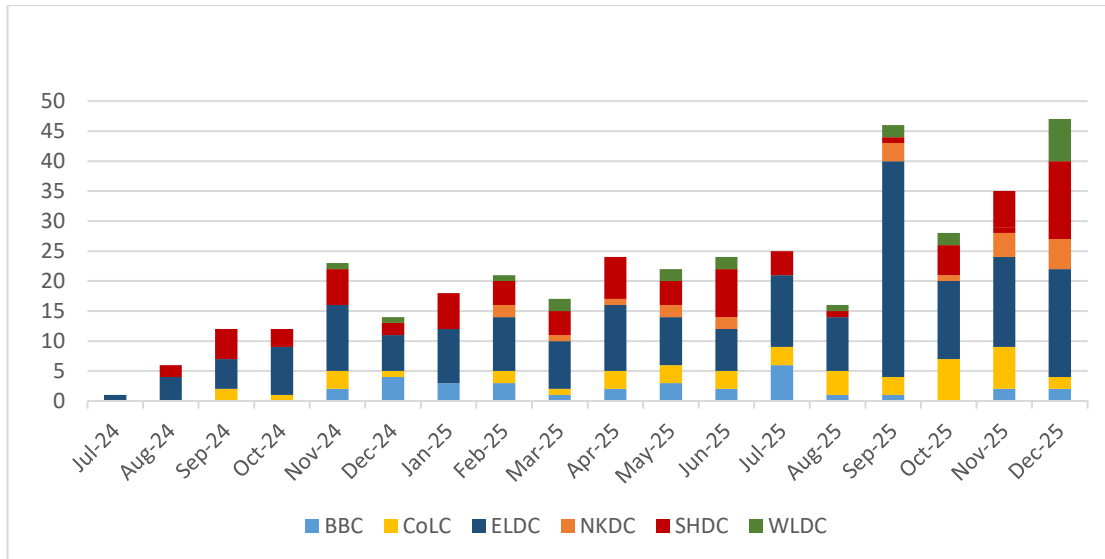
6.11.2 The table below provides data on the number of referrals received by the GHA across funding districts.

6.11.3 **Table 4. Referrals by GHA funding District**

BBC	CoLC	ELDC	NKDC	SHDC	WLDC
32	45	190	21	80	21

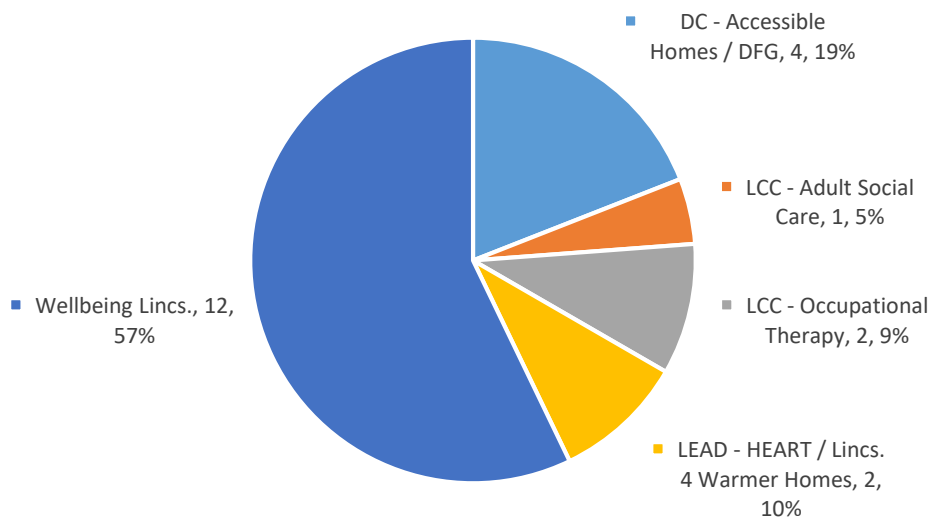
6.11.4 Figure 2 below provides data on the number of referrals by month by resident district.

6.11.5 **Figure 2. Referrals by Month by Resident District (July 2024 – 31 December 2025)**



6.11.6 Referrals have been received from all referral partners. The chart below shows the source of referrals for WLDC residents to 31 December 2025.

6.11.7 **Figure 3. WLDC – Source of Referrals to 31 December 2025**



7 Staffing

7.1 The Lincolnshire Good Home Alliance currently consists of 7 x Full-time Equivalent (FTE) staff:

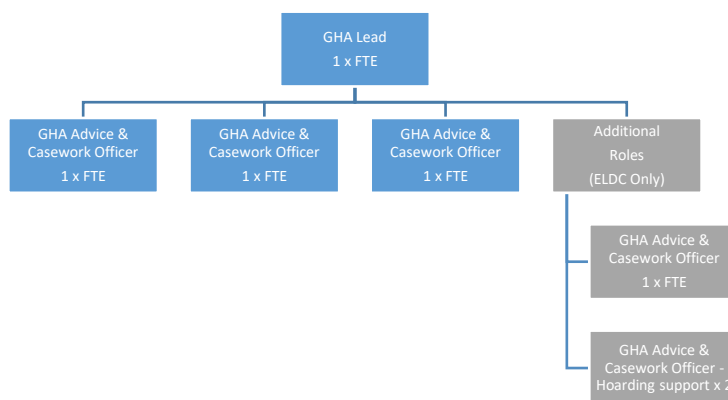
- The GHA Lead position & 3 FTE Advice and Caseworkers – funded by Lincolnshire District & County councils; and
- Three additional Caseworkers, supporting enhanced damp & mould / Hoarding support activities in the East Lindsey District Council (ELDC) area only (and funded only by ELDC).

7.2 Additional project management capacity is provided by LCC through the allocation of both Public Health Programme Management and Officer capacity (at no additional cost to the GHA operations budget).

7.3 The 6 Casework positions are hosted and employed by ELDC.

7.4 The GHA Lead position is hosted and employed by Boston Borough Council and provides operational management of the Advice and Casework team under S113 arrangements between BBC and ELDC as part of the South and East Lincolnshire Councils (SELCP) partnership arrangements.

7.5 **Figure 4 below sets out the current staffing structure**



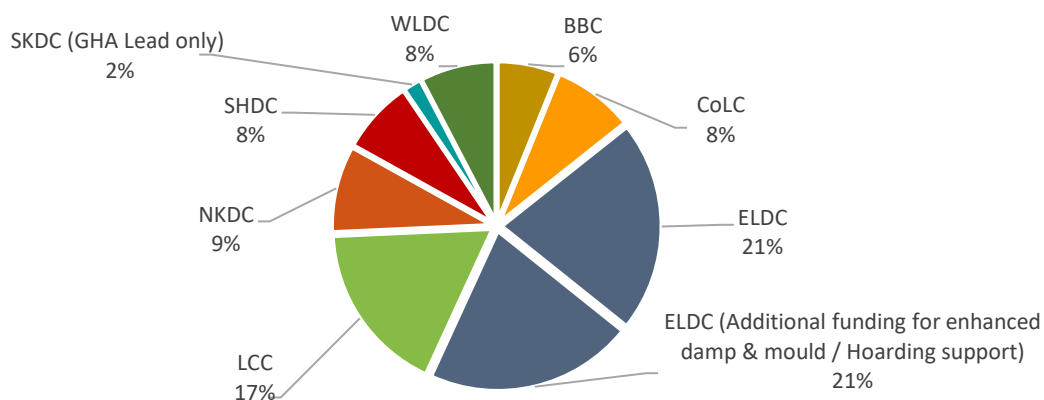
8 Financial implications

8.1 This report seeks consideration on the continued funding of the GHA Advice and Casework service from 1 July 2026 to 31 March 2028.

8.2 The GHA advice and casework service is currently funded by 6 District councils and Lincolnshire County Council. District contributions are calculated in line with respective proportions of DFG allocation received via LCC.

8.3 Figure 5 below shows the current proportions of funding received from contributing councils for the initial pilot period to 30 June 2026.

Figure 5. GHA Funding Council Contributions (1 July 2024 to 30 June 2026)



8.4 The table below sets out the identified contributions required from participating councils to continue the current advice and casework service level (3 FTE) and GHA Lead position for a further 21 months.

8.5 Contributions are based on the following:

- Continuing the GHA Lead position and 3 x full time equivalent (FTE) Advice & Casework Officers
- Maintaining advice and casework service contributions from existing funding districts – including BBC, ELDC, CoLC, NKDC, SHDC and WLDC, and excluding SKDC.
- Retaining a funding contribution towards the GHA Lead position from SKDC (non-advice & casework service management activities).
- Maintaining an annual equivalent funding contribution of 50,000 per year from LCC.
- Calculating contributions in line with the DFG allocation formula and proportions received by each core funding district.

Table 5. GHA Funding contributions (2026/27 to 2027/28)

District Funding Contribution	2026/2027	2027/2028	Total Funding
Boston Borough Council (BBC)	£11,263	£15,726	£26,989
East Lindsey District Council (ELDC)	£36,305	£50,693	£86,997
City of Lincoln Council (CoLC)	£15,166	£21,176	£36,342
North Kesteven District Council (NKDC)	£16,208	£22,631	£38,840
South Holland District Council (SHDC)	£13,749	£19,198	£32,946
South Kesteven District Council (SKDC) (GHA Lead contribution only)	£3,973	£5,484	£9,457
West Lindsey District Council (WLDC)	£14,134	£19,736	£33,871
Lincolnshire County Council (LCC)	£37,500	£50,000	£87,500

8.6 The total funding contribution required from WLDC to continue the provision of GHA advice and casework activities in the WLDC area to 31 March 2028 is £33,871.

8.7 2-year extension to be funded the Health and Wellbeing Reserve:

Year 1 - 2026/2027 £14,200

Year 2 - 2027/2028 £19,700

Leaving a balance on the reserve as of 31st March 2028 of £52,20

9 Stakeholder / Consultation / Timescales

9.1 The associated proposals to continue the GHA to 31 March 2028 have been developed in consultation with respective Housing Health and Ageing Well Delivery Group district and county council representatives and informed by the LSE evaluation, resident and stakeholder feedback.

9.2 This report has also been to WLDC Overview and Scrutiny Committee with the following recommendations agreed:

- *Members consider the content of this report and provides feedback on the Good Home Alliance (GHA) pilot activities, performance and outcomes to date, to inform the Corporate Policy and Resources Committee's consideration on continued funding of the GHA Advice & Casework service for a further 21 months from 1 July 2026 to 31 March 2028.*
- *Members support further work by WLDC officers and the Good Homes Alliance (GHA) on the opportunities to lobby for change and additional funding to support the climate agenda with retro fitting energy efficiency measures in households, over and above those available through the Warm Homes Local Grants.*
- *Members champion an increase in communications to highlight the positive work of the Good Homes Alliance (GHA) and the unique opportunity provided to Lincolnshire through this service.*

10. Recommendations

- 10.1 Members acknowledge the positive impact of the Good Homes Alliance work to date
- 10.2 Members agree to fund the Good Homes Alliance for a further 2 years to 31st March 2028 to the sum of £33,871 from the Health and Wellbeing reserve.

Agenda Item 6c



**Corporate Policy &
Resources Committee**

Thursday, 16 April 2026

**Subject: Recommendation from JSCC: Review of the Anti Money
Laundering and Financial Crime Prevention Policy**

Report by:

Peter Davy
Director of Finance and Assets (S151 Officer)

Contact Officer:

Peter Davy
Director of Finance and Assets (S151 Officer)

peter.davy@west-lindsey.gov.uk

Purpose / Summary:

To approve the revised policy which outlines the Council's approach to preventing and responding to anti money laundering and now incorporates the prevention of financial crime.

RECOMMENDATION(S):

- a) That Members accept the recommendation from the Joint Staff Consultative Committee, and the revised Anti-Money Laundering and Financial Crime Prevention Policy be approved.
- b) That minor housekeeping amendments be delegated to the Section 151 Officer following consultation with the Chairman of the JSCC and CP&R Committees.

IMPLICATIONS

Legal: The legal duties around money laundering and financial crime are detailed within the policy.

Financial: FIN/133/26/CPR/SL

There are no financial implications arising from this report. Low risk investigations can be carried out by Human Resources; medium risk investigations by the Monitoring Officer; and high-risk investigations by the Section 151 Officer, supported by external legal and/or specialist fraud investigation support. There is a necessary cost when engaging specialist external investigation resource.

Staffing: There are no staffing implications arising from this report. However, the report does make reference to key contacts for whistleblowing.

Equality and Diversity including Human Rights:

There are no implications arising from this report.

Data Protection Implications:

There are no implications arising from this report.

Climate Related Risks and Opportunities:

There are no implications arising from this report.

Section 17 Crime and Disorder Considerations:

There are no implications arising from this report.

Health Implications:

There are no implications arising from this report.

Title and Location of any Background Papers used in the preparation of this report :

Risk Assessment:

The Fraud Risk Assessment was provided to Members of the Governance and Audit Committee in July 2024.

Is the decision one which Rule 14.7 of the Scrutiny Procedure Rules apply?

i.e. is the report exempt from being called in due to urgency (in consultation with C&I chairman)

Yes

No

Key Decision:

A matter which affects two or more wards, or has significant financial implications

Yes

No

1. Background

- 1.1 This report recommends a revised Anti-Money Laundering and Financial Crime Prevention Policy, attached at appendix 1. The previous Anti Money Laundering Policy (appendix 2) has been in place for a number of years and, following an audit of the council's fraud policies and processes, a review of the existing policy was recommended.
- 1.2 Specifically, the associated management action arising from the audit was: **“The Council will combine the Prevention of Financial Crime Policy and the Anti-Money Laundering Policy, making it the Anti-Money Laundering and Financial Crime Prevention Policy”**. Section five of the revised policy details the prevention of financial crime.
- 1.3 Given the revisions required to the previous Anti Money Laundering Policy, the updated document is presented for adoption. This is a re-written document and will replace the existing policy. It will be subject to review and amendment in line with current protocols.
- 1.4 The revised policy provides a clear framework for the Council to undertake necessary, legal, and proportionate actions where evidence supports an investigation into an allegation of money laundering or financial crime, and sets out that the Council will seek to deal with cases brought to its attention.
- 1.5 The policy also sets out that the minimisation of money laundering and financial crime is essential to ensure that public resources are used for their intended purpose of providing services to local residents.
- 1.6 The policy details the Council's no tolerance stance to all forms of money laundering and financial crime, and references the policy framework with which our staff, contractors, members and suppliers must comply. Reporting mechanisms are also included.
- 1.7 Following the introduction of this revised policy, staff and member training will be provided, in addition to an update in our supplier terms and conditions.

2 Summary of Amendments to Revised and Updated Policy

- 2.1 Whilst the previous version of the Anti Money Laundering Policy is attached for information, the revised document incorporates a number of updates, amendments, and additional information. The key changes are detailed within the following table, however, as this is a re-written document, this is not an exhaustive list.

2.2 Table of amendments

Amendment	Report Section
Policy name change	Title page
Corporate branding and layout	Whole document
Record of review / approval	Page 2
Clearer definitions of fraud, corruption, theft, and bribery	Section 3
Details of relevant legislation updated	Section 4
Prevention of financial crime now included	Section 5
Removal of named individuals to make reference to role and title only	Section 7
Requirements for training and exchange of information with other organisations updated	Section 8
Removal of extraneous appendices	End of document

3. Recommendation

3.1 Following the recommendation from the JSCC, Members of the Corporate Policy and Resources Committee are asked to:

3.1.1 accept the recommendation from the Joint Staff Consultative Committee, and the revised Anti-Money Laundering and Financial Crime Prevention Policy be approved; and

3.1.2 that minor housekeeping amendments be delegated to the Section 151 Officer following consultation with the Chairman of the JSCC and CP&R Committees.

Anti Money Laundering and Financial Crime Prevention Policy

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Record of review / approval:

	Approval By:	Date Approved:
Version 1 Revised Policy	JSCC	
	Corporate Policy & Resources Cttee	

1. Policy Statement

West Lindsey District Council recognises that measures need to be in place to:

- Monitor, detect and prevent financial crime in the Council;
- Help put in place systems and controls which mitigate financial crime risk effectively; and
- Enable the reporting of any suspicion of financial crime or related issues (using the councils Whistleblowing policy).

The council will promote this policy in accordance with legislation and will strive to provide an environment free of financial crime. Senior management will be responsible for ensuring that this is understood and adhered to by all employees of the council. It is also acknowledged that some services will be more exposed to potential financial crime than others but that all staff should still have an awareness of this policy.

2. Scope of Policy

All Councillors, employees and others who work on behalf of the council are expected to carry out their responsibilities under this policy and to follow relevant policies and procedures.

This policy covers the following areas:

- Prevention of Financial Crime
- Anti-Money Laundering
- Fraud and Bribery Response Plan

This policy applies to all aspects of the Council's functions including:

- Provision of services
- Commissioning and purchasing of goods and services
- Recruitment, employment, training and development of staff
- Grants to voluntary and community organisations
- Landlord functions in respect of housing and other property
- Exercise of statutory powers and responsibilities
- Partnerships with other organisations

- Community involvement
- Consultation with local people
- Promotion and publicity

Any breach of this policy by employees may result in action being taken under the Disciplinary Policy. Volunteers and contractors may be excluded from further involvement with provision of council services.

3. Definitions

In regard to this policy and associated policies the definitions used by West Lindsey District Council are:

Fraud: the intentional distortion of financial statements or other records by persons internal or external to the authority which is carried out to conceal the misappropriation (misuse) of assets or otherwise for gain.

Corruption: the offering, giving, soliciting, or acceptance of an inducement or reward which may influence any person to act inappropriately

Theft: appropriating property belonging to another with the intention of permanently depriving the other of it

Bribery: is an inducement or reward offered, promised or provided to gain personal, commercial, regulatory or contractual advantage

Money laundering: is the term used for a number of offences involving concealing the proceeds of crime or terrorist funds, so that they appear that they have come from a legitimate source. Relevant legislation includes the Proceeds of Crime Act 2002, Money Laundering Regulations 2007, the Terrorism Acts of 2000 and 2006, and the Serious Organised Crime and Police Act 2005. Money Laundering involves one or more of three principal offences: concealing, arranging and acquisition/use/possession.

Whistleblowing: when a person reports suspected wrongdoing at work. Officially this is called 'making a disclosure in the public interest'

4. Legislation

Financial crime in the Proceeds of Crime Act 2002, (as amended by the Serious Crime Act 2015) covers any kind of criminal conduct relating to money or to financial services or markets, including any offence involving:

- i. Fraud or dishonesty; or
- ii. Misconduct in, or misuse of information relating to, a financial market; or
- iii. Handling the proceeds of crime; or

iv. The financing of terrorism.

This was originally aimed at professionals in the financial and investment sectors. However, it was subsequently recognised that those involved in criminal conduct were able to 'clean' the proceeds of crime through a wider range of business and professional activities – including council activities.

The Fraud Act 2006 describes fraud as the intention to make gain or cause loss under three main headings:

- Fraud by false representation
- Fraud by failing to disclose information
- Fraud by abuse of position

The Bribery Act 2010 defines bribery as giving someone a financial or other advantage, to encourage that person to perform their functions or activities improperly, to reward a person for having already done so, in order to gain personal, commercial, regulatory or contractual advantage. It is the most common form of corruption.

5. Prevention of Financial Crime

This policy recognises the increase in economic crime which refers to a broad category of activity involving money, finance or assets, the purpose of which is to unlawfully obtain a profit or advantage for the perpetrator to cause loss to others. This can include fraud against the individual, private sector and public sector, terrorist financing, sanctions contravention, market abuse, corruption and bribery, and the laundering of proceeds of all crimes.

This policy provides measures to monitor, detect and prevent financial crime within the Council and to help put in place systems and controls which mitigate financial crime risk effectively. The policy applies to all council activities and outlines our commitment to creating a culture of zero tolerance of fraud, theft and corruption (including bribery) and maintaining high ethical standards in the administration of public funds.

To report any suspicion you have of any financial crime or related issues you can follow the Councils' whistleblowing procedure.

Prevention of Financial Crime

The areas where we particularly look for risks of financial crime are in relation to fraud, corruption, theft, bribery, and money laundering.

The Council firmly endorses a culture of integrity and honesty and take a robust approach to any signs of financial crime.

The Councils' approach is to proactively and effectively manage the risk of financial crime and to minimise losses incurred by:

- Maintaining fully integrated policies;
- Promoting a culture of honesty and propriety;
- Deterring the risk of occurrence of financial crime;
- Preventing risks that cannot be deterred;
- Detecting risks that cannot be prevented;
- Professionally investigating financial crime detected;
- Applying sanctions against people who commit financial crime;
- Seeking redress for assets defrauded;
- Communicating with officers, members, contractors, the public and partners making them aware of the policies and how to raise concerns;
- Providing training and guidance to all employees and members.

Appropriate policies and procedures are maintained to ensure that internal controls are built into the Councils' systems and processes to prevent or detect financial crime.

There is an expectation and requirement that all contractors, suppliers, individuals and organisations associated in whatever way with the Councils will act with integrity and that Council staff and Members will lead by example. Members and officers should demonstrate the highest standards of openness, propriety and integrity and lead by example by adhering to legally sound and honest procedures and practices. The prevention and detection of fraud or corruption, and the protection of the public purse, are everyone's responsibility, both internal and external to the organisation.

6. Anti-Money Laundering

The purpose of this policy is to ensure that all staff and Members are aware of:

- What money laundering is;
- The legislative changes;
- Their responsibilities;
- How to deal with suspected money laundering cases;
- The consequences of non-compliance with this policy.

What money laundering is and possible signs of money laundering activity

Money laundering is the term used for various offences involving the process by which criminally obtained money or other assets are exchanged for clean money or assets with no obvious link to their criminal origins. It also covers money, however come by, which is used to fund terrorism.

The four main offences are concealing, arranging, acquisition/use/possession, and tipping off.

Organisations in the 'regulated sector' and which undertake particular types of regulated activity must:

- appoint a Money Laundering Reporting Officer (MLRO) to receive disclosures from employees of money laundering activity (their own or anyone else's);
- implement a procedure to enable the reporting of suspicions of money laundering;
- apply customer due diligence measures in certain circumstances;
- obtain information on the purpose and nature of certain proposed transactions / business relationships;
- conduct ongoing monitoring of certain business relationships;
- maintain record keeping and other specified procedures on a risk sensitive basis;
- train relevant staff.

It is impossible to give a definitive list of ways in which to spot money laundering; however, one or more of the following may suggest money laundering activity (not an exhaustive list):

General

- A secretive client e.g., refuses to provide requested information without a reasonable explanation;
- Concerns about honesty, integrity, identity or location of a client;
- Illogical third party transactions e.g. unnecessary routing or receipt of funds from third parties or through third party accounts;
- Involvement of an unconnected third party without logical reason or explanation;
- Payment of a substantial sum in cash;
- Overpayments by a client;
- Absence of an obvious legitimate source of the funds;
- Where, without reasonable explanation, the size, nature and frequency of transactions or instructions (or the size, location or type of a client) is out of line with normal expectations;
- A transaction without obvious legitimate purpose or which appears uneconomic, inefficient or irrational;
- The cancellation or reversal of an earlier transaction;
- Requests for release of client account details other than in the normal course of business;

- Poor business records or internal accounting controls;
- A previous transaction for the same client, which has been, or should have been and was not, reported to the Money Laundering Reporting Officer;
- Complaints about a customer that raise suspicions of criminal activity / money laundering; and
- Items in a customer's home that raise suspicions / seem out of the norm (e.g. several new boxed televisions).

Council/Property Matters

- A cash buyer;
- A sudden change of buyer;
- Unusual property investment transactions if there is no apparent investment purpose or rationale;
- Instructions to receive and pay out money where there is no linked substantive property transaction involved (surrogate banking);
- Funds received for deposits, or prior to completion from an unexpected source or where instructions were given for settlement funds to be paid to an unexpected destination;
- No clear explanation as to the source of funds along with lack of clarity as to how the client would be in a position to finance the purchase; and
- Money comes from an unexpected source.
- Right to Buy (e.g., tenant able to pay for the purchase of their house in cash);
- Housing Rents, Council Tax, Non-Domestic Rates (e.g., customer able to pay large sums that are either in arrears, or in advance, in cash); and
- Sundry Debtors (e.g., an individual is able to clear their account with large amounts of cash)

Client Identification

All cash transactions over £1,000 must be reported to the Councils' Money Laundering Reporting Officer (Section 151 Officer). Cash includes notes, coins and travellers cheques.

Where the Council is carrying out regulated business such as the provision to other persons of accountancy, audit and tax services and the participation in financial or real property transactions and a cash transaction is complex or unusually large (more than £1,000), or the transaction is considered suspicious, staff must carry out a 'Customer due diligence test'.

Satisfactory evidence must be obtained of the identity of the prospective client and full details of the purpose and intended nature of the relationship or transaction as soon as practicable after instruction has been received.

For private individuals, evidence should include one of the following:

- valid Passport,
- valid Photo Card Driving Licence

This must be supported by secondary evidence such as:

- Utility Bill
- Bank, building society or credit union statement
- Most recent mortgage statement from a recognised lender

For business clients evidence should be obtained that is relevant to the business and confirms the identity of the business such as their company registration number and registered address. Investigations should take place that are appropriate to ensure that the business's identification is legitimate.

Staff conducting regulated business need to be able to demonstrate that they know their clients and the rationale behind particular instructions and transactions.

Disclosure Procedure

Any employee who knows, suspects, or has reasonable grounds for knowing or suspecting that a person is engaged in money laundering or terrorist financing must report such matters to the MLRO. The disclosure should be within "hours" of the information coming to the employee's attention. Should the employee not do so, then he/she may be liable to prosecution.

An employee's disclosure should be made through the form at Appendix one. The form must include as much detail as possible.

Once an employee has reported the matter to the MLRO he/she must follow any directions given. An employee must NOT make any further enquiries into the matter themselves: Any necessary investigation will be undertaken by the National Crime Agency (NCA).

Upon receipt of a completed form, the MLRO must note the date of receipt on his/her section of the report and acknowledge receipt of it. They should also advise the employee of the timescale within which they expect to respond to the employee.

The MLRO will consider the report and any other available internal information they think relevant e.g.:

- reviewing other transaction patterns and volumes;

- the length of any business relationship involved;
- the number of any one-off transactions and linked one-off transactions;
- any identification evidence held;

and undertake such other reasonable inquiries they think appropriate in order to ensure that all available information is taken into account in deciding whether to report to the NCA.

Once the MLRO has evaluated the completed form and any other relevant information, they must make a timely determination as to whether:

- there is actual or suspected money laundering or terrorist financing taking place; or
- there are reasonable grounds to know or suspect that is the case; and
- whether they need to seek consent from the NCA for a particular transaction to proceed.

Where the MLRO does conclude potential money laundering, then they must disclose the matter as soon as practicable to the NCA.

Where the MLRO suspects money laundering but has reasonable cause for non-disclosure, then they must note the report accordingly (the MLRO must liaise with the monitoring officer to decide whether there is a reasonable excuse for not reporting the matter to the NCA), they can then immediately give their consent for any ongoing or imminent transactions to proceed.

Where the MLRO concludes that there are no reasonable grounds to suspect money laundering then they shall mark the form accordingly and give their consent for any ongoing or imminent transaction(s) to proceed.

Where consent is required from the NCA for a transaction to proceed, then the transaction(s) in question must not be undertaken or completed until the NCA has specifically given consent, or there is deemed consent through the expiration of the relevant time limits without objection from the NCA.

All disclosure forms referred to the MLRO and reports made by them to the NCA must be retained by the MLRO in a confidential file kept for that purpose, for a minimum of five years.

The MLRO commits a criminal offence if they know or suspect, or has reasonable grounds to do so, through a disclosure being made to them, that another person is engaged in money laundering and they do not disclose this as soon as practicable to the NCA.

At no time and under no circumstances should an employee voice any suspicions to the person(s) whom they suspect of money laundering, even if the NCA has given consent to a particular transaction proceeding, otherwise the employee may commit a criminal offence of “tipping off”. Do not, therefore, make any reference on a client file to a report having been made to the MLRO. Should the client exercise their right to see the file, then such a note will obviously tip them off to the report having been made and may render you liable to prosecution. The MLRO will keep the appropriate records in a confidential manner.

Money Laundering Offences

The consequences of committing an offence are potentially very serious. Whilst it is considered most unlikely that staff or Members would commit any of the four main offences, failing to reveal a suspicion of a case of money laundering is a serious offence in itself.

Money laundering offences can be tried at a Magistrates court or in the Crown Court, depending on the severity of the suspected offence. If someone is found guilty in a Magistrates court, s/he can be fined, face a prison sentence, or both. In a Crown Court, fines are unlimited and prison sentences range from two to fourteen years.

The main money laundering offences are:

Concealing – where someone knows or suspects a case of money laundering but conceals or disguises its existence.

Arranging – where someone involves himself or herself in an arrangement to assist in money laundering.

Acquisition /use/possession – where someone tries to benefit from money laundering by acquiring, using or possessing the item concerned.

Tipping Off – where someone warns a person who is, or is suspected of being, involved in money laundering in such a way as to reduce the chance that s/he will be investigated or to prejudice an investigation.

So, if you have any suspicions complete the form at Appendix one and report it to the MLRO without discussing it with anyone else.

7. Roles and Responsibilities

Money Laundering Reporting Officer – The officer nominated to receive internal suspicious transaction reports (known as disclosures) about possible money laundering activities within the Council/s is the Section 151 Officer, i.e. The Money Laundering Reporting Officer (MLRO).

The role of the MLRO is to decide upon the receipt if the internal suspicious transaction reports should be reported to the NCA and if appropriate make such reports.

Section 151 Officer - The Section 151 Officer is delegated as having the statutory responsibility under section 151 of the Local Government Act 1972 to “make arrangements for the proper administration of their financial affairs and shall secure that one of their officers has the responsibility for the administration of those affairs”. Proper administration is interpreted as encompassing all aspects of local authority financial management.

To be responsible for developing and implementing the Anti Money Laundering and Financial Crime Policy and investigating any issues reported under this Policy.

To ensure that all suspected or reported irregularities are dealt with professionally and that action is identified to improve controls and reduce the risk of reoccurrence.

To provide assurance that financial crime risks are being managed and to provide advice on managing fraud risk and design of controls.

Chief Executive - To support and promote an anti-money laundering and financial crime culture. The Members with the Chief Executive, are ultimately accountable for the effectiveness of the Councils' arrangements for preventing, detecting and investigating fraud and corruption.

Management Team - To promote staff awareness and ensure that all suspected or reported irregularities are immediately referred to one of the officers named in the Whistleblowing Policy.

Responsible for the communication and implementation of this Policy within their service areas. They are responsible for ensuring that their employees are aware of the Council's Human Resources policies and procedures, the Council's Financial Regulations and Codes of Conduct and that the requirements of each are being met in their everyday service activities. In addition, Management must make their staff aware of the requirements of the National Code of Conduct for Local Government Employees through training courses.

Managers are expected to create an environment in which staff feel able to approach them with any concerns they may have about suspected irregularities. Where they are unsure of the procedures they should refer to the Council's documented Whistleblowing Policy.

A key preventative measure in tackling money laundering and financial crime is for Management to take effective steps during recruitment to establish, as far as possible, the honesty and integrity of potential employees, whether for permanent, temporary or casual posts and agency staff.

The Councils' formal recruitment procedure contains appropriate safeguards in the form of written references, the verification of qualifications held and employment history, however it may also be appropriate to request that a Disclosure and Barring Service (DBS) check is undertaken for employees working with, or who may have contact with, children or vulnerable adults, or financial systems.

To ensure that there are mechanisms in place within their service areas to assess risk of money laundering and financial crime and to reduce these risks by implementing strong internal controls.

Members - As elected representatives, all Members have a duty to protect public money from any acts of money laundering and financial crime.

This is achieved through Members operating within:

- The Council's Constitution.
- the Council's Standing Orders.
- The Code of Conduct for Members.
- Local Authorities (Members Interests) Regulations 1992.
- the National Code of Local Government Conduct and any future legislation or codes of conduct.
- The requirement to complete an annual Declaration of Related Party Transactions.
- the Anti Money Laundering and Financial Crime Policy.

The Council's Constitution makes specific reference to some of these elements and also includes the declaration and registration of Members' interests in accordance with approved Council policy. Circumstances surrounding conflicts of interest, whether personal or financial, are also addressed.

Members are required to disclose to the Monitoring Officer details of any outside interests that they or their relatives have which may result in a conflict of interest and should remove themselves from involvement in matters in which they have a prejudicial interest (except to the extent that may be permitted by the Code of Conduct).

Accounting Codes of Practice require Members and Senior Management to formally disclose payments from the Council received by "related parties". These declarations form part of the Statement of Accounts and are subject to external audit each year.

Members must register the receipt of gifts and hospitality in the Register of Gifts and Hospitality.

Internal Audit - Plays a vital preventative role in working to ensure that adequate key controls are implemented to prevent and detect money laundering and financial crime. The service recommends changes in key controls and procedures with the aim of reducing the risk of losses to the Councils and works with management in ensuring that these are implemented.

Internal Audit staff have rights of access to all of the Council's records, information and assets which it considers necessary to fulfil its responsibilities.

Scrutiny Committee - To monitor compliance with the Councils' policies and consider the effectiveness of the Councils' anti money laundering and financial crime arrangements.

Promoting and maintaining high standards of conduct by Members in accordance with their Code of Conduct.

Monitoring Officer - To advise Members and Officers on ethical issues, probity and standards to ensure that the council operates within the law and statutory codes of conduct. Maintains the Register of Members' Interests and advises Members of new legislative or procedural requirements.

All employees - At all times to comply with council policies and procedures.

To be aware of the possibility of all aspects of money laundering and financial crime and to report any genuine concerns to the MLRO. If for any reason, they feel unable to speak to do this they should follow the Whistleblowing policy.

The Code of Conduct for Employees requires that officers are aware of their statutory requirements under section 117 of the Local Government Act 1972 regarding declaration of pecuniary and non-pecuniary interests. Declarations can be made to the Monitoring Officer.

Disclose to their line manager any outside interests they or any 'Personal Relationships' as defined in the Councils' policies they have which may result in a conflict of interest in

respect of transactions and dealings with the council, and these will be recorded in the appropriate registers.

Ensure that they avoid situations where there is a potential for a conflict of interest and they must ensure that there is an effective role separation for decisions made so that they are seen as being based upon impartial and objective advice.

Gifts and hospitality should only be accepted in accordance with the Council's guidelines within the Code of Conduct for employees and Members.

Be made aware of and be expected to adhere to any internal control system designed to prevent and detect money laundering and financial crime. All employees are required to bring any concerns they have on the adequacy of control measures to the attention of their line manager and the Monitoring Officer.

8. Training, Communications and Resources

We will provide awareness sessions for all staff and appropriate training for staff taking into consideration their roles within the organisation.

The Council will continue to encourage the exchange of information with other organisations, in compliance with the General Data Protection Regulation, tailed by the Data Protection Act 2018, in respect of financial crime activities. These bodies can include:

- The Police;
- External Auditors;
- Chartered Institute of Public Finance and Accountancy (CIPFA);
- Financial Conduct Authority (FCA);
- Department of Works and Pensions (DWP);
- National Anti-Fraud Network;
- Association of Local Authority Treasurers;
- Society of District Council Treasurers;
- Internal Auditors; and
- Other Local Authorities.

This collaboration provides a base for combating potential criminal activity of a fraudulent nature against this and other public sector organisations.

With regard to the National Fraud Initiative (NFI) exercise and data matching techniques generally, the Councils have adopted the Cabinet Office's Code of Data Matching Practice.

9. Consultation and Involvement

The Councils' Communications Team will optimise the publicity opportunities associated with money laundering and financial crime activity within the Councils and will try to ensure that the results of any action taken, including prosecutions, are reported in the press.

Where the Councils have suffered a financial loss as a result of money laundering or financial crime, in all cases the Councils will seek to recover the loss and advertise this fact, whether involving an officer or a Member.

All money laundering and financial crime activities, including this policy, will be made publicly available to make all staff and the public aware of the Councils' commitment to taking action against financial crime, should it occur.

10. Monitoring

The success of this policy will be measured by focusing on the outcomes achieved from the actions outlined within this document. The outcomes to be measured will include:

- awareness levels
- reports of suspicions
- successful investigations
- sanctions applied
- financial losses recovered and where appropriate financial savings.

The achievements against these outcomes, and the actions taken to minimise future cases of money laundering and financial crime, will be documented in the internal audit annual report to the council's Governance and Audit Committee.

11. Document Retention

Where the Council is carrying out regulated business, each department of the Council must monitor on an ongoing basis, their business relationships in terms of scrutinising transactions.

Records must be maintained of:

- client identification/ verification evidence obtained (or references to it);
- details of all relevant business transactions carried out for clients for at least 7 years plus current year, from the completion of the transaction (audit trail). This is so that they may be used as evidence in any subsequent investigation.

Appendix One

Suspected money laundering/financial crime reporting template

Your contact details:

Please provide your contact details for confirmation of report being received and in case of any additional questions.

Name:	
Role:	
Email:	
Contact Telephone:	

Main Subject details:

Please provide the details of the person you suspect of money laundering. If you suspect more than one person, please fill in the additional boxes below.

Full Name:	
Title:	
Date of Birth:	
Gender:	
Occupation:	
Address: <i>Home/Work</i> <i>(please delete as appropriate)</i>	

Transaction details:

Please enter the details of the transactions you believe are suspicious.

Date:	
Amount:	
Currency:	
Credit/Debit:	
Reason for the transaction:	

Associations:

Please give details of any linked associations.

Reason for association:	
Address:	

<i>Home/Work (please delete as appropriate)</i>	
---	--

Linked addresses:

Please enter any details of linked addresses.

Address: <i>Home/Work (please delete as appropriate)</i>	
---	--

Details of Suspicion:

Please enter details of your suspicion, giving as much detail as possible.

--

Any other details:

Please give any other relevant information.

--

To be completed by the Director of Finance and Assets (S151 Officer):-

Date report received:	
Date receipt of report acknowledged:	

If you would like a copy of this in large, clear print, audio, Braille or in another language, please call 01427 676676

За повече информация пръстен 01427 676676

Lai iegūtu vairāk informācijas gredzenu 01427 676676

Norėdami gauti daugiau informacijos žiedo 01427 676676

Aby uzyskać więcej informacji na 01427 676676

Pentru mai multe informații inel 01427 676676

За више информација назовите 01427 676676

Para más información llama 01427 676676

على اتصل المعلومات من لمزيد 01427 676676

Para mais informações ligue 01427 676676

欲了解更多信息，请致电 01427 676676

Guildhall,
Marshall's Yard
Gainsborough,
Lincolnshire,
DN21 2NA

Tel: 01427 676676
Fax: 01427 675170
DX 27214 Gainsborough

www.west-lindsey.gov.uk



Anti-Money Laundering

Policy 2018



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ANTI MONEY LAUNDERING POLICY

1. Introduction

- 1.1. West Lindsey District Council has a zero tolerance policy concerning money laundering and is committed to the highest standards of conduct.
- 1.2. The Proceeds of Crime Act (POCA) 2003, the Terrorism Act 2000 and the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 place obligations on West Lindsey District Council and its employees to ensure that procedures are in place to prevent the Council's services being used for money laundering.
- 1.3. This policy sets out the process to minimise the risk, as well as provide guidance on the Council's money laundering procedures. Adhering to this policy and guidance will protect employees from the risk of prosecution if an employee becomes aware of money laundering activity while employed by the Council.
- 1.4. The policy is not intended to prevent customers and service providers from making payments for Council services, but to minimise the risk of money laundering in high value cash transactions.

2. Definition of Money Laundering

- 2.1. The term 'Money Laundering' can be used to describe a number of offences involving the proceeds of crime or terrorist financing. In simple terms, money laundering is a process used by criminals to make the proceeds of their crimes appear as though they originated from a legitimate source. Money launderers aim to disguise the identity of the criminal and/or conceal their connection to the proceeds of the crimes.
- 2.2. The following constitute money laundering offences:
 - Concealing, disguising, converting, transferring criminal property or removing it from the UK (section 327 of the Proceeds of Crime Act 2002).
 - Entering into or becoming concerned in an arrangement which you know or suspect facilitates the acquisition, retention, use or control of criminal property by or on behalf of another person (section 328).
 - Acquiring, using or possessing criminal property (section 329).
 - Doing something that might prejudice an investigation e.g. falsifying a document.

- Failure to disclose one of the offences listed above, where there are reasonable grounds for knowledge or suspicion.
- Tipping off a person(s) who is or is suspected of being involved in money laundering in such a way as to reduce the likelihood of or prejudice an investigation.

Attached at Appendix A are some examples of money laundering.

- 2.3. There is a possibility that any member of staff could be prosecuted for money laundering offences if they suspect money laundering and either become involved with it in some way and/or do nothing about it. This policy sets out the appropriate practice and how any concerns should be raised.
- 2.4. Although the risk to the Council of contravening the legislation is low, it is important that all employees are aware of their responsibilities as serious criminal sanctions may be applied to those who breach the legislation.
- 2.5. **The significant requirement for employees is to immediately report any suspected money laundering activity to the Money Laundering Reporting Officer (MLRO; see section 5). Failure to do so could lead to prosecution.**

3. Identifying Money Laundering

- 3.1. There is no clear definition of what constitutes a suspicion of money laundering – common sense will be needed. Although you do not need to have actual evidence that money laundering is taking place, mere speculation is unlikely to be sufficient to give rise to knowledge or suspicion. However, if you deliberately shut your mind to the obvious, this will not absolve you of your responsibilities under the legislation.
- 3.2. Examples of money laundering activity include:
 - Large cash payments;
 - Asking for cash refunds on credit card payments; or
 - Overpaying bills and invoices and then asking for cash refunds.
- 3.3. Any transaction involving an unusually large amount of cash should cause concern and prompt questions to be asked about the source. This will particularly be the case where the value of cash paid exceeds the amount due to settle the transaction and the person(s) concerned ask for a non-cash refund of the excess.
- 3.4. If the person(s) concerned use trusts or offshore funds for handling the proceeds or settlement of a transaction, then the reasons for this should be questioned.

3.5. Care should be exercised and questions asked where:

- A third party intermediary becomes involved in a transaction;
- The identity of a party is difficult to establish, or is undisclosed;
- A company is used where the ultimate ownership of the company is concealed or difficult to verify; and/or
- A party is evasive about the source or destiny of funds.

4. The Council's Obligations

4.1. The Council is obligated to:

- Appoint a money laundering reporting officer.
- Maintain client identification procedures in certain circumstances.
- Implement a procedure to enable the reporting of suspicions of money laundering.
- Report any cash transactions over €15,000 (or the Sterling equivalent).
- Maintain sufficient records.

5. The Money Laundering Reporting Officer (MLRO)

5.1. The Council has nominated the following officers to be responsible for anti-money laundering measures within the Council:

MLRO: **Ian Knowles**, Executive Director of Resources.

Email: ian.knowles@west-lindsey.gov.uk Tel: 01427 676682

Deputy MLRO: **Tracey Bircumshaw**, Strategic Finance and Business Support Manager

Email: tracey.bircumshaw@west-lindsey.gov.uk Tel: 01427 676560

5.2. In the absence of the MLRO (or deputy), or in instances where it is suspected that the MLRO themselves are involved in suspicious transactions, concerns should be raised with Mark Sturgess, Executive Director Operations/Head of Paid Service.

6 Identification of Clients

6.1 In general, management should ensure that appropriate checks are carried out on new partners, suppliers and contractors in accordance with the Council's existing policies and procedures.

- 6.2 However, where the Council is carrying out a **‘relevant business’**,¹ and as part of this:
- forms an ongoing business relationship with a client; or
 - undertakes a one-off transaction involving payment by or to the client of €15,000 (or the equivalent in sterling) or more; or
 - undertakes a series of linked on-off transactions involving total payment by or to the client(s) of €15,000 (or the sterling equivalent) or more; or
 - it is known or suspected that a one-off transaction (or a series of them) involves money laundering.

Then the client identification procedures (listed below) must be followed before any business is undertaken for that client. In the event the business relationship with the client existed before 1st March 2004 this requirement does not apply.

6.3 Where the ‘relevant business’ is being provided internally signed, written instructions on Council headed notepaper or an email on the internal email system should be provided at the outset of the business relationship.

6.4 If the ‘relevant business’ is being provided externally then the following additional checks must be completed:

- Check the organisation’s website and other publically available information such as telephone directory services and Companies House to confirm the identity of the personnel, their business address and any other details.
- Ask the key contact officer to provide evidence of personal identity and position within the organisation, for example a passport, photo ID card, driving licence and signed, written confirmation from the Head of Service or Chair of the relevant organisation that the person works for the organisation.

6.5.1 Remember, these additional client identification procedures are **only** required when conducting a ‘relevant business.’

7. Reporting concerns

7.1 Where you know or suspect that money laundering activity is taking place/has taken place you must report this as soon as possible (i.e. within hours of the information coming to your attention, not weeks or months later) to the MLRO using the pro forma Money Laundering Reporting Form attached at Appendix B.

¹ Relevant business is defined as the provision ‘by way of business’ of advice about tax affairs; accounting services; audit services; legal services; services involving the formation, operation or arrangement of a company or trust; or dealing in goods wherever a transaction involves a cash payment of €15000 or more

SHOULD YOU NOT DO SO THEN YOU MAY BE LIABLE TO PROSECUTION

7.2 Record Keeping Procedures

- 7.2.1 Each section of the Council delivering services must maintain records of:
- client identification evidence obtained; and;
 - details of all relevant business transactions carried out for clients for at least five years.
- 7.2.2 This is so that they may be used as evidence in any subsequent investigation by the Council into money laundering.
- 7.2.3 The precise nature of the records is not prescribed by law however they must be capable of providing an audit trail during any subsequent investigation, for example distinguishing the client and the relevant transaction and recording in what form any funds were received or paid. In practice, the divisions of the Council will be routinely making records of work carried out for clients in the course of normal business and these should suffice in this regard.

7.3 Cash Payments

- 7.3.1 Instances of Council officers accepting cash payments have been reduced considerably so that there are now very few areas where cash is accepted. In those few instances the following shall apply.
- 7.3.2 No payment to the Council should automatically be accepted in cash (including notes, coins or travellers cheques in any currency) if it exceeds £1,000. This does not, however, mean that cash transactions below this value will be valid and legal and should not arise any suspicion. Professional scepticism should remain at all times.
- 7.3.4 Staff who collect cash payments are asked to provide the details of any cash transaction over £1,000 to the MLRO so that precautionary checks can be performed.
- 7.3.5 It is best practice to insist on payment by cheque or electronically from a UK clearing bank and this is the case for the majority of Council income.
- 7.3.6 The Council can accept payments from individuals and organisations. If an employee has no reason to suspect or know that money laundering activity is taking/has taken place and if the money offered is less than £1,000 in cash as payment or part payment for goods/services offered by the Council then there is no need to seek guidance from the MLRO.

7.4 Reporting Procedure

- 7.4.1 If a member of staff has reasonable grounds to suspect money laundering activities or proceeds of crime, or is simply suspicious, the matter should still be reported to the MLRO. If the money offered is £1,000 or more in cash then payment must not be accepted until guidance has been received from the MLRO even if this means the person has to be asked to wait.
- 7.4.2 Any officer involved in a transaction of this kind should ensure that the person provides satisfactory evidence of their identity personally, through passport/photo driving licence plus one other document providing evidence of current address in the form of a bank statement, credit card statement, mortgage or insurance details or a utility bill. Where the other party is a company, this can be done through company formation documents or business rate bill.
- 7.4.3 In the event of an employee suspecting a money laundering activity they must immediately report their suspicion to the MLRO, or to the deputy MLRO, using the Reporting Form available on Minerva. The report must contain as much detail as possible, the Reporting form is attached at Appendix B.
- 7.4.4 If the suspicious transaction is happening right now, for example someone is trying to make a large cash payment, every effort should be made to speak with the MLRO or deputy, who will decide whether to accept the payment or suspend the transaction. If it is not practical or safe to do so, a report should be made to the MLRO or deputy immediately after the transaction is complete.
- 7.4.5 The information provided to the MLRO will be used to decide whether there are reasonable grounds to demonstrate knowledge or suspicion of money laundering, whether further investigation is necessary, whether the transaction should be accepted or suspended, and if appropriate, whether a suspicious activity report should be made to the National Crime Agency (NCA). If it is not practical or safe to suspend a suspicious transaction a report should be made to the National Crime Agency immediately after the transaction is complete.
- 7.4.6 The employee must follow directions given to them by the MLRO and must **not** discuss the matter with others or notify the person(s) who is suspected of money laundering. 'Tipping off' a person suspected of money laundering is a criminal offence.
- 7.4.7 The MLRO or deputy must immediately evaluate any disclosure to determine whether the activity should be reported to the National Crime Agency (NCA).
- 7.4.8 The MLRO or deputy must, if they so determine, promptly report the matter to NCA in a prescribed manner and on their standard report form

(currently referred to as a suspicious activity report (SAR)). This can be found on the NCA website: www.nationalcrimeagency.gov.uk

8. Training

- 8.1 Officers considered to be most at risk of being exposed to suspicious situations will be made aware by their Team Manager and provided with appropriate training.
- 8.2 Additionally, all officers and Members will be familiarised with the legislation and regulations relation to money laundering and how they affect the employees (themselves) and the Council.
- 8.3 It is not necessary for all staff to be aware of the specific criminal offences, staff that are likely to encounter money laundering should be aware of the procedures that are in place. This policy and procedures provides sufficient information to raise awareness for most staff.
- 8.4 It is recommended that staff in areas that are highly vulnerable to money laundering, should be provided with targeted training that is specific to the Council activity at hand. This could be achieved by in house resources, or through training courses and seminars run by external providers

9 Further information

- 9.1 Further information can be obtained from the MLRO and the following websites:
 - www.nationalcrimeagency.gov.uk
 - Proceeds of Crime (Anti- Money Laundering) - Practical Guidance for Public Service Organisations'- CIPFA
 - Money Laundering Guidance at www.lawsociety.org.uk
 - HM Revenue & Customs <http://www.hmrc.gov.uk/mlr/>

10 Conclusion

- 10.1 The likelihood of West Lindsey District Council being exposed to money laundering is extremely low. However, the legislation and requirements that have been implemented must be followed. Failure to comply with such legislation and requirements by individuals could lead to prosecution.

APPENDIX A

POSSIBLE SIGNS OF MONEY LAUNDERING

It is not possible to give a definitive list of ways in which to spot money laundering but facts which tend to suggest that something “odd” is happening may be sufficient for a reasonable suspicion of money laundering to arise.

The following are the types of risk factors which *may*, either alone or cumulatively with other factors, suggest the possibility of money laundering activity:

- A new customer with no previous history with the Council;
- A secretive customer: for example one who refuses to provide requested information without a reasonable explanation;
- Concerns about the honesty, integrity or identity of a customer;
- Illogical third party transactions: for example unnecessary routing or receipt of funds from third parties or through third party accounts;
- Involvement of an unconnected third party without logical reason or explanation;
- Payment of a substantial sum in cash;
- Overpayments by a customer;
- Absence of an obvious legitimate source of the funds;
- Movement of funds to and from overseas;
- Where, without reasonable explanation, the size, nature and frequency of transactions or instructions is out of line with normal expectations;
- Cancellation or reversal of an earlier transaction.

APPENDIX B: MONEY LAUNDERING REPORTING FORM

Anti-Money Laundering Reporting Form

Date report received:

Date receipt of report acknowledged:

Your Contact Details

Please provide your contacts details in the box below so we can confirm that we have received the report and get into contact with you if required.

Name :	
Role:	
Email:	
Contact Telephone:	

Main Subject

Please provide the details of the person you suspect of money laundering. If you suspect more than one person, please fill in the additional boxes below.

Name:			
Date of Birth:		Gender:	
Occupation:			
Address	Type: (Home, work etc)		

Transaction(s)

Please enter the details of the transactions you think are suspicious

Date:			
Amount:		Currency:	
Credit/Debit			
Reason for the transaction:			

Date:			
Amount:		Currency:	
Credit/Debit			
Reason for the transaction			

Account(s)

Please enter details of the account(s) used.

Account Holder's Name		Acc. No	
		Sort Code:	
Current balance:		Balance date:	

Account Holder's Name		Acc. No	
		Sort Code:	
Current balance:		Balance date:	

Associated Subjects:

If there are any other people you suspect are involved in money laundering, please enter their details below.

Name:			
Date of Birth:		Gender:	
Occupation:			
Reason for association			
Address	Type: (Home, work etc)		

Name:			
Date of Birth:		Gender:	
Occupation:			

Reason association	for	
Address	Type: (Home, work etc)	

Linked addresses:

Please enter details of any linked addresses:

Address	Type: (Home, work etc)	

Reason for Suspicion:

Please enter details of your suspicions. Please provide as much information as possible.

APPENDIX C: MONEY LAUNDERING DISCLOSURE FORM

THE FOLLOWING PART OF THIS FORM IS FOR COMPLETION BY THE MONEY LAUNDERING REPORTING OFFICER (MLRO)

Date report received:

Date receipt of report acknowledged:

CONSIDERATION OF DISCLOSURE:

Action Plan:

OUTCOME OF CONSIDERATION OF DISCLOSURE:

Are there reasonable grounds for suspecting money laundering activity:

Date consent received from NCA:

Date consent given by you to employee:

If there are reasonable grounds to suspect money laundering but you do not intend to report the matter to NCA, please set out below the reason(s) for non-disclosure:

[Please set out reasons for non-disclosure]

Date consent given by you to employee for any prohibited act transactions to proceed:

.....

Other relevant information:

Signed:

Dated:

THIS REPORT IS TO BE RETAINED FOR AT LEAST FIVE YEARS.

APPENDIX D

Document Enhancement notification

DOCUMENT ENHANCEMENT FOR THE VISUALLY IMPAIRED OR TRANSLATION FROM ENGLISH IS AVAILABLE ON REQUEST.

TELEPHONE: (01427) 676578

OR E-MAIL: customer.relations@west-lindsey.gov.uk

INFORMATION REGARDING EQUALITY AND DIVERSITY CAN BE ACCESSED FROM OUR WEBSITE AT

www.west-lindsey.gov.uk

West Lindsey District Council, The Guildhall, Marshall's Yard, Gainsborough, Lincolnshire DN21 2NA

Telephone: (01427) 676578

Fax: (01427) 675170

Next Review date: May 2019 (and every year thereafter) or amended should best practice change or for changes in new legislation.



**Corporate Policy and
Resources Committee**

Thursday, 16 April 2026

Subject: Community Asset Transfer Policy

Report by:	Director of Finance and Assets (S151 Officer)
Contact Officer:	Peter Davy Director of Finance and Assets (S151 Officer) peter.davy@west-lindsey.gov.uk
Purpose / Summary:	To present a new Community Asset Transfer Policy for Approval

RECOMMENDATION(S):

Corporate Policy and Resources Committee review and approve the new Community Asset Transfer Policy

IMPLICATIONS

Legal:

The General Disposal Consent (England) 2003 removes the requirement for local authorities to seek specific consents to dispose of land and it provides criteria under which authorities can do at an undervalue.

Section 123 and 127 Local Government Act 1972 provide land disposal powers for local authorities.

Legal advice and any relevant professional advice should always be sought as appropriate for individual transactions.

Financial : FIN/169/26/CPR/SL

There are no financial implications arising from this report.

Staffing :

Whilst the Policy can be administered by existing internal resources, appropriate external professional and legal advice will be required on specific disposals of property.

Equality and Diversity including Human Rights :

None arising from this report

Data Protection Implications :

None arising from this report

Climate Related Risks and Opportunities:

None arising from this report

Section 17 Crime and Disorder Considerations:

None arising from this report

Health Implications:

None arising from this report

Title and Location of any Background Papers used in the preparation of this report :

Risk Assessment :

Call in and Urgency:

Is the decision one which Rule 14.7 of the Scrutiny Procedure Rules apply?

i.e. is the report exempt from being called in due to urgency (in consultation with C&I chairman)

Yes

No

Key Decision:

A matter which affects two or more wards, or has significant financial implications

Yes

No

1 Introduction

- 1.1 Community Asset Transfer is the permanent or temporary transfer of land or buildings from the Council into the stewardship and/or ownership of a voluntary or community organisation or Town or Parish Council.
- 1.2 The Council does not have a formal community asset transfer policy. This report seeks approval of a new policy as set out at Appendix 1.

2 Main Report

- 2.1 The Council is approached on occasion by community bodies, town and parish Councils and volunteer groups requesting that assets be transferred to them. Currently the Council does not have a formal policy to assess any expressions of interest such as these or a framework to assess whether the transfer of assets would be in the best interests of the Council.
- 2.2 The draft policy at appendix 1 looks to put in place a framework and an objective way of assessing if and when a transfer is appropriate and whether it meets certain criteria.
- 2.3 When looking at asset transfer requests the Council must fully consider the risks and benefits of any transfer whilst ensuring community assets are protected.
- 2.4 The General Disposals Consent (England) 2003 allows the Council to transfer the ownership and management of land and buildings they own to local communities at less than best consideration (less than the full market value) where it can demonstrate the promotion of social, economic and environmental wellbeing. Any decision to dispose at less

than market value would need to be a transparent and evidenced decision.

2.5 The type of assets which could be transferred could include different types of land and buildings in the following circumstances:-

- The Council must be the freehold owner of the asset.
- The asset currently supports council community objectives or was formerly delivering such objectives where the asset is now surplus to requirements.
- The asset has been reviewed and the asset has been identified for possible transfer. Ward councillors must be engaged in such considerations.
- The relevant Director supports the transfer.
- The asset generates social, economic or environmental benefits.
- Where the asset is being transferred to a Town or Parish Council, it would be required in order to deliver key services of that Council.
- The financial implications need to be fully considered for any transfer, including an up to date valuation of the asset, to ensure that it offers value for money.

2.6 The Council will not consider applications for Community Asset Transfers where: -

- The asset has been identified as being required for strategic, planning or redevelopment/regeneration.
- The proposed use of the asset does not meet its current use in planning terms.
- The transfer of the asset would be to an individual(s) or businesses to be used purely as a vehicle for commercial ventures. This does not include, for example, charitable organisations with trading arms, where profits are given back to communities.
- A transfer would contravene Trade and Cooperation Agreement Principles.
- The asset would be used solely for religious purposes/activities.
- The asset would be used for any political purposes/activities.
- The result would be detrimental to any individual, geographical community or community of interest, resulting in unlawful

discrimination, harassment or a failure to promote good relations.

- 2.6 The application process would start with an expression of interest, a review, detailed analysis and then completion.
- 2.7 Once complete the Council will then review the outcomes of the transfer periodically to ensure that the transfer has been successful.
- 2.8 In all circumstances concerning land disposal the appropriate legal and professional advice will be sought and applied.

3 Conclusion

- 3.1 The transfer of assets to town and parish councils and community groups can have many positive effects for residents. This can include assets being repurposed and being used in a more effective way than under Council control.
- 3.2 If done correctly the benefits are clear but the process must be done clearly and transparently to ensure assets are safeguarded and are only transferred where certain criteria are met.
- 3.3 Once the policy is approved this will be then be publicised to community groups and parish and town councils around the district. A full list of the assets the Council owns is available on the Council's website.

4 Recommendation

- 4.1 Corporate Policy and Resources Committee review and approve the new Community Asset Transfer Policy



Community Asset Transfer Policy

January 2026

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1. Purpose of this Policy and Scope

The purpose of this Community Asset Transfer Policy is to set out a transparent and consistent approach to applications and the decision-making process governing the transfer of assets in the district to Town and Parish Councils and community organisations (where applicable) and the council's commitment to community asset transfer where it benefits residents. To achieve this, it is necessary to demonstrate how community asset transfer supports direct service delivery, West Lindsey District Council's (referred hereafter as 'the Council') Corporate Plan, its objectives and other corporate plans and policies.

This policy applies to freehold assets that are owned by or under stewardship of the Council and are deemed suitable for community asset transfer.

This policy should be used when considering an application for a Community Asset Transfer to a voluntary or community organisation (VCO) or local Town and Parish Councils. This policy does not include the arrangements and policy governing nominations for Assets of Community Value (ACV) which is a separate procedure.

2. What is Community Asset Transfer?

The Council is in the position of being a custodian of assets which it holds on behalf of the community. For the purposes of this policy, Community Asset Transfer is defined by this Council as "the permanent or temporary transfer of land or buildings from the Council into the stewardship and/or ownership of a voluntary or community organisation (VCO) or Town or Parish Council".

The General Disposals Consent 2003 allows the Council to transfer the ownership and management of land and buildings they own to local communities at 'less than best consideration' (at less than full market value), where it can demonstrate the promotion of social, economic and environmental well-being. Any disposal at less than best consideration would need to be a transparent and evidenced decision.

The Council must fully consider the risks and benefits of any Community Asset Transfer, while ensuring that community assets are protected. Due to the diverse nature of the Council's land and buildings, one policy will not cover all circumstances. However, common themes will apply before consideration is given to the transfer of an asset, including:

- The nature and capacity of the applicant.
- Sound long term management and governance arrangements.
- Adoption of a robust option appraisals as part of the council's ongoing asset review process (including financial implications to the Council).
- The proposed use must meet with the Council's Corporate Plan objectives.
- Assessment of risks.
- Sustainable business cases.
- Socio-Economic or Environmental benefits.

- Legal Implications or restrictions

3. National and Local Policy Context

The Local Government and Public Involvement in Health Act 2007 and Localism Act 2011 brought about a number of public sector reforms aimed at creating strong, prosperous communities and delivering better public services through a re-balancing of the relationship between Central Government, Local Government and local people by giving residents a greater say over local services.

The Council faces many current challenges both financial and operational including:

- Devolution and Local government Reorganisation
- The current economic environment.
- Reduced government funding
- Increased public expectation.
- Reduction in available resources to operate and run non-operational and community buildings.

The outputs of this policy will give consideration to the aims and objectives in other council service area strategies including but not limited to:

- The Corporate Plan
- The Strategic Asset Management Plan
- The Capital Strategy
- The Local Plan

4. What Assets can be Transferred?

The Council must be the freehold owner of the asset. Assets that can be transferred, by way of Community Asset Transfer, include different types of land and buildings. The Council may consider transferring assets where it is considered to be beneficial for all parties involved and in the best interests of the community, which might include in the following circumstances:

- The asset currently supports council community objectives or was formerly delivering such objectives where the asset is now surplus to requirements.
- The asset has been reviewed and the asset has been identified for possible transfer. (Ward councillors must be engaged in such considerations).
- The asset generates social, economic or environmental benefits.

- Where the asset is being transferred to a Town or Parish Council, it would be required in order to deliver key services of that Council.

The financial implications need to be fully considered for any transfer, including an up to date valuation of the asset, to ensure that it offers value for money.

The Council will not consider applications for Community Asset Transfers where it is not considered to be beneficial for all parties involved and in the best interests of the community which might include in the following circumstances:

- The asset has been identified as being required for strategic, planning or redevelopment/regeneration.
- The proposed use of the asset does not meet its current use in planning terms.
- The transfer of the asset would be to an individual(s) or businesses to be used purely as a vehicle for commercial ventures. This does not include, for example, charitable organisations with trading arms, where profits are given back to communities.
- A transfer would contravene Trade and Cooperation Agreement Principles.
- The asset would be used solely for religious purposes/activities.
- The asset would be used for any political purposes/activities,
- The result would be detrimental to any individual, geographical community or community of interest, resulting in unlawful discrimination, harassment or a failure to promote good relations.

For the purposes of Community Asset Transfer and this policy, disposals will be by way of a freehold disposal or a lease. If a lease is agreed it should be for a period long enough to deliver the Council's community objectives and mitigate the risks associated with Asset Transfer. The lease length will be agreed via negotiations with legal advice sought throughout the process. Transfers to Town and Parish councils will be freehold.

This policy provides for a pro-active approach to the council by any VCO or town and parish council or for the council to identify itself where it believes it might be beneficial to explore transfer of an asset under this policy. In such instances, any Community Asset Transfer will initially be offered to the relevant Town or Parish Council as the local democratically elected body in the area of the asset. If this doesn't result in a transfer then the opportunity will be advertised appropriately and openly and in a manner which is appropriate and proportionate, inviting expressions of interest from VCOs.

The terms of any disposal (including freehold transfer) will be determined on a case-by-case basis and the Council will consider the specific circumstances of the applicant, sustainability of any business case, the proposed asset and intended use. Detailed consideration will be given to the community impact and benefit of the transfer in terms of economic, social or environmental wellbeing of the community.

There will be an Asset Lock in the lease that prevents the asset from being sold for unintended financial gain and the loss of the agreed benefits. Leases will contain suitable

clauses to ensure the return of the asset to the council (or its successor organisation) if the terms of the service agreement are not met, or in the case of dissolution, insolvency or corruption by the transferee and its representatives.

5. Organisations Suitable for Community Asset Transfer

Any organisation wishing to be considered would need to be based within the area of West Lindsey District Council and have strong links with and be of benefit to the community within the district. They must be able to demonstrate provisions within their legal structure that provide assurances that assets will be retained for community use and benefit and do not distribute any surplus they make to their members. The local community must also be able to participate within their operational and decision-making processes.

Consideration may be given to the following:

- Town or Parish Council
- Community Interest Company
- Charitable Trust
- Charitable Incorporated Organisation
- Charitable Company
- Other legal entities for Voluntary or Community Organisations (VCO)

If a group of individuals wish to form a VCO to benefit their local community, no application for a Community Asset Transfer can be completed until the group is legally formed into one of the entities listed above or similar type of organisation.

The Council has a duty to ensure that due diligence is carried out on any VCO to mitigate the risk of any transfer failing, as this would have a negative impact on local communities. In order to do this the VCO MUST meet the following criteria:

- A well-prepared business case for their proposed use of the asset. This will need to demonstrate that there is a clear intention for the long-term use of the asset for the benefit of communities within West Lindsey, and an understanding of the activities the VCO wishes to deliver.
- Prove a secure financial base to ensure long term sustainability, including providing copies of audited financial accounts where necessary. This will be subject to a formal valuation of the asset.
- Demonstrate a clear community/social demand for the proposed transfer.
- The staffing capacity to manage the asset and have management or committee members who possess the necessary experience and skills to manage the asset.
- Good governance, robust financial systems and all the necessary policies expected of a VCO in place.

- Not duplicate activities, services or facilities already provided elsewhere within the area or local community.
- Clearly demonstrate how they will comply with all statutory/regulatory obligations connected with the use and occupation of property which is the subject of the transfer request including but not limited to asbestos management, legionella and fire risk assessments, and responsibilities under the PREVENT agenda.
- Detail on how they will contribute to the council's corporate priorities.

Where two or more VCOs submit an expression of interest for a Community Asset Transfer of a particular asset, the Council's Property Team will make an initial assessment and recommendations to Management Team (MT). Any final decision will be subject to approval by the relevant Committee.

The Council reserves the right to refuse any application for a Community Asset Transfer if the criteria set out in this section are not met and all decisions will proceed through the Council's internal governance processes.

6. Application Process

The following process for considering applications for Community Asset Transfer will be applied by the Council either where the Council is identifying a possible transfer, or the initiative has come from a VCO:

Expression of Interest

- The VCO/existing Parish Council should submit a written expression of interest detailing the specific land/building that is the subject of the application, an explanation of the reasoning behind why it is needed and the aims and objectives of the transfer.

Review

- The Property Team will review the expression of interest seeking the views of other Council teams and consider if the applicant is suitable, meets the requirements laid out in this policy and if the asset is deemed suitable and appropriate for a transfer. The ward councillors should be invited to comment on the proposals. This will lead to a recommendation on whether the application can progress to the Council's MT. Should MT deem the applicant or asset unsuitable, the applicant will be notified. Any decision is final.

Detailed Analysis

- If MT agree that the application should progress through the Council's governance process the applicant will be invited to submit a detailed, evidenced business case and feasibility study. This will be assessed and evaluated by council officers against the criteria laid out in this policy. Detailed consideration will be given to the community impact and benefit of the transfer in terms of economic, social or environmental wellbeing of the community.

- A report will be prepared, taking into account any legal requirements under the Local Government Act 1972 (as amended). A decision could be made either by officers under the terms of the Council's constitution (and reported in due course to the Council) or reported to the appropriate committee for a decision.

Completion

- Heads of Terms will be agreed detailing all the main aspects of the transaction leading to the Council's legal advisors drafting formal documentation which will include service level agreements, support and investment plans and any other relevant documentation. This final stage will require the applicant to work collaboratively with the Council in order to avoid delays to the completion of the transfer.
- Timescales for the completion of a Community Asset Transfer are dependent on the nature and type of the transaction involved and the process can take up to a year to complete.

7. Outcomes

The aims and objectives of this policy are that the Council enables the transfer of asset ownership to VCOs or Town and Parish Councils, which in turn supports community wellbeing as well as safeguarding the delivery of public services. The policy also serves to set out the process and criteria for transferring assets to support the Council's priorities.

The success and outcomes of this policy will be measured principally by the success and delivery of community-based services and activities leading to community empowerment, generation of social, economic and environmental benefits to local communities.

The Council will also review whether any transfer is not delivering the required community outcomes. If agreed services or required outcomes are not being delivered, the Council will take all necessary steps to remedy poor performance including reviewing how the Council can further support the applicant in delivering objectives.

8. Review

This policy will be reviewed to incorporate legislative, regulatory amendments, best practice developments, or to address any operational issues with the policy.

The policy will be monitored and maintained by the Property Team.

9. Contact Details

Expressions of interest and documentation relating to any application should be marked for the attention of the Chief Executive and sent to the following address: West Lindsey District Council, Guildhall, Marshall's Yard, Gainsborough DN21 2NA

Agenda Item 8a

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

Document is Restricted

By virtue of paragraph(s) 5 of Part 1 of Schedule 12A of the Local Government Act 1972.

Document is Restricted