

CABINET – 24 JUNE 2025

A meeting of Cabinet will be held at 6.00pm on Tuesday 24 June 2025 in the Council Chamber at the Town Hall, Rugby.

Members of the public may also view the meeting via the livestream available on the Council's website.

Dan Green
Acting Chief Executive

AGENDA PART 1 – PUBLIC BUSINESS

1. Minutes.

To confirm the minutes of the meeting held on 8 April 2025.

2. Apologies.

To receive apologies for absence from the meeting.

3. Declarations of Interest.

To receive declarations of –

(a) non-pecuniary interests as defined by the Council's Code of Conduct for Councillors;

(b) pecuniary interests as defined by the Council's Code of Conduct for Councillors; and

(c) notice under Section 106 Local Government Finance Act 1992 – non-payment of Community Charge or Council Tax.

Note: Councillors are reminded that they should declare the existence and nature of their interests at the commencement of the meeting (or as soon as the interest becomes apparent). If that interest is a prejudicial interest, the Councillor must withdraw from the room unless one of the exceptions applies.

Membership of Warwickshire County Council or any Parish Council is classed as a non-pecuniary interest under the Code of Conduct. A Councillor does not need to declare this interest unless the Councillor chooses to speak on a matter relating to their membership. If the Councillor does not wish to speak on the matter, the Councillor may still vote on the matter without making a declaration.

4. Question Time.

Notice of questions from the public should be delivered in writing or by e-mail to the Chief Executive at least three clear working days prior to the meeting (no later than Wednesday 18 June 2025).

Growth and Investment, Digital and Communications Portfolio

5. South West Rugby Design Code SPD – adoption.
6. Memorandum of Understanding on Planning in Coventry and Warwickshire.
7. High Street Rental Auctions (report to follow).
8. Communication and Engagement Strategy.

Partnerships and Wellbeing Portfolio

Nothing to report to this meeting.

Finance, Performance, Legal and Governance Portfolio

9. Appointments to Working Groups 2025/26.
10. Finance and Performance Monitoring 2024/25 – Year End.

Communities, Homes, Regulation and Safety Portfolio

11. Asylum Seeker support from Warwickshire County Council.
12. Capital Programme – Roof Replacement.
13. Demonstrating Compliance with the Requirements of the Housing Ombudsman Service 2024/25.

Operations and Traded Services Portfolio

14. Communications Plan and Collections Rescheduling for Food Waste 2026.

Organisational change Portfolio

Nothing to report to this meeting.

The following item contains reports which are to be considered en bloc subject to any Portfolio Holder requesting discussion of an individual report

15. Councillors' Allowances 2024/25.
16. Motion to exclude the public under Section 100(A)(4) of the Local Government Act 1972

To consider the following resolution:

“under Section 100(A)(4) of the Local Government Act 1972 the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of information defined in paragraphs 2 and 3 of Schedule 12A of the Act.”

PART 2 – EXEMPT INFORMATION

Growth and Investment, Digital and Communications Portfolio

Nothing to report to this meeting.

Partnerships and Wellbeing Portfolio

Nothing to report to this meeting.

Finance, Performance, Legal and Governance Portfolio

Nothing to report to this meeting.

Communities, Homes, Regulation and Safety Portfolio

Nothing to report to this meeting.

Operations and Traded Services Portfolio

Nothing to report to this meeting.

Organisational change Portfolio

Nothing to report to this meeting.

The following item contains reports which are to be considered en bloc subject to any Portfolio Holder requesting discussion of an individual report

1. Write Offs.

Any additional papers for this meeting can be accessed via the website.

The Reports of Officers are attached.

Membership of Cabinet:

Councillors Moran (Chair), C Edwards, Livesey, Mistry, O'Rourke and Robinson.

CALL-IN PROCEDURES

Publication of the decisions made at this meeting will normally be within three working days of the decision. Each decision will come into force at the expiry of five working days after its publication. This does not apply to decisions made to take immediate effect. Call-in procedures are set out in detail in Standing Order 15 of Part 3c of the Constitution.

If you have any general queries with regard to this agenda please contact Claire Waleczek, Democratic and Support Services Manager (01788 533524 or e-mail claire.waleczek@rugby.gov.uk). Any specific queries concerning reports should be directed to the listed contact officer.

AGENDA MANAGEMENT SHEET

Report Title: South West Rugby Design Code SPD - adoption

Name of Committee: Cabinet

Date of Meeting: 24 June 2025

Report Director: Chief Officer - Growth and Investment

Portfolio: Growth and Investment, Digital and Communications

Ward Relevance: Dunsmore, Bilton, Admirals and Cawston

Prior Consultation: Yes - public consultation held on the draft South West Rugby Design Code SPD 10 February to 10 March 2025

Contact Officer: Hayley Smith/Abigail Murphy

Public or Private: Public

Report Subject to Call-In: No

Report En-Bloc: Yes

Forward Plan: Yes

Corporate Priorities: This report relates to the following priority(ies):
 A Healthier Rugby – To support people to live healthier, longer, and more independent lives.
 A Thriving Rugby – To deliver a thriving economy which brings Borough-wide investment and regenerates Rugby Town Centre.
 A Greener Rugby – To protect the environment and ensure the Borough adapts to climate change.
 A Fairer Rugby – To reduce inequalities and improve housing across the Borough.
[Corporate Strategy 2025-2035](#)
 This report does not specifically relate to any Council priorities but

Summary: The South West Rugby Design Code SPD is intended to coordinate and enhance the design quality of physical development across the allocated urban extension at South West Rugby. The draft design code SPD has been subject to a period of public consultation, and the document has been amended as a result. It is now being put forward for adoption.

Financial Implications: No direct financial implications identified as a result of this report.

Risk Management/Health and Safety Implications: There are no health and safety implications

Environmental Implications: A climate and environmental impact assessment has been produced and is attached as Appendix 4.

Legal Implications: No direct legal implications as a result of this report.

Equality and Diversity: An Equality Impact Assessment is appended to this report as appendix 5.

Options: Option 1 – The South West Rugby Design Code SPD is adopted and becomes a material consideration in respect of planning proposals at South West Rugby

Option 2 – The South West Rugby Design Code SPD is not adopted, and cannot be a material consideration in relation to planning proposals at South West Rugby.

Recommendation: IT BE RECOMMENDED TO COUNCIL THAT -

(1) The South West Rugby Design Code SPD (see [appendix 1](https://www.rugby.gov.uk/w/south-west-rugby-design-code-adoption-documents) see <https://www.rugby.gov.uk/w/south-west-rugby-design-code-adoption-documents>) be adopted; and

(2) delegated authority be given to the Chief Officer for Growth and Investment to make minor amendments as necessary following adoption and prior to it being published.

Reasons for Recommendation: So that the South West Rugby Design Code SPD becomes a material consideration in respect of planning proposals at South West Rugby, and to provide a basis for improved consistency and quality across the allocated urban extension at South West Rugby.

Cabinet - 24 June 2025

South West Rugby Design Code SPD - public consultation

Public Report of the Chief Officer - Growth and Investment

Recommendation

IT BE RECOMMENDED TO COUNCIL THAT -

- (1) The South West Rugby Design Code SPD (attached as appendix 1) be adopted; and
- (2) delegated authority be given to the Chief Officer for Growth and Investment to make minor amendments as necessary following adoption and prior to it being published.

1. Executive Summary

- 1.1 A draft South West Rugby Design Code SPD has been produced within the Development Strategy team, with specialist consultant input in respect of movement, streets, public space and landscape.
- 1.2 The production of design codes is encouraged by the National Planning Policy Framework (NPPF), and in this case is intended to both raise quality aspirations and achieve a more consistent and cohesive place overall at South West Rugby. This is particularly important given that the area will be subject to multiple planning applications by different applicants.
- 1.3 Following a period of public consultation from 10 February 2025 and 10 March 2025, feedback received has been reviewed, and modifications proposed to the draft design code, as appended to this report (appendix 2 – consultation statement). The amended South West Rugby Design Code SPD ([appendix 1](#)) is now proposed for adoption.

2. Background

- 2.1 A design code is a set of concise principles and parameters, which should be illustrated and measurable wherever possible. They set out mandatory requirements for development, in addition to other principles which will be appropriate in some circumstances. The National Planning Policy Framework (NPPF) sets out that local planning authorities should prepare and use design codes for their areas, which should be consistent with the National Model Design Code, and National Design Guide.

2.2 As a Supplementary Planning Document, it will be the role of the South West Rugby Design Code to support and provide further detailed guidance on local plan policies, and will be a material consideration in decision making. The urban extension at South West Rugby is allocated in the adopted local plan (policy DS3). Policy DS8 sets out a number of requirements for the allocation, and policy DS9 sets out requirements for the spine road network. A South West Rugby Masterplan SPD was adopted in 2021, which supplements policy DS8 and seeks to set out more detailed information on multiple themes, including the provision of infrastructure. The proposed South West Rugby Design Code SPD does not seek to replicate the existing adopted policy nor the Masterplan SPD which remains relevant. Instead, it seeks to set out a range of clear design and placemaking principles, which are intended to generate greater consistency and quality across the allocation at South West Rugby. This is important as land at South West Rugby is within multiple landownerships, and different parts of it are expected to be brought forward at different times, and by different landowners or organisations.

3. The South West Rugby Design Code SPD – how it was developed

3.1 The South West Rugby Design Code SPD sets out a range of requirements and principles to guide physical development on South West Rugby. It was drafted in house by officers, with specialist consultant contribution to the chapters on movement, nature and public space. Specialist officers at Warwickshire County Council were also engaged in the content development of the aforementioned chapters.

3.2 The draft was developed with community engagement as set out in the published [engagement report](#), and summarised to Cabinet on 03 February 2025 prior to public consultation.

3.3 In summary the following community engagement workshops were undertaken in the preparation of the code:

Group	Date	Location	Session
Borough Councillors (Dunsmore, Bilton, Admirals and Cawston)	07 March 2024	Town Hall	Introductory
	12 November 2024	Town Hall	Follow up
Bilton School Students	26 April 2024	Bilton School	Introductory
Parish Councillors	14 March 2024	Dunchurch Sportsfield and Village Hall	Introductory
	12 November 2024	Town Hall	Follow up
Public (ticketed event via Eventbrite)	04 June 2024	Dunchurch Sportsfield and Village Hall	Introductory
	05 November 2024	Dunchurch Sportsfield and Village Hall	Follow up

3.4 During the community workshops, participants were asked about preferences and priorities for streets, public spaces and buildings. The following summarise the most frequently recurring elements in feedback:

- **Streets:** Safety, wide paths, and green areas.
- **Public spaces:** Accessible space, green space, play areas, public art and street furniture.
- **Buildings:** Bungalows, and a variety of types/styles of buildings.

3.5 The design code was developed to incorporate this feedback. Some very specific feedback was received from some participants especially around species selection, which we sought external expert advice upon.

3.6 In addition to community workshops, we have liaised with stakeholders at Warwickshire County Council throughout, in terms of highways, ecology and flood risk.

3.7 Developer interests in South West Rugby were also engaged with to keep them apprised of progress on the design code.

4. Public consultation on the South West Rugby Design Code

4.1 SPDs must be prepared in accordance with the Council's Statement of Community Involvement (SCI) (Section 19(3) of the Planning and Compulsory Purchase Act 2004). The SCI is a document which sets out the Council's policy for consulting and engaging with individuals, communities and other stakeholders for a range of planning matters. The public consultation on the draft South West Rugby Design Code SPD was carried out between 10 February 2025 and 10 March 2025.

4.2 Before an SPD is adopted, the Council must prepare a consultation statement (see [appendix 2](#)) setting out:

- a) Who was consulted when the SPD was prepared;
- b) A summary of the main issues raised by those persons; and
- c) How those issues have been addressed in the SPD.

4.3 In summary, there were 19 respondents to this consultation.

4.4 Unlike the Local Plan, SPDs are not subject to independent examination. Once the consultation has been completed, the Council can adopt a SPD either as originally prepared or as modified to take account of:

- 1) Any representations received.
- 2) Any other matter the Council considers relevant.

4.5 The necessary consultation statement is included in [appendix 2](#). This consultation statement includes a table setting out the comments received, an officer response to each comment, and what (if any) modifications have been made to the design code as a result.

4.6 The amended South West Rugby Design Code (adoption version) is available here: [Appendix 1](#). This is provided in sections due to the file size.

5. Implications

5.1 An Adoption Statement will be issued in the event the SPD is adopted. A draft version is included at Appendix 3 to this report.

5.2 The Climate & Environmental Impact Assessment (Appendix 4 to this report) shows no negative impacts on climate or environmental factors.

5.3 The Equality Impact Assessment (Appendix 5 to this report) shows no negative impacts on any people who share a protected characteristic.

5.4 The South West Rugby Design Code SPD has also been subject to a Strategic Environmental Assessment (SEA) screening opinion – which concluded that a SEA was not required. The SEA screening opinion is included in Appendix 6 to this report.

Name of Meeting: Cabinet

Date of Meeting: 24 June 2025

Subject Matter: South West Rugby Design Code SPD - adoption

Originating Department: Growth and Investment

DO ANY BACKGROUND PAPERS APPLY YES NO

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A

Appendix 1 is available on the following link:

<https://www.rugby.gov.uk/w/south-west-rugby-design-code-adoption-documents>

Appendix 2 is available on the following link:

<https://www.rugby.gov.uk/documents/20124/61157000/Consultation+Statement.pdf/50d20b9c-3d5f-fbce-1a3b-d3225ebf3f22?t=1749718744999>

Appendix 3 –South West Rugby Design Code Supplementary Planning Document Adoption Statement

In accordance with Regulation 11 of the Town and Country Planning Regulations (Local Planning) (England) Regulations 2012 (as amended) notice is hereby given that Rugby Borough Council adopted the South West Rugby Design Code Supplementary Planning Document (SPD) on **INSERT DATE 2025**.

A number of modifications were made to the SPD in accordance with Section 23(1) of the Planning and Compulsory Purchase Act 2004. These are set out in the ‘South West Rugby Design Code SPD Consultation Statement’.

In accordance with Regulation 35 of the Town and Country Planning Regulations (Local Planning) (England) 2012, the following have been made available:

1. South West Rugby Design Code SPD
2. South West Rugby Design Code SPD Adoption Statement
3. South West Rugby Design Code SPD Consultation Statement

These are available on Rugby Borough Council’s website: **Link TBA**

Paper copies may also be inspected within normal opening hours at: The Town Hall, Evreux Way, Rugby, CV21 2RR.

Any person aggrieved by the decision to adopt the South West Rugby Design Code SPD may apply to the High Court under Section 113 of the Planning and Compulsory Purchase Act 2004 for a judicial review of the decision to adopt the document. Any such application should be made promptly and in any event, no later than three months from the date of adoption.

Rugby Borough Council

Climate Change and Environmental Impact Assessment

South West Rugby Design Code SPD – Agreement to undertake Public Consultation

CONTEXT

In 2019 the UK Parliament set a commitment in law to reach net zero carbon emissions by 2050. Achieving this target will require considerable effort with public bodies, private sector organisations, the third sector and individuals working together to take action. Rugby Borough Council declared a climate emergency in 2019, in doing so committed to:

- To move the Council's operations towards Carbon Neutrality by 2030.
- To establish action to tackle climate change as a key driver of all decision-making.
- To provide community leadership in reducing the impact of Climate Change.
- To take action to mitigate the impact of climate change on a Borough wide basis and beyond, through adaptation.

The Council's Corporate Strategy (2021-24) [link](#) sets ambitious outcomes in relation to Climate Change. These ambitions must now be progressed through the decisions which the Council makes.

It is therefore important that Rugby Borough Council gives due regard to climate change when making decisions. In the context of the Council's business, Climate Change includes carbon emissions, biodiversity, habitat loss and environmental destruction. When putting forward recommendations for decision, officers must assess how these recommendations are likely to influence our climate change commitments by completing the following Climate Change and Environmental Impact Assessment.

A copy of this Climate Change and Environmental Impact Assessment, including relevant data and information should be forwarded to the Deputy Executive Director.

If you require help, advice and support to complete the forms, please contact Dan Green, Deputy Executive Director.

SECTION 1: OVERVIEW

Portfolio and Service Area	Growth and Investment
Policy/Service/Change being assessed	The report recommends to Cabinet and Council that it adopts the South West Design Code SPD following a period of public consultation.
Is this a new or existing Policy/Service/Change?	New.
If existing policy/service please state date of last assessment	Not applicable.
Ward Specific Impacts	Dunsmore, Bilton, Admirals and Cawston
Summary of assessment Briefly summarise the policy/service/change and potential impacts.	<p>The South West Rugby Design Code aims to set out specific and concise design parameters to:</p> <ol style="list-style-type: none"> 1. Ensure a cohesive layout and design approach to the allocated urban extension, building further upon the work in the adopted South West Rugby Masterplan SPD (2021). This is deemed necessary due to the multiple land ownerships and the anticipation that there will be no overarching planning application. I.e. multiple planning applications are anticipated. 2. Enhance the overall design quality of development across the urban extension. <p>In developing this design code, specialist input has been provided on matters of movement and active and sustainable travel, and landscape and ecology. Whilst this assessment indicates 'no change' with regard to climate indicators, the document has been developed with the aim of uplifting the quality of development proposals in respect of these key climate matters, amongst others.</p>
Completed By	Hayley Smith, Principal Planner
Authorised By	Neil Holly, Development Strategy Manager
Date of Assessment	11 June 2025

SECTION 2: IMPACT ASSESSMENT

Climate Change and Environmental Impacts	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Energy usage	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	None at this stage			
Fleet usage	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	None at this stage			
Sustainable Transport/Travel (customers and staff)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	None at this stage			
Sustainable procurement	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	None at this stage			
Community leadership	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	None at this stage			
Biodiversity and habitats	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	None at this stage			
Adaptation/Mitigation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	None at this stage			
Impact on other providers/partners	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	None at this stage			

SECTION 3: REVIEW

Where a negative impact is identified, the proposal and/or implementation can be adapted or changed; meaning there is a need for regular review. This review may also be needed to reflect additional data and evidence for a fuller assessment (proportionate to the decision in question). Please state the agreed review timescale for the identified impacts of the policy implementation or service change.

Review date	To be reviewed periodically in light of planning applications on the South West Rugby urban extension.
Key points to be considered through review	No negative impacts have been identified at this stage.
Person responsible for review	Hayley Smith, Principal Planner
Authorised by	Neil Holly, Development Strategy Manager

EQUALITY IMPACT ASSESSMENT (EqIA)

Context

1. The Public Sector Equality Duty as set out under section 149 of the Equality Act 2010 requires Rugby Borough Council when making decisions to have due regard to the following:
 - eliminating unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Act,
 - advancing equality of opportunity between people who share a protected characteristic and those who do not,
 - fostering good relations between people who share a protected characteristic and those who do not, including tackling prejudice and promoting understanding.
2. The characteristics protected by the Equality Act are:
 - age
 - disability
 - gender reassignment
 - marriage/civil partnership
 - pregnancy/maternity
 - race
 - religion/belief
 - sex/gender
 - sexual orientation
3. In addition to the above-protected characteristics, you should consider the crosscutting elements of the proposed policy, such as impact on social inequalities and impact on carers who look after older people or people with disabilities as part of this assessment.
4. The Equality Impact Assessment (EqIA) document is a tool that enables RBC to test and analyse the nature and impact of what it is currently doing or is planning to do in the future. It can be used flexibly for reviewing existing arrangements but in particular should enable identification where further consultation, engagement and data is required.
5. The questions will enable you to record your findings.
6. Where the EqIA relates to a continuing project, it must be reviewed and updated at each stage of the decision.
7. Once completed and signed off the EqIA will be published online.
8. An EqIA must accompany all **Key Decisions** and **Cabinet Reports**.
9. For further information, refer to the EqIA guidance for staff.
10. For advice and support, contact:
Rebecca Ewers
Corporate Equality and Diversity Officer
rebecca.ewers@rugby.gov.uk
01788 533509

Equality Impact Assessment

Service Area	Development Strategy, Growth and Investment
Policy/Service being assessed	South West Rugby Design Code Supplementary Planning Document - adoption
Is this a new or existing policy/service?	This is a new document which supplements existing adopted policy in respect of South West Rugby
If existing policy/service please state date of last assessment	
EqIA Review Team – List of members	
Date of this assessment	March 2025
Signature of responsible officer (to be signed after the EqIA has been completed)	

A copy of this Equality Impact Assessment report, including relevant data and information to be forwarded to the Corporate Equality and Diversity Officer.

Details of Strategy/ Service/ Policy to be analysed

<u>Stage 1 – Scoping and Defining</u>	
(1) Describe the main aims, objectives and purpose of the Strategy/Service/Policy (or decision)?	The aim of the South West Rugby Design Code is to set out clear design and placemaking parameters for developments at South West Rugby. It seeks to generate greater consistency and cohesiveness across the allocated urban extension, which is particularly important as the ‘site’ is within multiple different ownerships and will be brought forward through multiple planning applications. It also aims to raise quality overall.
(2) How does it fit with Rugby Borough Council’s Corporate priorities and your service area priorities?	The design code aims to make us more effective and consistent in guiding planning applications at South West Rugby, whilst also aspiring to higher quality places and associated social, environmental and economic benefits.
(3) What are the expected outcomes you are hoping to achieve?	<ul style="list-style-type: none"> • Improved clarity and consistency on expectations across the development of South West Rugby to assist the process of considering and determining planning applications. • Improved quality in the development at South West Rugby, with associated social, environmental and economic benefits.
(4) Does or will the policy or decision affect: <ul style="list-style-type: none"> • Customers • Employees • Wider community or groups 	<ul style="list-style-type: none"> • The policy will initially principally impact applicants and developers through the planning process for developments at South West Rugby. • Residents likely to be impacted by development at South West Rugby (i.e. in immediately surrounding areas) have been invited to engage in the development of the design code, to manage impacts on them and seek to achieve local aspirations. There has also been a period of public consultation between 10 February and 10 March 2025. • In meeting its objectives, the design code should positively impact the future occupiers of properties at South West Rugby.
<u>Stage 2 - Information Gathering</u>	As a minimum you must consider what is known about the population likely to be affected which will support your understanding of the impact of the policy, e.g. service uptake/usage, customer satisfaction surveys, staffing data, performance data, research information (national, regional and local data sources).

<p>(1) What does the information tell you about those groups identified?</p>	<p>As part of the process of developing the design code for South West Rugby, we have engaged with local residents (those in neighbouring areas to the allocation), and stakeholders, including land owners, developers and colleagues at Warwickshire County Council. A report regarding the engagement undertaken is published here. A wider public consultation has taken place between 10 February and 10 March 2025, with the feedback reported in appendix 1 of the Council report.</p>		
<p>(2) Have you consulted or involved those groups that are likely to be affected by the strategy/ service/policy you want to implement? If yes, what were their views and how have their views influenced your decision?</p>	<p>As above. We have sought to engage elected representatives, members of the public and local secondary school children, to get their views on the area, site, key characteristics, and aspirations. A wider public consultation has taken place between 10 February and 10 March 2025, with the feedback reported in appendix 1 of the Council report.</p>		
<p>(3) If you have not consulted or engaged with communities that are likely to be affected by the policy or decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary.</p>	<p>We have engaged and consulted as outlined above.</p>		
<p><u>Stage 3 – Analysis of impact</u></p>			
<p>(1) Protected Characteristics From your data and consultations is there any positive, adverse or negative impact identified for any particular group, which could amount to discrimination? If yes, identify the groups and how they are affected.</p>	<p>RACE No impact</p>	<p>DISABILITY No impact</p>	<p>GENDER No impact</p>
	<p>MARRIAGE/CIVIL PARTNERSHIP No impact</p>	<p>AGE No impact</p>	<p>GENDER REASSIGNMENT No impact</p>
	<p>RELIGION/BELIEF No impact</p>	<p>PREGNANCY MATERNITY No impact</p>	<p>SEXUAL ORIENTATION No impact</p>

<p>(2) <u>Cross cutting themes</u> (a) Are your proposals likely to impact on social inequalities e.g. child poverty, geographically disadvantaged communities? If yes, please explain how? (b) Are your proposals likely to impact on a carer who looks after older people or people with disabilities? If yes, please explain how?</p>	<p>A key objective of the design code is to maximise opportunities for active travel and public transport to avoid geographical isolation.</p> <p>The provision of necessary infrastructure and some locational information is already included in existing policy and a South West Rugby Masterplan SPD which remain relevant.</p> <p>No.</p>
<p>(3) If there is an adverse impact, can this be justified?</p>	<p>No adverse impact envisaged – the objective is to design and inclusive development.</p>
<p>(4) What actions are going to be taken to reduce or eliminate negative or adverse impact? (This should form part of your action plan under Stage 4.)</p>	<p>As above</p>
<p>(5) How does the strategy/service/policy contribute to the promotion of equality? If not, what can be done?</p>	<p>As above – aims to support the creation of an inclusive development</p>
<p>(6) How does the strategy/service/policy promote good relations between groups? If not, what can be done?</p>	<p>N/a</p>
<p>(7) Are there any obvious barriers to accessing the service? If yes how can they be overcome?</p>	<p>N/a</p>

<p>Stage 4 – Action Planning, Review and Monitoring</p>	
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If No Further Action is required then go to – Review and Monitoring

(1) Action Planning – Specify any changes or improvements that can be made to the service or policy to mitigate or eradicate negative or adverse impact on specific groups, including resource implications.

EqIA Action Plan

Action	Lead Officer	Date for completion	Resource requirements	Comments

(2) Review and Monitoring
State how and when you will monitor policy and Action Plan

This EqIA will be reviewed again after the public consultation and before the SPD proceeds to adoption.

Please annotate your policy with the following statement:

‘An Equality Impact Assessment on this policy was undertaken on (date of assessment) and will be reviewed on (insert review date).’



Appendix 6

South West Rugby Design Code Supplementary Planning Document (SPD) - SEA Screening Opinion

Introduction

This Screening Opinion has been produced to determine the need for a Strategic Environmental Assessment (SEA) in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 (EAPP Regulations).

The purpose of the Screening Opinion is to undertake a screening assessment that meets the requirements of the European Legislation, applied in the UK through the EAPP Regulations.

The policy framework for the South West Rugby Design Code Supplementary Planning Document (SPD) is the Rugby Borough Local Plan 2011-2031 (adopted June 2019).

The SPD will be subject to public consultation in accordance with the relevant regulations and in line with the Council's Statement of Community Involvement.

Requirement for SEA

Previous UK legislation required all land use plans, including Supplementary Planning Documents to be subject to Sustainability Appraisal, which incorporated the need for Strategic Environmental Assessment. The 2008 Planning Act (paragraph 180 (5d)) and the Town and Country Planning (Local Planning) (England) Regulations 2012 removed the UK legislative requirement for the sustainability appraisal of Supplementary Planning Documents. However, SPDs may still require SEA in exceptional circumstances if they are likely to have significant environmental effects that have not already been assessed during the preparation of the Local Plan. Many councils prepare screening opinions to provide a transparent process to demonstrate that the environmental effects have been assessed in accordance with the EAPP Regulations to identify any requirement for SEA.

SEA Screening Opinion

The assessment has been made by Rugby Borough Council as to whether the SPD is likely to have any significant environmental effects. This assessment has been undertaken bearing in mind the following context:

- The SPD has been developed to be in general conformity with the strategic policies of the adopted development plan together with the NPPF
- The Local Plan was subject to a Sustainability Appraisal that sets the framework for growth and development within the borough until 2031.

Application of the SEA Directive

SEA Directive Criteria Schedule 1 of Environmental Assessment of Plans and Programmes Regulations 2004	Is the Plan likely to have a significant environmental effect Y/N	Summary of significant effects. Scope and influence of the document
Regulation	Y / N	Reason
Regulation 2 (1) Is the SPD subject to preparation and/or adoption by a national, regional or local authority or	Yes	The SPD is prepared and will be adopted by Rugby Borough Council.

prepared by an authority through a legislative procedure by Parliament or Government (Article 2(a))		
Is the SPD required by legislative, regulatory or administrative provisions (Article 2(a))	Yes	It is required to support local plan policy.
Regulation 5(2) Is the SPD prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use; AND does it set the framework for future development consent of projects in Annex I or II to Council Directive 85/337/EEC on the assessment of the effects of certain public and private projects on the environment, as amended by Council Directive 97/11/EC? (Article 3.2(a))	Yes	The SPD is required for town and country planning purposes and it provides further detail to adopted policies in the Local Plan. It seeks to guide the design and coordination of the urban extension at South West Rugby, as allocated in the local plan. It aims to improve the quality of development overall.
Regulation 5(3) Will the SPD, in view of the likely effect on sites, require an assessment pursuant to Article 6 or 7 of the Habitats Directive? (Article 3.2(b))	No	The adopted Local Plan was subject to a Sustainability Appraisal that sets the framework for growth and development within the borough until 2031. SPDs are required, by virtue of the fact they must be supplementary to an adopted policy, to help achieve sustainable development.
It may be required that the Plan would be eligible for full SEA, unless the exemptions set out under Reg 5 (5) or 5(6) apply.		
Regulation 5 (5) Is the SPD sole purpose to serve national defence or civil emergency; a financial or budget PP or is it co-financed under Council Regulations (EC) No's 1260/1999 or 1257/1999 (Article 3.8,3.9)	No	Not applicable
Regulation 5(6) Does the SPD: determine the use of a small area at local level; or propose a minor modification of an existing PP subject of the regulations. (Article 3.3)	No	(a) The SPD does not designate land for development (b)The SPD does not propose minor modifications of an existing PP subject of the regulations.
It may still be required that the Plan would be eligible for full SEA, unless it is determined that it will not give rise to significant environmental effects under Regulation 9.		
Regulation 9(1) Is the PP likely to have a significant effect on the environment taking into account the views of the consultation bodies and the criteria set out at Schedule 1 of the Regulations? (Article 3.5)	No	The SPD does not allocate land for development and it is simply supplementary to Local Plan policy. Natural England has stated agreement with the conclusion of this screening opinion. Heritage England concurs with the conclusion of the screening opinion The Environment Agency

The assessment set out below has also been informed by other relevant screenings of the SPD against the Habitat Regulations.

Criteria	Assessment	Significant environmental effect (positive or negative)?
1. The characteristics of plans and programmes, having regard to:		
(a) The degree to which the SPD sets a framework for projects and other activities, either in regard to location, nature, size and operating conditions or by allocating resources.	No. The design code seeks to guide coordination of development and enhance overall design quality across the allocated urban extension. Local plan policy, and the existing South West Rugby Masterplan SPD set out framework principles in terms of the range of land uses, and there broad locations. The design code does not seek to amend these, rather guide the physical development.	No
(b) The degree to which the plan or programme influences other plans and programmes including those in the hierarchy.	The SPD supplements the policies of the Local Plan by adding further detail. The SPD does not influence other development plan documents and is in general conformity with the development plan.	No
(c) The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.	SPDs are required, by virtue of the fact they must be supplementary to an adopted policy help achieve sustainable development. This includes environmental sustainability, as one of the three pillars identified in the NPPF. The primary objective of the SPD is to coordinate across land ownerships, and guide and improve the overall quality of development design.	No
(d) Environmental problems relevant to the plan or programme.	The Local Plan has been subject to a Sustainability Appraisal process.	No
(e) The relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).	The matters described are primarily guided by higher level legislation.	No
2. The characteristics of the effects and of the area likely to be affected, having regard, in particular, to:		
(a) The probability, duration, frequency and reversibility of effects	Since the SPD itself does not allocate land or formulate policies, the effects of the SPD are not considered significant.	No
(b) The cumulative nature of the effects	Since the SPD itself does not allocate land or formulate policies for this land, the effects of the SPD are not considered significant.	No
(c) The transboundary nature of the effects	It is unlikely that the SPD will have any sort of significant transboundary effect, taken primarily to mean impacting on another EU member state, as defined in the EIA Regulations. Even if 'transboundary' were to be defined as impacting on the jurisdiction of other administrative areas within the UK (for example between parishes or boroughs) the effect would be minimal in both instances.	No
(d) The risks to human health or the environment (for example, due to accidents)	It is highly unlikely that the SPD will give rise to any significant instances of risk to human health.	No

(e)The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	As identified above it is highly unlikely that any environmental effect brought about by the SPD will be of any magnitude or impact on any area of scale. It is particularly important to remember that the SPD does not allocate land for development and it is merely supplementary to a Local Plan policy.	No
(f)The value and vulnerability of the area likely to be affected due to (i) special natural characteristics or cultural heritage; (ii) exceeded environmental quality standards or limit values; or (iii) intensive land use.	The SPD incorporates design principles for the allocation at South West Rugby. The response from all three consultation bodies, are referred to in this instance.	No
(g)The effects on areas or landscapes which have a recognised national, Community or international protection status.	The allocation includes areas of woodland, including ancient woodland. This was considered as part of the allocation process through the local plan, and subsequent SPD development in the form of the South West Rugby Masterplan SPD which includes guidance and a woodland management plan. Professional landscape and ecology input has been sought in the development of the South West Rugby Design Code SPD to seek to maximise opportunities in relation to landscape, and minimise risks.	No

As a result of the assessment set out above, Rugby Borough Council has concluded that the SPD will not give rise to any significant environmental effects and therefore SEA is not required.

Date: 21 February 2025
Our ref: 502554
Your ref: Rugby Borough Local Plan – draft South West Design Code
Supplementary Planning Document – SEA Screening Opinion



Hayley Smith
Rugby Borough Council

BY EMAIL ONLY
LocalPlan@rugby.gov.uk

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 8GJ

T 0300 060 3900

Dear Hayley Smith,

Strategic Environmental Assessment – Screening consultation: Rugby Borough Local Plan - draft Southwest Rugby Design Code Supplementary Planning Document - SEA Screening Opinion

Thank you for your consultation on the above dated 11 February 2025 which was received by Natural England on 11 February 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Where Local Plans could have significant environmental effects, they may require a Strategic Environmental Assessment (SEA) under the Environment Assessment of Plans and Programmes Regulations 2004 (as amended). Further guidance on deciding whether the proposals are likely to have significant environmental effects and the requirements for consulting Natural England on SEA are set out in the [planning practice guidance](#).

It is Natural England's advice, on the basis of the material supplied with the consultation, that significant effects on statutorily designated nature conservation sites or landscapes are unlikely. Natural England agree with the conclusion of the SEA that it will not give rise to any significant environmental effects and therefore a SEA is not required.

Please note that this response relates only to the SEA screening consultation. Natural England may wish to provide advice should your authority consult us on any subsequent planning application. Guidance on when to consult Natural England is [here](#).

Please send any new consultations, or any further information on this consultation to: consultations@naturalengland.org.uk.

Yours sincerely

Holly Marlow

Planning for a Better Environment – West Midlands Team.



Historic England

Our ref: PL – 00798132 & 00798139

Your ref:

Telephone: 07823 878657

Email:

elizabeth.boden@historicengland.org.uk

13 March 2025

FAO: Development Strategy Team

localplan@rugby.gov.uk

Dear Sir/Madam,

Re: South West Rugby Masterplan Design Code Supplementary Planning Document (SPD) public consultation March 2025 and SEA Screening Opinion for consultation

Thank you for providing Historic England with an opportunity to comment on the South West Rugby Masterplan Design Code SPD. As the Government's statutory advisor on the historic environment, we are keen to ensure that the conservation, enhancement and enjoyment of the historic environment are taken into account in the preparation of plans and associated guidance.

We welcome consultation on this Design Code SPD document, which builds on the previous good work undertaken in formulating the site allocation policy and Masterplan SPD for the South West Rugby allocation. We note that this Design Code seeks to achieve a higher consistent quality of design and wish to highlight that Historic England has a wealth of published advice on this subject. The following guidance may be of assistance:

<https://historicengland.org.uk/advice/planning/design-in-the-historic-environment>

In terms of our remit for the historic environment we have some specific comments to make which are set out below:

Page 9 of Section 2.1 Site Context – we welcome the inclusion of reference to Bilton Grange Registered Park & Garden (RPG) (GII), but we note that there are two RPGs next to each other, Bilton Grange and Dunchurch Lodge (GII) with multiple Listed Buildings (LBs) within these RPGs, including Bilton Grange School and Dunchurch Lodge (both GII*).



Historic England, Midlands Regions Group, The Foundry, 82 Granville Street, Birmingham, B1 2LH

Telephone 0121 6256888 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



Additionally, there appears to be no reference within the documents to the nearby Conservation Areas (CAs) (Dunchurch, Thurlaston or Bilton) and whilst the majority of LBs within the CAs and around the site are GII, this site is surrounded by a strong historic landscape.

Therefore, HE considers that the Design Code should have regard to the historic environment, and we suggest that the 'Analysis' chapter of document 1 should include a specific section on heritage. We also consider that there are opportunities to make linkages to the historic environment in the document on 'Nature' ('Landscape Character' and 'Buffers and Boundaries' in particular), and also in the document on 'Identity'; where those heritage assets immediately surrounding the site could be referenced.

With regard to the SEA Screening Opinion, in terms of Historic England's area of interest, given the nature of the SPD, we would concur with your assessment that the document is unlikely to result in any significant environmental effects and will simply provide additional guidance on existing Policies contained within the adopted Rugby Borough Local Plan which has already been subject to a Sustainability Appraisal/SEA. As a result, we would endorse the Authority's conclusions that it is not necessary to undertake a Strategic Environmental Assessment of this particular SPD.

However, the views of the other two statutory consultation bodies should be taken into account before the overall decision on the need for a SEA is made.

We look forward to engaging with you as this SPD is progressed over the coming months and we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise (either as a result of this consultation or in later versions of the guidance) where we consider that these would have an adverse impact upon the historic environment.

For information and for further consultation please note our consultation email address e-midlands@historicengland.org.uk

We hope that the above comments will assist, but if you have any queries about any of the matters raised, please do not hesitate to contact me.

Yours faithfully,

Elizabeth Boden

Elizabeth Boden (Mrs)
Historic Environment Planning Adviser

AGENDA MANAGEMENT SHEET

Report Title: Memorandum of understanding on planning in Coventry and Warwickshire

Name of Committee: Cabinet

Date of Meeting: 24 June 2025

Report Director: Chief Officer - Growth and Investment

Portfolio: Growth and Investment, Digital and Communications

Ward Relevance: All

Prior Consultation:

Contact Officer: Neil Holly, Development Strategy Manager, neil.holly@rugby.gov.uk

Public or Private: Public

Report Subject to Call-In: Yes

Report En-Bloc: No

Forward Plan: Yes

Corporate Priorities: This report relates to the following priority(ies):
 A Healthier Rugby – To support people to live healthier, longer, and more independent lives.
 A Thriving Rugby – To deliver a thriving economy which brings Borough-wide investment and regenerates Rugby Town Centre.
 A Greener Rugby – To protect the environment and ensure the Borough adapts to climate change.
 A Fairer Rugby – To reduce inequalities and improve housing across the Borough.
[Corporate Strategy 2025-2035](#)
 This report does not specifically relate to any Council priorities but

Summary: The report seeks Cabinet’s approval to the signing on behalf of Rugby Borough Council of a memorandum of understanding between Coventry City Council and the Warwickshire district councils on planning for strategic matters (a copy of which is at Appendix 1) (“the MoU”).
This MoU discusses the position on the need for housing and employment land in the Coventry and

Warwickshire Housing Market Area (HMA) and Functional Economic Market Area (FEMA).

- Financial Implications:** There are no financial implications of this report.
- Risk Management/Health and Safety Implications:** A project risk register for the new Local Plan was reported to Cabinet on [4 March 2025](#).
- Environmental Implications:** A climate change and environmental impact assessment is attached as Appendix 2.
- Legal Implications:** Local authorities are, under s33A of the Planning and Compulsory Purchase Act 2004, subject to a duty to co-operate in maximising the effectiveness of plan-making in relation to the development or use of land that would have a significant impact on at least two planning areas. This duty is reinforced in national planning policy and guidance. The MoU demonstrates cooperation between the Coventry and Warwickshire authorities in plan making.
- Equality and Diversity:** An equality impact assessment is attached as Appendix 3.
- Options:**
- Option 1- Cabinet authorises the MoU to be entered into.
- Option 2 – Cabinet does not approve the MoU. In those circumstances Rugby Borough Council is likely to be the only authority in Coventry and Warwickshire that is not a signatory to the MoU. This would jeopardise the ability of the Council to demonstrate legal compliance with the duty to cooperate. Compliance with that duty is a requirement for a new local plan to be able to pass examination.
- Recommendation:**
- (1) The entering into of the draft Memorandum of Understanding between Coventry City Council and the Warwickshire district councils on planning for strategic matters be approved; and
 - (2) delegated authority be given to the Chief Officer for Growth and Investment to agree with the co-signing authorities' amendments and corrections to the memorandum of understanding as necessary prior to its finalisation.

**Reasons for
Recommendation:**

To support the council in demonstrating compliance with the duty to cooperate.

Cabinet - 24 June 2025

**Memorandum of understanding on planning in Coventry and
Warwickshire**

Public Report of the Chief Officer - Growth and Investment

Recommendation

- (1) The entering into of the draft Memorandum of Understanding between Coventry City Council and the Warwickshire district councils on planning for strategic matters be approved; and
- (2) delegated authority be given to the Chief Officer for Growth and Investment to agree with the co-signing authorities' amendments and corrections to the memorandum of understanding as necessary prior to its finalisation.

1 Executive Summary

- 1.1 This report seeks approval for the signing on behalf of Rugby Borough Council of a memorandum of understanding between Coventry City Council and the Warwickshire district councils on planning for strategic matters, a copy of which is at Appendix 1 ("the MoU").
- 1.2 The MoU documents the position on the need for housing and employment land in the Coventry and Warwickshire Housing Market Area (HMA) and Functional Economic Market Area (FEMA).
- 1.3 The MoU identifies that there is no current identified unmet need for housing, whereby one authority is unable to meet its assessed need for housing within its administrative boundaries. It documents that Coventry City Council has identified a shortfall of 45 hectares of employment land and is requesting assistance from other local authorities to meet this shortfall. It documents Rugby Borough Council has identified a need for 47 Gypsy and Traveller pitches beyond that which it can meet within its administrative boundaries and has written to the other signatories to the MOU, together with its neighbouring authorities in Leicestershire and Northamptonshire, to seek assistance in meeting this unmet need.
- 1.4 The MoU is purely factual, setting out the current position and evidence on development requirements. It does not contain agreements in relation to the distribution of unmet needs.

2 Background

- 2.1 Rugby Borough Council is preparing a new local plan and recently concluded a consultation on preferred options. The next stage in plan-making, as set out in the adopted Local Development Scheme, will be the preparation of a pre-submission plan which will be consulted upon in early 2026.
- 2.2 In producing its new local plan, in common with all local authorities, Rugby Borough Council is required to cooperate with its neighbouring authorities in maximising the effectiveness of planning for development with cross-boundary implications. Compliance with this legal duty is one of the first matters to be assessed in local plan examinations.
- 2.3 The provision of housing and employment land are matters with cross-boundary implications in Coventry and Warwickshire because the authorities share functional geographies, namely a housing market area and functional economic market area.
- 2.4 To demonstrate that effective joint working has been taking place and document the current state of evidence and agreement on development needs, a memorandum of understanding has been prepared. It is proposed that this is signed by all of the Coventry and Warwickshire authorities. This will later be supplemented by bilateral or multilateral statements of common ground.

3 Detail

- 3.1 In relation to planning for employment land, the MoU documents the findings of the alignments paper between the Coventry and Warwickshire Housing and Economic Development Needs Assessment (HEDNA) and the West Midlands Strategic Employment Sites Study (WMSESS) which was published in November 2024. The alignment paper sets out the authorities' current evidence on need for employment land across Coventry and Warwickshire and formed the basis for assessing employment land needs in the recent preferred options consultation.
- 3.2 In relation to future housing needs, the position is that Coventry City Council and Nuneaton and Bedworth District Council's plans have been/are being progressed under the 2023 National Planning Policy Framework (NPPF) whereas the plans of the other Warwickshire districts, including Rugby Borough will be examined under the December 2024 NPPF. On this basis, the housing needs for Coventry and Nuneaton and Bedworth were assessed using the Coventry and Warwickshire HEDNA whereas the housing needs of the other authorities are required to be determined using the new standard method for calculating local housing need. This is documented in the MoU.
- 3.3 The Rugby Borough Gypsy and Traveller Accommodation Assessment 2025 which was published alongside the preferred options consultation in March 2025 identified a need for 94 pitches 2024-2042. The recent preferred options consultation proposes potential new allocations for Gypsy and Traveller pitches. Responses to the consultation are currently being reviewed and decisions will need to be made later in the year as to whether the proposed allocations are carried forward into the pre-submission version of the plan.

3.4 Notwithstanding the potential new site allocations for pitches, it is clear that Rugby Borough Council will not be able to identify sufficient sites to meet the entirety of its assessed need. On that basis officers have contacted neighbouring authorities to notify them of the unmet need and enquire as to whether they can assist in meeting it. This is documented in the MoU.

4 Conclusion

4.1 The MoU is an important step to documenting effective cooperation within the Coventry and Warwickshire housing market area and functional economic market area.

Name of Meeting: Cabinet

Date of Meeting: 24 June 2025

Subject Matter: Memorandum of understanding on planning in Coventry and Warwickshire

Originating Department: Growth and Investment

DO ANY BACKGROUND PAPERS APPLY YES NO

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A

1. INTRODUCTION

- 1.1 This Memorandum of Understanding (MoU) has been prepared in accordance with national guidance¹ and is intended to cover matters of strategic importance relevant to all authorities, specifically relating to housing and employment needs across the Housing Market Area (HMA) and Functional Economic Market Area (FEMA).
- 1.2 The intention is that once discussed and supported, through amendments if required, this MoU will be agreed by the following Councils:

Coventry City Council
North Warwickshire Borough Council
Nuneaton & Bedworth Borough Council
Rugby Borough Council
Stratford-on-Avon District Council
Warwick District Council
Warwickshire County Council

2. GEOGRAPHY COVERED BY MEMORANDUM OF UNDERSTANDING

- 2.1 This MoU covers the Local Planning Authorities within the Coventry and Warwickshire HMA/FEMA (C&W HMA). The C&W HMA/FEMA is made up of Coventry City Council, North Warwickshire Borough Council, Nuneaton and Bedworth Borough Council, Rugby Borough Council, Stratford-on-Avon District Council, Warwick District Council and Warwickshire County Council. It is also acknowledged that North Warwickshire Borough Council and Stratford-on-Avon District Council are also part of the Greater Birmingham HMA.

3. PURPOSE

- 3.1 There is a legal requirement for effective cooperation relating to strategic matters that cross administrative boundaries to be dealt with and evidenced by Statements of Common Ground.
- 3.2 This Memorandum of Understanding seeks to ensure that as the Local Planning Authorities develop their Local Plans, at differing paces, the housing and employment needs of the C&W HMA/FEMA are met. It is framed within the duty to cooperate set out in Section 33A of the Planning and Compulsory Purchase Act 2004 and in the context of the National Planning Policy Framework (2023 & 2024). This sets out the duty for local planning authorities and county councils to co-operate in maximising the effectiveness of the preparation of development plan documents so far as relating to strategic matters which affect more than one local authority area. As many of the local planning authorities in the Coventry and

¹ Planning Practice Guidance Paragraph 011 Reference ID: 61-011-20190315

Warwickshire area are only in the early stages of reviewing their adopted plans (and acknowledging that not all have commenced such reviews, nor are required to at this stage), the situation is evolving in identifying levels of supply for housing and employment needs within authority boundaries. Through capacity assessment and a strategy of promoting best use of development land it is understood that Coventry anticipates being able to meet its own local housing needs as identified in the HEDNA – Table 1.

- 3.3 The Coventry & Warwickshire HEDNA-WMSESS Alignment Paper (November 2024) establishes that Coventry has 105 Ha of local employment need to 2041, a supply of 60ha and a residual need of 45Ha (Table 3). In regard to strategic need, Appendix 1 of the Alignment Report sets out details of committed sites across the FEMA. Discussions with partners as to how to address residual local and strategic employment needs across the FEMA are underway, therefore the MoU is iterative and will be updated as discussions progress.
- 3.4 This Memorandum of Understanding commits Coventry City Council and the five Borough/District Councils within Warwickshire to an ongoing collaborative process to address the housing and economic development needs of the market area and to maintain realistic assumptions about the availability, suitability and viability of land to meet that need. In addition, given the importance of Warwickshire County Council's role and responsibilities within the area they are a signatory to this MoU.

4. POINTS OF AGREEMENT

- 4.1 It is agreed that for plan making purposes there is a housing market area and functional economic market area comprising Coventry and the whole of Warwickshire. In addition, North Warwickshire Borough Council and Stratford-on-Avon District Council fall within the Greater Birmingham and Black Country Housing Market Area and therefore have a functional relationship with that area.
- 4.2 The Coventry and Warwickshire Housing and Economic Development Needs Assessment 2022 (HEDNA), produced by independent consultants ICENI Projects on behalf of the Coventry and Warwickshire local authorities, sets out an objective assessment of housing need and employment need for the Coventry and Warwickshire area. The figures below are taken directly from the HEDNA and do not include the 35% 'cities uplift' for Coventry (see para.4.6.3)

Table 1: Local Housing Need (dwellings per annum) Trend-based - HEDNA

Authority	HEDNA Housing Need (dpa)
Coventry	1455
North Warwickshire	119

Nuneaton and Bedworth ²	409
Rugby	735
Stratford-on-Avon	868
Warwick	811
Total	4397

Source: Table 5.33 HEDNA 2022

- 4.3 It is agreed that the 2022 HEDNA, utilising 2021 Census Data, forms the most robust evidence base of establishing the housing and employment needs of the HMA/FEMA for plans being prepared by Coventry City Council and Nuneaton and Bedworth Borough Council, under the December 2023 NPPF.
- 4.4 It is agreed that for plans being prepared under the December 2024 NPPF, the HEDNA Housing Needs are superseded by the December 2024 NPPF Standard Method outcomes of Local Housing Need, as shown in Table 2 below.

Table 2: December 2024 National Planning Policy Framework - Local Housing Need

Authority	2024 NPPF Indicative Local Housing Need (dpa)
Coventry	1388
North Warwickshire	364
Nuneaton and Bedworth ³	737
Rugby	618
Stratford-on-Avon	1126
Warwick	1062
Total	5295

Source: NPPF Standard Method December 2024

- 4.5 It is agreed that the West Midlands Strategic Employment Sites Study (WMSESS) 2023/2024 further informs the strategic employment needs of the HMA/FEMA, and that the Coventry & Warwickshire HEDNA-WMSESS Alignment Paper (2024) accurately updates the HEDNA employment evidence and presents the current levels of employment need and supply across the HMA/FEMA.

² Nuneaton and Bedworth Borough Council commissioned a bespoke report 'Towards a Housing Requirement for Nuneaton' to be read alongside the HEDNA which provides more specific consideration of housing and employment need in Nuneaton and Bedworth Borough taking into account relevant local considerations. This identifies a housing requirement of 545 dwellings per annum for Nuneaton and Bedworth Borough.

³ See Footnote 2 regarding the figure for NBBC.

Table 3: Local Industrial Residual Need 2021-41 (Ha) – Icení HEDNA - WMSESS Alignment Paper – November 2024

Authority	Need	Supply	Residual Need
Rugby	58	5	53
North Warwickshire	60	34	26
Nuneaton and Bedworth ⁴	41	52 ⁵	-11
Coventry	105	60	45
Stratford	144	56	88
Warwick	83	37	46
Total	492	244	248

NB: figures may not sum due to rounding

Table 4: Local Industrial Residual Need 2021-45 (Ha) – Icení HEDNA - WMSESS Alignment Paper – November 2024

Authority	Need	Supply	Residual Need
Rugby	68	5	63
North Warwickshire	70	34	36
Nuneaton and Bedworth	48	52	-4
Coventry	122	60	62
Stratford	167	56	111
Warwick	97	37	60
Total	572	244	328

Table 5: Local Industrial Residual Need 2021-50 (Ha) – Icení HEDNA - WMSESS Alignment Paper – November 2024

Authority	Need	Supply	Residual Need
Rugby	80	5	75
North Warwickshire	82	34	48
Nuneaton and Bedworth	56	52	4
Coventry	143	60	83
Stratford	196	56	140
Warwick	113	37	76
Total	670	244	426

4.6 Each Council will cooperate in the delivery of the local housing and employment need which ensures that the overall needs across the housing market area will be met. To achieve this objective, it is agreed that:

⁴ Nuneaton and Bedworth Borough Council commissioned a bespoke report 'Towards a Housing Requirement for Nuneaton' and to be read alongside the HEDNA and 'Review of Nuneaton & Bedworth Employment Land Portfolio'. These documents identify a local industrial and warehouse employment need figure for Nuneaton and Bedworth of 66.45 ha.

⁵ Figure only includes allocated sites.

- 4.6.1 At the time of signing this agreement it is considered that the HEDNA and WMSESS Alignment paper constitutes robust evidence for future plan-making for both housing and employment land for Coventry and Warwickshire (noting the provisions for calculating housing need as set out in paragraph 4.3 and 4.4).
- 4.6.2 The local authorities consider that the exceptional circumstances in Coventry and Warwickshire which are identified in the HEDNA⁶, justify a departure from the use of the Government’s Standard Method for assessing local housing need, in line with paragraph 61 of the NPPF December 2023⁷.
- 4.6.3 It is agreed the 35% cities uplift applies specifically to the Government's Standard Method as referred to in the 2023 NPPF paragraph 62 and supporting Guidance and has been deleted in the 2024 NPPF revision. It relates only to specific cities and there is no requirement for this to be redistributed. It is agreed this figure was not evidenced by Government and did not reflect local need.
- 4.6.4 All parties will work together to address Strategic Employment Needs as shown in Table 6.

Table 6: Residual Strategic Site needs 2022-2045 – Icen HEDNA - WMSESS Alignment Paper – November 2024

Opportunity area*	Residual Need
Area 5 – North Warwickshire	50 – 100ha
Area 7 – M6/A45/A46/M45 Coventry and Rugby	9 – 84ha
Area 8 – A46 / M40 Warwick	75 – 125ha

*As set out in the WMSESS these are broad areas they do not represent Local Authority administrative boundaries

- 4.6.5 The plan making process will ultimately establish the capacity of each area, and the quantities of housing and employment development that can be delivered.
- 4.6.6 Each local authority is committed to ongoing cooperation and engagement by both officers and members in relation to delivery of housing and employment land for the Coventry and Warwickshire area. Should any authority identify a shortfall, the Local Authorities will seek to work constructively together to explore how the needs of the HMA and/or FEMA may be accommodated within the appropriate geography.
- 4.6.7 This MOU will be reviewed as necessary in light of any changes to the National Planning Policy Framework (NPPF) and any new relevant new legislation.
- 4.6.8 All parties confirm the understanding that Coventry City Council is proceeding with

⁶ See summary section 5, paragraph 5.159 to 5.161 of the HEDNA.

⁷ In line with the Transitional Arrangements under which the Coventry Local Plan is being reviewed.

progressing its plan under the current transitional arrangements and as such it is being prepared in line with the NPPF December 2023. Should this position change the MoU will be reviewed.

5. POINTS YET TO BE RESOLVED

- 5.1 Distribution of housing and employment: if any LPA within the area determines they are unable to deliver the amount of housing or employment as identified in the tables contained in this MoU then further discussions will be held and the MoU will be revised as appropriate.
- 5.2 Coventry City Council considers that it cannot meet its residual need of 45 hectares to 2041 and is requesting assistance from partners across the FEMA to help meet its Local Employment Need shortfall. However, the extent of this shortfall has not yet been agreed with partners and has been subject to challenge by other FEMA authorities. The detailed extent of agreement and disagreement will be set out in Statements of Common Ground with the relevant FEMA authorities.
- 5.3 Discussions regarding strategic employment need are underway across the FEMA in relation to the Opportunity Areas identified in the WMSESS but how this will be accommodated is yet to be resolved.
- 5.4 Rugby Borough Council has identified a need for 47 Gypsy and Traveller pitches beyond that which it can meet within its administrative boundaries. It has written to the other signatories to this MOU, together with its neighbouring authorities in Leicestershire and Northamptonshire to seek assistance in meeting this unmet need.

6. LIMITATIONS

- 6.1 For the avoidance of doubt, this Memorandum shall not fetter the discretion of any of the Councils in the determination of any planning application, or in the exercise of any of their statutory powers and duties, or in their response to consultations, and is not intended to be legally binding but shows clear commitment and intent to meeting the full housing and employment needs of the market area.
- 6.2 The objectively assessed need figures set out in this MOU have not yet been tested at examination and do not supersede the housing or employment land requirements in current local plans.

7. LIAISON

- 7.1 Member level representatives of the Local Authorities will meet when appropriate, in order to:
 - Maintain and update the memorandum, as necessary.

- Monitor the preparation of Local Plans across the six authorities and discuss strategic issues emerging from them.

8. MONITORING

- 8.1 Annual monitoring will be carried out for both housing and employment. This will be overseen by the Joint Monitoring Officers Group (JMOG) for the Coventry and Warwickshire area, who will agree monitoring targets to include permissions and completions.

9. SIGNATORIES

Signed on behalf of Coventry City Council:

Date:

Signed on behalf of North Warwickshire Borough Council:

Date:

Signed on behalf of Nuneaton & Bedworth Borough Council:

Date:

Signed on behalf of Rugby Borough Council:

Date:

Signed on behalf of Stratford-on-Avon District Council:

Date:

Signed on behalf of Warwick District Council:

Date:

Signed on behalf of Warwickshire County Council:

Date:

Rugby Borough Council

APPENDIX 2 - Climate Change and Environmental Impact Assessment

CONTEXT

In 2019 the UK Parliament set a commitment in law to reach net zero carbon emissions by 2050. Achieving this target will require considerable effort with public bodies, private sector organisations, the third sector and individuals working together to take action.

Rugby Borough Council declared a climate emergency in 2019 and the Council's Corporate Strategy (2025-2035) [link](#) sets ambitious outcomes in relation to Climate Change. These ambitions are further defined through the Council's Climate Change Strategy [link](#) and must now be progressed through the decisions which the Council makes.

It is therefore important that Rugby Borough Council gives due regard to climate change when making decisions. In the context of the Council's business, Climate Change includes greenhouse gas emissions, biodiversity, habitat loss and environmental destruction. When putting forward recommendations for decision, officers must assess how these recommendations are likely to influence our climate change commitments by completing the following Climate Change and Environmental Impact Assessment.

To help you complete this assessment, please see the following guidance on SharePoint [here](#).

A copy of this Climate Change and Environmental Impact Assessment, including relevant data and information should be forwarded to your Chief Officer for approval.

If you require help, advice and support to complete the form, please contact your Chief Officer.

SECTION 1: OVERVIEW

Portfolio and Service Area	Growth and Investment – Development Strategy
Policy/Service/Change being assessed	Memorandum of Understanding on planning in Coventry and Warwickshire
Is this a new or existing Policy/Service/Change?	The memorandum of understanding documents the current status of agreement on cross-border planning issues in Coventry and Warwickshire. It does not set policy. It is a factual document. It is prepared to demonstrate cooperation and provide evidence that the councils are meeting the legal duty to cooperate.
If existing policy/service please state date of last assessment	N/A
Ward Specific Impacts	None
Summary of assessment Briefly summarise the policy/service/change and potential impacts	There are no direct environmental effects arising from the memorandum of understanding (MoU). The MoU documents the position on future housing and economic needs in Coventry and Warwickshire. It is factual in nature. It is not a policy document. Environmental effects would occur through the local plans which the MoU supports and will be assessed through those documents.
Completed By	Neil Holly
Authorised By	Nicola Smith
Date of Assessment	9 June 2025

SECTION 2: GREENHOUSE GAS EMISSIONS

	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Scope 1 Emissions Direct emissions from council owned resources, for example through boilers or vehicles.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Scope 2 Emissions Indirect emissions occurring at the location energy is produced for council activities. For example, electricity generation for council buildings.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

SECTION 3: CLIMATE CHANGE STRATEGY

	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Workplaces and the Economy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Transport	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Natural Environment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Homes and Energy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Waste, Resources and the Circular Economy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Climate and Nature Positive Communities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Adaptation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

SECTION 4: REVIEW

Where a negative impact is identified, the proposal and/or implementation can be adapted or changed; meaning there is a need for regular review. This review may also be needed to reflect additional data and evidence for a fuller assessment (proportionate to the decision in question). Please state the agreed review timescale for the identified impacts of the policy implementation or service change.

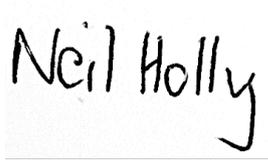
Review date	Review not planned. This will be picked up through the next stage of preparation of the Rugby Borough local plan.
Key points to be considered through review	N/A
Person responsible for review	N/A
Authorised by	

APPENDIX 3 - EQUALITY IMPACT ASSESSMENT (EqIA)

Context

1. The Public Sector Equality Duty as set out under section 149 of the Equality Act 2010 requires Rugby Borough Council when making decisions to have due regard to the following:
 - eliminating unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Act,
 - advancing equality of opportunity between people who share a protected characteristic and those who do not,
 - fostering good relations between people who share a protected characteristic and those who do not, including tackling prejudice and promoting understanding.
2. The characteristics protected by the Equality Act are:
 - age
 - disability
 - gender reassignment
 - marriage/civil partnership
 - pregnancy/maternity
 - race
 - religion/belief
 - sex/gender
 - sexual orientation
3. In addition to the above-protected characteristics, you should consider the crosscutting elements of the proposed policy, such as impact on social inequalities and impact on carers who look after older people or people with disabilities as part of this assessment.
4. The Equality Impact Assessment (EqIA) document is a tool that enables RBC to test and analyse the nature and impact of what it is currently doing or is planning to do in the future. It can be used flexibly for reviewing existing arrangements but in particular should enable identification where further consultation, engagement and data is required.
5. The questions will enable you to record your findings.
6. Where the EqIA relates to a continuing project, it must be reviewed and updated at each stage of the decision.
7. Once completed and signed off the EqIA will be published [online](#).
8. An EqIA must accompany all **Key Decisions** and **Cabinet Reports**.
9. For further information, refer to the EqIA guidance for staff.
10. For advice and support, contact:
Rebecca Ewers
Corporate Equality & Diversity Officer
rebecca.ewers@rugby.gov.uk
01788 533509

Equality Impact Assessment

Service Area	Development Strategy – Growth and Investment
Policy/Service being assessed	Memorandum of Understanding on planning in Coventry and Warwickshire
Is this a new or existing policy/service? If existing policy/service please state date of last assessment	This is a new document, it isn't a policy.
EqlA Review Team – List of members	Neil Holly, Nicola Smith
Date of this assessment	9 June 2025
Signature of responsible officer (to be signed after the EqlA has been completed)	

A copy of the completed and signed Equality Impact Assessment report, including relevant data and information to be forwarded to the Corporate Equality & Diversity Officer.

Details of Strategy/ Service/ Policy to be analysed

<u>Stage 1 – Policy to be analysed</u>	
(1) Describe the main aims, objectives and purpose of the Strategy/Service/Policy (or decision)?	The memorandum of understanding documents the current status of agreement on cross-border planning issues in Coventry and Warwickshire. It does not set policy. It is a factual document. It is prepared to demonstrate cooperation and provide evidence that the councils are meeting the legal duty to cooperate.
(2) How does it fit with Rugby Borough Council's Corporate priorities and your service area priorities?	The MoU supports preparation of the new local plan for Rugby Borough.
(3) What are the expected outcomes you are hoping to achieve?	Support the preparation of a new local plan that is legally compliant.
(4) Does or will the policy or decision affect: <ul style="list-style-type: none"> • Customers • Employees • Wider community or groups 	There are no direct effects arising from the MoU which is not a policy document. However, direct effects will arise from the local plan which will be assessed through equality impact assessments prepared and appended to relevant cabinet/council reports for the local plan.
(5) Will the policy or decision involve substantial changes in resources?	
<u>Stage 2 – Evidence about user population and consultation</u>	As a minimum you must consider what is known about the population likely to be affected which will support your understanding of the impact of the policy, e.g. service uptake/usage, customer satisfaction surveys, staffing data, performance data, research information (national, regional and local data sources).

<p>(1) What does the data tell you about the groups this policy or decision impacts?</p> <p>Possible data sources:</p> <ul style="list-style-type: none"> • national statistics/census data • local statistics • evaluations • analysis of complaints • user feedback • outcomes from consultation/community voice • Council published information, service data • District and Ward Profile – Warwickshire Observatory • Office of National Statistics • Fingertips health profiles • Indices of Multiple Deprivation • RBC Annual Workforce Equality Report 	<p>Overall housing needs assessment for Rugby Borough was based on the government’s standard method for calculating housing needs. This uses national statistics combining dwelling stock estimates and median affordability ratios.</p> <p>The need for Gypsy and Traveller accommodation in Rugby Borough was calculated through the accommodation assessment 2025. This included primary survey research with those groups.</p>
<p>(2a) Have you consulted or involved those groups that are likely to be affected by the strategy/ service/policy you want to implement?</p> <p>If yes, please state which groups were involved in the consultation and what were their views and how have their views influenced the policy/decision?</p>	<p>Consultation has and will taken place on the local plan. No consultation will take place on the MoU. The evidence of future Gypsy and Traveller accommodation needs was based on direct consultation with these groups.</p>

<p>(2b) If you have not consulted or engaged with communities that are likely to be affected by the policy/decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary.</p>	<p>The MoU is not a policy decision or document. It is not appropriate to consult on it.</p>		
<p><u>Stage 3 – Analysis of impact</u></p>			
<p>(1) <u>Protected Characteristics</u> From your data and consultations is there any positive, adverse or negative impact identified for any particular group, which could amount to discrimination? If yes, identify the groups and how they are affected.</p>	<p>Protected Characteristic</p>	<p>Nature of Impact Positive, Neutral, Adverse (explain why)</p>	<p>Extent of impact Low, medium, high</p>
	<p>Age</p>	<p>Neutral</p>	<p>N/A</p>
	<p>Disability</p>	<p>Neutral</p>	<p>N/A</p>
	<p>Sex</p>	<p>Neutral</p>	<p>N/A</p>
	<p>Gender reassignment</p>	<p>Neutral</p>	<p>N/A</p>
	<p>Marriage/civil partnership</p>	<p>Neutral</p>	<p>N/A</p>
	<p>Pregnancy/maternity</p>	<p>Neutral</p>	<p>N/A</p>
	<p>Race</p>	<p>Positive There is a potential for positive effect if, through the duty to cooperate, the unmet need for pitches in Rugby Borough is able to be met in a neighbouring authority. However, the likelihood of that being agreed is considered to be low.</p>	<p>Low</p>

	Religion/belief	Neutral	N/A
	Sexual Orientation	Neutral	N/A
(2) <u>Cross cutting themes</u> (a) Are your proposals likely to impact on social inequalities e.g. child poverty, geographically disadvantaged communities? If yes, please explain how?	Description of impact	Nature of impact Positive, Neutral, Adverse (explain why)	Extent of impact Low, medium, high
	Socio-economic e.g.: child poverty, income level, education level, working hours/occupation, family/social support, access to good nutrition	Positive The MoU is a framework for meeting assessed housing and employment land needs in Coventry and Warwickshire. If carried forward through the local plans this would likely have a positive impact on income levels and employment levels.	Low
	Environmental e.g.: housing status, transport links, geography, access to services, air quality, noise pollution	Positive The MoU is a framework for meeting assessed housing needs in Coventry and Warwickshire. If carried forward through the local plans this would likely have a positive impact on housing status.	Low

<p>(3) Using the information gathered in stages 2 and 3, please describe how the policy/strategy/service will:</p> <ul style="list-style-type: none"> a. Eliminate unlawful discrimination, harassment, victimisation and any other unlawful conduct prohibited by the act b. Advance equality of opportunity between people who share and people who do not share a relevant protected characteristic c. Foster good relations between people who share and people who do not share a relevant protected characteristic 	<p>As highlighted above, there is potential for the MoU to help in addressing inequalities in access to accommodation for Gypsies and Travellers.</p>
<p>(4) Are there any obvious barriers to accessing the service? If yes, how can they be overcome?</p>	<p>No</p>
<p>(5) What Equality Monitoring Data will be collected to analyse impact? How will the Equality Monitoring Data collected be used?</p> <p>If no Equality Monitoring Data is being collected, why not?</p> <p>For support with this section, please refer to the Equality Monitoring Guidance.</p>	<p>N/A</p>

<p>(6) Complete this section if any adverse impacts were identified in 3.1.</p> <p>Outline any actions that will be taken to remove or mitigate the adverse impacts identified in 3.1 to ensure that no discrimination is taking place. If removing or mitigating the impact is not possible, you may in certain circumstances, justify the discrimination. If that is the case, please give evidence for why justifying is possible in this case.</p>	<p>N/A</p>
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<p><u>Stage 4 – Action Planning, Review and Monitoring</u></p>	
<p>(1) Data analysis What does feedback from Equality Monitoring Data gathered tell you about impact on groups? Were there any unforeseen impacts (positive or negative)?</p> <p>The feedback/data should be used to inform your Action Plan in (2)</p>	<p>N/A</p>

<p>If No Further Action is required then go to – Review and Monitoring</p> <p>(2) Action Planning – Specify any changes or improvements that can be made to the service or policy to mitigate or eradicate negative or adverse impact on specific groups, including resource implications.</p>	<p>EqlA Action Plan</p> <table border="1"> <thead> <tr> <th data-bbox="875 349 1120 424">Action</th> <th data-bbox="1120 349 1364 424">Lead Officer</th> <th data-bbox="1364 349 1615 424">Date for completion</th> <th data-bbox="1615 349 1865 424">Resource requirements</th> <th data-bbox="1865 349 2116 424">Comments</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Action	Lead Officer	Date for completion	Resource requirements	Comments																				
Action		Lead Officer	Date for completion	Resource requirements	Comments																					
<p>(3) Review and Monitoring State how and when you will monitor policy and Action Plan. Will you make any changes to the Equality Data that you are collecting or how you are collecting/using the data?</p>	<p>An EqlA has been prepared for the local plan consultation and this will be reviewed at the next local plan consultation stage in early 2026. No review of this EqlA for the memorandum of understanding is proposed.</p>																									

Please annotate your policy with the following statement:

‘An Equality Impact Assessment on this policy was undertaken on (date of assessment) and will be reviewed on (insert review date).’

AGENDA MANAGEMENT SHEET

Report Title:	Communication and Engagement Strategy
Name of Committee:	Cabinet
Date of Meeting:	24 June 2025
Report Director:	Chief Officer - Digital and Communications
Portfolio:	Growth and Investment, Digital and Communications
Ward Relevance:	All
Prior Consultation:	Cabinet, Leadership Team, Scrutiny Committee 7 May 2025
Contact Officer:	Matthew Deaves
Public or Private:	Public
Report Subject to Call-In:	No
Report En-Bloc:	No
Forward Plan:	Yes
Corporate Priorities:	<p>This report relates to the following priority(ies):</p> <p><input type="checkbox"/> A Healthier Rugby – To support people to live healthier, longer, and more independent lives.</p> <p><input type="checkbox"/> A Thriving Rugby – To deliver a thriving economy which brings Borough-wide investment and regenerates Rugby Town Centre.</p> <p><input type="checkbox"/> A Greener Rugby – To protect the environment and ensure the Borough adapts to climate change.</p> <p><input type="checkbox"/> A Fairer Rugby – To reduce inequalities and improve housing across the Borough.</p> <p>Corporate Strategy 2025-2035</p> <p><input checked="" type="checkbox"/> This report does not specifically relate to any Council priorities but supports all of them</p>
Summary:	<p>The Communication and Engagement Strategy sets out a framework for how the authority will engage with and communicate with its many communities, including seldom heard communities and partners. It includes a Customer Charter setting out expectations for how we will respond to enquiries and what we expect of our residents.</p>

Financial Implications: There are no financial implications in adopting the Communication and Engagement Strategy.

Risk Management/Health and Safety Implications: There are no risk management/health and safety implications in adopting the Communications and Engagement Strategy.

Environmental Implications: A completed Environmental Impact Assessment is attached at Appendix 3. There are no environmental implications in adopting the Communications and Engagement Strategy.

Legal Implications: There are no legal implications in adopting the Communications and Engagement Strategy.

Equality and Diversity: A completed Equality Impact Assessment is attached at Appendix 2. The Communications and Engagement Strategy will result in a positive impact on equality.

Options:

1. Adopt the Communications and Engagement Strategy
2. Do not adopt the Communications and Engagement Strategy

Recommendation: IT BE RECOMMENDED TO COUNCIL THAT -

1. the Communications and Engagement Strategy, as at Appendix 1 to the report, be approved; and
2. delegated authority be granted to the Chief Officer – Digital and Communications to implement the strategy as appropriate and make minor changes to the strategy.

Reasons for Recommendation: To guide the council's communication and engagement activity.

Cabinet - 24 June 2025

Communication and Engagement Strategy

Public Report of the Chief Officer - Digital and Communications

Recommendation

IT BE RECOMMENDED TO COUNCIL THAT -

3. the Communications and Engagement Strategy, as at Appendix 1 to the report, be approved; and
4. delegated authority be granted to the Chief Officer – Digital and Communications to implement the strategy as appropriate and make minor changes to the strategy.

1. Executive Summary

- 1.1 A draft Rugby Borough Council Communication and Engagement Strategy has been produced. This is attached as Appendix 1 to this report.
- 1.2 Development of the draft strategy has been overseen by the Portfolio Holder for Growth, Investment, Digital and Communications and the Liberal Democrat spokesperson for Growth, Investment, Digital and Communications. It has been considered by the Council’s Scrutiny Committee at its meeting held on 7 May 2025.
- 1.3 Adoption of an up-to-date strategy is considered essential to setting out expectations for engaging with communities and using modern communications techniques including short-form video for social media.
- 1.4 By adopting a customer charter and establishing a framework for community engagement it is intended that services across the council will meet a minimum standard for all communication and engagement activity, supported by the council’s communications team.

2 Background

- 2.1 The Corporate Strategy seeks to deliver a healthier, thriving, greener and fairer Rugby. The Communication and Engagement Strategy supports all these objectives but particularly supports the healthier and fairer themes with their focus on engagement and on keeping communities informed.

- 2.2 The primary goal of the strategy is to ensure that the council engages, consults and communicates actively with residents, businesses and communities throughout the borough of Rugby.
- 2.3 The Council wants to make its communications accessible for everyone. This means producing materials that are easy to understand, so that residents can stay informed and participate in important discussions.
- 2.4 The Council also wants to reflect accurately the feelings of different communities through its projects and services. This means that engagement must be a two-way conversation.
- 2.5 To keep engagement activities relevant and effective, the Council will evaluate whether key messages are clear and well understood by communities and audiences. This analysis will help officers enhance clarity and impact.
- 2.6 The Council's customer charter sets out its commitment to residents and what they can expect from the customer service team, alongside the Council's expectations on how customers will treat staff.

3. Next steps

- 3.1 Officers will roll out the adopted Communication and Engagement Strategy to all Council services.
- 3.2 Councillors and officers will be provided with resources to help them ensure that they take every opportunity to engage and communicate effectively with their audiences.
- 3.3 To ensure that the Council has the best access to meaningful data with which it can monitor and evaluate its communications, officers will source a social media management tool. This will also help the Council to plan content ahead of time, creating suitable content for multiple social media platforms.

Name of Meeting: Cabinet
Date of Meeting: 24 June 2025
Subject Matter: Communication and Engagement Strategy
Originating Department: Digital and Communications

DO ANY BACKGROUND PAPERS APPLY YES NO

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A

Communication and Engagement

Our promise to communities



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Introduction

The goal of this strategy is to ensure that the council actively engages, consults, and communicates with residents, businesses, and communities throughout Rugby borough.

By keeping open lines of communication, we want to make it easier for everyone to participate and have a say in decisions that matter to you.

Our communications approach will serve as the foundation for all other strategies we implement, including the corporate strategy, economic strategy, climate change initiatives, and town centre regeneration project, amongst other activities.



Cllr Louise Robinson
Portfolio holder for Digital and Communications

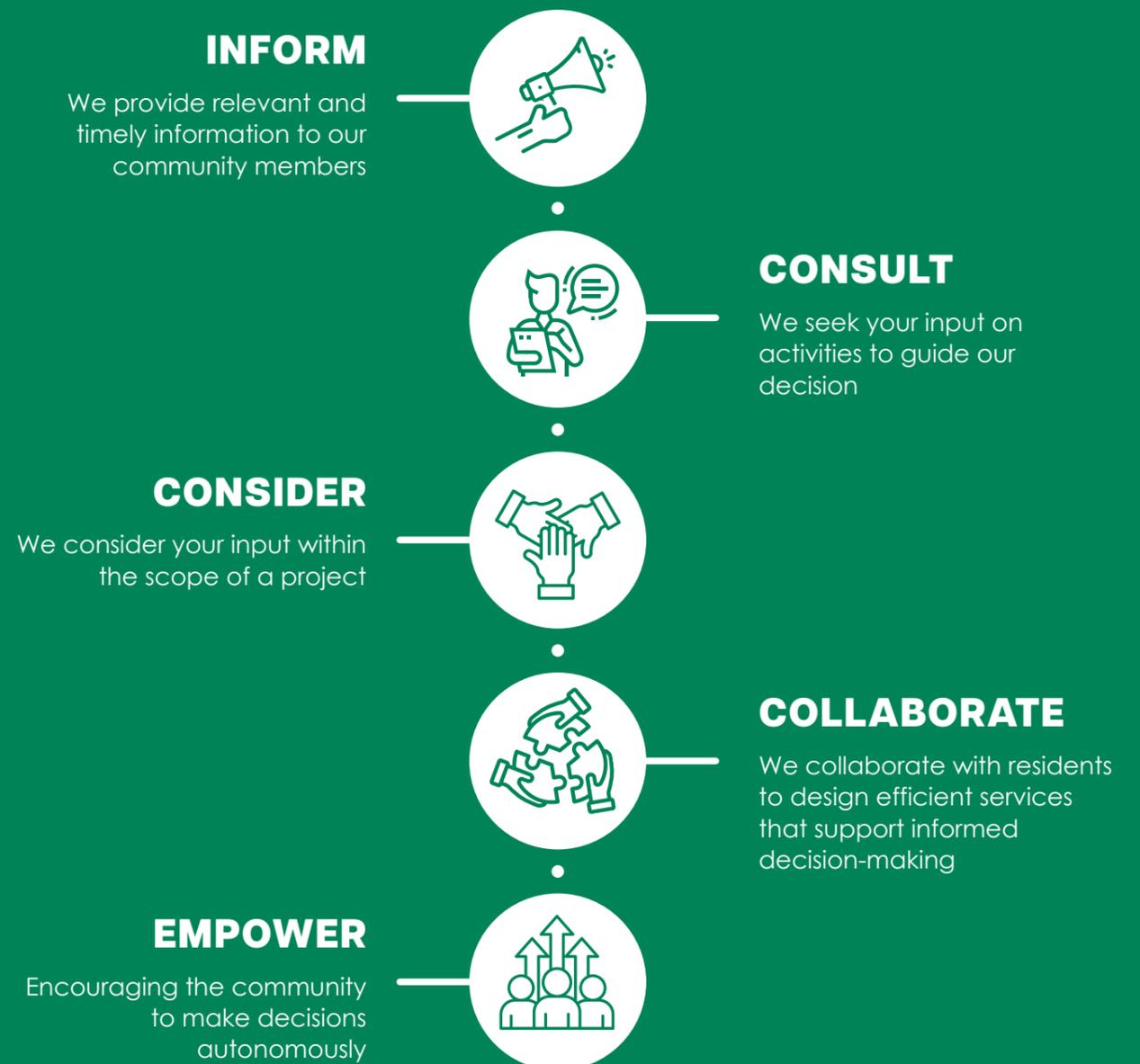


Cllr Isabelle McKenzie
Spokesperson for Liberal Democrats

Steps of engagement

Engagement is a crucial process that promotes meaningful interactions and strengthens relationships within communities. The steps of engagement have been designed to enable groups to be fully involved in the implementation process.

These steps encourage a sense of ownership, allowing residents to collaborate effectively towards achieving common goals with the council's operations.



What is meaningful engagement?

Meaningful engagement is your chance to be heard. Through consultations, we can include everyone and make sure our approach is open, honest, and easy to understand.

Effective engagement helps build a strong community, provide better services, and ensures that the needs and opinions of residents are taken into account when decisions are made. We will use different ways to communicate so we can reach the entire Borough.

Our goal is to make communication accessible for everyone. This means providing materials that are easy to understand, such as translations and digestible content in alternative formats, so that residents can stay informed and participate in important discussions.

We will also talk with our councillors to find out what the biggest issues are for people in our wards. By having honest conversations, we can identify solutions and create a plan that meets the needs of our communities.



Our vision for communications

Engagement must be a two-way conversation between us and you. We want to accurately reflect the feelings of different communities through our projects.

This helps us to create a vision of Rugby with the valuable input of the people living here. We ensure that all our resources are being used in the appropriate places to achieve the goals of our corporate strategy, a thriving, healthier, greener and fairer Rugby.

To make it easy for you to reach us, we diversify our communication channels through both digital and print media. Offer flexible consultation opportunities so that you can engage with us at your convenience. We will provide online participation options to ensure accessibility for all. Facilitate community workshops to create interactive spaces for dialogue and collaboration.



Our audiences

You are at the centre of everything we do. By using data and insights, we can tailor the communications we produce into different audiences. This helps us identify the best channels to communicate with you and refine our messages effectively.

We communicate in a way that meets your expectations, clear and effective without losing meaning. We focus on communities that are often overlooked, making sure our messages reach the right audiences so everyone gets the information they need.

Our key audiences are:

- Residents
- Local businesses
- Council housing tenants
- Community groups
- Partners
- Media
- Schools
- Charities
- Visitors to the borough
- Healthcare / community care
- Parish Councils
- WALC
- County Council
- NHS
- Warwickshire Police

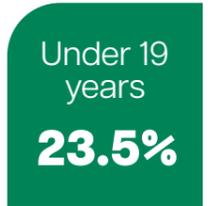
Rugby Borough demographics



Languages

English	85.6%	Portuguese	0.65%
Romanian	1.78%	Gujarati	0.52%
Polish	2.95%	Other languages	8.47%

Age



Population
114,400



Ethnic groups



¹ How life has changed in Rugby: Census 2021

How to get involved

Inform - We will ensure you're informed about consultation opportunities, using multiple communication channels to reach communities across the borough.

Consult - We will gather your input through online platforms, printed materials, focus groups, and more.

Consider - We will collect and review consultation results with relevant staff members.

Collaborate - We will adjust the project as needed to accurately reflect your views and feelings.

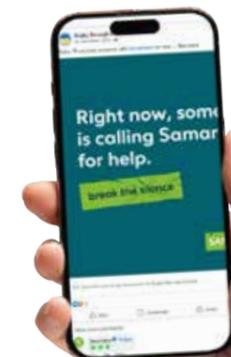
Empower - We will launch the final work and assess its effectiveness through key metrics and feedback.



How we'll communicate with you

We use the following methods to communicate with you and choose the most suitable channels to consult, involve, collaborate and empower you on projects or activities.

- Social media platforms (Facebook, Instagram, LinkedIn).
- Vertical video content (Instagram Reels and TikTok).
- YouTube
- Nextdoor
- Council website
- Leaflets, booklets and direct mail
- Surveys
- Posters
- Digital screens
- Rugby Borough Council app
- SMS messaging
- Roadshows
- Email marketing
- Press releases



Learning and improving

To keep our engagement activities relevant and effective, we focus on key objectives. By monitoring communication channels, we analyse their impact and reach. This data-driven approach helps us refine and improve future campaigns.

improving our communications:

We will assess whether our key messages are clear and understood by our communities and audiences. This analysis will help us refine our messaging for better clarity and impact.

It is essential that all communications are inclusive and accessible, ensuring they resonate with everyone. We will work to make our content easy to understand and available to all in the community.

In some cases, we may not be able to incorporate all of your feedback. When this happens, we will provide clear explanations throughout the project or activity.



Google Analytics for website traffic and social media analytics to track engagement metrics.



Regular reporting to track progress over time and identify trends or areas for improvement.



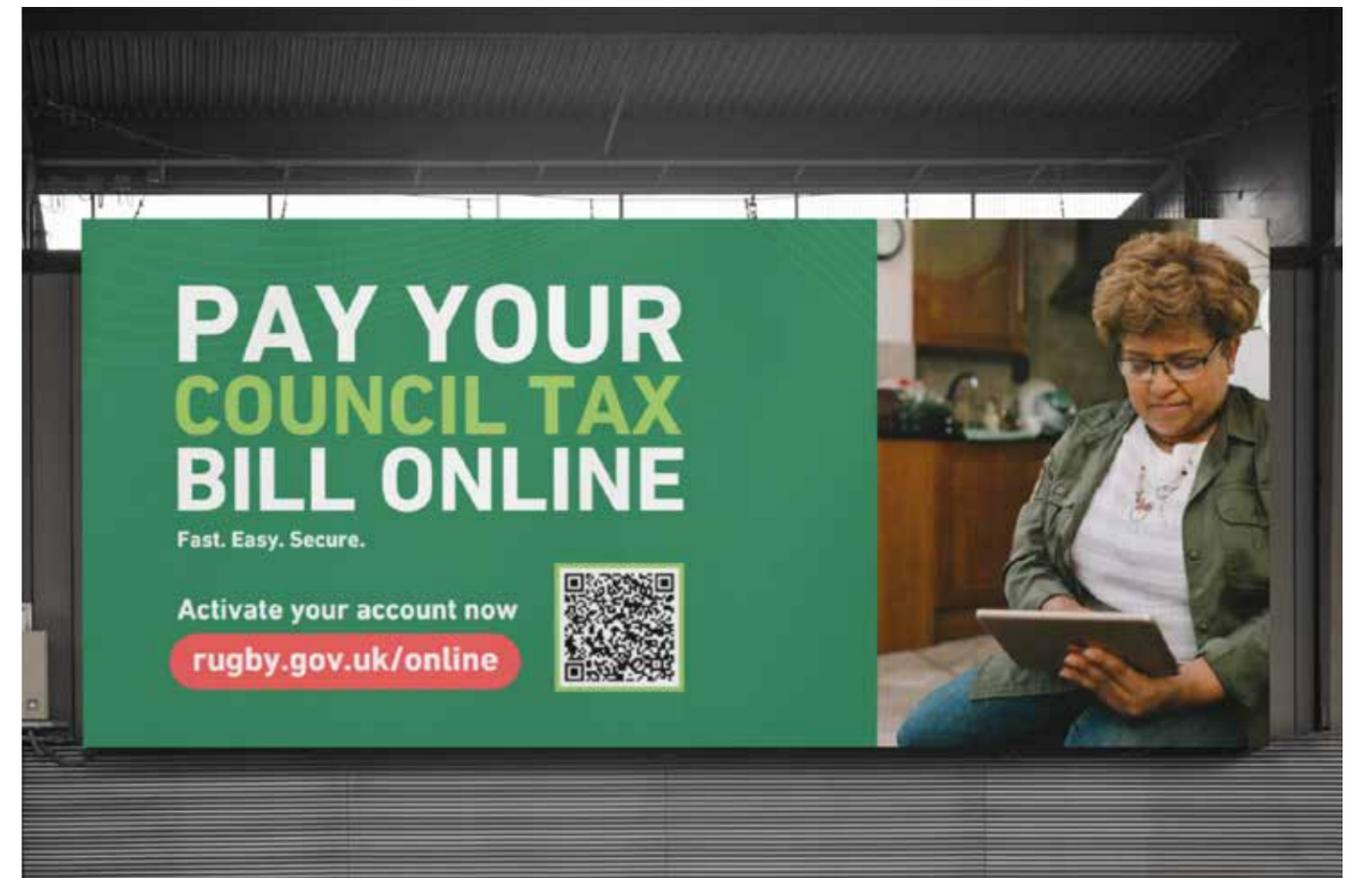
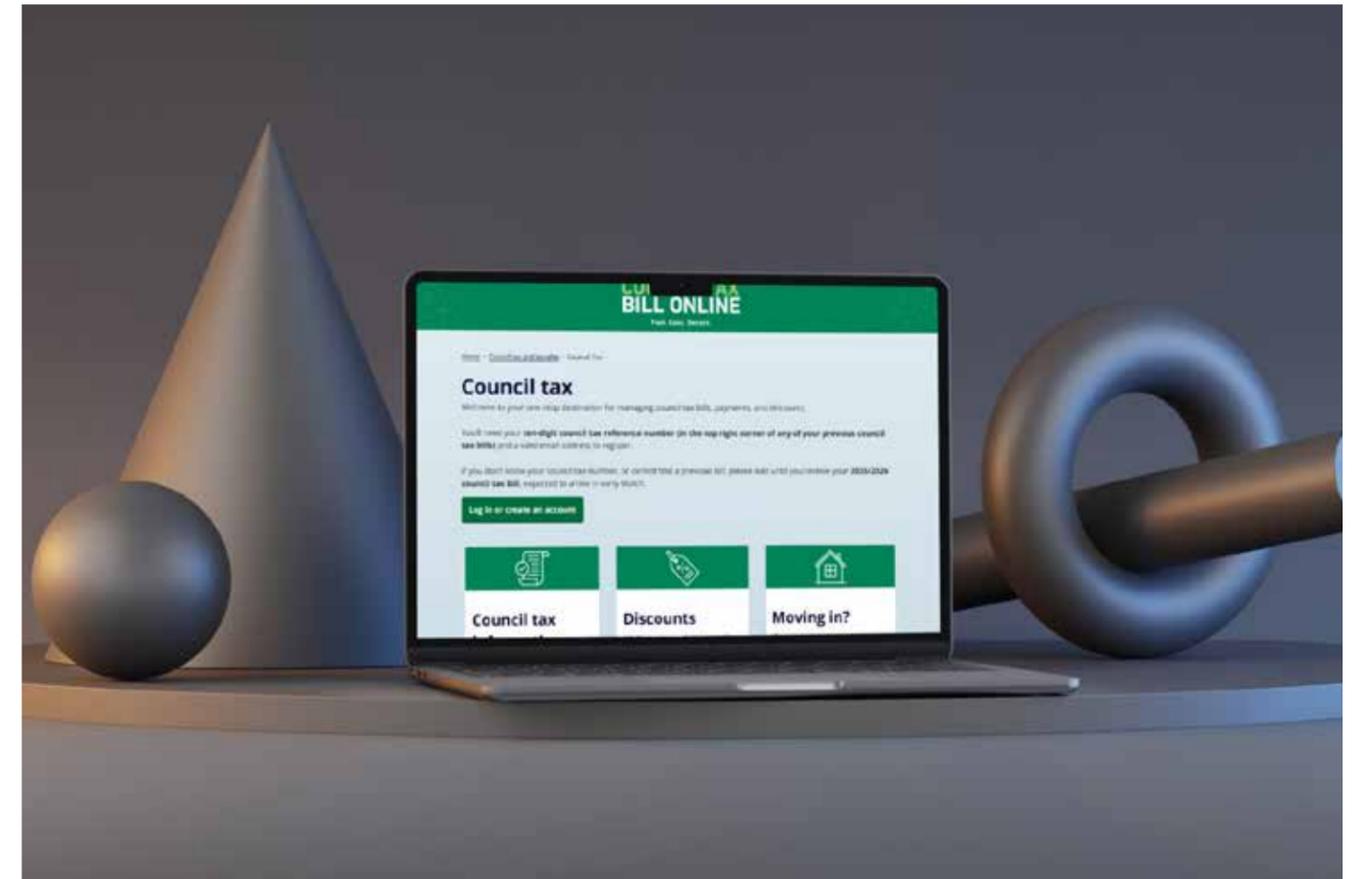
Social media management tool to plan our content ahead of time, creating the content in one place and pushing this out on multiple social platforms.

Case study: Council tax

We've launched a new online payment option to tackle long wait times for council tax queries. With dedicated funding, this initiative helps residents create online accounts, cutting down calls to our contact centre. Our easy-to-use portal lets people manage their accounts and update details whenever they want. To keep everyone informed, we're using a mix of digital and print

We've used a variety of advertising methods to reach all residents, including newspaper and magazine adverts, transport adverts, radio adverts across the borough, and paid social media targeting key groups. Our council tax digitisation project has achieved major milestones in its first year, successfully cutting contact centre calls by **1379** during the busiest period of council tax calls (comparing last years data* to this years) and proving the impact of our digital transformation.

* 23/24 = **9249**, 24/25 = **7870**





At Rugby Borough Council, we affirm a culture of high-performing, customer-first focused work. We are a Caring Council and put the needs of our residents, partners and local businesses and staff at the forefront of all the decisions we make and the actions we take.

We respond promptly to customer enquiries, concerns and complaints and escalate to the correct team and officers. We give customers reasonable expectations of timeframes and ensure their enquiry is handled professionally and confidentially.

We engage with residents and let them know the decisions we make and how they affect them and improve their lives. We highlight the work of our staff in the public domain and the environment the residents live in on a day-to-day basis.

Our expectations for customers:

- We expect our customers to treat all our staff with respect.
- We expect our customers not to abuse our staff in any way.
- We expect our customers to understand that we do not always have enough resources to immediately meet their needs but they will receive a response.
- We expect our customers to understand that we always do our best to provide excellent service.

Customer service expectations:

Email:

- Customers should always receive an acknowledgment of their enquiry, aiming to respond to an initial response to all enquiries within 3 working days.
- Enquiries should be forwarded to relevant departments and the customer should be informed that they will receive a response within 10 working days.
- Emails and enquiries should be logged and traceable.
- Plain and understandable language should be used for responses.
- Customer's personal details are protected and kept confidential, adhering to GDPR legislation. Customer information will not be shared with any third parties.

Town Hall:

- Our Meet & Greet reception staff, greet customers respectfully and work professionally to deal with customer's enquiries.
- Reception staff work professionally and efficiently, handling enquiries with equal importance and respect.
- Reception staff direct customers to the correct service, and where necessary provide contact details for the service that can help.
- Reception staff help and direct customers to online services, either online from the Town Hall or to be able access from home. Customers are sign-posted to our digital forms.
- We provide a clean, welcoming environment to all our customers.

Telephone:

- We treat all our customers with equality and respect. We handle data with respect and confidentiality and compliant with GDPR
- We introduce ourselves at the beginning of each call, so that the customer is aware of who we are talking to
- We solve customer enquiries at the first point of contact, or direct it to an officer who can return the call

Rugby Borough Council is committed to supporting the use of digital channels.

This will allow residents, businesses and communities to engage with us in a way which works for them.

This document contains hyperlinks, text, images and other interactive content. For best viewing experience we recommend using a digital device.

If you require this document in large print, an alternative accessible format or different language please contact:

Email - alternative-documents@rugby.gov.uk

Phone - 01788 533 588



Rugby Borough Council

Climate Change and Environmental Impact Assessment

CONTEXT

In 2019 the UK Parliament set a commitment in law to reach net zero carbon emissions by 2050. Achieving this target will require considerable effort with public bodies, private sector organisations, the third sector and individuals working together to take action.

Rugby Borough Council declared a climate emergency in 2019 and the Council's Corporate Strategy (2025-2035) [link](#) sets ambitious outcomes in relation to Climate Change. These ambitions are further defined through the Council's Climate Change Strategy [link](#) and must now be progressed through the decisions which the Council makes.

It is therefore important that Rugby Borough Council gives due regard to climate change when making decisions. In the context of the Council's business, Climate Change includes greenhouse gas emissions, biodiversity, habitat loss and environmental destruction. When putting forward recommendations for decision, officers must assess how these recommendations are likely to influence our climate change commitments by completing the following Climate Change and Environmental Impact Assessment.

To help you complete this assessment, please see the following guidance on SharePoint [here](#).

A copy of this Climate Change and Environmental Impact Assessment, including relevant data and information should be forwarded to your Chief Officer for approval.

If you require help, advice and support to complete the form, please contact your Chief Officer.

SECTION 1: OVERVIEW

Portfolio and Service Area	Digital and Communications
Policy/Service/Change being assessed	Communication and Engagement Strategy
Is this a new or existing Policy/Service/Change?	New strategy
If existing policy/service please state date of last assessment	
Ward Specific Impacts	None
Summary of assessment Briefly summarise the policy/service/change and potential impacts	While communication and engagement impact will be neutral, the strategy supports the Corporate Strategy which has a focus on a Greener Rugby
Completed By	Matthew Deaves, Dr Thomas Griffiths
Authorised By	
Date of Assessment	28 May 2025

SECTION 2: GREENHOUSE GAS EMISSIONS

	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Scope 1 Emissions Direct emissions from council owned resources, for example through boilers or vehicles.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	While communication and engagement impact will be neutral, the strategy supports the Corporate Strategy which has a focus on a Greener Rugby			
Scope 2 Emissions Indirect emissions occurring at the location energy is produced for council activities. For example, electricity generation for council buildings.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	While communication and engagement impact will be neutral, the strategy supports the Corporate Strategy which has a focus on a Greener Rugby			

SECTION 3: CLIMATE CHANGE STRATEGY

	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Workplaces and the Economy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	While communication and engagement impact will be neutral, the strategy supports the Corporate Strategy which has a focus on a Greener Rugby			
Transport	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	While communication and engagement impact will be neutral, the strategy supports the Corporate Strategy which has a focus on a Greener Rugby			
Natural Environment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	While communication and engagement impact will be neutral, the strategy supports the Corporate Strategy which has a focus on a Greener Rugby			
Homes and Energy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	While communication and engagement impact will be neutral, the strategy supports the Corporate Strategy which has a focus on a Greener Rugby			
Waste, Resources and the Circular Economy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	While communication and engagement impact will be neutral, the strategy supports the Corporate Strategy which has a focus on a Greener Rugby			

	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Climate and Nature Positive Communities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	While communication and engagement impact will be neutral, the strategy supports the Corporate Strategy which has a focus on a Greener Rugby			
Adaptation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	While communication and engagement impact will be neutral, the strategy supports the Corporate Strategy which has a focus on a Greener Rugby			

SECTION 4: REVIEW

Where a negative impact is identified, the proposal and/or implementation can be adapted or changed; meaning there is a need for regular review. This review may also be needed to reflect additional data and evidence for a fuller assessment (proportionate to the decision in question). Please state the agreed review timescale for the identified impacts of the policy implementation or service change.

Review date	
Key points to be considered through review	
Person responsible for review	
Authorised by	

EQUALITY IMPACT ASSESSMENT (EqIA)

Context

1. The Public Sector Equality Duty as set out under section 149 of the Equality Act 2010 requires Rugby Borough Council when making decisions to have due regard to the following:
 - eliminating unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Act,
 - advancing equality of opportunity between people who share a protected characteristic and those who do not,
 - fostering good relations between people who share a protected characteristic and those who do not, including tackling prejudice and promoting understanding.
2. The characteristics protected by the Equality Act are:
 - age
 - disability
 - gender reassignment
 - marriage/civil partnership
 - pregnancy/maternity
 - race
 - religion/belief
 - sex/gender
 - sexual orientation
3. In addition to the above-protected characteristics, you should consider the crosscutting elements of the proposed policy, such as impact on social inequalities and impact on carers who look after older people or people with disabilities as part of this assessment.
4. The Equality Impact Assessment (EqIA) document is a tool that enables RBC to test and analyse the nature and impact of what it is currently doing or is planning to do in the future. It can be used flexibly for reviewing existing arrangements but in particular should enable identification where further consultation, engagement and data is required.
5. The questions will enable you to record your findings.
6. Where the EqIA relates to a continuing project, it must be reviewed and updated at each stage of the decision.
7. Once completed and signed off the EqIA will be published [online](#).
8. An EqIA must accompany all **Key Decisions** and **Cabinet Reports**.
9. For further information, refer to the EqIA guidance for staff.
10. For advice and support, contact:
Rebecca Ewers
Corporate Equality & Diversity Officer
rebecca.ewers@rugby.gov.uk
01788 533509

Equality Impact Assessment

Service Area	Digital and Communications
Policy/Service being assessed	Communication and Engagement Strategy
Is this a new or existing policy/service? If existing policy/service please state date of last assessment	New strategy
EqlA Review Team – List of members	Matthew Deaves, Dr Thomas Griffiths
Date of this assessment	28 May 2025
Signature of responsible officer (to be signed after the EqlA has been completed)	

A copy of the completed and signed Equality Impact Assessment report, including relevant data and information to be forwarded to the Corporate Equality & Diversity Officer.

Details of Strategy/ Service/ Policy to be analysed

<u>Stage 1 – Policy to be analysed</u>	
(1) Describe the main aims, objectives and purpose of the Strategy/Service/Policy (or decision)?	The goal of this strategy is to ensure that the council actively engages, consults, and communicates with residents, businesses, and communities throughout the Rugby borough. By keeping open lines of communication, we want to make it easier for everyone to participate and have a say in decisions that matter most to you.
(2) How does it fit with Rugby Borough Council's Corporate priorities and your service area priorities?	Our communications approach will serve as the foundation for all other strategies we implement, including the corporate strategy, economic strategy, climate change initiatives, and town centre regeneration project, amongst other activities.
(3) What are the expected outcomes you are hoping to achieve?	Effective engagement helps build a strong community, provide better services, and ensures that the needs and opinions of residents are taken into account when decisions are made. We will use different ways to communicate so we can reach all residents within the borough. Our goal is to make our communications accessible for everyone. This means producing materials that are easy to understand, such as providing translations and accessible content in various formats, so that residents can stay informed and participate in important discussions.
(4) Does or will the policy or decision affect: <ul style="list-style-type: none"> • Customers • Employees • Wider community or groups 	Yes - all
(5) Will the policy or decision involve substantial changes in resources?	No

<p><u>Stage 2 – Evidence about user population and consultation</u></p>	<p>As a minimum you must consider what is known about the population likely to be affected which will support your understanding of the impact of the policy, e.g. service uptake/usage, customer satisfaction surveys, staffing data, performance data, research information (national, regional and local data sources).</p>
<p>(1) What does the data tell you about the groups this policy or decision impacts?</p> <p>Possible data sources:</p> <ul style="list-style-type: none"> • national statistics/census data • local statistics • evaluations • analysis of complaints • user feedback • outcomes from consultation/community voice • Council published information, service data • District and Ward Profile – Warwickshire Observatory • Office of National Statistics • Fingertips health profiles • Indices of Multiple Deprivation • RBC Annual Workforce Equality Report 	<p>Analysis of demographic data shows us that: The current population of Rugby borough is 114,400</p> <ul style="list-style-type: none"> • 61.4 per cent are in employment • 6.2 per cent are disabled and limited a lot, and ten per cent a little • 23.5 per cent are under 19, 18.5 are 20-34, 20.6 are 35-49, 19.2 are 50-64 and 18.2 are over 60. • 85.7 per cent are white, 2.7 are black, 7.6 are Asian and 2.8 are mixed. • 85.6 per cent speak English as a first language, 1.78 Romanian, 2.95 Polish, 0.65 Portuguese and 0.52 Gujarati. <p>The council’s communications and engagement will use this data to best communicate and engage with all of our communities, including seldom heard communities.</p> <p>In addition, the council will make resources available in alternative formats where this would assist communities and where this is the best way to meet their needs.</p>

Appendix 3

<p>(2a) Have you consulted or involved those groups that are likely to be affected by the strategy/ service/policy you want to implement?</p> <p>If yes, please state which groups were involved in the consultation and what were their views and how have their views influenced the policy/decision?</p>	<p>We have consulted with the portfolio holder and Liberal Democrat spokesperson, Leadership Team, internal service areas and with the Scrutiny Committee.</p> <p>This has helped to broaden the scope of the strategy to include partners among our key audiences, and give an emphasis on engaging with seldom heard communities.</p>		
<p>(2b) If you have not consulted or engaged with communities that are likely to be affected by the policy/decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary.</p>	<p>The purpose of the strategy is to increase engagement with seldom heard communities.</p>		
<p><u>Stage 3 – Analysis of impact</u></p>			
<p>(1) <u>Protected Characteristics</u> From your data and consultations is there any positive, adverse or negative impact identified for any particular group, which could amount to discrimination?</p> <p>If yes, identify the groups and how they are affected.</p>	<p>Protected Characteristic</p>	<p>Nature of Impact Positive, Neutral, Adverse (explain why)</p>	<p>Extent of impact Low, medium, high</p>
	<p>Age</p>	<p>Positive Data shows that nearly 1 in 5 residents is under 19. New formats such as short-form video aim to better reach these residents</p>	<p>Medium</p>
	<p>Disability</p>	<p>Positive A better understanding of needs will ensure that alternative formats are made available where this will be helpful.</p>	<p>Low</p>

Appendix 3

	Sex	Neutral	
	Gender reassignment	Neutral	
	Marriage/civil partnership	Neutral	
	Pregnancy/maternity	Neutral	
	Race	Positive Alternative language and format provision will be made available where this will be helpful	Low
	Religion/belief	Neutral	
	Sexual Orientation	Positive Communications and engagement will seek to increase representation	Low
(2) <u>Cross cutting themes</u> (a) Are your proposals likely to impact on social inequalities e.g. child poverty, geographically disadvantaged communities? If yes, please explain how?	Description of impact	Nature of impact Positive, Neutral, Adverse (explain why)	Extent of impact Low, medium, high
	Socio-economic e.g.: child poverty, income level, education level, working hours/occupation, family/social support, access to good nutrition	Neutral While communication and engagement impact will be neutral, the strategy supports the Corporate Strategy which has a focus on a Fairer Rugby	

Appendix 3

	<p>Environmental e.g.: housing status, transport links, geography, access to services, air quality, noise pollution</p>	<p>Neutral While communication and engagement impact will be neutral, the strategy supports the Corporate Strategy which has a focus on a Greener Rugby</p>	
<p>(3) Using the information gathered in stages 2 and 3, please describe how the policy/strategy/service will:</p> <ul style="list-style-type: none"> a. Eliminate unlawful discrimination, harassment, victimisation and any other unlawful conduct prohibited by the act b. Advance equality of opportunity between people who share and people who do not share a relevant protected characteristic c. Foster good relations between people who share and people who do not share a relevant protected characteristic 	<p>The strategy goal is to increase engagement with all of Rugby's communities and ensure that all communities are better informed on council services and how they can be influenced. This will improve access to services for all communities, and increase understanding of factors that affect residents with protected characteristics.</p>		
<p>(4) Are there any obvious barriers to accessing the service? If yes, how can they be overcome?</p>	<p>The strategy goal is to improve engagement with all communities.</p>		

Appendix 3

<p>(5) What Equality Monitoring Data will be collected to analyse impact? How will the Equality Monitoring Data collected be used?</p> <p>If no Equality Monitoring Data is being collected, why not?</p> <p>For support with this section, please refer to the Equality Monitoring Guidance.</p>	<p>Where available, we will use analytics to identify communities that have been reached/engaged. This data will be used to modify our communications approach to best reach our target audiences. A social media management tool will assist with this, where communications are digital.</p>
<p>(6) Complete this section if any adverse impacts were identified in 3.1.</p> <p>Outline any actions that will be taken to remove or mitigate the adverse impacts identified in 3.1 to ensure that no discrimination is taking place. If removing or mitigating the impact is not possible, you may in certain circumstances, justify the discrimination. If that is the case, please give evidence for why justifying is possible in this case.</p>	

<p><u>Stage 4 – Action Planning, Review and Monitoring</u></p>	
<p>(1) Data analysis What does feedback from Equality Monitoring Data gathered tell you about impact on groups? Were there any unforeseen impacts (positive or negative)?</p> <p>The feedback/data should be used to inform your Action Plan in (2)</p>	

<p>If No Further Action is required then go to – Review and Monitoring</p> <p>(2) Action Planning – Specify any changes or improvements that can be made to the service or policy to mitigate or eradicate negative or adverse impact on specific groups, including resource implications.</p>	<p>EqlA Action Plan</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Action</th> <th style="text-align: left;">Lead Officer</th> <th style="text-align: left;">Date for completion</th> <th style="text-align: left;">Resource requirements</th> <th style="text-align: left;">Comments</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>					Action	Lead Officer	Date for completion	Resource requirements	Comments																				
Action	Lead Officer	Date for completion	Resource requirements	Comments																										
<p>(3) Review and Monitoring State how and when you will monitor policy and Action Plan. Will you make any changes to the Equality Data that you are collecting or how you are collecting/using the data?</p>																														

Please annotate your policy with the following statement:

‘An Equality Impact Assessment on this policy was undertaken on (date of assessment) and will be reviewed on (insert review date).’

AGENDA MANAGEMENT SHEET

Report Title: Appointments to Working Groups 2025/26

Name of Committee: Cabinet

Date of Meeting: 24 June 2025

Report Director: Acting Chief Executive

Portfolio: Finance and Performance, Legal and Governance

Ward Relevance: N/A

Prior Consultation: Group Leaders

Contact Officer: Claire Waleczek, Democratic and Support Services Manager claire.waleczek@rugby.gov.uk

Public or Private: Public

Report Subject to Call-In: Yes

Report En-Bloc: No

Forward Plan: Yes

Corporate Priorities: This report relates to the following priority(ies):
 A Healthier Rugby – To support people to live healthier, longer, and more independent lives.
 A Thriving Rugby – To deliver a thriving economy which brings Borough-wide investment and regenerates Rugby Town Centre.
 A Greener Rugby – To protect the environment and ensure the Borough adapts to climate change.
 A Fairer Rugby – To reduce inequalities and improve housing across the Borough.
[Corporate Strategy 2025-2035](#)
 This report does not specifically relate to any Council priorities but the Council is a responsible, effective and efficient organisation

Summary: Cabinet is requested to consider which Working Groups be re-constituted for 2025/26 and appoint the membership of each group.

Financial Implications: There are no direct financial implications arising from this report.

Risk Management/Health and Safety Implications:	There are no direct risk management implications arising from this report.
Environmental Implications:	There are no direct environmental implications arising from this report.
Legal Implications:	There are no direct legal implications arising from this report.
Equality and Diversity:	There are no direct equality and diversity implications arising from this report.
Options:	N/A
Recommendation:	<ol style="list-style-type: none"> (1) The Equality and Diversity Steering Group be renamed the Equality and Diversity Working Group and be formally appointed to; (2) the membership of each Working Group for the 2025/26 municipal year, as detailed in paragraph 2 of the report, be approved; (3) members of all working groups note that they represent the views of their political group at meetings and provide regular feedback to them on workstreams; (4) each working group review its terms of reference at its first meeting of the municipal year; (5) delegated authority be given to the Monitoring Officer, in consultation with the relevant Chair, to disestablish any working group that has completed its business and is no longer required; and (6) the Asset Management Working Group and the Economic Strategy Working Group be disestablished.
Reasons for Recommendation:	Cabinet needs to decide which Working Groups are required to carry out business in 2025/26.

Cabinet - 24 June 2025

Appointments to Working Groups 2025/26

Public Report of the Acting Chief Executive

Recommendation

- (1) The Equality and Diversity Steering Group be renamed the Equality and Diversity Working Group and be formally appointed to;
- (2) the membership of each Working Group for the 2025/26 municipal year, as detailed in paragraph 2 of the report, be approved; and
- (3) members of all working groups note that they represent the views of their Group at meetings and provide regular feedback to them on workstreams;
- (4) each working group review its terms of reference at its first meeting of the municipal year;
- (5) delegated authority be given to the Monitoring Officer, in consultation with the relevant Chair, to disestablish any working group that has completed its business and is no longer required; and
- (6) the Asset Management Working Group and the Economic Strategy Working Group be disestablished.

1. EXECUTIVE SUMMARY

- 1.1 Cabinet is requested to consider which working groups need to be re-constituted for 2025/26 in order that they can proceed with their business and work programmes.

2. DISESTABLISHMENT OF WORKING GROUPS

- 2.1 It is recommended that the following working groups be disestablished:

Asset Management Working Group – the working group has not met since November 2023 and its workstreams have been incorporated within the Town Centre Regeneration Working Group.

Economic Strategy Working Group - it has achieved its purpose to develop an Economic Strategy.

3. MEMBERSHIPS OF WORKING GROUPS FOR 2025/26

- 3.1 It is proposed that the Equality and Diversity Steering Group be renamed the Equality and Diversity Working Group and be formally appointed to.
- 3.2 Group Leaders have been consulted based on the proposals within the report and have provided nominees for each working group for 2025/26 as detailed below.
- 3.3 The Conservative Group has informed the Acting Chief Executive that, with the exception of the Equality and Diversity Working Group, Civic Honours Working Group and Climate Emergency Working Group, it will not have representation on other working groups.

Civic Honours Working Group

Councillors Garcia, Mistry and Roodhouse.

Climate Emergency Working Group

Councillors S Edwards, Harrington, Henderson, Livesey, McKenzie and Willis.

Constitution Review Working Group

Councillors Brown and Lewis.

Equality and Diversity Working Group

Councillors Garcia, Hassell, O'Rourke, Sayani and Trimble.

Planning Services Working Group

Councillors Karadiar, McKenzie, Moran, Robinson and Sandison.

Town Centre Regeneration Working Group

Councillors Moran, Robinson, Roodhouse and Thomas.

Twinning Working Group

Councillors Bennett, Brown, S Edwards and Livesey.

4. ROLE OF GROUP REPRESENTATIVES ON WORKING GROUPS

- 4.1 Members are appointed to represent their Group's views and ideas at working groups within their respective terms of reference. It is important, therefore, that Members provide feedback to their relevant political group about working groups on which they sit to ensure all Members are kept informed of progress on workstreams.

5. REVIEW OF TERMS OF REFERENCE FOR EACH WORKING GROUP

- 5.1 The first item of business for each working group for this municipal year will be to review its terms of reference. If it is considered that business has been completed, it is proposed that delegated authority be given to the Monitoring Officer, in consultation with the Chair, to disestablish the relevant working group.

Name of Meeting: Cabinet
Date of Meeting: 24 June 2025
Subject Matter: Appointments to Working Groups 2025/26
Originating Department: Legal and Governance

DO ANY BACKGROUND PAPERS APPLY YES NO

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A

Agenda No 10

AGENDA MANAGEMENT SHEET

Report Title:	Finance and Performance Monitoring 2024/25 - Year-End
Name of Committee:	Cabinet
Date of Meeting:	24 June 2025
Report Director:	Chief Officer - Finance and Performance
Portfolio:	Finance, Performance, Legal and Governance
Ward Relevance:	All Wards
Prior Consultation:	All Group Leaders
Contact Officer:	Tom Rowland, Interim Finance Manager Tom.Rowland@rugby.gov.uk
Public or Private:	Public
Report Subject to Call-In:	Yes
Report En-Bloc:	No
Forward Plan:	Yes
Corporate Priorities:	This report relates to the following priority(ies): <input type="checkbox"/> A Healthier Rugby – To support people to live healthier, longer, and more independent lives. <input type="checkbox"/> A Thriving Rugby – To deliver a thriving economy which brings Borough-wide investment and regenerates Rugby Town Centre. <input type="checkbox"/> A Greener Rugby – To protect the environment and ensure the Borough adapts to climate change. <input type="checkbox"/> A Fairer Rugby – To reduce inequalities and improve housing across the Borough. Corporate Strategy 2025-35 <input checked="" type="checkbox"/> This report does not specifically relate to any Council priorities but supports all of them
Financial Implications:	As detailed in the main report.
Risk Management/Health and Safety Implications:	This report is intended to give Cabinet an overview of the Council's spending and performance position for 2024/25 to inform future decision-making.

Environmental Implications:	There are no environmental implications arising from this report and no environmental assessment is required for this report.
Legal Implications:	There are no legal implications arising from this report.
Equality and Diversity:	No new or existing policy or procedure has been recommended, and no Equalities Impact Assessment is required for this report.
Options:	Members can elect to approve, amend or reject the reserve contributions as listed in paragraph 2.18
Recommendation:	<ol style="list-style-type: none"> 1) The Council's anticipated financial position for 2024/25 in Sections 1 to 4 and Appendices One and Two be considered. 2) General Fund capital project reprofiling detailed in paragraph 2.24 and Appendix One be noted and the budget added to the 2025/26 programme. 3) HRA capital project reprofiling detailed in paragraph 3.14 and Appendix Two be noted and the budget added to the 2025/26 programme. 4) HRA revenue carry forward requests of £0.135m as detailed in section 3.9 be approved and the budget added to the 2025/26 programme. 5) A General Fund revenue reserve transfer of (£0.063m) from additional grant funding income, as detailed within Appendix one, to be transferred to the Budget Stability Reserve, be approved. 6) Performance summary & performance data included in Section 5 be considered & noted.
Reasons for Recommendation:	A strong financial and performance management framework, including oversight by Members and the Leadership Team, is an essential part of delivering the Council's Corporate Strategy.

Cabinet - 24 June 2025

Finance & Performance Monitoring 2024/25- Year-End

Public Report of the Chief Financial Officer

Recommendation

- 1) The Council's anticipated financial position for 2024/25 in Sections 1 to 4 and Appendices One and Two be considered.
- 2) General Fund capital project reprofiling detailed in paragraph 2.24 and Appendix One be noted and the budget added to the 2025/26 programme.
- 3) HRA capital project reprofiling detailed in paragraph 3.14 and Appendix Two be noted and the budget added to the 2025/26 programme.
- 4) HRA revenue carry forward requests of £0.135m as detailed in section 3.9 be approved and the budget added to the 2025/26 programme.
- 5) A General Fund revenue reserve transfer of (£0.063m) from additional grant funding income, as detailed within Appendix one, to be transferred to the Budget Stability Reserve, be approved.
- 6) Performance summary & performance data included in Section 5 be considered & noted.

Executive Summary

The purpose of this report is to provide the final outturn position for 2024/25. It combines finance (revenue and capital) as well as performance for the General Fund (GF) and Housing Revenue Account (HRA). The year-end position for 2024/25 is based on actual expenditure from 01 April 2024 to 31 March 2025.

Please note that this financial position is subject to change following the outcome of the external audit review of the Statement of Accounts with any changes to be reported as part of the 2025/26 quarterly monitoring exercises.

The key findings of this report are as follows:

- **General Fund Revenue (GF)** – across the council there is a final variance of £0.653m compared to the expenditure budget of £21.746m. After the funding variance of £0.458m is also taken into account, the overall net position is £1.111m. The service variance was £2.560m, which was partly offset from savings in the net cost of borrowing.
- **General Fund Corporate and Earmarked Reserves** – reserves have a balance of (£35.563m) at 31 March 2025. This includes (£25.375m) of corporate reserves and (£10.189m) of earmarked reserves.
- **General Fund Capital Programme** – the revised approved GF capital programme for 2024/25 is £9.507m. The programme shows a net variance at year-end of (£0.288m).
- **General fund savings programme** – the council has delivered 93%, (£2.835m) of savings against a 2024/25 target of (£3.033m).
- **Housing Revenue Account (HRA)** – the final outturn reports a balanced position, after reducing the contribution to capital by £0.590m.
- **Housing Revenue Account Capital Programme** – the approved HRA capital programme for 2024/25 is £23.526m. The programme shows a net variance of (£0.391m).
- **Collection Fund** – the final outturn has resulted in a council tax surplus of (£0.272m) and a business rates deficit of £0.520m.
- **Performance measures** – final year performance measures are detailed in Section 5.

1. BACKGROUND

- 1.1. Local Authorities have a requirement to account separately for core operational services and the provision of dwellings. This is achieved by creating two reporting functions. The General Fund and the Housing Revenue Account.

- 1.2. The General Fund is the main revenue account of the local authority, which includes day-to-day income and expenditure on the provision of services. Activities within the General Fund include waste and recycling, parks and recreation and regulatory services.
- 1.3. The Housing Revenue Account is a statutory requirement for local authorities with a council housing stock. It contains all the expenditure and income relating to the direct provision of that stock. Included in the Housing Revenue Account are elements such as rent, service charges, maintenance, repairs, and property management.
- 1.4. The Council takes a multiyear approach to its budget planning and monitoring, recognising that the two are inextricably linked. At three-month intervals officers provide their latest forecast expectations for each of the reporting units. This report provides the final outturn for the council based on the information available at 31 March 2025.
- 1.5. Throughout the report, pressures on expenditure and income shortfalls are shown as positive values. Savings on expenditure and additional income are shown in brackets.
- 1.6. This report also contains an update on the Collection Fund and the performance measures that are seen as fundamental to the Council's continued focus on improving its offering to the local community.

2. GENERAL FUND (GF)

2.1. GF Operating Position (Appendix One)

2.2. The 2024/25 General Fund revenue outturn position is summarised below.

Table One: General Fund Revenue Outturn

Type	Revised Budget £000	2024/25 Outturn £000	Outturn Variance to Budget £000
General Fund services	20,169	22,729	2,560
Corporate items	(1,607)	(3,514)	(1,907)
Reserves	3,184	3,184	0
Total	21,746	22,400	653
Grants	(2,648)	(2,711)	(63)
Business Rates	(9,074)	(8,555)	520
Council Tax	(10,023)	(10,023)	0
Total Funding	(21,746)	(21,289)	458
Total Net Position	0	1,111	1,111

2.3. Across the Council there is a final variance of £0.653m compared to the expenditure budget of £21.746m. After taking into account the funding variance of £0.458m, the net overall position is £1.111m. The service variance was £2.560m, which was offset from savings in the net cost of borrowing and Minimum Revenue Provision (see paragraph 2.11).

- 2.4. Where a combined Portfolio variance totals +/- £0.100m, the main contributing factors are shown below. Further details of Portfolio variances can be found in Appendix One.
- 2.5. Communities and Homes, Regulation and Safety is reporting a variance of **£0.155m**.
- **£0.102m - Housing Advice and Benefits Team Staff Costs** – Difficulty in recruiting experienced Housing Benefit staff due to the national transition over to the Universal Credit scheme. As a result of the move over to Universal Credit, people in the industry are less likely to train in Housing Benefit Administration, meaning the service is trying to recruit from an even smaller and more competitive pool of applicants, many of whom aspire to 100% remote working. Agency workers have been employed to keep up with the workload and allow the team to satisfy their statutory duties. If people fall into crisis as a result of delays in administering claims, then this could potentially increase homelessness.
 - **(£0.133m) – Housing Advice and Benefits Team Accommodation Charge** – Due to the successful Private Rented Sector Leasing scheme and the work carried out by the Housing team on homelessness prevention, the need for emergency accommodation has significantly reduced during 2024/25.
- 2.6. Finance, Performance, Legal and Governance reports a variance of **£0.680m**.
- **£0.177m – Finance and Performance Staff Costs** – Following on from a difficult year of recruitment in 2023/24, a vacant Lead Accountant position, long term sickness and maternity leave has resulted in agency workers still being required to cover roles within the Financial Services. Agency staff have been required in the Revenues team to deal with a backlog of IT issues in relation to the CIVICA system plus coverage for sickness also. Finally, the Corporate Assurance team have filled 2 vacant roles with agency whilst posts are trying to be filled. Experienced agency staff with the right skills are highly sought after and come at a premium cost. Failure to cover key roles would have had a significant impact on delivery in the year.
 - **£0.178m – General Financial Services External Audit Fees** - The contract price of external audit fees was only communicated after the budget was set. In addition to that the 2023/24 external audit resulted in additional costs on top of the original contract price. The fees are set nationally and going forward, the budget will reflect the current contract price based on the information we know at the time of producing the next year's budget.
 - **£0.131m – Revenues Grant income** – Historical budget relating to grant income which previously was being received to cover the cost of additional admin work for extra reliefs / payments given to residents and businesses especially over the COVID-19 period. These grants have ended and no income was received during 2024/25. The budget will be reviewed during the 2026/27 budget setting process to identify an appropriate budget going forward.

2.7. Growth and Investment, Digital and Communications is reporting a variance of **£0.306m**.

- **£0.861m - Planning Services, Planning Income** - Applications are lower than the budgeted target. Ongoing uncertainty in the global economic market, interest rate levels and cost of living concerns is making investors and individuals more cautious about commencing development. Impact from initially the General Election in July 24 and then the scheduled Budget by the new Government at end of Oct 24 adding further uncertainty and meaning the submission of major applications in particular are being delayed or held back.
- **(£0.150m) – Town Centre Improvements Development Activities** - Earmarked for shop front facade improvements to supplement allocated UKSPF budget. The amount to be spent was not known until January 2025 when the call for projects was closed. Fewer applications than expected were received and therefore this budget was not utilised on this occasion.

2.8. Partnership and Wellbeing is reporting a variance of **£0.462m**.

- **£0.141m – Rugby Art Gallery Business Rates** – A check and challenge was submitted for the 2017 business rates listing which was successful and resulted in the Rugby Art Gallery Museum being revalued to £1. The Council was reimbursed for this in 2023/24 and it was decided to remove the business rates budget from the service with the intention that the Art Gallery will be revalued to £1 in future years. Another claim has been submitted for the 2023 listing and upon success of the check and challenge, the Council will be reimbursed - hopefully during 2025/26 - with the income being transferred to the Budget Stability Reserve to offset the 2024/25 business rates costs that we have to pay until the check and challenge is complete.
- **£0.134m – Parks & Open Spaces Maintenance & Repairs** - Higher-than-expected levels of maintenance and repairs of play areas partly due to vandalism and equipment needing to be made safe. There have also been increased fencing works due to deterioration of adopted infrastructure. The service intends to review the arrangements for these activities. This includes embedding in the planning process the use of non-wooden street furniture and infrastructure. This should prolong the life of the asset as well as aiding the Council's sustainability and environmental aspirations.
- **£0.134m – Sports & Recreation Income** - Vacancies covering permanent and casual staff have played a part in the income shortfall across On-Track, Play and Recreation and Sports Development. There is an ongoing recruitment campaign to fill the vacancies within the service. The Service is currently embarking on identifying additional income opportunities. This could include corporate sponsorship and additional grant funding.

2.9. Operations and Traded Services is reporting a variance of **£0.738m**.

- **£0.220m – Domestic Refuse Service External Contractors** – Less than expected income received for recycling materials, increased haulage costs for materials from the waste depot in Rugby to the end destination such as Sherbourne Recycling Facility and increased costs relating to contaminated waste. The increase in costs have been offset partially by additional income from Warwickshire County Council for Recycling Credits and reimbursement for transport costs for journeys outside of the borough.
- **£0.587m – Refuse Service Staff costs** – The high levels of staff sickness and absence have necessitated the need to turn to the agency market to ensure that the service continues to operate. There is also the need to use agency staff to cover holiday periods. The service is working with HR to help manage sickness levels as well as exploring initiatives to deliver efficiencies across working practices. A pool of staff has been created for 2025/26 to help reduce the need to employ agency staff.

2.10. Chief Executive is reporting a variance of **£0.136m**.

- **£0.136m** – Corporate consultancy and legal support

2.11. Corporate Items is reporting a variance of **(£1.907m)**.

- **(£2.161m) – Net cost of borrowing** - The pressures on General Fund services are being alleviated by a saving in the net cost of borrowing. Interest rates were budgeted at a prudent and responsible level. With the Bank of England continuing to keep rates at an elevated level the Council has continued to see a benefit during 2024. This benefit cannot be relied upon in future periods as the expectation remains that at some point interest rates will begin to fall.
- **(£0.160m) – Minimum Revenue Provision** - Fewer 2023-24 capital schemes required financing from borrowing, resulting in a reduced charge to revenue in the subsequent year.
- **£0.460m – Corporate Savings Target** – Not all budgeted savings were delivered. Additional governance measures will be included in 2025/26 to track progress against the increased savings target and ensure appropriate corrective action is taken for any areas where efficiencies have not been realised.

2.12. **GF Corporate and General Fund Earmarked Reserves (Appendix One)**

2.13. Corporate Reserves have a balance of (£25.375m) at 31 March 2025 which is a movement of (£2.243m) since 31 March 2024. Details can be found in Appendix One.

2.14. Other earmarked reserves managed within services are (£10.189m) which is a movement of (£1.254m) since 31 March 2024. Details of this movement can be found in Appendix One.

2.15. **GF Savings Programme (Appendix One)**

2.16. The councils 2024/25 savings programme totalled (£3.033m). 93% (£2.835m) of the savings have been delivered. The balance of (£0.198m) were undelivered during the year.

2.17. Even though the red rated savings have not been delivered, work will continue in order to achieve them in future years. A list of the undelivered savings is detailed in Appendix One.

2.18. The impact of non-delivery means that the Councils will be required to deliver additional savings proposals to ensure a balanced Medium Term Financial Plan.

2.19. **GF Capital Programme**

2.20. The approved General Fund capital programme was £9.507m. Reprofiling and savings have resulted in a 2024/25 outturn of (£0.288m).

Table Four: General Fund Capital Programme

Type	Revised Budget £000	Budget Reprofiling £000	Reprofiled Budget £000	2024/25 Outturn £000	Outturn Variance to Budget £000	Q3 Forecast £000
GF Capital	9,507	(2,274)	7,233	6,945	(288)	8,243

2.21. Of the reported saving of (£0.288m) against this year's programme, (£0.294m) is relating to the Housing Acquisitions Scheme. There were no General Fund properties that met the requirements during 2024/25. This budget is being returned as a saving at year-end as it is not a sufficient value for the type of accommodation required. Temporary accommodation will continue to be actively sought during 2025/26, and relevant budgets will be sought via a Council report as and when required.

2.22. There is (£2.274m) of capital reprofiling. This is spread across several small schemes, the details of which can be found in Appendix One.

2.23. A detailed summary of all the GF Capital programme for 2024/25 is shown in appendix One.

2.24. **Capital Budget Reprofiling**

2.25. Budget reprofiling on the capital programme arises when the approved scheme is not completed in the year in which the budget was approved. Details of the reprofiling on both the General Fund and the Housing Revenue Account is detailed in Appendix One and Two.

2.26. The reprofiling relating to the 2024/25 programme has been presented to the budget working group and has been approved by the Chief Officer – Finance and

Performance under delegated powers as detailed in the 2024/25 Capital Strategy. Progress on the delivery of the schemes will continue to be reported as part of the quarterly reports to Cabinet.

2.27. Capital Programme Financing

2.28. The below table sets out how the 2024/25 General Fund capital programme has been financed.

Table Five: GF Capital Financing

Portfolio	Direct Revenue Financing	Borrowing	Section 106	Government Grant	Capital Receipts	Total
	£000	£000	£000	£000	£000	£000
Communities & Homes, Regulation & Safety	0	1,740	0	833	1,095	3,668
Growth & Investment, Digital & Communications	0	356	0	1,078	0	1,434
Partnership & Wellbeing	0	82	210	408	0	700
Operations & Traded Services	92	38	9	0	1,004	1,143
Grand Total	92	2,216	219	2,319	2,099	6,945

3. HOUSING REVENUE ACCOUNT (HRA)

3.1. HRA Operating Position (Appendix 2)

3.2. Housing rents were set by Council on 6 February 2024. Rent increases for 2024/25 were capped at 7.7% as announced in the Autumn Budget Statement on 22 November 2023.

3.3. The 2024/25 HRA revenue outturn position is summarised below.

Table Six: HRA Revenue Outturn Position

Type	Revised Budget £000	2024/25 Outturn £000	Carry Forward £000	Outturn Variance to Budget £000
Income	(19,806)	(19,837)	0	(31)
Expenditure	15,240	16,051	135	946
HRA share of Corporate Democratic Core	318	353	0	35
Cost of HRA services	(4,249)	(3,433)	0	950
Interest and investment income/expense	(11)	(371)	0	(360)
Net cost after interest	(4,259)	(3,804)	0	590
Contribution to capital expenditure	4,210	3,755	0	(590)
Contributions to (+) / from (-) reserves	49	49	0	(0)
Total	0	0	135	0

3.4. Although the HRA reports a balanced position there were variances within function that total +/- £0.100m, they are shown below.

3.5. Transfer to Housing Repairs Account is reporting a variance of **£1.150m**. This is due to several factors.

- **£0.808m - External Contractor spend** - The overspend on contractors is due to increase in demand resulting from a higher volume of stock condition surveys and tenant welfare checks. These surveys, particularly those identifying Housing Health and Safety Rating System (HHSRS) issues such as damp and mould, have been carried out at a significantly greater rate than in previous years and is expected to continue, and as a result additional budget has been approved for 2025/26.

There are also ongoing recruitment challenges within the Direct Labour Organisation (DLO) which have further impacted the ability to meet demand in-house, resulting in ongoing reliance on external contractors. This has in turn reduced internal capacity to support income-generating works from other departments and contributed to a build-up in work-in-progress (WIP).

A WIP recovery plan is currently being developed in collaboration with the ARC action plan and in partnership with the Assets and Homes & Communities teams. Initiatives to improve productivity and reporting through the use of Total Mobile software are underway. Recruitment remains ongoing, with two of four vacant trade positions now filled and the remaining posts being re-advertised.

- **£0.214m - Void Works** - Due to an excessive number of voids entering the workstream, of which 50% are classed as major voids based upon the complexity of work required. This is expected to continue in the short term until new contractor frameworks are completed and properties are to be returned in better condition.

Measures to improve efficiencies are being explored and put in place, including offering decorating vouchers in place of redecoration and deferring garden works until a new tenancy begins. The ongoing integration of housing, asset management, and property repairs service teams is expected to support more effective tenancy and property management, helping to reduce costs while maintaining lettable standards. Some of these measures are expected to be seen in the form of quicker void turnaround times so that properties are available to let, and to reduce lost rental income. However, it should be noted that much of the benefit will be realised in the medium to long term. The age and condition of the housing stock also continue to influence spend in this area.

- **£0.158m - Housing Maintenances** - This was due to unforeseen and reactive repair needs, including emergency boiler works at Tanser Court requiring temporary systems in place (£0.029m), and a rise in responsive electrical repairs due to increased demand (£0.044m). An accelerated upgrade of laundry equipment to meet compliance standards (£0.077m) also contributed to the overspend. While these works resulted in higher costs this year, they are expected to reduce future compliance pressures. The service continues to monitor budgets closely and manage pressures where possible.
- **£0.157m - Income** - A challenging budget was set with the intention to offer more external services. Due to the volume of internal works and pressure on the service to deliver in a timely manner, expansion of the service has not been possible. The service is planning to undertake a review in the new financial year, to understand where, if possible, there may be potential capacity to offer additional external services. As a result, a revised budget to meet a more suitable income target has been approved for 2025/26.
- **(£0.228m) - Materials** - This was due to shortage of four DLO staff and system errors, which have now been resolved but resulted in 2,400 financial reviews needing manual completion by just two staff. In the meantime, external contractors have been used to cover work. Recruitment is underway to fill the remaining operative roles, which should ease the pressure early in the next financial year. Efforts are also being made to clear system backlogs and explore better supplier frameworks for improved value.

- 3.6. **(£0.355m) -Supervision and Management** - This is largely due to salary savings from vacant posts that have been difficult to recruit to or where recruitment has been paused.
- 3.7. **£0.123m - Rent, Rates, Taxes and Other Charges** - This is related to higher number of void properties, including some that are harder to let and newly built homes awaiting occupation. These properties have remained empty for longer than expected as they await repairs, turnaround, and reletting. As a result, the HRA has incurred additional Council Tax liabilities on these unoccupied homes. The service is currently underway to reduce the number and duration of voids by accelerating repair times, reviewing long term void cases and improving the letting process.
- 3.8. **(£0.360m) - Interest and Investment Income.** This is due to interest rates have been held high throughout 2024/25, resulting in increased returns on investments.
- 3.9. **Carry Forward Requests**
- 3.10. A Cabinet report was approved to bring forward the future allocation budget of £0.135m for stock condition surveys into 2024/25. However, none of this was utilised during the year. The remaining surveys will now be undertaken in 2025/26 as originally planned. It is requested the HRA Carry forward request mentioned above and in Appendix Two are approved by Full Council.
- 3.11. **HRA Reserves**
- 3.12. The reserves at 31 March 2025 have a balance of £38.219m which is a movement of £0.032m since 31 March 2024. Details can be found in Appendix Two.
- 3.13. **HRA Capital**
- 3.14. The approved HRA capital programme is £23.526m. Reprofiling and expected savings have resulted in a 2024/25 outturn of £0.391m.

Table Seven: HRA Capital Programme

Type	Revised Budget £000	Budget Reprofiling £000	Reprofiled Budget £000	2024/25 Outturn £000	Outturn Variance to Budget £000	Q3 Forecast £000
HRA Capital Programme	23,526	(3,501)	20,025	20,416	391	20,540

3.15. There was £3.501m of capital reprofiling. Explanations for these are detailed in Appendix Two.

3.16. The outturn figure contains a pressure of £0.391m. This is spread across several small schemes, the details of which can be found in Appendix Two.

3.17. Capital Programme Financing

3.18. The below table sets out how the 2024/25 HRA capital programme has been financed.

Table Five: HRA Capital Financing

Type of Spend	Direct Revenue Financing £000	Borrowing £000	Major Repairs Reserve £000	Government Grant £000	Earmarked Reserves £000	Total £000
Improvement and Capitalised Repairs	53	0	3,056	627	512	4,248
New Build & Acquisitions	65	11,480	0	2,228	0	16,168
Grand Total	118	11,480	3,056	2,855	512	20,416

4. COLLECTION FUND

4.1. The Council has a statutory requirement to operate a Collection Fund as a separate account to the General Fund. The purpose of the Collection Fund, therefore, is to isolate the income and expenditure relating to Council Tax and National Non-Domestic Business Rates.

4.2. The administrative costs associated with the collection process are charged to the General Fund. For the purpose of this report the analysis will be split between Council Tax and Business Rates.

4.3. Council Tax

4.4. The amount of council tax income received into the General Fund for 2024/25 is fixed to the original budgeted amount, not the actual amount billed during the year. Any difference between the actual amount and the original budget will create a surplus or deficit on the Collection Fund, to be accounted for in future years. This has no impact on the 2024/25 General Fund revenue budget variance.

4.5. The final outturn has resulted in a council tax surplus of (£0.272m) and is detailed in the table below:

Table Eight: Council Tax Apportionment

Council Tax Collection Fund Surplus	2024/25 £000
Warwickshire County Council	(207)
Police and Crime Commissioner for Warwickshire	(35)
Rugby Borough Council	(30)
Total	(272)

4.6. Business Rates

4.7. The Council sets its business rates income budget based on the NNDR1 form that is submitted to Government on 31 January each year. It was forecast that the Council would collect (£64.818m) of business rates during 2024/25, of which Rugby Borough Council would retain (£9.758m).

4.8. The following table details the Council's outturn position.

Table Nine: Business Rates Income

Business Rates Income	2024/25 Budget £000	2024/25 Outturn £000	Variance £000
RBC share of NDR Income @ 40% (as per the NNDR1 forecast)	(25,926)	(25,926)	-
Less Tariff	16,168	16,184	16
Gross Amount Retained	(9,758)	(9,742)	16
Section 31 Grants	(6,341)	(4,803)	1,538
Levy Payment	5,548	6,172	624
Net Retained Income	(10,551)	(8,373)	2,178
Coventry & Warks' BR Pool Income*	(800)	(2,264)	(1,464)
Retained Disregarded Amounts	(22)	(23)	(1)
Business Rates Income	(11,373)	(10,660)	713
Year-end reconciliation adjustments (PY)	2,299	2,105	(194)
Total Business Rates Income	(9,074)	(8,555)	520

* This is a provisional figure pending final closure of accounts from Business Rates Pooling in 2024/25 any further changes will be reflected in the 2024/25 accounts.

4.9. The 2024/25 budget deficit of £0.520m is due to the reasons below:

- In accordance with legislation, the business rates income charged to the General Fund is fixed to the statutory NNDR1 estimate, regardless of how much business rates are billed or received. Any actual cash variance is being managed through the Collection Fund.
- Section 31 Grants show a pressure of £1.538m due to actual reliefs awarded to businesses being lower than forecast. As a result, the council received less compensation through section 31 grants than originally budgeted for.
- Levy payments show a pressure of £0.624m, linked to the increase in business rates received during the year.
- The Council is a member of the Coventry & Warwickshire Business Rates Pool (the Pool). The pooling gain in 2024/25 was (£2.264m) which was higher than the budgeted amount of (£0.800m), due to the risk-based approach taken at budget setting.

- 4.10. The overall Business Rates surplus on the Collection Fund was £3.611m of which the relevant shares are shown in the table below. The Council's share of the surplus is £1.445m.

Table Tent: Business Rates Apportionment	
Business Rates Collection Fund Surplus	2024/25 £000
Central Government	(1,806)
Warwickshire County Council	(361)
Rugby Borough Council	(1,445)
Total	(3,611)

5. PERFORMANCE SUMMARY

- 5.1. This section of the report summarises the performance of the organisation against key performance indicators (KPIs) for the financial year. It provides a snapshot of key achievements and areas requiring improvement across various service areas.
- 5.2. The reporting dashboard has now been used across the Council, with officers recognising the role it can play in driving performance. There is now a full year of measures which will help with trend and benchmarking.
- 5.3. Through the use of tools such as LG Inform officers have access to equivalent information from other local authorities. It is worth highlighting that due to the collection of government returns, there could be inconsistencies due to different reporting years, however officers will use best practice from other authorities to raise the bar for future analysis.
- 5.4. The 2024/25 Key performance indicators (KPI's) and key statistics can be accessed via the link shown below.

<https://www.rugby.gov.uk/w/performance-dashboard>

5.5. Overall Performance

- 5.6. The Council has identified 76 KPIs that not only impact on Portfolio performance but are also aligned to the Corporate Strategy. 39 (51%) of all KPIs reported against in 2024/25 either met or exceeded the set target.

5.7. 2024/25 Highlights

- 5.8. There have been a number of instances throughout 2024/25 where performance has improved. They include:
- 5.9. The number of Fly tipping reports investigated during the year through all quarters was 100% though the service has seen increased complaints due to

waste and rogue bins but have targeted key street locations and worked with residents to inform and educate them around the issues.

- 5.10. The planning service continues to maintain a high percentage against the national government target when determining major planning applications within a 13 week period with the last quarter of the financial year hitting 100% of major applications determined.
- 5.11. Council Tax collection rates were 95%; the highest in year collection since pre-Covid.
- 5.12. **2024/25 Areas for Improvement**
- 5.13. In certain areas performance has fell below the targets that were set at the beginning of the year. For example, the percentage of major voids completed on time is currently below target. This is due to an excessive number of properties requiring major works entering the workstream. With a target of 80% the average percentage across the year was 58% of major voids completed on time.
- 5.14. Following the conclusion of the year all measures will be subject to review and as a result of this alternatives may be identified. This will be discussed in more detail with Portfolio holders and then wider members in the lead up to the 2025/26 Quarter One report.

Name of Meeting: Cabinet

Date of Meeting: 24 June 2025

Subject Matter: Finance and Performance Monitoring 2024/25 - Year-End

Originating Department: Finance and Performance

DO ANY BACKGROUND PAPERS APPLY YES NO

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A

Appendix 1 - General Fund Dashboard - Quarter 4 2024-25

1) Revenue Outturn								
Portfolio	Current Net Budget	Total Net Expenditure	Pending Carry Forward Requests	Pending Supplementary Budget/Virement/Reserve transfers	Total Variance	Q3 Forecast Variance	Movement between Q3 and Q4	% VARIANCE
	£000	£000	£000	£000	£000	£000	£000	
Communities and Homes, Regulation and Safety	5,574	5,729			155	92	63	3%
Finance, Performance, Legal and Governance	3,701	4,381			680	808	(128)	18%
Growth and Investment, Digital and Communications	1,692	1,998			306	526	(220)	18%
Partnerships and Wellbeing	4,008	4,470			462	105	357	12%
Operation and Traded Services	5,001	5,739			738	875	(137)	15%
Chief Executive	(0)	136			136	12	124	-38906%
Organisational Change	193	277			84	(141)	225	43%
SUBTOTAL	20,169	22,729	0	0	2,560	2,277	283	13%
Corporate Items - Other	(1,607)	(3,514)			(1,907)	(1,121)	(786)	119%
GF Revenue Carry Forward Reserve	0	0			0			
Business Rates Equalisation Reserve	4,491	4,491			(0)			
Budget Stability Reserve	(168)	(168)			(0)			
Earmarked Reserves	(1,139)	(1,139)			0			
	21,746	22,400	0	0	653	1,157	(502)	0

Funding

Grants	(2,648)	(2,711)			(63)
Business Rates	(9,075)	(8,555)			520
Council Tax*	(10,023)	(10,023)			0
	(21,746)	(21,289)	0	0	458

*Please note that final Collection Fund figures are currently being agreed with our partner authorities and will be included prior to publication of this Outturn Report

Net outturn position

	0	1,111	0	0	1,111
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*Please note that the outturn pressure of £0.653m will be funded from the Budget Stability Reserve

2) Reserve Summary

Name of reserve	Balance as at 31 March 2024	Total Net Expenditure	Balance as at 31 March 2025	Forecast contributions 25/26	Balance as at 31 March 2026	Forecast contributions 26/27	Balance as at 31 March 2027	Forecast contributions 27/28	Balance as at 31 March 2028
	£000	£000	£000	£000	£000	£000	£000	£000	£000
Gen Fund Revenue Acc	(2,250)	0	(2,250)	0	(2,250)	0	(2,250)	0	(2,250)
Business Rates Equalisation Reserve	(16,740)	(3,971)	(20,711)	(2,143)	(22,854)	0	(22,854)	0	(22,854)
Budget Stability Reserve	(3,013)	599	(2,413)	0	(2,413)	0	(2,413)	0	(2,413)
Corporate reserves	(22,003)	(3,372)	(25,375)	(2,143)	(27,518)	0	(27,518)	0	(27,518)
Town Centre Strategy Reserve	(4,810)	208	(4,603)	946	(3,657)	300	(3,357)	400	(2,957)
Transformation Fund	(1,801)	323	(1,478)	143	(1,335)	0	(1,335)	0	(1,335)
Climate Emergency Reserve	(1,000)	104	(896)	486	(410)	0	(410)	0	(410)
STW Pensions Reserve	(86)	86	0						
Section Agreements	(2,056)	91	(1,966)	119	(1,847)	119	(1,728)	0	(1,728)
Non-Conditional Revenue Grants	(196)	(349)	(546)	546	0	0	0	0	0
Warwickshire Consortium Reserve	(2)	2	0						
Communities and Homes, Regulation and Safety	(772)	163	(610)	(23)	(633)	(23)	(656)	0	(656)
Finance, Performance, Legal & Governance	(59)	59	0						
Growth and Investment, Digital and Communications	(376)	376	0						
Partnerships and Wellbeing	(100)	9	(91)	0	(91)	0	(91)	0	(91)
Operations and Traded Services	(84)	84	0						
Organisational Change	0	0	0						
Chief Executive	(100)	100	0						
	(33,446)	(2,117)	(35,563)	74	(35,490)	396	(35,094)	400	(34,694)

3) Capital Summary

Portfolio	Current Budget	Total Net Expenditure	Pending Reprofiling Requests	Total Variance	Q3 Forecast Variance	Movement between Q3 and Q4
	£000	£000	£000	£000	£000	£000
Communities and Homes, Regulation and Safety Capital	4,376	3,667	383	(326)	(26)	(300)
Finance, Performance & Governance Capital	107	0	107	0	(30)	30
Growth and Investment, Digital and Communications Capital	1,409	1,434		25	42	(17)
Partnerships and Wellbeing Capital	1,996	701	1,299	4	99	(95)
Operations and Traded Services Capital	1,619	1,143	485	9	(7)	16
Organisational Change Capital						
Chief Executive Capital						
Grand Total	9,507	6,945	2,274	(288)	78	(367)

4) Head Count				
Portfolio	Original Budgeted FTE's	Revised Budgeted FTE's	Actual FTE's at Q4	Vacant FTE's
Communities and Homes, Regulation and Safety	96.10	96.10	90.71	(5.39)
Finance, Performance, Legal and Governance	55.09	55.09	39.55	(15.54)
Growth and Investment, Digital and Communications	78.68	77.68	64.72	(12.96)
Partnerships and Wellbeing	51.55	51.55	53.25	1.70
Operation and Traded Services	125.84	126.84	117.45	(9.39)
Chief Executive	14.93	14.93	1.00	(13.93)
Organisational Change	2.00	2.00	9.08	7.08
Total	424.19	424.19	375.76	(48.43)

5) Delivery of new savings & income targets			
PORTFOLIO	Total	Red	Green
	£000s	£000s	£000s
Communities, Homes, Regulation and Safety	369		369
Finance, Performance, Legal and Governance	144	18	126
Growth and Investment, Digital and Communications	321	150	171
Operation and Traded Services	245		245
Partnership and Wellbeing	764		764
Organisational Change	0		0
Chief Executive	43		43
Corporate Items	1,147	30	1,117
TOTAL GF	3,033	198	2,835

Red savings- further details

	£000s
Planning Income - Increased income target	150
General Financial Services - 2024/25 Pension Recharges	18
Corporate Items - Income relating to the PAGABO initiative	30
TOTAL GF	198

Appendix 2 - Housing Revenue Account (HRA) Dashboard - Quarter 4 2024/25

1) Revenue Summary

Service	Current Budget	Total Income/ Expenditure	Pending Carry Forward Requests	Pending Reserve Movement Requests	Total Variance
	£000	£000	£000	£000	£000
Rent income from dwellings	(18,342)	(18,433)	0	0	(91)
Rent income from land and buildings	(129)	(118)	0	0	11
Charges for services	(1,180)	(1,133)	0	0	47
Contributions towards expenditure	(154)	(153)	0	0	1
Total Income	(19,806)	(19,837)	0	0	(31)
Transfer to Housing Repairs Account	4,779	5,930	0	0	1,150
Supervision & Management	6,945	6,454	(135)	0	(355)
Rent, rates, taxes and other charges	125	248	0	0	123
Depreciation and Impairment	3,324	3,324	0	0	(0)
Debt management costs	0	0	0	0	0
Provision for bad or doubtful debts	66	94	0	0	28
Total Expenditure	15,240	16,051	(135)	0	946
HRA share of Corporate/Democratic Core Costs	318	353	0	0	35
Net cost of HRA services	(4,249)	(3,433)	(135)	0	950
Interest payable and similar charges	1,104	1,104	0	0	0
Interest and Investment Income	(1,115)	(1,475)	0	0	(360)
Net Operating expenditure	(4,259)	(3,804)	(135)	0	590
Contributions to (+) / from (-) reserves	49	49	0	0	0
Revenue Contributions to Capital Expenditure	4,210	3,755	135	0	(590)
(Surplus) / Deficit for the Year on HRA Services	0	0	0	0	0

2) Head Count- Vacancies (HRA)

Service	Budgeted FTE's 24/25	Actual FTE's at Q4	Vacant FTE's at Q4
Housing	48.41	33.80	(14.61)
Property Repairs Service	50.32	46.04	(4.28)
TOTAL	98.73	79.84	(18.89)

3) Reserves & Balances

Name of reserve / balance	Balance as at 1/04/24	Contribution (to)/from	Balance as at 31/03/25	Forecast contribution (to)/from	Forecast balance as at 31/03/26	Forecast contribution (to)/from
	£000	£000	£000	£000	£000	£000
Housing Revenue Account Balances	(4,085)	0	(4,085)	0	(4,085)	0
HRA Capital Balances	(14,327)	150	(14,177)	10,631	(3,546)	(3,953)
HRA Major Repairs Reserve	(5,802)	63	(5,739)	(756)	(6,495)	(412)
Housing Repairs Account	0	0	0	0	0	0
HRA Climate Change Reserve	(1,512)	0	(1,512)	601	(911)	0
HRA - Transformation Reserve	(77)	(150)	(227)	0	(227)	0
Sheltered Housing Rent Reserve	(407)	(49)	(456)	(49)	(505)	(51)
Right to buy Capital Receipts	(12,040)	17	(12,023)	2,350	(9,673)	424
	(38,251)	32	(38,219)	12,777	(25,442)	(3,992)

5) Revenue variance narrative

Service	Total Q4 Variance to Budget	Item Variances to budget	Pressure/(Saving)	Expenditure Type	Service Area	Description	Root Cause Analysis - When you have found a material variance you must first determine the root cause of the variance.	Impact - Next, quantify the impact. This involves not only understanding the impact to the current month; also if no changes are made, what the go-forward impact to the business is for both favourable and unfavourable budget variances.	Action - The final part of any analysis should include an action for the business. What can be put in place to mitigate the impact.
Housing Repairs Account	1,150	808	Pressure	Expenditure	PRS Unplanned M&R	External Contractor & Operator	Contractor spend still high due to increase in demand on the service from stock condition surveys, increased tenant welfare checks and challenges with recruitment for DLO resource.	The impact from the increase in receipts from stock condition surveys HHSRS (predominantly damp and mold) and welfare checks is at an all time high. The stock condition survey has increased the WIP and demand on the service. This has increased the WIP and demand on the service. Without intervention, this would continue whilst we drive the WIP down to increase or remain high. This also means our workforce isn't free to work on income streams from other departments.	An action plan and WIP recovery is being worked on in conjunction with the ARC action plan for the joint with asset and homes and communities departments. To boost productivity and strengthen reporting, Totalmobile software across departments is being implemented. This will support targeted reductions and require additional budget, which should result in a decrease in some areas moving to the capital programmes. But the budget, unless savings are made, isn't sufficient for the works required to the ageing stock. Additional budget has been approved for 2025/26. Two of four trade positions have been filled, with recruitment ongoing for the remaining roles.
		157	Pressure	Income	PRS Unplanned M&R	Contract Income - Internal	The income target remains too high, as it was not adjusted from the 2023/24 levels, which will continue to contribute to budget deficits. The implementation of the new system has also impacted expected income.	Income has been lower than expected due to several reasons, moving over to the new system has created some housekeeping issues where income has not been captured correctly via different codes input on the system, also due to the high demand from HRA we have been unable to provide services to other departments as we have in the past, including WSU and Asset.	Income Target to be reviewed until WIP recovery has been completed and the service is in a better place.
		(228)	Pressure	Expenditure	PRS Unplanned M&R	Materials	The root cause stems from DLO being short by 4 staff The system issues have now been resolved but this has created 2,400 financial reviews which need to be completed internally by 2 people	The decrease will cease going into the next financial year now that the system issues have been fixed. Two operative positions are impacting this, but again these should be filled within the first two months of the next financial year.	The issues have been fixed around the supplier system errors. Our focus is being made on clearing them through the systems to be able to show on Agresso for accounts. Recruitment is underway for the vacant positions and there is effort in looking at other suppliers and frameworks for better value-for-money solutions.
		214	Pressure	Expenditure	PRS Void works	Property Expenses	Major voids receipts still remain the single largest factor impacting this budget. Although a saving was projected through the year, the final WIP reports showed a significant movement of costs to Voids.	No signs of change in the near future; this will remain the same until the frameworks have been completed and properties are being returned in better condition. The ageing stock also affects the impact on spend going forward.	Collaborate with the housing team to minimise redecoration costs by offering decorating vouchers as an alternative. Delay garden cutting and clearance until a tenant has signed for the property, reducing the number of cuts needed and lowering overall costs. Explore additional strategies to optimise spending in this area while ensuring that a lettable standard is maintained, aligning with client needs. Spending decreased compared to the previous year, partly due to reduced garden maintenance requirements; however, major voids remain high at 50%. The integration of housing, assets and PRS will support the improved management of tenancies and properties.
		158	Pressure	Expenditure	Housing Planned Maintenance	Other Running Expenses	Gas Heating Systems £0.029m - Emergency costs due to boiler failure at Tanser Court; as a result, temporary boilers were needed. Electrical Maintenance £0.044m - This is a responsive budget where expenditure depends on unforeseen breakdowns, and there has been an increase in numbers. Smoke Alarm Replacements £0.018m - Overspend due to £29k from last year being posted to the current year. Laundry Equipment Maintenance £0.077m - This overspend was down to the accelerated upgrade programme due to compliance issues.	Gas Heating Systems – Unplanned cost affects the current year's budget and highlights future risk. Electrical Maintenance – Ongoing risk of overspending due to the reactive nature of repairs. Smoke Alarm Replacements – Impact on budget looks overspent this year, though it's a timing issue. Laundry Equipment Maintenance – High upfront cost now, but reduces future compliance risk.	Budgets are being monitored closely. Any risks are now being flagged earlier for timely management. Opportunities are also being explored to improve preventative works and to reduce reactive costs where possible.
Supervision & Management	(355)	(329)	Saving	Expenditure	Supervision & Management	Salaries	There are vacancies that have been difficult to recruit to or where recruitment activity has been paused.	It could cause delays to services and put more pressure on existing staff.	The service is currently reviewing different options with the intention of re-advertising certain roles.
Rent, rates, taxes and other charges	123	123	Pressure	Expenditure	Supervision & Management	Council Tax	There has been a higher number of voids, including some harder-to-let properties and new builds waiting to be occupied.	These homes are taking longer than expected to be repaired, turned around and re-let.	Work is already underway to reduce voids, including speeding up repair times, reviewing long-term voids and improving the letting process.
Interest and Investment Income	(360)	(360)	Saving	Expenditure	HRA	Net Cost of Borrowing	Due to the Bank of England continuing to keep rates at an elevated level, this results in increased returns on investments.	As the capital balance is reduced in meeting the cost of delivering the scheme, the investment return will also continue to reduce.	This benefit cannot be relied upon in future periods, as the expectation remains that at some point, interest rates will begin to fall.
Revenue Contributions to Capital Expenditure	(590)	(590)	Saving	Expenditure	HRA	Contribution	This saving is due to pressure on net operating expenditure, resulting in a reduced revenue contribution to capital. □	There is less in balances to fund future capital activity.	Future plans need to be aligned with the cash available to deliver them.

4) Capital Summary

Service	Current Budget	Total Expenditure	Pending Supplementary Budget/ Virement/ Reprofiting	Total Variance	Narrative
	£000	£000	£000	£000	
Navigation Way (formerly Biart Place) - Construction	9,455	13,289	(3,380)	454	The value for construction works is higher than originally budgeted, largely due to inflation in the period between the budget being approved and the final contract being signed, causing a pressure of circa £200k for 2024/25. There is also a pressure of £197k arising from onsite compensation events submitted by the main contractor under the terms of the NEC contract. As construction is out of the ground, the risk profile of these events occurring is diminishing as this phase of the project where the abnormal and unknown events tend to materialise. Across the whole scheme, the pressure is expected to be circa 2% variance compared to budget. Budget of £3.380m is requested to be reprofiled to 24/25 from future years to align with the current programme. There have been additional construction works done in 24/25 compared to the original budget profile across the scheme, partly due to various delays (weather, WCC permitting process).
Navigation Way (formerly Biart Place) - Design	221	24		(197)	The design element was complete part way through 2024/25 and future costs were novated to the contractor resulting in a saving on this element of the scheme of (£197k).
Housing Management System	82	65	17	(0)	This is for phase 2, which will complete next year.
Fire Risk Prevention Works	100	110		10	
Rewiring	160	173		13	
Lifeline Renewal Programme	46	28		(18)	Saving at year-end due to costs for new cloud-based system being revenue rather than capital.
Finlock Gutter Improvements	100	66		(34)	As work is progressing on properties, the Finlock guttering requirements are decreasing. This is resulting in fewer properties that require these works.
Rebuilding Retaining Walls	102	69		(33)	Retaining walls are still a problem in the stock, but it is not possible to accurately predict when they will fail or need repair or replacement.
Replacement Footpaths	119	156		37	Work is reactive and unpredictable. There were some larger than normal repairs that needed to be completed, which increased expenditure in the current year. This included two major projects valued at over £30k each.
Driveways	40	17		(23)	There were fewer driveways to repair than the previous year, but signs are already showing that projects will be needed for 2025/26.
Fire Risk Prevention works voids	70	87		17	An increase in material costs and works required led to the increase in spend as well as changes to regulations.
Rewiring Unplanned Renewals	100	23	77	0	Most rewires are completed by the asset team so there aren't many unplanned rewires on repairs but there has been an increase in Electrical Inspection Condition Reports for 2025/26 which will result in remedial works required, so budget is to be reprofiled.
Fire Risk Unplanned Renewals	60	6		(54)	Work was delayed while clarity was sought from Health and Safety as to the training requirements of operatives. Work will begin to be booked in. RBC operatives are still to have suitable training, and external contractors are currently used for emergency works.
Roofing unplanned renewals	62	232		170	As previous years roofing has been a huge increase in expenditure due to no capital programme of works being completed for some 40 years +
Lesley Souter house new boiler and building management system	68	74		6	
Disabled Adaptations	250	260		10	
Kitchen Modifications	859	891		32	Work intended by the contractor to complete into 2025/26 was brought forward.
Kitchen Modifications Voids	200	118		(82)	Works have been added to the capital programme where possible.
Kitchens non voids	52	170		118	Kitchens that have required replacing but were not due on the capital programme represent an increasing trend. Work needs to be done to prevent tenants from mistreating these assets.
Heating Upgrades	60	66		6	
Bathroom Modifications	358	333	25	0	There are 41 outstanding refusals from the past two financial years that may still be requested for completion, so remaining budget will be reprofiled.
Bathroom Modifications - voids	100	80		(20)	Works have been added to the capital programme where possible, which is likely to continue as a trend for 2025/26.
Bathrooms non voids	50	36		(14)	Works have been added to the capital programme where possible, which is likely to continue as a trend for 2025/26.
Carbon Management Plan (HRA)	1,315	1,254	59	(2)	Scheme to complete in early 2025/26 as a result of delays to final installations, so remaining of the budget will be reprofiled.
Low Carbon Skills Fund	58	0	58	(0)	Corporate decarbonisation feasibility works to be reprofiled into 2025/26.
Purchase of Council Houses	7,450	2,395	5,055	0	There were 9 housing acquisitions completed during 2024/25. The remaining budget of £5.055m to be reprofiled to 2025/26, with 16 housing acquisitions already secured for completion in 2025/26.
Rounds Gardens demolition	522	184	338	0	Tower block demolition works are completed; however, there are some finishing works due to be done in 2025/26, therefore it is requested to be reprofiled to 2025/26 to finalise this element of the scheme.
Rounds Gardens- Design and Legal Fees	1,381	129	1,252	0	Spend for 2024/25 was less than originally anticipated, as the programme has been delayed due to hydraulic modelling assessment findings and procurement delays. The remaining budget of £1.252m to be reprofiled to 2025/26 to continue the feasibility design stage of the scheme. However, detailed costs are not yet known. We are awaiting further outputs from the feasibility design before the next stage (detailed design) and the outcome of the public consultation before further contractual commitment.
Property Repairs Team Vehicle	86	82		(4)	
Overall Total	23,526	20,416	3,501	391	

AGENDA MANAGEMENT SHEET

Report Title:	Asylum Seeker Support from Warwickshire County Council
Name of Committee:	Cabinet
Date of Meeting:	24 June 2025
Report Director:	Chief Officer - Communities and Homes
Portfolio:	Communities and Homes, Regulation and Safety
Ward Relevance:	Dunsmore
Prior Consultation:	The Portfolio Holders – Communities and Homes and Leisure and Wellbeing and Liberal Democrat Housing and Communities spokesperson.
Contact Officer:	Mary Jane Gunn – Communities and Projects Manager (maryjane.gunn@rugby.gov.uk)
Public or Private:	Public
Report Subject to Call-In:	Yes
Report En-Bloc:	No
Forward Plan:	Yes
Corporate Priorities:	<p>This report relates to the following priority(ies):</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> A Healthier Rugby – To support people to live healthier, longer, and more independent lives.<input type="checkbox"/> A Thriving Rugby – To deliver a thriving economy which brings Borough-wide investment and regenerates Rugby Town Centre.<input type="checkbox"/> A Greener Rugby – To protect the environment and ensure the Borough adapts to climate change.<input checked="" type="checkbox"/> A Fairer Rugby – To reduce inequalities and improve housing across the Borough. <p>Corporate Strategy 2025-2035</p> <p><input type="checkbox"/> This report does not specifically relate to any Council priorities but</p>
Summary:	The report sets out proposals for utilising two allocations of funding that have been awarded to the Council, in respect of the provision of support for asylum seekers living in the borough.

The first allocation is for £304,500 (based on the number of asylum seekers resident in contingency accommodation as of 1 April 2024).

The second allocation is £382,800. This is made up of £334,800 in respect of the support of asylum seekers living in contingency accommodation and a further £48,000 in respect of those living in dispersed accommodation as of 1 April 2025.

It is proposed to split the grant in respect of contingency accommodation, with Warwickshire County Council (WCC), in recognition of their support of health and well being of the cohort.

Financial Implications:

These are outlined in section 5.0 of the report

Risk Management/Health and Safety Implications:

The Council and WCC work in partnership to support asylum seekers resident in contingency accommodation in the borough. However, the grant, intended to support the resulting costs of providing this support, is paid directly, and in full, to the borough Council.

There is a risk that without receiving any of the funding Warwickshire County Council may have to withdraw from any activities over and above their basic statutory duties. This is likely to have a detrimental impact on Rugby Borough Council, who would need to find alternative resource to offer this support but more fundamentally, there will be a potentially negative impact on the wellbeing of this vulnerable cohort.

It is proposed that should it be agreed that the grant is shared with Warwickshire County Council, conditions be attached that they will be required to:

- i) provide transparent and regular reporting, setting out how the funds have been utilised
- ii) demonstrate the value of outcomes achieved.
- iii) Return any unutilised funds to the Council

Environmental Implications:

There are no identified environmental implications.

Legal Implications:

The Council has a wide power within section 2 of the Local Government Act 2000. This is known as the “wellbeing power” and seeks to promote or improve the economic, social and environmental wellbeing of the Council’s area. This includes the power to provide financial assistance to achieve this purpose.

In addition to the “wellbeing power” the Council is also able to utilise the General Power of Competence under the Localism Act 2011. This represents a more recent statutory power and strengthens the ability of the Council to provide financial assistance, as set out within the proposals contained in this report.

Equality and Diversity:

An equality impact assessment has been completed and forms appendix A to this report.

Options:

- 1) To pay Warwickshire County Council half of the grant allocations relating to contingency accommodation that have been confirmed by the Home Office.

This in recognition of the collaborative work that has taken place at both a county and borough level to support a very vulnerable cohort within the community. The county has incurred substantial costs in delivering support services to the cohort (more detail provided in section 4.0 of the report)

- 2) For Rugby Borough Council to retain the grant in full:

There are risks associated with this as Warwickshire County Council could legitimately withdraw the non-statutory support that they are currently providing for the wellbeing of this vulnerable cohort.

The impact of this would be an expectation the Rugby Borough Council would have to intervene, bringing with this both operational and reputational risks.

Such a decision would also likely undermine the successful collaborative relationship of the two organisations going forward.

Recommendation:

IT BE RECOMMENDED TO COUNCIL THAT:

- 1) a supplementary General Fund revenue budget of £319,650 be established to enable the transfer of funding to Warwickshire County Council (WCC);
- 2) the transfer of this funding to WCC be conditional on their:
 - i) providing transparent and regular reporting, to the Chief Officer of Communities & Homes, setting out how the funds have been utilised and demonstrating the value of outcomes achieved.
 - ii) returning any unutilised funds to the Council
- 3) the remaining funding be held as a reserve to support any financial pressures arising from increased homelessness within the cohort during 2025/26;
- 4) delegated authority be given the Chief Officer for Communities and Homes to utilise the remaining funding, in consultation with the Portfolio Holder for Communities and Homes, Regulation and Safety; and
- 5) any unutilised funding as at 31 March 2026 be returned to balances.

Reasons for Recommendation:

This is an opportunity to ensure that Warwickshire County Council benefits from a proportion of the grant, to cover some of the costs that they have incurred, and will continue to incur, in supporting this cohort.

This gesture reflects the value attached to the collaboration between the two organisations in supporting these vulnerable guests.

Cabinet - 24 June 2025

Asylum Seeker Support from Warwickshire County Council

Public Report of the Chief Officer - Communities and Homes

Recommendation

IT BE RECOMMENDED TO COUNCIL THAT:

- 1) a supplementary General Fund revenue budget of £319,650 be established to enable the transfer of funding to Warwickshire County Council (WCC).
- 2) the transfer of this funding to WCC be conditional on their:
 - i) providing transparent and regular reporting, to the Chief Officer for Communities and Homes, setting out how the funds have been utilised and demonstrating the value of outcomes achieved, and
 - ii) returning any unutilised funds to the Council.
- 3) the remaining funding be held as a reserve to support any financial pressures arising from increased homelessness within the cohort during 2025/26;
- 4) delegated authority be given to the Chief Officer for Communities and Homes to utilise the remaining funding, in consultation with the Portfolio Holder for Communities and Homes, Regulation and Safety; and
- 5) any unutilised funding as at 31 March 2026 be returned to balances.

1.0 Executive Summary

- 1.1 Both the borough Council and Warwickshire County Council have provided support to the asylum seeker cohort resident in contingency accommodation in the borough during 2024/25, and this continues in 2025/26.
- 1.2 The report sets out proposals for utilising two allocations of funding that have been awarded to the Council, by the Home Office, in respect of the provision of support for asylum seekers living in the borough. No funds are directly paid to the cohort.
- 1.3 The first allocation is for £304,500 (based on the number of asylum seekers resident in contingency accommodation as of 31 March 2024).

- 1.4 The second allocation is £382,800. This is made up of £334,800 in respect of the support of asylum seekers living in contingency accommodation and a further £48,000 in respect of those living in dispersed accommodation as of 31 March 2025.
- 1.5 It is proposed to split the grant in respect of contingency accommodation, with Warwickshire County Council (WCC), in recognition of their support of health and well-being of the cohort.

2.0 Introduction

- 2.1 During the 2024/25 financial year, the Council received a funding allocation from the Home Office. This one-off un-ringfenced funding was allocated based on £750 for each asylum seeker resident in contingency accommodation in the borough as at 1 April 2024. The total funding allocation was £304,500.
- 2.2 In April 2025 the Council was notified of an additional allocation of £1,200.00 for each asylum seeker resident in contingency accommodation as at 1 April 2025, a total of £334,800. There was also an additional element of £1,200.00 for each asylum seeker in dispersal accommodation in the borough as at 1 April 2025, a total of £48,000.
- 2.3 The funding is awarded in recognition of the support needed by asylum seekers, mainly families, in respect of their health and well being needs, over and above the basic contingency accommodation offer.
- 2.4 Whilst funding is paid directly by the Home Office to the borough council, Warwickshire County Council have also had a significant role to play in supporting our guests, and this has and continues to incur costs.

3.0 The different models of asylum seeker accommodation provided by the Home Office

- 3.1 Contingency accommodation is the initial accommodation provided to asylum seekers if they are destitute, until their application for longer term grant support with accommodation and subsistence is determined through an initial assessment review. It should be noted that this initial assessment is not a decision on their asylum application.
- 3.2 The provision of contingency accommodation forms part of the statutory duty of the Home Office to provide accommodation and subsistence of all destitute asylum seekers whilst their asylum claims are being decided.
- 3.3 If asylum support is granted, following the initial assessment interview, then the household will then be eligible for dispersed accommodation until a final decision is made on their asylum claim. This tends to be smaller properties, dispersed in communities, again procured by the Home Office's appointed contractors – locally this is Serco.

3.4 Since April 2022, all local authorities are now defined as dispersal areas. As part of this they work in regional partnerships to agree how their regional allocation of dispersal numbers can be allocated.

4.0 Support to asylum seekers living in contingency accommodation

4.1 In addition to the day-to-day operational impact of such accommodation being in the borough, the main role of the borough council has been leading and co-ordinating the multi-agency response to ensure the health, wellbeing and safety of our guests. This has included working closely with public health, the police and Serco, the contractor appointed by the Home Office to manage contingency accommodation in the borough.

4.2 However, the practical day-to-day support for guests has been co-ordinated by the Warwickshire County Council's (WCC) Youth and Targeted Support Teams' migration support project. They continue to:

- employ workers to work within the hotels to provide advice and support to guests to ensure that they have can overcome barriers in accessing essential services – for example access to education (including transport), health and social care.
- work with the voluntary and community sector to support access to clothing, school uniforms and English for Speakers of other languages (ESOL)
- deliver community cohesion activities, to build social bonds, social bridges and social links (as defined by the Home Office Indicators of Integration Framework, 2019)
- assist with the development of skills for any future transition into employment or volunteering

4.3 At the time of writing, WCC are working closely with EQUIP to support the asylum seeker community in Warwickshire including a project that recruits and supports volunteers to work with individuals and families.

5.0 Financial proposal

5.1 In recognition of the collaborative working of both the Council and WCC, and the costs incurred by the county, for which no recompense has been made via the allocated funding, it is proposed that the contingency funding allocations for 2024/25 and 2025, 26 – totalling £639,300 for 2024/25 and 2025/26 be split 50/50 between both Councils.

5.2 The 2025/26 allocation of £48,000 for dispersed accommodation will be retained in full by the borough as the county do not actively support this cohort.

5.2 This proposal is in recognition of the cost and resource implications impacting on both organisations in support of the cohort living in contingency accommodation.

5.3 As the funding is not ringfenced, it is proposed that the borough allocation will be used to create a reserve to offset the potential costs (for example

translation support and temporary accommodation) associated with households presenting as homeless during 2025/26, with any unspent allocation being returned to balances at the end of 2025/26.

- 5.4 If WCC do not spend the full allocation in accordance with the agreement then the grant agreement will require that they return any unspent funds.

6.0 Risk management

- 6.1 The proposed amount for passporting to WCC for asylum support in Rugby is a substantial amount and as a result there has to be accountability in how it is utilised.

- 6.2 It is proposed that should the request be approved, it be conditional on the requirement for an update to be delivered to the Chief Officer of Communities and Homes, at quarterly intervals, to demonstrate how the funding has been spent, along with what spend is committed and what has been achieved in utilising the funding.

7.0 Conclusion

- 7.1 Both the borough and WCC have worked collaboratively, and continue to do so, to support the asylum seeker community living in contingency accommodation in the borough.
- 7.2 Council has previously approved grants awarded for this purpose be shared with WCC in recognition of the costs incurred by them in supporting this cohort.

Name of Meeting: Cabinet
Date of Meeting: 24 June 2025
Subject Matter: Asylum Seeker Support from Warwickshire County Council
Originating Department: Communities and Homes

DO ANY BACKGROUND PAPERS APPLY YES NO

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A

Asylum Seeker Support WCC

Appendix A

EQUALITY IMPACT ASSESSMENT (EqIA)

Context

1. The Public Sector Equality Duty as set out under section 149 of the Equality Act 2010 requires Rugby Borough Council when making decisions to have due regard to the following:
 - eliminating unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Act,
 - advancing equality of opportunity between people who share a protected characteristic and those who do not,
 - fostering good relations between people who share a protected characteristic and those who do not, including tackling prejudice and promoting understanding.
2. The characteristics protected by the Equality Act are:
 - age
 - disability
 - gender reassignment
 - marriage/civil partnership
 - pregnancy/maternity
 - race
 - religion/belief
 - sex/gender
 - sexual orientation
3. In addition to the above-protected characteristics, you should consider the crosscutting elements of the proposed policy, such as impact on social inequalities and impact on carers who look after older people or people with disabilities as part of this assessment.
4. The Equality Impact Assessment (EqIA) document is a tool that enables RBC to test and analyse the nature and impact of what it is currently doing or is planning to do in the future. It can be used flexibly for reviewing existing arrangements but in particular should enable identification where further consultation, engagement and data is required.
5. The questions will enable you to record your findings.
6. Where the EqIA relates to a continuing project, it must be reviewed and updated at each stage of the decision.
7. Once completed and signed off the EqIA will be published [online](#).
8. An EqIA must accompany all **Key Decisions** and **Cabinet Reports**.
9. For further information, refer to the EqIA guidance for staff.
10. For advice and support, contact:
Rebecca Ewers

Corporate Equality & Diversity Officer
rebecca.ewers@rugby.gov.uk
01788 533509



Equality Impact Assessment

Service Area	Communities & Homes
Policy/Service being assessed	Asylum Seeker Support from Warwickshire County Council
Is this a new or existing policy/service?	Existing
If existing policy/service please state date of last assessment	7 December 2023
EqlA Review Team – List of members	Michelle Dickson Mary Jane Gunn
Date of this assessment	29 April 2025
Signature of responsible officer (to be signed after the EqlA has been completed)	

A copy of the completed and signed Equality Impact Assessment report, including relevant data and information to be forwarded to the Corporate Equality & Diversity Officer.

Details of Strategy/ Service/ Policy to be analysed

<u>Stage 1 – Policy to be analysed</u>	
(1) Describe the main aims, objectives and purpose of the Strategy/Service/Policy (or decision)?	Rugby Borough Council and Warwickshire County Council have provided support to the asylum seeker cohort resident in contingency accommodation in 2024/25. It is proposed that the borough share with Warwickshire County Council an allocation of £304,500 un ring fenced funding received by the borough from the Home Office during 2024/25 in respect of asylum seekers living in contingency accommodation within the borough as at 1 April 2024 and a further allocation of £334,800 confirmed by the Home Office in April 2025 in respect of asylum seekers living in contingency accommodation as at 1 April 2025.
(2) How does it fit with Rugby Borough Council's Corporate priorities and your service area priorities?	The support of asylum seekers in contingency accommodation relates to the following corporate priorities: <ul style="list-style-type: none"> • A Healthier Rugby - to support people to live healthier, longer and more independent lives. • A Fair Rugby - to reduce inequalities and improve housing across the borough
(3) What are the expected outcomes you are hoping to achieve?	The appropriate utilisation of a Home Officer funding allocation of £304,500 received by the council in respect of asylum seekers living in contingency accommodation in the borough in 2024/25 and a further allocation of £334,800 confirmed by the Home Office in respect of asylum seekers living in contingency accommodation as at 1 April 2025.

<p>(4) Does or will the policy or decision affect:</p> <ul style="list-style-type: none"> • Customers • Employees • Wider community or groups 	<p>This policy/decision affects:</p> <ul style="list-style-type: none"> • Asylum seekers living in contingency accommodation and funds appropriate support from the borough and Warwickshire County Council • Rugby residents who benefit from appropriate support being in place for asylum seekers in contingency accommodation • Warwickshire County Council
<p>(5) Will the policy or decision involve substantial changes in resources?</p>	<p>No</p>
<p><u>Stage 2 – Evidence about user population and consultation</u></p>	<p>As a minimum you must consider what is known about the population likely to be affected which will support your understanding of the impact of the policy, e.g. service uptake/usage, customer satisfaction surveys, staffing data, performance data, research information (national, regional and local data sources).</p>
<p>(1) What does the data tell you about the groups this policy or decision impacts?</p> <p>Possible data sources:</p> <ul style="list-style-type: none"> • national statistics/census data • local statistics • evaluations • analysis of complaints • user feedback • outcomes from consultation/community voice • Council published information, service data • District and Ward Profile – Warwickshire Observatory • Office of National Statistics • Fingertips health profiles • Indices of Multiple Deprivation • RBC Annual Workforce Equality Report 	<p>The population most affected are asylum seekers living in contingency accommodation and Warwickshire County Council.</p>

<p>(2a) Have you consulted or involved those groups that are likely to be affected by the strategy/ service/policy you want to implement?</p> <p>If yes, please state which groups were involved in the consultation and what were their views and how have their views influenced the policy/decision?</p>	<p>We have consulted with Warwickshire County Council on the correct apportionment of the Home Office grant to reflect the costs and resource requirements of both Warwickshire County Council and the borough.</p>		
<p>(2b) If you have not consulted or engaged with communities that are likely to be affected by the policy/decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary.</p>	<p>The funding provided to the borough is based on a set amount for each asylum seeker in contingency accommodation in the borough on 1 April 2024 and 1 April 2025. The funding formula is defined by the Home Office.</p>		
<p><u>Stage 3 – Analysis of impact</u></p>			
<p>(1) <u>Protected Characteristics</u> From your data and consultations is there any positive, adverse or negative impact identified for any particular group, which could amount to discrimination?</p> <p>If yes, identify the groups and how they are affected.</p>	<p>Protected Characteristic</p>	<p>Nature of Impact Positive, Neutral, Adverse (explain why)</p>	<p>Extent of impact Low, medium, high</p>
	<p>Age</p>	<p>Neutral</p>	
	<p>Disability</p>	<p>Neutral</p>	
	<p>Sex</p>	<p>Neutral</p>	
	<p>Gender reassignment</p>	<p>Neutral</p>	
	<p>Marriage/civil partnership</p>	<p>Neutral</p>	
	<p>Pregnancy/maternity</p>	<p>Neutral</p>	

	Race	Neutral	
	Religion/belief	Neutral	
	Sexual Orientation	Neutral	
(2) <u>Cross cutting themes</u> (a) Are your proposals likely to impact on social inequalities e.g. child poverty, geographically disadvantaged communities? If yes, please explain how?	Description of impact	Nature of impact Positive, Neutral, Adverse (explain why)	Extent of impact Low, medium, high
	Socio-economic e.g.: child poverty, income level, education level, working hours/occupation, family/social support, access to good nutrition	Neutral	
	Environmental e.g.: housing status, transport links, geography, access to services, air quality, noise pollution	Neutral	

<p>(3) Using the information gathered in stages 2 and 3, please describe how the policy/strategy/service will:</p> <ul style="list-style-type: none"> a. Eliminate unlawful discrimination, harassment, victimisation and any other unlawful conduct prohibited by the act b. Advance equality of opportunity between people who share and people who do not share a relevant protected characteristic c. Foster good relations between people who share and people who do not share a relevant protected characteristic 	<p>Our proposals assist the borough, and Warwickshire County Council in working collaboratively to support the asylum seeker community living in contingency accommodation.</p>
<p>(4) Are there any obvious barriers to accessing the service? If yes, how can they be overcome?</p>	<p>N/A</p>
<p>(5) What Equality Monitoring Data will be collected to analyse impact? How will the Equality Monitoring Data collected be used?</p> <p>If no Equality Monitoring Data is being collected, why not?</p> <p>For support with this section, please refer to the Equality Monitoring Guidance.</p>	<p>N/A</p>

(6) Complete this section if any adverse impacts were identified in 3.1.

Outline any actions that will be taken to remove or mitigate the adverse impacts identified in 3.1 to ensure that no discrimination is taking place. If removing or mitigating the impact is not possible, you may in certain circumstances, justify the discrimination. If that is the case, please give evidence for why justifying is possible in this case.

Stage 4 – Action Planning, Review and Monitoring

(1) Data analysis
What does feedback from Equality Monitoring Data gathered tell you about impact on groups? Were there any unforeseen impacts (positive or negative)?

The feedback/data should be used to inform your Action Plan in (2)

No further action is required.

If No Further Action is required then go to – Review and Monitoring

(2) Action Planning – Specify any changes or improvements that can be made to the service or policy to mitigate or eradicate negative or adverse impact on specific groups, including resource implications.

EqlA Action Plan

Action	Lead Officer	Date for completion	Resource requirements	Comments

(3) Review and Monitoring
State how and when you will monitor policy and Action Plan. Will you make any changes to the Equality Data that you are collecting or how you are collecting/using the data?

Please annotate your policy with the following statement:

An Equality Impact Assessment on this policy was undertaken on 29 April 2025 and will be reviewed if required.

AGENDA MANAGEMENT SHEET

Report Title: Capital Programme - Roof Replacement

Name of Committee: Cabinet

Date of Meeting: 24 June 2025

Report Director: Chief Officer - Communities and Homes

Portfolio: Communities and Homes, Regulation and Safety

Ward Relevance: All

Prior Consultation: Portfolio Holder and the Budget Working Group

Contact Officer: Peter Nicholas, Asset Manager
(peter.nicholas@rugby.gov.uk)

Public or Private: Public

Report Subject to Call-In: Yes

Report En-Bloc: No

Forward Plan: Yes

Corporate Priorities: This report relates to the following priority(ies):
 A Healthier Rugby – To support people to live healthier, longer, and more independent lives.
 A Thriving Rugby – To deliver a thriving economy which brings Borough-wide investment and regenerates Rugby Town Centre.
 A Greener Rugby – To protect the environment and ensure the Borough adapts to climate change.
 A Fairer Rugby – To reduce inequalities and improve housing across the Borough.
[Corporate Strategy 2025-2035](#)
 This report does not specifically relate to any Council priorities but is necessary to maintain a number of Council assets that require replacement elements

Summary: The report seeks approval for funding to launch a capital programme for the replacement of roofs to Housing Revenue Account properties.

The programme will focus on replacement roofs for those properties where this is appropriate to ensure ongoing compliance with regulatory

requirements, particularly those set out in the consumer standard for quality and safe homes. Furthermore, the information being gathered by the ongoing Stock Condition Surveys will inform the necessary investment decisions for the Housing portfolio.

Financial Implications:

The financial implications, including those of achieving value for money, are set out on section 9 of the report.

Risk Management/Health and Safety Implications:

A planned programme is required to address the risk of deteriorating roofs.

The deteriorating condition of roofs, if not managed appropriately, could increase the prevalence of damp and mould and in doing so have a detrimental impact on tenant safety and reduce their satisfaction with landlord services.

A more detailed commentary in respect of risk is detailed in section 8 of the report.

Environmental Implications:

An environmental impact assessment forms appendix 1 to this report.

Legal Implications:

The Social Housing Regulation Act (2023) sets out the regulatory regime for social housing.

Implementation is overseen by the Regulator of Social Housing. They set out their requirements in respect of four consumer standards. One of these is the Safety and Quality Standard, which requires landlords to provide safe and good quality homes for their tenants, along with good quality landlord services.

Equality and Diversity:

An equality impact assessment forms appendix 2 to this report.

Options:

Option 1 - Implement a planned annual capital programme of roof replacement on those properties that require it

This will pro-actively address the needs of tenants and ensure compliance with the Safety and Quality Homes consumer standard.

Option 2 – continue to address roof repairs on a reactive basis.

This will be costly in revenue terms and not provide best value. In addition, it is a lost opportunity to be pro-active in preventing further deterioration of our stock and avoid the potential for an adverse impact on tenants.

Recommendation:

IT BE RECOMMENDED TO COUNCIL THAT:

(1) a supplementary budget of £500,000 from Housing Revenue Account Capital reserves be established for phased roof replacement during 2025/26; and

(2) provision be made at budget setting for 2026/27 onwards for a rolling capital programme of roof replacements

Reasons for Recommendation:

The Council is legally and morally obliged to ensure that its homes are safe, well-maintained and energy efficient for current and future tenants.

Ad hoc reactive repairs are costly and do not prove value for money. Whilst, such repairs, will still be needed, on occasion, a programme of planned works will limit the need for this in future years.

Cabinet - 24 June 2025

Capital Programme - Roof Replacement

Public Report of the Chief Officer - Communities and Homes

Recommendation

IT BE RECOMMENDED TO COUNCIL THAT -

(1) a supplementary budget of £500,000 from Housing Revenue Account Capital reserves be established for phased roof replacement during 2025/26; and

(2) provision be made at budget setting for 2026/27 onwards for a rolling capital programme of roof replacements

1.0 Executive summary

- 1.1 The ambition of the Council is to be a trusted landlord of choice, providing quality homes at affordable rents for the tenants of the borough now and into the future.
- 1.2 In addition, there is a recognition that good quality housing is a key determinant of ensuring positive health and social outcomes for our tenants.
- 1.3 The recent stock condition survey has highlighted that investment is required in a replacement roofing programme as a means of reducing the requirement for reactive / responsive revenue funded repairs to roofs.
- 1.4 The ongoing work to integrate the Property Repairs Service into the wider Communities and Homes Service has identified that the absence of a formal capital programme for roof replacement is a key contributor to this arising need.
- 1.5 It is therefore proposed that for 2025/26, a supplementary capital budget of £500,000 for roof replacements be established, with a rolling programme of continued investment to be budgeted for in future years.
- 1.6 Planning the spend in future years will continue to be intelligence led, informed by the interrogation of stock condition data (which is to be refreshed at 20% of total stock per annum) and the analysis of responsive repair data for roof repairs.
- 1.7 This approach demonstrates proactive asset management and can be viewed as a spend to save initiative.

- 1.8 The scale, logistics and risks associated with such works requires that it is best undertaken by a suitably qualified, experienced and adequately resourced external contractor.
- 1.9 The contractor services will be procured via a framework, which has already been through the process of establishing both contractor competency and value for money.
- 1.10 In the wider operational context, this work is evidence of our commitment to meet the needs of tenants as well as the requirements of the Regulator of Social Housing, in respect of Safety and Quality Standard.

2.0 Introduction

- 2.1 The stock condition survey has identified several properties where the roofs require complete renewal, to achieve value for money in the long term and avoid the need for costly reactive repairs.
- 2.2 The safety and welfare of our tenants is paramount in exercising our duties as a responsible landlord and deteriorating roofing structures can lead to issues that can have a potential adverse impact on health, including damp, mould and heat loss.
- 2.3 A roof upgrade programme will demonstrate compliance with the Regulator for Social Housing's consumer regulation requirements and adherence to the Decent Homes standard.

3.0 Key Issues Identified

- 3.1 A number of properties have roofs that exceed their expected lifespan, resulting in structural vulnerabilities. The Decent Homes legislation identifies a life cycle of approximately 60 years for roofing. However, it is also clear that replacement will not always be necessary after 60 years and a decision should be made based on assessed condition.
- 3.2 Increased maintenance costs due to recurring repairs and temporary fixes do not provide long term value for money. This often results in multiple visits, set up costs for minor repairs including scaffold and repeated mobilisation. A Capital programme will reduce expensive revenue cost.
- 3.3 An unsound roof will increase the likelihood of water ingress which could result in damp and mould issues.
- 3.4 Risk of excessive water ingress in extreme weather conditions that would lead to further maintenance and repair requirements both internally and externally to the Council's asset.
- 3.5 There is a risk that by not tackling this issue in a planned way, the Council will be in breach of compliance and mandatory requirements – including adherence to Decent Homes Legislation (2006) and Social Housing Regulations (2023).

Delays in addressing the issue will lead to higher future costs due to inflation and further degradation as well as the potential for water ingress causing further damage to homes and potentially to tenants' belongings.

4.0 Proposed works

- 4.1 A programme of works will be agreed using already gathered information on the poor condition of some roofs (responsive repairs requests), with a particular focus on Parkfield Road and Lea Crescent initially and other data gathered through the ongoing stock condition surveys
- 4.2 The appointed contractor will be expected to assist with the required survey, design and subsequent specification for the replacement roofs, including access requirements (scaffold) and ancillary works such as gutter and fascia replacements.

5.0 Managing the customer experience

- 5.1 The Council, in conjunction with the appointed contractor, will develop and implement an effective communication plan for tenants, setting out why the work is required and the benefits that will be gained.
- 5.2 Tenants will routinely be expected to remove or cover items stored in loft spaces. However, Contractors will be expected to make reasonable adjustments and offer help and assistance for those who are unable to do so due to age or ability.
- 5.3 Vulnerability data collected through customer contact will be utilised to plan the programme of work and communication methods to be tailored to meet tenants' needs. The completion of 1,000 tenancy welfare checks in the last few months will be a valuable tool in planning this aspect of the project.
- 5.2 The Council and contractor will agree on any start and finish date but will endeavour to get work done when the weather during warmer and drier months of the year.

6.0 Contract management

- 6.1 The contractor will be required to produce succinct performance data at agreed frequencies, as part of the wider contract. management process. These will include updates on:
 - Starting and completing on the agreed dates.
 - Complying with all health and safety regulations, keeping incidences to zero.
 - Remaining within budget and agreed costs.

- 6.2 There will be a robust approach to contract management by the Council's Asset Manager, which will include the development, maintenance and review of a risk register for the duration of the project.

7.0 Environmental benefits of the proposed works

- 7.1 The replacement roofing will also provide an opportunity to top up loft insulation and therefore reduce the Council's carbon footprint by reducing heat loss in tenants' homes.
- 7.2 This will help poor performing properties in achieving an Energy Performance Certificate rating of C or above, in line with the 2030 target set by Government.
- 7.3 An Environmental Impact Assessment forms Appendix 1 to this report.

8.0 Risk management

- 8.1 Failure to address the deteriorating roofs on social housing stock poses significant risks.
- 8.2 Delaying replacements may lead to higher future and repeated revenue repair costs. Delay will also result in worsening damage resulting in a higher remedial specification being needed.
- 8.3 Prolonged exposure to harsh weather conditions may exacerbate roof damage, requiring more extensive repairs.
- 8.4 Contractor resource is becoming harder to procure, resulting in increased costs due to supply and demand.
- 8.5 Failure to meet specific housing standards will potentially result in increased disrepair claims, maladministration findings the Housing Ombudsman and the potential for unlimited fine by the Regulator of Social Housing.
- 8.6 Insufficient budget allocation and delays could potentially disrupt other ongoing projects that the Council is undertaking not least the installation of Solar panel installations where funding has been secured through a recently secured £10.7M grant – Warm Homes 3.
- 8.7 Failure to act can result in reduced tenant dissatisfaction and could erode trust in the Council's ability to manage social housing effectively, which could also attract the attention of media.
- 8.8 Missed opportunities to integrate sustainable and energy-efficient materials during replacements.
- 8.9 Persistent leaks can cause dampness and mould growth, leading to respiratory issues and other illnesses among tenants. Whilst falling debris from damaged roofs could pose a risk to passers-by, particularly in densely populated areas.

8.10 Repetitive roofing repairs require work at height, exposing workers to risks of falls, injuries or fatalities if safety measures are not strictly followed.

9.0 Conclusion

9.1 The Council is already committed to being a proactive and responsible landlord, providing high quality homes for our current and future tenants.

9.2 The proposed capital programme of roof replacement is to be informed by data collected through the stock condition survey, providing evidence of a move toward proactive rather than reactive asset management

Name of Meeting: Cabinet
Date of Meeting: 24 June 2025
Subject Matter: Capital Programme - Roof Replacement
Originating Department: Communities and Homes

DO ANY BACKGROUND PAPERS APPLY YES NO

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A

Rugby Borough Council

Climate Change and Environmental Impact Assessment for the Capital Programme – Roof Replacements

CONTEXT

In 2019 the UK Parliament set a commitment in law to reach net zero carbon emissions by 2050. Achieving this target will require considerable effort with public bodies, private sector organisations, the third sector and individuals working together to take action.

Rugby Borough Council declared a climate emergency in 2019 and the Council's Corporate Strategy (2021-2024) [link](#) sets ambitious outcomes in relation to Climate Change. These ambitions are further defined through the Council's Climate Change Strategy [link](#) and must now be progressed through the decisions which the Council makes.

It is therefore important that Rugby Borough Council gives due regard to climate change when making decisions. In the context of the Council's business, Climate Change includes greenhouse gas emissions, biodiversity, habitat loss and environmental destruction. When putting forward recommendations for decision, officers must assess how these recommendations are likely to influence our climate change commitments by completing the following Climate Change and Environmental Impact Assessment.

To help you complete this assessment, please see the following guidance on SharePoint [here](#).

A copy of this Climate Change and Environmental Impact Assessment, including relevant data and information should be forwarded to your Chief Officer for approval.

If you require help, advice and support to complete the form, please contact your Chief Officer.

SECTION 1: OVERVIEW

Portfolio and Service Area	Communities and Homes
Policy/Service/Change being assessed	Cabinet Report for funding to undertake an ongoing capital programme of roof renewal
Is this a new or existing Policy/Service/Change?	New capital programme
If existing policy/service please state date of last assessment	N/A
Ward Specific Impacts	All
Summary of assessment Briefly summarise the policy/service/change and potential impacts	The request for a capital budget to fund deteriorating roofing structures on Council housing stock, to comply with Decent Homes legislation and Social Housing Regulations (2023)
Completed By	Peter Nicholas
Authorised By	
Date of Assessment	02/04/2025

SECTION 2: GREENHOUSE GAS EMISSIONS

	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Scope 1 Emissions Direct emissions from council owned resources, for example through boilers or vehicles.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Scope 2 Emissions Indirect emissions occurring at the location energy is produced for council activities. For example, electricity generation for council buildings.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

SECTION 3: CLIMATE CHANGE STRATEGY

	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Workplaces and the Economy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Transport	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Natural Environment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Reduce carbon footprint			
Homes and Energy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Increase energy efficiency of council stock			
Waste, Resources and the Circular Economy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Climate and Nature Positive Communities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Adaptation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

SECTION 4: REVIEW

Where a negative impact is identified, the proposal and/or implementation can be adapted or changed; meaning there is a need for regular review. This review may also be needed to reflect additional data and evidence for a fuller assessment (proportionate to the decision in question). Please state the agreed review timescale for the identified impacts of the policy implementation or service change.

Review date	No review date
Key points to be considered through review	N/A
Person responsible for review	Pete Nicholas
Authorised by	

EQUALITY IMPACT ASSESSMENT (EqIA) for the Capital Programme – Roof Replacements

Context

1. The Public Sector Equality Duty as set out under section 149 of the Equality Act 2010 requires Rugby Borough Council when making decisions to have due regard to the following:
 - eliminating unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Act,
 - advancing equality of opportunity between people who share a protected characteristic and those who do not,
 - fostering good relations between people who share a protected characteristic and those who do not, including tackling prejudice and promoting understanding.
2. The characteristics protected by the Equality Act are:
 - age
 - disability
 - gender reassignment
 - marriage/civil partnership
 - pregnancy/maternity
 - race
 - religion/belief
 - sex/gender
 - sexual orientation
3. In addition to the above-protected characteristics, you should consider the crosscutting elements of the proposed policy, such as impact on social inequalities and impact on carers who look after older people or people with disabilities as part of this assessment.
4. The Equality Impact Assessment (EqIA) document is a tool that enables RBC to test and analyse the nature and impact of what it is currently doing or is planning to do in the future. It can be used flexibly for reviewing existing arrangements but in particular should enable identification where further consultation, engagement and data is required.
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6. Where the EqIA relates to a continuing project, it must be reviewed and updated at each stage of the decision.
7. Once completed and signed off the EqIA will be published [online](#).
8. An EqIA must accompany all **Key Decisions** and **Cabinet Reports**.
9. For further information, refer to the EqIA guidance for staff.
10. For advice and support, contact:
Rebecca Ewers

Corporate Equality & Diversity Officer
rebecca.ewers@rugby.gov.uk
01788 533509



Equality Impact Assessment

Service Area	Communities and Homes
Policy/Service being assessed	Cabinet Report for funding to undertake an ongoing capital programme of roof renewal
Is this a new or existing policy/service? If existing policy/service please state date of last assessment	New
EqlA Review Team – List of members	Pete Nicholas
Date of this assessment	02/04/2025
Signature of responsible officer (to be signed after the EqlA has been completed)	Michelle Dickson

A copy of the completed and signed Equality Impact Assessment report, including relevant data and information to be forwarded to the Corporate Equality & Diversity Officer.

Details of Strategy/ Service/ Policy to be analysed

<u>Stage 1 – Policy to be analysed</u>	
(1) Describe the main aims, objectives and purpose of the Strategy/Service/Policy (or decision)?	The request for a capital budget to fund deteriorating roofing structures on Council housing stock, to comply with Decent Homes legislation and Social Housing Regulations (2023)
(2) How does it fit with Rugby Borough Council's Corporate priorities and your service area priorities?	The report relates the Council's A Fairer Rugby corporate priority and is necessary to maintain a number of Council assets that require elemental replacements. The information gathered from the Council's ongoing stock condition surveys will inform investment decisions for its housing portfolio.
(3) What are the expected outcomes you are hoping to achieve?	Compliance with Decent Homes legislation and Social Housing Regulations (2023)
(4) Does or will the policy or decision affect: <ul style="list-style-type: none"> • Customers • Employees • Wider community or groups 	Customer
(5) Will the policy or decision involve substantial changes in resources?	A commitment of £500k for 2025/2026 and an ongoing Capital budget for future years
<u>Stage 2 – Evidence about user population and consultation</u>	As a minimum you must consider what is known about the population likely to be affected which will support your understanding of the impact of the policy, e.g. service uptake/usage, customer satisfaction surveys, staffing data, performance data, research information (national, regional and local data sources).

<p>(1) What does the data tell you about the groups this policy or decision impacts?</p> <p>Possible data sources:</p> <ul style="list-style-type: none"> • national statistics/census data • local statistics • evaluations • analysis of complaints • user feedback • outcomes from consultation/community voice • Council published information, service data • District and Ward Profile – Warwickshire Observatory • Office of National Statistics • Fingertips health profiles • Indices of Multiple Deprivation • RBC Annual Workforce Equality Report 	N/A
<p>(2a) Have you consulted or involved those groups that are likely to be affected by the strategy/ service/policy you want to implement?</p> <p>If yes, please state which groups were involved in the consultation and what were their views and how have their views influenced the policy/decision?</p>	No

(2b) If you have not consulted or engaged with communities that are likely to be affected by the policy/decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary.	No - the budget is to replace deteriorating roofs on some Council housing stock – consultation with tenants regarding this happening is not necessary. Consultation on when the work will be carried out will be done once contracts and programmes have been approved.		
<u>Stage 3 – Analysis of impact</u>			
<p>(1) <u>Protected Characteristics</u> From your data and consultations is there any positive, adverse or negative impact identified for any particular group, which could amount to discrimination?</p> <p>If yes, identify the groups and how they are affected.</p>	Protected Characteristic	Nature of Impact Positive, Neutral, Adverse (explain why)	Extent of impact Low, medium, high
	Age	None	N/A
	Disability	None	N/A
	Sex	None	N/A
	Gender reassignment	None	N/A
	Marriage/civil partnership	None	N/A
	Pregnancy/maternity	None	N/A
	Race	None	N/A
	Religion/belief	None	N/A
	Sexual Orientation	None	N/A

(2) <u>Cross cutting themes</u> (a) Are your proposals likely to impact on social inequalities e.g. child poverty, geographically disadvantaged communities? If yes, please explain how?	Description of impact	Nature of impact Positive, Neutral, Adverse (explain why)	Extent of impact Low, medium, high
	Socio-economic e.g.: child poverty, income level, education level, working hours/occupation, family/social support, access to good nutrition	None	N/A
	Environmental e.g.: housing status, transport links, geography, access to services, air quality, noise pollution	None	N/A
(3) Using the information gathered in stages 2 and 3, please describe how the policy/strategy/service will: <ul style="list-style-type: none"> a. Eliminate unlawful discrimination, harassment, victimisation and any other unlawful conduct prohibited by the act b. Advance equality of opportunity between people who share and people who do not share a relevant protected characteristic c. Foster good relations between people who share and people who do not share a relevant protected characteristic 	N/A		
(4) Are there any obvious barriers to accessing the service? If yes, how can they be overcome?	N/A		

<p>(5) What Equality Monitoring Data will be collected to analyse impact? How will the Equality Monitoring Data collected be used?</p> <p>If no Equality Monitoring Data is being collected, why not?</p> <p>For support with this section, please refer to the Equality Monitoring Guidance.</p>	<p>The Tenancy Health Checks that are currently being undertaken by the Housing Management team will inform of any vulnerabilities of residents where additional help may be required and / or adjustments made to the proposed work.</p>
<p>(6) Complete this section if any adverse impacts were identified in 3.1.</p> <p>Outline any actions that will be taken to remove or mitigate the adverse impacts identified in 3.1 to ensure that no discrimination is taking place. If removing or mitigating the impact is not possible, you may in certain circumstances, justify the discrimination. If that is the case, please give evidence for why justifying is possible in this case.</p>	<p>N/A</p>

<p><u>Stage 4 – Action Planning, Review and Monitoring</u></p>	
<p>(1) Data analysis What does feedback from Equality Monitoring Data gathered tell you about impact on groups? Were there any unforeseen impacts (positive or negative)?</p> <p>The feedback/data should be used to inform your Action Plan in (2)</p>	<p>This Equality Impact Assessment will be reviewed by Michelle Dickson, Chief Officer for Communities and Homes</p>

<p>If No Further Action is required then go to – Review and Monitoring</p> <p>(2) Action Planning – Specify any changes or improvements that can be made to the service or policy to mitigate or eradicate negative or adverse impact on specific groups, including resource implications.</p>	<p>EqlA Action Plan</p> <table border="1" data-bbox="875 347 2107 579"> <thead> <tr> <th data-bbox="875 347 1120 427">Action</th> <th data-bbox="1120 347 1364 427">Lead Officer</th> <th data-bbox="1364 347 1615 427">Date for completion</th> <th data-bbox="1615 347 1865 427">Resource requirements</th> <th data-bbox="1865 347 2107 427">Comments</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>					Action	Lead Officer	Date for completion	Resource requirements	Comments																				
Action	Lead Officer	Date for completion	Resource requirements	Comments																										
<p>(3) Review and Monitoring State how and when you will monitor policy and Action Plan. Will you make any changes to the Equality Data that you are collecting or how you are collecting/using the data?</p>	<p>N/A</p>																													

Please annotate your policy with the following statement:

‘An Equality Impact Assessment on this Cabinet report was undertaken on 02/04/2025

AGENDA MANAGEMENT SHEET

Report Title: Demonstrating Compliance with the Requirements of the Housing Ombudsman Service 2024/25

Name of Committee: Cabinet

Date of Meeting: 24 June 2025

Report Director: Chief Officer - Communities and Homes

Portfolio: Communities and Homes, Regulation and Safety

Ward Relevance: All Wards

Prior Consultation: Complaints Working Group, Portfolio Holder Communities and Homes, Regulation and Safety, Report Consultation Officers Group, Transparency, Influence and Accountability Tenants Group, Communication, Consultation and Information Manager.

Contact Officer: Mary Jane Gunn
Communities and Projects Manager
maryjane.gunn@rugby.gov.uk

Public or Private: Public

Report Subject to Call-In: Yes

Report En-Bloc: No

Forward Plan: Yes

Corporate Priorities: This report relates to the following priority(ies):
 A Healthier Rugby – To support people to live healthier, longer, and more independent lives.
 A Thriving Rugby – To deliver a thriving economy which brings Borough-wide investment and regenerates Rugby Town Centre.
 A Greener Rugby – To protect the environment and ensure the Borough adapts to climate change.
 A Fairer Rugby – To reduce inequalities and improve housing across the Borough.
[Corporate Strategy 2025-2035](#)
 This report does not specifically relate to any Council priorities but

Summary: This report demonstrates through two appended reports the compliance of Rugby Borough Council

housing service with the requirements of the Housing Ombudsman Service in 2024/25.

The Complaints Performance and Service Improvement Report 2024/25 forms appendix 1 of this report and provides an opportunity for Rugby Borough Council to be open and transparent about complaint handling performance. The Housing Ombudsman Service requires this report to be considered by the landlord's governing body and the report, and the governing bodies response must be published.

Rugby Borough Council's self-assessment against the Complaint Handling Code of the Housing Ombudsman Service forms appendix 2 of this report. The Complaint Handling Code requires landlords to assess themselves against each provision of the Code. This self-assessment must be considered and approved by the landlords governing body.

The report and the self-assessment have been considered by a cross party, member appointed group of Cllr Claire Edwards. Cllr Noreen New and Cllr Tim Willis who form the Complaints Working Group and this report and its appendices reflect their findings.

Financial Implications:

There are no financial implications of this report.

Risk Management/Health and Safety Implications:

The Complaints Performance and Service Improvement Report 2024/25 sets out actions and measures taken which mitigate the risk of non-compliance with the Complaint Handling Code of the Housing Ombudsman Service which has since 1 April 2024 been a statutory code.

The self-assessment against the provisions of the Complaint Handling Code demonstrates compliance with the Code and mitigates the risk of noncompliance with the statutory Code.

Environmental Implications:

None have been identified.

Legal Implications:

Commencing 1 April 2024, the Complaint Handling Code of the Housing Ombudsman Service is a statutory code.

The Social Housing (Regulation) Act 2023 sets out that there will be a Memorandum of Understanding

between the Regulator of Social Housing and the Housing Ombudsman Service enabling them to collaborate and share information to protect tenants' rights.

The Social Housing (Regulation) Act 2023 in summary seeks to:

- to facilitate a new, proactive consumer regulation regime
- to refine the existing economic regulatory regime
- to strengthen the Regulator of Social Housing's (Regulator) powers to enforce the consumer and economic regimes

Equality and Diversity:

An Equality Impact Assessment has been carried out and is attached as appendix 3 to this report.

Options:

Option 1 - Cabinet is invited to endorse the action plan set out in Section 5.7 of appendix 1 and approve the self-assessment against the provisions of the Complaint Handling Code. Both report and self-assessment having been considered by the Complaints Working Group and reflect their findings.

Option 2 – Cabinet does not endorse the action plan set out in Section 5.7 of appendix 1 and does not approve the self-assessment against the provisions of the Complaint Handling Code.

Recommendation:

1. The action plan, as set out in paragraph 5.7 of Appendix 1, be endorsed;
2. the self-assessment against the provision of the complaint handling code set out in appendix 2 be approved; and
3. the significantly improved performance during 2024/25 in respect of complaints handling be noted.

Reasons for Recommendation:

Both the action plan set out in Section 5.7 of appendix 1 and the self-assessment forming appendix 2 have been considered by the Complaints Working Group and reflect their findings.

This is an opportunity to ensure that Members have oversight of complaints within the housing/landlord service and the measures that Rugby Borough Council is taking to improve complaint handling in the housing/landlord service.

Cabinet - 24 June 2025

Demonstrating Compliance with the Requirements of the Housing Ombudsman Service 2024/25

Public Report of the Chief Officer - Communities and Homes

Recommendation

- (1) The action plan, as set out in paragraph 5.7 of Appendix 1, be endorsed;
- (2) the self-assessment against the provision of the complaint handling code set out in appendix 2 be approved; and
- (3) the significantly improved performance during 2024/25 in respect of complaints handling be noted.

1. Executive Summary

- 1.1 This report provides Cabinet with the opportunity to respond to the Complaints Performance and Service Improvement Report 2024/25, attached as appendix 1 in line with the requirements of the Complaint Handling Code of the Housing Ombudsman Service.
- 1.2 This report provides Cabinet with the opportunity to review and approve the self-assessment of Rugby Borough Council against the Complaint Handling Code of the Housing Ombudsman Service. The self-assessment is attached as appendix 2.
- 1.3 The Complaints Performance and Service Improvement Report 2024/25 and the self-assessment of Rugby Borough Council against the provisions of the Complaint Handling Code of the Housing Ombudsman Service have been considered by the Complaints Working Group and this report and the appendices reflects their findings.
- 1.4 The Complaints Performance and Service Improvement Report 2024/25 satisfies the requirements of the Complaints Handling Code which requires the identification and sharing of intelligence and learning from complaints. The analysis in the report is of complaints made in respect of our housing/landlord service and relating to:
 - Tenancy management
 - Management of neighbourhoods and communities

- Responsive repairs and asset management including compliance works to keep our homes safe, planned works and environmental improvements
 - Tenant involvement, empowerment and communications with our tenants
- 1.5 The report sets out analysis of complaints performance in 2024/25 including:
- Complaint volumes
 - Complaint types
 - Compliance with the complaint handling timescales required by the Complaint Handling Code of the Housing Ombudsman Service
 - Learning outcomes
 - Actions being undertaken to address learning outcomes
- 1.6 The self-assessment of Rugby Borough Council against the Complaint Handling Code of the Housing Ombudsman Service is attached at appendix 2 and demonstrates the compliance of Rugby Borough Council with the Code.

2. Background

- 2.1 The Complaints Performance and Service Improvement Report 2024/25 has been produced to ensure we learn from the complaints we receive and to evidence Rugby Borough Council's compliance with the Complaint Handling Code of the Housing Ombudsman Service which has from 1 April 2024 been a statutory code.
- 2.2 The report sets out complaint volumes and types within the housing/landlord service and compliance with the 10-working day timescale for responding to complaints at stage one, and the 20-working day timescale for responding to complaints at stage 2, as set out in the Complaint Handling Code of the Housing Ombudsman Service.
- 2.3 The report sets out learning from complaints and measures that we take to improve services and complaint handling.
- 2.4 The self-assessment against the Complaint Handling Code of the Housing Ombudsman Service should be produced at least annually and reviewed and approved by the landlords governing body. Our self-assessment of April 2025, which forms Appendix 2 demonstrates compliance with the Code.

3. Performance in 2024/25

- 3.1 In 2024/25 we received 98 complaints about the housing/landlord service. Of these complaints 79% were responded to within the 10-day response time required by the Complaint Handling Code of the Housing Ombudsman Service.

3.2 Of those complaints 18 progressed to Stage two. 89% of stage two complaints were responded to within the 20-day response time required by the Complaint Handling Code of the Housing Ombudsman Service.

4. Performance against previous year

4.1 We are pleased to inform Cabinet of the significant improvement in performance from 2023/24 when only 35% of our stage 1 complaints were responded to within the 10-working day response time required by the Housing Ombudsman Service as one of their key indicators of compliant complaint handling. Our performance is now top quartile within the sector.

4.2 This improvement has been brought about through:

- Staff training including in house training and accessing training from the Housing Ombudsman Service
- Establishment in 2023/24 of a quarterly Lessons Learnt Clinic which scrutinises complaints and serious incidents including how we respond to complaints
- Establishment of the Transparency, Influence and Accountability Tenants Group who work with us on a regular basis to improve complaint handling and communication
- Close weekly monitoring of open complaints
- Setting objectives relating to appropriate complaint handling in Performance Development Reviews'

4.3 It should be noted, we expect our complaint volumes to increase as we continue to embed within the Communities and Homes a positive culture with regard to complaints. Complaints provide us with opportunities to learn and improve our services which we welcome.

5. Conclusion

5.1 The Complaints Performance and Service Improvement Report 2024/25 enables the Council to learn from its complaints to improve services and assists compliance with the Complaint Handling Code of the Housing Ombudsman Service. Our self-assessment against the Code demonstrates compliance with the Code.

Name of Meeting: Cabinet

Date of Meeting: 24 June 2025

Subject Matter: Demonstrating Compliance with the Requirements of the Housing Ombudsman Service 2024/25

Originating Department: Communities and Homes

DO ANY BACKGROUND PAPERS APPLY YES NO

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A



Cabinet Report 24 June 2025

Demonstrating Compliance with the Reporting Requirements of the Housing Ombudsman Service

Appendix 1

Report from:	Mary Jane Gunn Communities and Projects Manager maryjane.gunn@rugby.gov.uk
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Subject:	Rugby Borough Council Communities and Homes Complaints Performance and Service Improvement Report 2024/25
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1.	Introduction
	<p>Rugby Borough Council is committed to learning from the complaints it receives and to assist this has produced this annual report for 2024/25.</p> <p>Rugby Borough Council will use this report to:</p> <ul style="list-style-type: none">• Inform our tenants about the type of complaints we receive and how we learn from these complaints to improve our services.• Report to the Regulator of Social Housing (RSH) (annually)• Report to the Housing Ombudsman Service (HOS) (annually)• Understand our compliance with the Complaint Handling Code (CHC) of the Housing Ombudsman Service and the Local Government and Social Care Ombudsman (LGSCO)• Report to our Complaints Working Party and Cabinet (annually)• Identify trends in complaints coming forward.• Scrutinise our complaint handling to embed an ethos of continuous improvement.

	<p>We produce reports each quarter in this format to ensure timely monitoring of performance and to inform quarterly Communities and Homes Lessons Learnt Clinics at which we review complaints, identify trends or systemic issues and agree and monitor actions required.</p>																				
<p>2.</p>	<p>Summary This report sets out the results of an analysis of complaints performance in 2024/25 including learning outcomes and actions being taken to address those learning outcomes.</p> <p>This satisfies the requirements of the HOS, LGSCO and their respective CHC's which require the identification and sharing of intelligence and learning from complaints.</p> <p>The analysis in this report is of complaints made in respect of services delivered by the Communities and Homes Directorate of Rugby Borough Council (including the responsive repairs service provided by the Property Repairs Service)</p> <p>Where a tenant or applicant is dissatisfied with our response to their complaint they may refer the matter to the appropriate Ombudsman service for investigation. The table below indicates which services delivered by the Communities and Homes Department are referred to/investigated by which Ombudsman service.</p> <table border="1" data-bbox="222 756 1772 1208"> <thead> <tr> <th data-bbox="222 756 1024 797">Local Government & Social Care Ombudsman</th> <th data-bbox="1024 756 1772 797">Housing Ombudsman Service</th> </tr> </thead> <tbody> <tr> <td data-bbox="222 797 1024 878">Housing Allocations (Under the Housing Act 1996 Part 6)</td> <td data-bbox="1024 797 1772 878">Leasehold Services</td> </tr> <tr> <td data-bbox="222 878 1024 919">Homelessness (Under the Housing Act 1996 Part 7)</td> <td data-bbox="1024 878 1772 919">Moving to a Property</td> </tr> <tr> <td data-bbox="222 919 1024 959">General Housing Advice</td> <td data-bbox="1024 919 1772 959">Rent and Service Charges</td> </tr> <tr> <td data-bbox="222 959 1024 1000">Housing Benefit</td> <td data-bbox="1024 959 1772 1000">Occupancy Rights</td> </tr> <tr> <td data-bbox="222 1000 1024 1040"></td> <td data-bbox="1024 1000 1772 1040">Property Condition – Repairs and Improvements</td> </tr> <tr> <td data-bbox="222 1040 1024 1081"></td> <td data-bbox="1024 1040 1772 1081">Tenant Behaviour</td> </tr> <tr> <td data-bbox="222 1081 1024 1122"></td> <td data-bbox="1024 1081 1772 1122">Estate Management</td> </tr> <tr> <td data-bbox="222 1122 1024 1162"></td> <td data-bbox="1024 1122 1772 1162">Complaint Handling</td> </tr> <tr> <td data-bbox="222 1162 1024 1208"></td> <td data-bbox="1024 1162 1772 1208">Compensation</td> </tr> </tbody> </table>	Local Government & Social Care Ombudsman	Housing Ombudsman Service	Housing Allocations (Under the Housing Act 1996 Part 6)	Leasehold Services	Homelessness (Under the Housing Act 1996 Part 7)	Moving to a Property	General Housing Advice	Rent and Service Charges	Housing Benefit	Occupancy Rights		Property Condition – Repairs and Improvements		Tenant Behaviour		Estate Management		Complaint Handling		Compensation
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<p>3.</p>	<p>How we will use this report This report enables regular updates on the volume, categories and outcome of complaints, including complaints that have gone on to be investigated at stage 2, alongside complaint handling performance including compliance with the timescales for responding required by the CHC's of the HOS and the LGSCO.</p> <p>This report enables themes or trends to be assessed by relevant managers to identify potential systemic issues, serious risks or policies and procedures that require revision. It will also be used to inform staff and contractor training.</p>																				

4.	<p>Relevant issues and implications</p>
4.1	<p>Risk Assessment Scrutinising complaints contributes to avoiding a finding of maladministration or the potential for the issue of a Complaints Failure Notice by the HOS or the LGSCO, which could trigger a regulatory enquiry.</p>
4.2	<p>Policy Implications This report meets the requirements of the Rugby Borough Council Customer Feedback Policy which requires the reporting of learning on complaints.</p>
4.3	<p>Reference to the Regulator of Social Housing (RSH) regulatory framework/legislation and the requirements of the HOS.</p> <p>This report assists compliance with the relevant consumer standard of the RSH: The Transparency, Influence and Accountability (TIA) Standard which requires:</p> <ul style="list-style-type: none"> • Registered providers must ensure their approach to handling complaints is simple and accessible. • Registered providers must publicise their complaints process and what tenants can do if they are dissatisfied with the outcome of a complaint or how a complaint was handled. • Registered providers must provide tenants with information about the type of complaints received and how they have learnt from complaints to continuously improve services. <p>The TIA Standard (of the RSH) requires us to report on satisfaction with complaints handling (see 5.3) complaint volumes and complaints responded to with the CHC timescales. This report will facilitate those reports.</p> <p>The Housing Ombudsman Service - Complaint Handling Code</p> <p>The CHC of the HOS is now (from 1 April 2024) a statutory requirement for social landlords. The CHC was produced in consultation with landlords, tenants, and other stakeholders.</p> <p>The CHC sets out the requirements for landlords to effectively respond to complaints from tenants.</p> <p>The HOS monitors' social landlords' compliance with the CHC. It can issue a complaint handling failure order if a landlord does not comply.</p> <p>Landlords must complete an assessment of their complaint handling set out within a Complaints Performance and Service Improvement Report. This helps the HOS to check landlords are following the code, and it can use the data to identify systemic issues.</p>

The annual Complaints Performance and Service Improvement Report is an important part of our assessment of complaint handling, it is a requirement of the HOS who require it to be submitted to our Governing Body and for the report and the response of the Governing Body to the report be published.

5. Complaint Report

5.1 Complaint Volumes

Number of complaints - HOS	Q1	Q2	Q3	Q4	Total
Stage 1	20 (75%)	21 (71%)	22 (77%)	35 (86%)	98 (79%)
Stage 1 Extensions***	4	4	3	3	14
Stage 2	6 (67%)	3 (100%)	5 (100%)	4 (100%)	18 (89%)
Stage 2 Extensions***	0	0	0	0	0
Ombudsman**	3	0	1	0	4

Number of complaints - LGSCO	Q1	Q2	Q3	Q4	Total
Stage 1	7 (100%)	13 (77%)	18 (50%)	13 (100%)	51 (76%)
Stage 1 Extensions***	0	2	1	2	5
Stage 2*	1 (100%)	0	3 (67%)	1 (100%)	5 (80%)
Stage 2 Extensions***	0	0	1	0	1
Ombudsman**	0	0	1	0	1

**FOR LGSCO – Before 1st December 2024 15 Day Target Timescale
1st December 2024 onward – 10 Day Target Timescale**

% of complaints responded to within the timescales required by the CHC of the HOS (10 working days) is indicated in ()
At Stage 2 % of complaints responded to within the timescales set out in the Rugby Borough Council Customer Feedback Policy is indicated in ()

On 1 December 2024 Rugby Borough Council changed its Customer Feedback Policy to align with the CHC's of the HOS and the LGSCO. The Policy now requires:

- A 10-working day response time at stage 1 for all complaints.
- A 20-working day response time at stage 2 for all complaints.

For all housing/landlord complaints (those investigated by the HOS) compliance against a 10-working day timescale has been measured and reported since 2022.

Stage 2 complaints are not additional complaints. They are the appeal stage of a Stage 1 complaint.

*Stage 2 complaints are recorded in the Q where the Stage 2 process commenced.

**Complaints that go to the Ombudsman are not additional complaints, they are complaints that are being investigated by the Housing Ombudsman Service or the Local Government and Social Care Ombudsman, usually following the appeal (stage 2) of RBC processes.

Ombudsman referrals are recorded in the quarter where the referral processed commenced (when Rugby Borough Council is informed by the Ombudsman Service)

*** Although extensions have been requested of tenants, some of the correspondence did not adhere to the requirements of the Complaint Handling Code of the Housing Ombudsman Service, these have been counted as **not** being responded to within target timescales.

The number of housing/landlord complaints per 1000 tenants for 24/25 is 28.1

No complaints were refused by Rugby Borough Council.

Our complaint volumes will be benchmarked against the rest of the sector and will be included in an annual Members update on our comparative performance on the Tenant Satisfaction Measures of the RSH.

5.2 Reasons for Complaint

Complaint Type (Stage 1) HOS	Q1 24/25	Q2 24/25	Q3 24/25	Q4 24/25
Responsive repairs	11	6	13	14
Damp & Mould	4	1		3
Communications	1	2	1	
Response to Fire in Independent Living Scheme	1			
Estate Management	2	1	2	1
Anti-Social Behaviour		8		4
Officer Conduct	1	2	1	6

Garages		1		
Right to Buy			1	1
Tenant Dispute			3	
Noise			1	
Infestation				1
Non-Receipt of Payment				1
Parking				1
Succession				2
Adaptations (Council)				1

Complaint Type (Stage 2) HOS	Q1 24/25	Q2 24/25	Q3 24/25	Q4 24/25
Responsive repairs	3		2	1
Damp & Mould	1			
Response to Fire in Independent Living Scheme	1			
Anti-Social Behaviour		1		
Officer Conduct		2	2	1
Estate Management	1			
Communications			1	
Adaptations (Council Homes)				
Right to Buy				2

Complaint Type (Stage 1) LGSCO	Q1 24/25	Q2 24/25	Q3 24/25	Q4 24/25
Home Adaptations (Private)	1	3	3	
Homelessness	3	7	3	5
Housing Benefit	3	2	3	4
Allocations		1	8	4
Overcrowding			1	

Complaint Type (Stage 2) LGSCO	Q1 24/25	Q2 24/25	Q3 24/25	Q4 24/25
Homelessness	1			1
Allocations			3	

5.3	<p>Satisfaction with the Complaints Process</p> <p>In 2024/25 Rugby Borough Council undertook its annual Tenants Survey. This was a census survey of our 3400 tenants, conducted by post. Our response rate was 32.03%.</p> <p>The survey identified 44.7% of our tenants who report making a complaint in the last 12 months were satisfied with the way that RBC handles complaints.</p> <p>This is an upward trend from 2023/24 when 41.5% of our tenants who report making a complaint in the last 12 months were satisfied with the way that RBC handles complaints.</p> <p>In 2025/26 we will undertake action to further increase satisfaction with our complaint handling including:</p> <ul style="list-style-type: none"> • The provision of information about our complaints policy and process in our Tenants Newsletters. • We have established a Transparency, Influence and Accountability Tenants Group, the group has assisted us in our self-assessment of compliance with the CHC of the HOS and we will work with this group on 2025/26 on improving communications around complaints and quality responses. • We are actively promoting engagement opportunities to those who have experienced our complaints process so their experience can inform our improvements. • Telephone surveys of tenants who have complained during so that we increase our understanding of how tenants receive our complaints handling service and identify ways we can improve. • Training for investigating and responding officers takes place twice a year and is mandatory for officers responding to complaints. • Training for frontline staff took place in Nov 2024 to support them in recognising complaints, recording them correctly and escalating them appropriately. This training will take place annually. • We have established a cross-party Complaints Working Group who will meet annually to oversee performance.
5.4	<p>Compensation</p> <p>In 2024/25 there were 23 settled compensation claims totalling £27,913.00</p> <p><i>Note: Not all compensation relates to complaints.</i></p>
5.5	<p>Learning from complaints</p> <p>The CHC of the HOS requires landlords to demonstrate learning and continuous improvement from complaints, ensuring intelligence from complaints drives change and enables the resident’s voice to be heard.</p>

	<p>The code sets out:</p> <p><i>For boards or equivalent governance, the Code supports culture setting and intelligence for assurance exercises, using complaint data alongside other management information on stock, services and customer feedback to provide insight into their organisation. It is important for governance to understand the complaints their organisations are receiving and the impact of their complaint handling on residents.</i></p> <p><i>For chief executives and senior managers, the Code supports learning from complaints and promotes the open and transparent use of information to assess performance and risks.</i></p> <p>The CHC requires reporting to tenants, staff, leadership team and elected Members to ensure that a culture of learning from complaints is truly embedded. An explicit requirement of the CHC is that organisations' self-assessments against compliance with the Complaint Handling Code demonstrate how we share learning with our elected Members and tenants.</p> <p>We report on complaints in our quarterly Tenants Newsletter: Numbers, complaint types, compliance with the response handing timescales of the CHC and numbers of complaints that are satisfied at Stage 1.</p>					
5.6	<p>Feedback From Complainants</p> <p>We undertake quarterly surveys with complainants following their complaint being closed. Our surveys tell us consistently:</p> <ul style="list-style-type: none"> • A lack of satisfaction with communications – people struggling to get through on the phone to discuss their issues was the main standout issues among all those surveyed. • One complainant said they had struggled to understand which email address was specifically for complaints • Generally, people were happy with the outcomes from their complaints. 					
5.7	<p>2024/25 Learning</p> <table border="1" data-bbox="220 1170 1990 1430"> <thead> <tr> <th data-bbox="220 1170 816 1211">Learning</th> <th data-bbox="816 1170 1990 1211">Action Undertaken</th> </tr> </thead> <tbody> <tr> <td data-bbox="220 1211 816 1430"> <p>Inconsistent use of our standard letters for responses. Some responses do not use the standard letters and do not, for example, confirm which stage the complaint is at, as is required.</p> </td> <td data-bbox="816 1211 1990 1430"> <p>Training for investigators and responders is now taking place twice yearly. We are seeing the impact in improved performance, for example on compliance with response times.</p> <p>Our suit of standard letters was reviewed and improved in May 2024.</p> </td> </tr> </tbody> </table>		Learning	Action Undertaken	<p>Inconsistent use of our standard letters for responses. Some responses do not use the standard letters and do not, for example, confirm which stage the complaint is at, as is required.</p>	<p>Training for investigators and responders is now taking place twice yearly. We are seeing the impact in improved performance, for example on compliance with response times.</p> <p>Our suit of standard letters was reviewed and improved in May 2024.</p>
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<p>Inconsistent use of our standard letters for responses. Some responses do not use the standard letters and do not, for example, confirm which stage the complaint is at, as is required.</p>	<p>Training for investigators and responders is now taking place twice yearly. We are seeing the impact in improved performance, for example on compliance with response times.</p> <p>Our suit of standard letters was reviewed and improved in May 2024.</p>					

	<p>Our extension letter did not include the contact details for the relevant Ombudsman Service.</p>	<p>The extension letter has been changed in the system and is now editable to ensure a compliant letter, including inviting tenants to refer to the appropriate Ombudsman service should they wish.</p>
	<p>Compliance with the timescales of the CHC of the HOS.</p>	<p>Compliance with the 10-working day timescale for stage 1 responses has improved significantly from 23/24 when the proportion of stage 1 complaints responded to within the CHC of the HOS timescales was 35%.</p> <p>(HOS data only, LGSCO in table at 5.1)</p> <p>Stage 1 Complaints responded to within the 10-working day timescale:</p> <p>Q1 2024/25 = 75% Q2 2024/25 = 71% Q3 2024/25 = 77% Q4 2024/25 = 86%</p> <p>Total 2024/25 = 79%</p> <p>In 2024/25 RBC changed its Customer Feedback Policy to provide a 10-day timescale across all complaints received, in line with the requirements of the Housing Ombudsman, (and the CHC of the Local Government and Social Care Ombudsman) (prior to 1 Dec 2024 a 15-day response time) this will assist responders in the housing service. The complaints system has been set to a 10-day response time at stage 1 across the organisation.</p> <p>All managers in the housing/landlord service have the following Performance Development Review (PDR) objective: <i>All stage 1 complaints to be responded to within the 10-day deadline (or a 10-day extension agreed with the tenant and correctly recorded on the system)</i> <i>Must have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments.</i> <i>Must take collective responsibility for any shortfalls identified, rather than blaming others; and</i> <i>To act within the professional standards for engaging with complaints as set out by any relevant professional body.</i></p> <p>This is required by HOS CHC.</p>

	Reasonable adjustments not being routinely considered when complainants report having disabilities or additional needs.	We are undertaking “Tenancy Health Checks” for all our tenants, around 1000 have taken place to date (April 2025) and this will improve our data on tenants’ additional needs and disabilities and enables a proactive response to complaints, ensuring that needs are understood and reasonable adjustments made. Training has taken place with investigators and responders using the HOS guidance, Spotlight on: Attitude, Respect and Rights, A Relationship of Equals.
	Quality of responses at stage 1 remained an issue in 2024/25 including: <ul style="list-style-type: none"> • Issues not correctly defined. • Issues not addressed sufficiently. • Handing off inappropriately to other teams or departments, insufficient collaboration demonstrated. 	Further training was delivered on 20 Jan 2025. Focused on quality responses that demonstrate a collaborative and co-operative approach and take collective responsibility. Training for investigators/responders takes place twice each year. The focus for 2025/26 is quality of responses.
	Poor communication was a theme through many complaints, especially in relation to responsive repairs, tenants’ complaints were exacerbated by difficulties in reaching staff to report to/talk to.	It has been embedded through training that the first action of investigators/responders assigned complaints is to pick up the phone to the complainant. Investigators/responders now commence their investigation by contacting the complaint and: <ul style="list-style-type: none"> • Explaining who they are • What their role will be • Ensuring they have understood the complaint correctly • Explaining what will happen and when • Establishing lines of communication through the complaint process that meet the needs of the complainant.
	Keeping up to date with current complaints and timescales.	Weekly “snapshot” of open complaints provided to investigators/responders. This has been effective in improving our response times at stage 1.
6.	Housing Ombudsman: Determination of Maladministration	
6.1	<p>In 2024/25 there have been two determinations of maladministration from the Housing Ombudsman Service.</p> <p>In May 2024 the HOS determined that there was there was maladministration in Rugby Borough Council’s handling of:</p> <ul style="list-style-type: none"> • The resident’s reports of repairs. 	

And, that there was service failure in RBC's handling of the complaint.

In August 2024 the HOS determined that there was maladministration in Rugby Borough Council's handling of:

- Reports of damp and mould in a resident's home.
- Other repairs in a resident's home.
- The associated complaint

The HOS made a number of orders and recommendations. Some relating to redress and putting the service right for the affected tenants, other orders and recommendations relating to actions required to improve RBC processes and policy.

All of the orders relating to redress and putting the service right for the tenants have been complied with in the required timescales and evidence of that compliance has been provided to the HOS.

In terms of actions required to improve RBC processes and policy:

The HOS has ordered that: *guidance is produced for its staff responsible for repairs that sets out repairs it is responsible for under its repair obligations.* Our Tenants Handbook sets out repairs that are the landlords responsibility. A new Repairs and Maintenance Policy will be adopted in 2025/26.

The HOS has ordered that: *guidance is produced for staff that sets out the recommended approach to damp and mould set out in the Ombudsman spotlight report.* Training on damp and mould was delivered in the Property Repairs Service, further work is underway in 2025/26 to ensure we are ready for Awaab's Law which will take effect in October 2025, this work includes revised. Compliant procedure, new tenant facing policy, staff training and support and information for tenants.

The HOS has ordered that: *The landlord should review its complaints policy to ensure it complies with the Code unless it has already done so.* The RBC Customer Feedback Policy now states a 10-day response time for all complaints at Stage 1 and the Placecube system supports this. Our annual self-assessment against the CHC of the HOS took place in May 2025 and will demonstrate greater compliance with the CHC than our 23/24 self-assessment.

The landlord's complaints policy says that if residents are unhappy with the outcome of their complaint after exhausting the landlord's complaint process, they can contact a designated person or wait 8 weeks before referring their complaint to our service. This is not correct as following a change in the law on 1 October 2022, residents no longer have to contact a designated person or wait 8 weeks before referring their complaint to our service. This content/clause has been removed from our Customer Feedback Policy.

The HOS recommended that:

If the landlord has not implemented a damp and mould policy / framework since the resident complained, it is recommended to consider doing so.

RBC implemented a Damp & Mould Procedure in October 2024, we are currently developing a new policy and procedure which will be fully compliant with Awaab's Law in preparation for its implementation in October 2025

Self-assessment form

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

Cabinet Report 24 June 2025

Demonstrating Compliance with the Requirements of the Housing Ombudsman

Appendix 2

Rugby Borough Council Self-Assessment against the Complaint Handling Code of the Housing Ombudsman Service: April 2025

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>	Yes	As set out in the Rugby Borough Council Customer Feedback Policy	
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy	
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a	Yes	As set out in the Rugby Borough Council Customer Feedback Policy	

	request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.			
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy	
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.		In line with the Transparency, Influence and Accountability Standard of the Regulator of Social Housing Rugby Borough Council undertook a Tenants Survey which took place October 2024 – January 2025. The cover letter informed tenants of the Housing Ombudsman Service.	Extract from Tenants Survey Cover Letter <i>“This is just a reminder that you have the right to raise any housing issues with the Housing Ombudsman at any point if you are not satisfied with the service you have received from our teams. The Housing Ombudsman can provide you with free, independent advice and support. Their contact details are as follows: www.housing-ombudsman.org.uk Telephone: 0300 111 3000 Or you can write to them at: Housing Ombudsman Service PO Box 1484 Unit D Preston PR2 0ET</i>

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	As set out in the Rugby Borough Council Customer Feedback Policy	
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy. 	Yes	As set out in the Rugby Borough Council Customer Feedback Policy	
2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept	Yes	As set out in the Rugby Borough Council Customer Feedback Policy	

	complaints made outside this time limit where there are good reasons to do so.			
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy	

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy	Tenants can complain in person at the Town Hall where housing staff are available to see callers every day, in writing, by phone and by using our online form. We have reintroduced a “hard copy” Tenants Newsletter which is posted out to all tenants and each edition contains information about how to complain and information about the Housing Ombudsman Service.
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy	Training has taken place with frontline staff in November/December 2024 and will take place annually and covers recognising and recording complaints, escalating complaints appropriately.
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low	Yes		Staff training on complaints covers the topic of a healthy complaints culture in which we learn from complaints.

	complaint volumes are potentially a sign that residents are unable to complain.			
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	The Rugby Borough Council Customer Feedback Policy is available on our website. It can be provided in different formats on request.	
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	The Rugby Borough Council Customer Feedback Policy sets out how we will publicise our policy and information about the Housing Ombudsman Service	Our quarterly Tenants Newsletter contains information about the Customer Feedback Policy, information about complaints received, the Housing Ombudsman Service and the Complaint Handling Code
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy	
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy	Our Tenants Newsletter contains information on tenants' rights to access the Ombudsman Service and how tenants can engage with the Ombudsman about their complaint.

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	<p>Our Communications Team is responsible for complaint handling. Complaints are assigned to a relevant officer and the Communications Team have oversight of the complaint within the system. Complaints are reported on as part of wider key indicators. A quarterly report is submitted to full Council. Complaint trends are examined by the Audit and Ethics Committee of the Council.</p> <p>Commencing in 2023/24 The Complaints Performance and Service Improvement Report (Landlord/HOS Complaints) has been considered by Cabinet and the report, and the response of Cabinet has been published (December 2024)</p> <p>The Complaints Performance and Service Improvement Report 2025/26 will be considered by a Complaints Working Group (May 2025) and Cabinet.</p>	
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also	Yes	The Complaints Officer allocated complaints to an appropriate officer to investigate and respond.	

	have the authority and autonomy to act to resolve disputes promptly and fairly.			
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes	<p>Training is in place for frontline staff and officers who investigate and respond to complaints.</p> <p>All responders and investigators have signed up to the HOS Centre for Learning to access the resources there.</p> <p>We have a quarterly “Lessons Learnt” Clinic that enables learning from complaints</p>	

Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy	
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as ‘stage 0’ or ‘informal complaint’) as this causes unnecessary confusion.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy	
5.3	A process with more than two stages is not acceptable under any circumstances as	Yes	As set out in the Rugby Borough Council Customer Feedback Policy	

	this will make the complaint process unduly long and delay access to the Ombudsman.			
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy	
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as "the complaint definition". If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy	We have developed a suite of standard letters that guide officers in setting out the complaint definition and the outcomes the tenant is seeking. We have embedded guidance that officers contact complainants as the first part of the investigation process.
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy	Our suite of standard letters supports this.
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; 	Yes	At stage 1 the investigation will be undertaken by an impartial officer, complaint responses are monitored by the Communities and Projects Manager. At stage 2 our Chief Officers ensure they can carry out	

	<ul style="list-style-type: none"> b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully. 		<p>an objective review of the complaint, should there be any conflict of interest another Chief Officer will undertake the stage 2 process.</p>	
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	Officers have been trained in the correct use of extensions to timescales, and we have a standard letter that guides officers and assists compliance.	
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	We are using guidance set out in the document: Spotlight on attitude, respect and rights – relationship of equals. In addition, we have implemented a new housing management system which has improved our ability to keep accurate and up to date records and have in place a programme of “tenancy health checks” which will improve our data on tenants’ disabilities and additional needs.	
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy	

5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	Yes	Our complaints system holds all documentation relating to each complaint.	
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy	
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	Relevant policies include: Persistent Contact Procedure and the Potentially Violent Persons Procedure.	
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	As set out in the Persistent Contact Procedure.	

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy	
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received.</u>	Yes	As set out in the Rugby Borough Council Customer Feedback Policy	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy	In 2024/25 RBC achieved 79% of complaints at stage 1 responded to within the 10-working day timescale of the HOS.
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the	Yrs	As set out in the Rugby Borough Council Customer Feedback Policy	We have a standard letter that supports officers in compliant extensions.

	reason(s) must be clearly explained to the resident.			
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Covered in training and our suite of standard letters.	
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	Our complaints system and training support officers in tracking actions and updating tenants.	
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy and guidance and training provided to officers	
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related, and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy	
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:	Yes	As set out in the Rugby Borough Council Customer Feedback Policy	

	<p>a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</p>			
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Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy	
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy	
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy. We accept stage 2 complaints at the direction of the tenant.	

6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	The Chief Officer Communities and Homes will investigate and respond at stage 2. Should there be a conflict of interest an alternative Chief Officer will be identified.	
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy	The response time at stage 2 was changed from 15 working days to 20 working days on 1 December 2024 to align with the CHC
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy	
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Our standard letters provide for this	
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	Our complaints system and training support officers in tracking actions and updating tenants	
6.18	Landlords must address all points raised in the complaint definition and provide clear	Yes	As set out in the Rugby Borough Council Customer Feedback Policy	

	reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.		and guidance and training provided to officers	
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. 	Yes	As set out in the Rugby Borough Council Customer Feedback Policy	
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy	

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:	Yes	As set out in the Rugby Borough Council Customer Feedback Policy, through our training for officers and our suite of standard letters	

	<ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 			
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	We follow guidance on remedies provided by the HOS	
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy, through our training for officers and our suite of standard letters	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	As stated in 7.2	

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 	Yes	This is set out in our Complaints Performance and Service Improvement Report 2024/25	
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints.	Yes	The 2023/24 Complaints Performance and Service Report was reported to Cabinet in December 2024 and the report, and	

	The governing body's response to the report must be published alongside this.		<p>the Cabinets response was published</p> <p>The 2024/25 Complaints Performance and Service Improvement Report will be reported to the Complaints Working Party in May 2025 and to Cabinet in June 2025 and the report and Cabinets' response will then be published</p>	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	If required	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	If required	
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes	Noted	

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	We have established a Lesson Learnt Clinic that meets quarterly to consider complaints and whether service improvements can be made. The clinic maintains an action plan sets out: What has gone wrong, what we have learnt, what will change, how we will feedback to tenants. The action plan is monitored by the Communities and Projects Manager	
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	Our Lessons Learnt Clinic facilitates a positive complaint handling culture and this is built into its functions and scope through a term of reference	
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes	We report on complaints to our Tenants Panel, to staff at team meetings, through our Tenants Newsletters. We have established a Transparency Influence and Accountability Tenants Group who will be actively involved in our development of a positive complaint handling culture	
9.4	Landlords must appoint a suitably senior lead person as accountable for their	Yes	Our Communication, Consultation and Information Manager is the	

	complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.		senior lead person accountable for complaints at Rugby Borough Council, for complaints related to the housing service they are supported by the Communities and Projects Manager. The Chief Officer for Communities and Homes is responsible for stage 2 responses for housing complaints	
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes	The Portfolio Holder for Communities and Homes, Regulation and Safety is the Member Responsible for Complaints (MRC)	
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	We have established a Complaints Working Party, chaired by the MRC and our annual Complaints Performance and Service Improvement Report is considered by the Complaints Working Party prior to consideration by Cabinet	
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: <ul style="list-style-type: none"> a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders 	Yes	Through the Complaints Performance and Service Improvement Report and regular updates from the Chief Officer Communities and Homes	

	related to severe maladministration findings; and d. annual complaints performance and service improvement report.			
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.	Yes	This objective is contained within the "Performance Development Review" objectives for all relevant officers	

EQUALITY IMPACT ASSESSMENT (EqIA)

Demonstrating Compliance with the Requirements of the Housing Ombudsman Service 2024/25

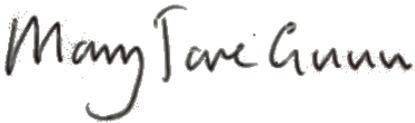
Appendix 3

Context

1. The Public Sector Equality Duty as set out under section 149 of the Equality Act 2010 requires Rugby Borough Council when making decisions to have due regard to the following:
 - eliminating unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Act,
 - advancing equality of opportunity between people who share a protected characteristic and those who do not,
 - fostering good relations between people who share a protected characteristic and those who do not, including tackling prejudice and promoting understanding.
2. The characteristics protected by the Equality Act are:
 - age
 - disability
 - gender reassignment
 - marriage/civil partnership
 - pregnancy/maternity
 - race
 - religion/belief
 - sex/gender
 - sexual orientation
3. In addition to the above-protected characteristics, you should consider the crosscutting elements of the proposed policy, such as impact on social inequalities and impact on carers who look after older people or people with disabilities as part of this assessment.
4. The Equality Impact Assessment (EqIA) document is a tool that enables RBC to test and analyse the nature and impact of what it is currently doing or is planning to do in the future. It can be used flexibly for reviewing existing arrangements but in particular should enable identification where further consultation, engagement and data is required.
5. The questions will enable you to record your findings.
6. Where the EqIA relates to a continuing project, it must be reviewed and updated at each stage of the decision.
7. Once completed and signed off the EqIA will be published [online](#).
8. An EqIA must accompany all **Key Decisions** and **Cabinet Reports**.
9. For further information, refer to the EqIA guidance for staff.
10. For advice and support, contact:

Rebecca Ewers
Corporate Equality & Diversity Officer
rebecca.ewers@rugby.gov.uk
01788 533509

Equality Impact Assessment

Service Area	Communities and Homes
<p>Policy/Service being assessed</p>	<p>Demonstrating Compliance with the Requirements of the Housing Ombudsman Service 2024/25.</p> <p>This EQIA relates to the requirement of the Housing Ombudsman Service (HOS) that the housing service of Rugby Borough Council produce an annual Complaints Performance and Service Improvement Report, and that the report is considered by the governing body of Rugby Borough Council and that the report and the response of the governing body is published.</p> <p>The Housing Ombudsman Service also requires landlords to undertake an annual self-assessment against the provisions of the Complaint Handling Code which, from 1 April 2024 is a statutory code.</p> <p>The Complaint Performance and Service Improvement Report 2024/25 forms appendix 1 of the Cabinet Report and the self-assessment against the provisions of the Complaint Handling Code of the Housing Ombudsman Service forms appendix 2 of the Cabinet Report.</p>
<p>Is this a new or existing policy/service?</p>	<p>Existing</p>
<p>If existing policy/service please state date of last assessment</p>	<p>31 October 2024</p>
<p>EqIA Review Team – List of members</p>	<p>Craig Oakley & Mary Jane Gunn</p>
<p>Date of this assessment</p>	<p>14 May 2025</p>
<p>Signature of responsible officer (to be signed after the EqIA has been completed)</p>	

A copy of the completed and signed Equality Impact Assessment report, including relevant data and information to be forwarded to the Corporate Equality & Diversity Officer.



Details of Strategy/ Service/ Policy to be analysed

<u>Stage 1 – Policy to be analysed</u>	
<p>(1) Describe the main aims, objectives and purpose of the Strategy/Service/Policy (or decision)?</p>	<p>The Complaint Handling Code of the Housing Ombudsman Service sets out: <i>“The annual Complaints Performance and Service Improvement report must be reported to the landlord’s governing body (or equivalent) and published on the section of its website relating to complaints. The governing body’s response to the report must be published alongside this”</i></p> <p>On 1 April 2024 the Complaint Handling Code of the Housing Ombudsman Service became a statutory code.</p> <p>The Complaints Performance and Service Improvement Report considers complaints about the housing/landlord service which includes:</p> <ul style="list-style-type: none"> • Tenancy matters. • Neighbourhood and Community matters including tackling anti-social behaviour. • Repairs and planned works. • Tenant involvement, engagement and communications. <p>Landlords are also required to undertake an annual self-assessment against the provisions of the Complaint Handling Code in order to understand and demonstrate compliance with the Code and for this self-assessment to be considered and approved by the landlords governing body.</p>
<p>(2) How does it fit with Rugby Borough Council’s Corporate priorities and your service area priorities?</p>	<p>This report relates to the following priorities;</p> <ul style="list-style-type: none"> • A Healthier Rugby – To support people to live healthier, longer and more independent lives. • A Fairer Rugby – To reduce inequalities and to improve housing across the Borough.

<p>(3) What are the expected outcomes you are hoping to achieve?</p>	<p>Compliance with the requirements of the Housing Ombudsman Service and the Regulator of Social Housing.</p> <p>Improved outcomes for tenants as a result of timely and effective complaint handling and service improvements as a result of lessons learnt from complaints.</p>
<p>(4) Does or will the policy or decision affect:</p> <ul style="list-style-type: none"> • Customers • Employees • Wider community or groups 	<p>This report will affect:</p> <p>RBC Tenants RBC Employees</p>
<p>(5) Will the policy or decision involve substantial changes in resources?</p>	<p>No</p>
<p><u>Stage 2 – Evidence about user population and consultation</u></p>	<p>As a minimum you must consider what is known about the population likely to be affected which will support your understanding of the impact of the policy, e.g. service uptake/usage, customer satisfaction surveys, staffing data, performance data, research information (national, regional and local data sources).</p>

(1) What does the data tell you about the groups this policy or decision impacts?

Possible data sources:

- national statistics/census data
- local statistics
- evaluations
- analysis of complaints
- user feedback
- outcomes from consultation/community voice
- Council published information, service data
- [District and Ward Profile – Warwickshire Observatory](#)
- [Office of National Statistics](#)
- [Fingertips health profiles](#)
- [Indices of Multiple Deprivation](#)
- [RBC Annual Workforce Equality Report](#)

The population affected are RBC tenants and we have good quality data available on this population available through our CX system.

We are improving the data we hold on our tenants through a programme of tenancy health checks with around 1000 checks having taken place so far. Improved data includes information on disability and additional needs of tenants which will enable us to improve our service delivery and access to services.

(2a) Have you consulted or involved those groups that are likely to be affected by the strategy/ service/policy you want to implement?

If yes, please state which groups were involved in the consultation and what were their views and how have their views influenced the policy/decision?

Yes.

We undertake an annual tenants survey, in line with the requirements of the Regulator of Social Housing. In the survey we ask: Have you made a complaint to Rugby Borough Council in the last 12 months? If yes, how satisfied, or dissatisfied are you with RBC's approach to complaints handling?

The survey goes out by post to our 3400 tenants, and, in 2024/25 we achieved a response rate of 32.03% which was comparable to the response rate in 2023/24.

In 2024/25 44.7% of our tenants who reported having made a complaint were satisfied with our approach to complaint handling, up from 41.5% in 2023/24.

We undertake quarterly telephone surveys with tenants and applicants whose complaints have closed in order that we can understand how we can improve the experience of those who complain.

We have a Transparency, Influence and Accountability Tenants Group who we work with on a regular basis including to improve our complaint handling including reviewing correspondence and developing a positive complaints culture.

We have implemented a number of changes including:

- Investigators/responders to contact the complainant as their first action & establish lines of communication, identify who the investigating officer is and how the process will roll out.
- Improved letter templates for complaint responses
- Training on quality responses for investigators/responders
- Weekly monitoring of open complaints so as to improve response times
- Reporting on complaints and complaint handling through our quarterly Tenants Newsletter

<p>(2b) If you have not consulted or engaged with communities that are likely to be affected by the policy/decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary.</p>	<p>N/A</p>		
<p><u>Stage 3 – Analysis of impact</u></p>			
<p>(1) <u>Protected Characteristics</u> From your data and consultations is there any positive, adverse or negative impact identified for any particular group, which could amount to discrimination? If yes, identify the groups and how they are affected.</p>	<p>Protected Characteristic</p>	<p>Nature of Impact Positive, Neutral, Adverse (explain why)</p>	<p>Extent of impact Low, medium, high</p>
	<p>Age</p>	<p>Neutral</p>	<p>Low</p>
	<p>Disability</p>	<p>Neutral</p>	<p>Low</p>
	<p>Sex</p>	<p>Neutral</p>	<p>Low</p>
	<p>Gender reassignment</p>	<p>Neutral</p>	<p>Low</p>
	<p>Marriage/civil partnership</p>	<p>Neutral</p>	<p>Low</p>
	<p>Pregnancy/maternity</p>	<p>Neutral</p>	<p>Low</p>
	<p>Race</p>	<p>Neutral</p>	<p>Low</p>
	<p>Religion/belief</p>	<p>Neutral</p>	<p>Low</p>
	<p>Sexual Orientation</p>	<p>Neutral</p>	<p>Low</p>

<p>(2) <u>Cross cutting themes</u> (a) Are your proposals likely to impact on social inequalities e.g. child poverty, geographically disadvantaged communities? If yes, please explain how?</p>	<p>Description of impact</p>	<p>Nature of impact Positive, Neutral, Adverse (explain why)</p>	<p>Extent of impact Low, medium, high</p>
	<p>Socio-economic e.g.: child poverty, income level, education level, working hours/occupation, family/social support, access to good nutrition</p>	<p>Positive – Tenants of social housing are more likely than the general population to be in receipt of means tested benefits and therefore more likely to be exposed to social inequalities.</p>	<p>Medium</p>
	<p>Environmental e.g.: housing status, transport links, geography, access to services, air quality, noise pollution</p>	<p>Neutral</p>	<p>N/A</p>
<p>(3) Using the information gathered in stages 2 and 3, please describe how the policy/strategy/service will:</p> <ol style="list-style-type: none"> Eliminate unlawful discrimination, harassment, victimisation and any other unlawful conduct prohibited by the act Advance equality of opportunity between people who share and people who do not share a relevant protected characteristic Foster good relations between people who share and people who do not share a relevant protected characteristic 	<p>Rugby Borough Council will use this report to:</p> <ul style="list-style-type: none"> Inform our tenants about the type of complaints we receive and how we learn from these complaints to improve our services. Report to the Regulator of Social Housing (RSH) (annually) Report to the Housing Ombudsman Service (HOS) (annually) Understand our compliance with the Complaint Handling Code (CHC) of the Housing Ombudsman Service and the Local Government and Social Care Ombudsman (LGSCO) Report to our Complaints Working Party and Cabinet (annually) Identify trends in complaints coming forward. Scrutinise our complaint handling to embed an ethos of continuous improvement 		

<p>(4) Are there any obvious barriers to accessing the service? If yes, how can they be overcome?</p>	<p>There were 98 complaints about the housing/landlord service in 2024/25, or 28.1 complaints per 1000 homes. In terms of sector benchmarking this is a relatively low number of complaints (35 complaints per 1000 homes is broadly where we should be aiming)</p> <p>We have a number of measures in place to enable tenants to access the complaints service thus giving us greater opportunities to learn from complaints, put things right as necessary and continue to improve our services, policies and communications.</p> <p>Measures to remove barriers to the complaints process include:</p> <ul style="list-style-type: none"> • Annual training of frontline staff on, recording complaints appropriately, escalating complaints appropriately and having a positive complaints culture • Reporting on complaints and how to make a complaint in our quarterly tenants' newsletter • Improving communications around complaints by working with our Transparency, Influence and Accountability Tenants Group
<p>(5) What Equality Monitoring Data will be collected to analyse impact? How will the Equality Monitoring Data collected be used?</p> <p>If no Equality Monitoring Data is being collected, why not?</p> <p>For support with this section, please refer to the Equality Monitoring Guidance.</p>	<p>We collect data on complaint volumes and complaint types, and this information is set out in the Complaints Performance and Service Improvement Report within appendix 1 of this report.</p> <p>During 2025/26 we will undertake greater analysis of complainants including age and gender so as to increase our understanding of who complains and who does not, thus enabling targeted work to remove barriers to making a complaint.</p>

<p>(6) Complete this section if any adverse impacts were identified in 3.1.</p> <p>Outline any actions that will be taken to remove or mitigate the adverse impacts identified in 3.1 to ensure that no discrimination is taking place. If removing or mitigating the impact is not possible, you may in certain circumstances, justify the discrimination. If that is the case, please give evidence for why justifying is possible in this case.</p>	<p>N/A</p>
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<p><u>Stage 4 – Action Planning, Review and Monitoring</u></p>	
<p>(1) Data analysis What does feedback from Equality Monitoring Data gathered tell you about impact on groups? Were there any unforeseen impacts (positive or negative)?</p> <p>The feedback/data should be used to inform your Action Plan in (2)</p>	<p>No Further Action Required</p>

<p>If No Further Action is required then go to – Review and Monitoring</p> <p>(2) Action Planning – Specify any changes or improvements that can be made to the service or policy to mitigate or eradicate negative or adverse impact on specific groups, including resource implications.</p>	<p>No Further Action Required</p> <p>EqIA Action Plan</p> <table border="1" data-bbox="875 349 2112 579"> <thead> <tr> <th>Action</th> <th>Lead Officer</th> <th>Date for completion</th> <th>Resource requirements</th> <th>Comments</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Action	Lead Officer	Date for completion	Resource requirements	Comments															
Action	Lead Officer	Date for completion	Resource requirements	Comments																	
<p>(3) Review and Monitoring State how and when you will monitor policy and Action Plan. Will you make any changes to the Equality Data that you are collecting or how you are collecting/using the data?</p>	<p>This EQIA will be reviewed in May 2026</p>																				

Please annotate your policy with the following statement:

An Equality Impact Assessment on this policy was undertaken on 14 May 2025 and will be reviewed in May 2026.

Agenda No 14

AGENDA MANAGEMENT SHEET

Report Title:	Communications Plan and Collections Rescheduling for Food Waste 2026
Name of Committee:	Cabinet
Date of Meeting:	24 June 2025
Report Director:	Chief Officer - Operations and Traded Services
Portfolio:	Operations and Traded Services
Ward Relevance:	All
Prior Consultation:	Operations and Traded Services Portfolio Holder, Operations and Traded Services Shadow Portfolio Holder, All Councillors, Budget Working Group, Finance Team, Human Resources
Contact Officer:	Andy Kelly Project Manager - Food Waste andy.kelly@rugby.gov.uk
Public or Private:	Public
Report Subject to Call-In:	Yes
Report En-Bloc:	No
Forward Plan:	Yes
Corporate Priorities:	This report relates to the following priority(ies): <input type="checkbox"/> A Healthier Rugby – To support people to live healthier, longer, and more independent lives. <input type="checkbox"/> A Thriving Rugby – To deliver a thriving economy which brings Borough-wide investment and regenerates Rugby Town Centre. <input checked="" type="checkbox"/> A Greener Rugby – To protect the environment and ensure the Borough adapts to climate change. <input type="checkbox"/> A Fairer Rugby – To reduce inequalities and improve housing across the Borough. Corporate Strategy 2025-2035
Summary:	This report requests Cabinet to approve the Communications Plan and associated budget for

the delivery of a food waste collection service as approved by Council in December 2024.

The new collection service will be supported by a comprehensive communications plan designed to provide clear information and guidance for all residents, including those from seldom heard communities, residents whose first language is not English, and individuals living in houses of multiple occupation.

The introduction of the food waste collections will be supported by a Community Engagement Officer to help and guide residents through the new service.

Financial Implications:

- Revenue budget requests for costs associated with the Communications plan for the food waste service for £0.086m for 2025/26, and £0.016m for 2026/27 are recommended in this report.
- An increase in salary budgets of £0.032m for 2025/26 and £0.051m for 2026/27 for a Community Engagement Officer post for 18 months and 2x temporary contact centre staff for 4 months are also recommended for approval.
- To be financed from DEFRA grant

Further details can be found in section 5 of this report.

Risk Management/Health and Safety Implications:

There may be financial penalties in the form of reduced Extended Producer Responsibility payments if collections are subsequently judged to be neither effective nor efficient. See Risk Register at Appendix 2.

Environmental Implications:

See Environmental Impact Assessment at Appendix 4.

Legal Implications:

Please refer to paragraph 7.1 in the report.

Equality and Diversity:

See Equalities Impact Assessment Appendix 3.

Options:	1) To approve the budget for the Communications Plan and recruitment of a Community Engagement Officer for 18 months, and two temporary Contact Centre staff for four months.
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Recommendation:

- 1) The Communication Plan for the implementation of food waste collections be approved; and

IT BE RECOMMENDED TO COUNCIL THAT:

- 2) the establishment of posts for a Community Engagement Officer and temporary recruitment of Contact Centre staff, as detailed within section 5 of the report, be approved;
- 3) a General Fund supplementary revenue budget of £0.086m for 2025/26 for the Communications Plan, as detailed within section 5, to be financed from DEFRA grant, be approved;
- 4) a General Fund supplementary revenue budget of £0.016m for 2026/27 for the Communications Plan, as detailed within section 5, be considered as part of the budget setting process for 2026/27;
- 5) a General Fund supplementary revenue budget of £0.032m for 2025/26 for salaries for a Community Engagement Officer post and temporary recruitment of Contact Centre staff, as detailed within section 5, to be financed from DEFRA grant; and
- 6) a General Fund supplementary revenue budget of £0.051m for 2026/27 for salaries for a Community Engagement Officer post and temporary recruitment of Contact Centre staff,

as detailed within section 5, be considered as part of the budget setting process for 2026/27.

**Reasons for
Recommendation:**

To support and encourage resident participation in food waste collections, helping to reduce black bin waste and increase recycling rates. Active engagement with all residents including diverse communities and seldom-heard groups will be essential to ensure equitable access to information and support. Tailored communications will be developed to meet a range of needs, including accessible formats for non-English speakers and targeted outreach for residents in houses of multiple occupation.

Cabinet - 24 June 2025

**Communications Plan and Collections Rescheduling
for Food Waste 2026
Public Report of the Chief Officer - Operations and Traded Services**

Recommendation

1) The Communication Plan for the implementation of food waste collections be approved;

IT BE RECOMMENDED TO COUNCIL THAT:

2) the establishment of posts for a Community Engagement Officer and temporary recruitment of Contact Centre staff, as detailed within section 5 be approved

3) a General Fund supplementary revenue budget of £0.086m for 2025/26 for the Communications Plan, as detailed within section 5, to be financed from DEFRA grant, be approved.

4) a General Fund supplementary revenue budget of £0.016m for 2026/27 for the Communications Plan, as detailed within section 5, be considered as part of the budget setting process for 2026/27

5) a General Fund supplementary revenue budget of £0.032m for 2025/26 for salaries for a Community Engagement Officer post and temporary recruitment of Contact Centre staff, as detailed within section 5, to be financed from DEFRA grant, be approved.

6) A General Fund supplementary revenue budget of £0.051m for 2026/27 for salaries for a Community Engagement Officer post and temporary recruitment of Contact Centre staff, as detailed within section 5, be considered as part of the budget setting process for 2026/27.

Executive Summary

The introduction of a new weekly food waste collection service will be supported by a comprehensive communications plan designed to provide clear information and guidance to all residents. This includes targeted support for seldom heard communities, residents whose first language is not English, and those living in houses of multiple occupation, communal settings, and sheltered housing.

A dedicated Community Engagement Officer will play a key role in delivering this support, working closely with local communities to promote participation in the scheme. Their efforts will help ensure residents are well informed and empowered to reduce waste and increase recycling across the borough.

The optimisation of collection rounds to improve efficiency will result in changes to collection days for many residents. However, all waste streams including residual (black) bins, recycling bins, garden waste bins, and food waste caddies will continue to be collected on the same designated day each week. While the collection frequency may vary by waste type, this consistency in scheduling aims to make the service more convenient for residents. Any changes to collection days will be clearly and widely communicated well in advance to ensure a smooth transition.

The communications plan will incorporate best practices and lessons learned from other councils that have implemented similar initiatives. Its goal is to ensure residents are well informed, engaged, and supported throughout the transition. The plan will offer clear, practical guidance to help residents adapt to the new waste habits, including the introduction of the food waste service. This report includes a request for budget allocation to support the delivery of the communications plan, including provision for additional temporary staffing

1. Background

- 1.1 Rugby borough currently has a property count of 51,563 domestic properties. Waste Services operate 14 collection rounds comprising six residual black bin rounds, five recycling blue bin rounds and three garden and food green bin rounds. These are operated by 14 drivers and 28 loading operatives. Residents currently have three separate waste containers. The separate food waste service will add another two, one indoor and one outdoor food caddy.
- 1.2 This Council collects approximately 43,500 tonnes of waste each year, of which around 19,700 tonnes are recycled representing a recycling rate of 47% for the 2023/24 period. Nationally, the household waste recycling rate stood at 44.0% in 2023, marking a 0.6 percentage point increase from the 2022 rate of 43.4%.
- 1.3 The Government introduced the Environment Act 2021. This led to the development of 'Simpler Recycling' and the implementation of several measures aimed at increasing recycling rates to meet the ambitious national target of 65% by 2035.
- 1.4 Removing food waste from garden waste bins (an opt-in service) and black bins (collected fortnightly) will help address concerns around odours, pests, and hygiene. The introduction of a weekly food waste collection will provide a more suitable and timely solution for managing this type of waste.
- 1.5 In addition to the new food waste service, the optimisation of all collection routes is expected to result in a reduction in fuel usage across the wider service. Any reduction in the number of large collection vehicles, achieved through route optimisation, would help offset the cost of additional food waste vehicles. The current annual operating cost for one large collection vehicle is approximately £0.188m.

2. Implementation

- 2.1 A thorough review of the existing service and a route optimisation of all collection services will provide more efficient routes to maximise fuel efficiencies and a comprehensive service across the borough.

- 2.2 To minimise confusion and potential dissatisfaction, all bins will be collected on the same weekday for each household, although this may differ from their current collection day
- 2.3 The introduction of the new service will be supported by a comprehensive communications plan, clearly outlining the reasons for the change, the councils obligations and the benefits for residents and the environment . The communications plan will include targeted messaging on waste reduction, guiding residents on which materials from black bins can be recycled, how to manage household food waste, and alternative disposal options for items not collected at the kerbside. Additionally, composting will be promoted as a sustainable solution for garden waste and non-meat food waste.
- 2.4 Guidance and messaging will be used from the WRAP toolkit which will provide insight and market research to further help residents minimise their waste. The communications messaging will also use learning from other councils that have successfully implemented such schemes.
([WRAP-Household-Food-Waste-Collections-Guide-V17.pdf](#))
- 2.5 This targeted messaging to all communities in the borough, including those 'seldom heard', will be designed to encourage all residents to reduce waste, maximise recycling, and adapt smoothly to the revised collection schedule.
- 2.6 It is recommended that an additional member of staff be recruited to the Communications Team to undertake community engagement, to gather information and good practice in delivering supportive communications to residents, organise community events, analyse residents' feedback, including concerns and the benefits of the scheme, and addressing complaints and queries including via social media. It is also recommended to temporarily increase Contact Centre staff to provide additional support, helping residents navigate and adjust to these changes effectively.
- 2.7 The Council's website will have a dedicated website page with supporting information, guidance and a frequently asked questions page.

3. Collection variations

- 3.1 Starting in spring 2026, food waste will no longer be accepted in garden waste bins. Residents will be encouraged to use their new food waste containers, or they may choose to compost certain types of food waste at home. Detailed guidance on which food waste can be composted at home will be available on our website. To further support home composting, Warwickshire County Council offers discounted compost bins and free training courses, all accessible through their website.
[Composting – Warwickshire County Council](#)
- 3.2 The reorganisation of all waste collection rounds has the potential benefit of reducing the overall number of waste collection vehicles , offsetting some of the carbon emissions. Current emissions calculations determine that through the removal of one large collection vehicle, around 38,600 kgs of carbon can be saved. This is the equivalent of the amount of carbon dioxide emitted by driving

a car for about 350,000 kms (around 217,500 miles) or more than 8 times around the globe.

4. Communications

Please refer to the Communications Plan at Appendix 1.

- 4.1 Effective communication is key to the successful rollout of any new service to residents. It's essential to clearly explain the reasons for the changes and how residents can participate. Information must be accessible to everyone, including those for whom English is not a first language and residents who may have difficulty reading or understanding written materials. Given the borough's diverse population, it is vital that all communities can easily access and engage with the information. The communications plan includes inclusive strategies to ensure that all residents are well informed and supported.
- 4.2 Communication efforts will include tailored messaging for both councillors and officers. Councillors play a crucial role in reinforcing key messages to residents and addressing any questions or concerns. Officers, many of whom are also borough residents, have a vested interest in the changes and can act as advocates, encouraging participation within their own communities.
- 4.3 The communications plan includes a variety of digital, print, and direct engagement methods, such as face-to-face, telephone, and online interactions. It allocates budget for social media ads, posters, leaflets, engagement materials, roadshows, newspaper and magazine ads, translations, and out of home advertising (e.g., billboards, bus ads, and bin lorries). Additionally, the plan provides for the distribution of two leaflets to all households in the lead up to the scheme's launch.

5. Financial Implications

- 5.1 The Communications Plan (Appendix 1) is a live document and will change to reflect evaluation and feedback at the end of each phase and may include further requests for funding to address any review outcomes where appropriate. The budget request associated with the Communications Plan of £0.086m for 2025/26 is based on estimates from current information and includes a contingency of 10% to allow for inflationary increases and unknown changes which may arise. Further details and a breakdown of costs can be seen in Appendix 1.
- 5.2 Within the Communications Plan is a need to recruit a Community Engagement Officer. The cost of this post, based on Grade D, is £0.039m per annum and will be required for an 18-month fixed term period from August 2025. The total budget for the 18-month period is £0.059m.
- 5.3. Additionally, it is crucial to support the Contact Centre in providing guidance and information to residents about the new collection schedule, particularly as its launch coincides with the issuance of the Council's annual tax bills. These posts are expected to be temporary and will depend on the volume of public inquiries. The pro-rata cost is estimated at £0.036m per year per staff member, based on Grade C. Two additional staff members are needed for a four-month

period starting in March 2026, at a total cost of £0.024m, to ensure the Contact Centre can manage the anticipated increase in calls.

- 5.4. The budget for communications and salaries for two customer services posts for 4 months and an engagement officer for 18 months is broken down as follows:

	2025/26		2026/27
Salaries	£0.032m	Salaries	£0.051m
Comms	£0.086m	Comms	£0.016m
	£0.118m		£0.067m

The non-salary budget costs have been based on costs recently incurred for other projects, such as the council tax digitisation project communications. They include a 10% contingency to allow for increased advertising or production costs and unforeseen expenditure. Any unspent budget for communications will be returned as savings.

- 5.5. DEFRA has announced details of new burdens funding which will be received in 2024/25 and 2025/26 towards the additional revenue costs associated with food waste collection. Some of this funding is being used to fund the 2025/26 costs for Communications and temporary staffing, as recommended in this report. Remaining funding will be allocated towards further costs of the new collection rounds and other related food waste project work as required. Further reports will be presented to the Council once further information becomes available. The recommendations of this report highlight estimated 2026/27 costs for Communications and Staffing; the budget will be included as part of the budget setting process for 2026/27; however, it should be noted that any remaining DEFRA grant will be used to cover these costs where possible.
- 5.6 Subject to the route review, the overall number of collection rounds is expected to decrease. Overall operating costs will decrease; however, these savings will only be fully realised once older vehicles are decommissioned and not replaced. Until their disposal, these vehicles will continue to incur maintenance and standing costs such as insurance and road fund tax.
- 5.7 Throughout this process, Human Resources implications, including staff engagement and support, will be carefully managed to ensure a fair and transparent transition. Staff will, subject to consultation where appropriate, be reassigned to the new food waste service, ensuring a smooth transition. This reallocation will support cost efficiency by reducing the revenue budget for the new service.

6. Risk

- 6.1 For Risk Register please refer to Appendix 2.

7. Legal Implications

- 7.1 The determination of the approach to communications and the strategic engagement of residents is a matter for Cabinet. The changes to the staffing establishment and budget allocation are matters reserved to Council.

- 7.2 The introduction of a weekly food waste collection service for all households is a legal requirement under the Environment Act 2021.
- 7.3 The Council has a statutory duty under the Equality Act 2010, often referred to as the Public Sector Equality Duty to ensure that it considers the impacts of its activities on those with protected characteristics. In the present case, whilst the consideration of those with needs for communications in different formats and approaches is both good customer service it can also meet the Councils requirement to consider these duties.

8. Conclusion

- 8.1 The introduction of a new food waste collections is essential for encouraging residents to make more mindful waste related decisions while also enhancing the boroughs recycling performance. This change supports progress toward meeting the mandatory 65% national recycling target set for 2035. While the national target is not a legal requirement for local authorities there may be financial penalties in the form of reduced Extended Producer Responsibility payments if collections are subsequently judged to be neither effective nor efficient.
- 8.2 While the potential repercussions of failing to meet the statutory recycling performance targets by 2035 remain uncertain, the government may impose fines on councils that cannot demonstrate sufficient progress toward compliance.
- 8.3 It is therefore recommended that the Communications Plan and associated costs be approved.

Name of Meeting: Cabinet

Date of Meeting: 24 June 2025

Subject Matter: Communications Plan and Route Options for Food Waste 2026

Originating Department: Operations and Traded Services

DO ANY BACKGROUND PAPERS APPLY YES NO

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A

Communications plan – Implementation of new food waste service

16 May 2025

[Covering Report – Food Waste](#)

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Background

Rugby Borough Council aims to reduce waste and increase the overall recycling rate to 65 percent by 2035 in line with the Government Environmental Act 2021.

We aim to improve the overall process of waste management and enable residents to recycle and separate waste effectively.

Roughly 47 percent of waste is recycled from the borough, higher than the national average of 44 percent. About 53 percent of waste is sent to Energy from Waste or landfill.

We will be introducing a new food waste collection service to help residents separate waste, focusing on long-term use and the reduction of residual waste.

New waste lorries and equipment will be purchased to support this initiative.

The Environment Act 2021 and the Government's Simpler Recycling reforms require local authorities to provide all households with a free weekly collection of food waste. The service will start from 11 May 2026.

To improve cost efficiency and boost recycling rates, the council is implementing a new food waste collection service. This initiative includes:

- **A weekly food waste collection**

This is a new service aimed at increasing the efficiency of waste management.

- **A fortnightly blue-lid recycling collection**

The council will maintain the existing service, ensuring that recyclables are collected every two weeks.

- **A fortnightly black bin residual waste collection**

The council will maintain the existing service.

- **An opt-in green bin garden waste collection**

The existing fortnightly service will be maintained, allowing residents to choose to have their garden waste collected. Food waste will be excluded from this service.

The new waste collection service will introduce changes to existing collection days for some residents across the borough. These changes will be communicated to all residents in advance.

Objectives

- In May 2026, introduce a new free food waste collection service for all households in the borough as well as engaging residents in multi-occupancy homes.
- Develop a targeted food waste communications campaign to inform residents about the new service and how to participate.
- Support residents and educate, promote, and encourage them to minimise their waste and recycle correctly at home using the new food waste caddies.
- Inform households about changes to waste collection services.
- By composting and minimising waste, residents can significantly reduce their environmental impact and contribute to a more sustainable and greener community.

Strategy

Insights and market research

Utilising insights and market research from other local authorities within Warwickshire such as Stratford-on-Avon District Council and Warwick District Council. By understanding their success and challenges, we can tailor our campaign to meet the needs of our residents. This approach allows Rugby Borough Council to adopt best practices and solutions that have been tested in similar environments. [WRAP](#) has developed campaign planning, guidance, and communication materials that have been proven effective in implementing the new waste collection service, we will use these materials to support the campaign.

Consistent language across channels

Using consistent language when implementing the new food waste service is crucial for building a clear message and empowering residents. Maintaining consistency will reduce confusion and ensure that all residents understand the services offered, how to use them, and the benefits of participation.

Monitoring and updates

Monitoring regularly and reviewing the strategy is essential to its success. This process allows us to be responsive to changes in residents' needs and environmental considerations, therefore enhancing overall participation and success rates.

Communications

A range of marketing and communication tactics will be used to promote the new offering to residents. Providing continuous support on how to correctly use the new caddies along with best practice and waste collection changes.

Audiences

Key audiences and how to target them:

	Kerbside properties	HMOs/flats/comunal properties/landlords	Non-English-speaking residents or seldom heard groups	Residents in council houses/flats and sheltered accommodation	Members/Parish Councils
Distribution stage	Instruction leaflet Caddy label 2x caddies	Instruction leaflet Caddy label 2x caddies Bin storage communal areas	Instruction leaflet Caddy label 2x caddies	Instruction leaflet Caddy label 2x caddies	Instruction leaflet
Targeted activity	Web content Press release Roadshows Newspaper advertising Social media Bus/bin lorry advertising	Web content Press release Roadshows Social media Posters Direct mail/email to landlords/businesses	Web content Press release Roadshows Social media Translated materials (posters or digital content) Images/infographics and video content Community groups or religious spaces	Web content Press release Roadshows Tenant Times newsletter Direct email Social media (FB group) Posters in community centres	Web content Press release Roadshows Member briefings Email newsletter to Parish Councils Social media packs Training packs Posters for Parish Councils notice boards

			Workshops/demonstrations		
			Posters		

Benefits

- *The government is committed to delivering comprehensive, frequent rubbish and recycling collections.* [gov.uk](https://www.gov.uk)
- *‘Municipal food waste collections will reduce the amount of food waste going to landfill, where it releases harmful greenhouse gases, helping to achieve our net zero strategy target to eliminate biodegradable waste sent to landfill from 2028. Instead, where food waste is collected separately, it can be reprocessed to create organic fertiliser and biogas, which can be used to generate electricity, bolstering our energy security.’* [gov.uk](https://www.gov.uk)
- Residual waste bins will be less full
- The use of food waste caddies and a weekly collection service helps reduce pests and odors caused by rotting food that would otherwise remain in bins for extended periods.
- Contributes to protecting the environment and tackling climate change.
- Reducing the amount of waste going to landfill is important. Food waste sent to landfill releases methane, a greenhouse gas that is 25 times more potent than carbon dioxide.
- To deter pests, caddies will have secure lids, preventing animals from accessing or scattering waste. Food waste will be stored for only one week rather than the current two weeks in black bins, helping to minimise issues with prolonged storage.
- The compact 7-litre indoor caddy, designed for kitchen counters, provides convenient storage for food waste before it is transferred to the larger 25-litre outdoor caddy for disposal.
- Offsetting carbon emissions can prevent around 38,600kg of carbon.
- It meets the government’s ‘Simpler Recycling’ requirements.
- The food waste service will reduce the net cost of waste collection services and maximise the environmental benefits, while offering a regular collection of food waste.

Issues

- The food waste collection service is not yet fully funded. The government has confirmed the allocation of capital funding for food waste containers and vehicles under the New Burdens report, but these do not meet the full capital cost or the revenue cost.
- Procurement bottlenecks could create some supply delays and impact the implementation timescales of the food waste service, see [covering report](#).
- Recycle rate target of 65% by 2035 nationally, see [covering report](#).
- The implementation of a new, weekly food waste collection service for all households was deemed mandatory under legislation introduced through the Environment Act 2021.

Risks

The identified risks related to communications and engagement will be continuously monitored throughout every phase of the project. Should any new risks arise, they will be documented and adjusted as necessary.

Proactive measures will be implemented to mitigate any potential impacts.

Risk	Mitigation
There is a risk that:	We will mitigate this by:
<ul style="list-style-type: none"> • Political risks, this project will launch at the same time as elections 	<ul style="list-style-type: none"> • Moving the launch date to the first full working week following the elections i.e. Monday 11 May 2026
<ul style="list-style-type: none"> • Residents will be confused by new/existing waste collection dates 	<ul style="list-style-type: none"> • Providing residents with a leaflet/app/web information ahead of launch, with specific details of collection dates for their property • Running a general communications campaign
<ul style="list-style-type: none"> • Communities whose first language is not English will be poorly engaged and have little understanding of the new food waste service 	<ul style="list-style-type: none"> • Ensuring content is written in plain English and is pictorial where possible. • Providing translations where this would be helpful • Providing digital content in formats that users can translate and understand
<ul style="list-style-type: none"> • Cultural differences may mean we do not effectively reach some groups 	<ul style="list-style-type: none"> • Attend community groups to build their knowledge of the new food waste collection service
<ul style="list-style-type: none"> • Residents will have a poor understanding of what goes in which bin/caddy 	<ul style="list-style-type: none"> • Providing a video guide, along with web content/app • Distributing a leaflet to all residents

<ul style="list-style-type: none"> Misinformation/climate change denial will be circulated in bad faith, leading to disengagement with the food waste service 	<ul style="list-style-type: none"> Publishing web content with facts and links to relevant resources Monitoring social media and engaging where appropriate
<ul style="list-style-type: none"> Poor engagement with occupiers of multi-occupier buildings e.g. flats, HMOs 	<ul style="list-style-type: none"> Prioritising the work of the Community Engagement Officer to work with these residents Produce messaging suitable for landlords to triage information to residents when there is regular movement in occupiers
<ul style="list-style-type: none"> Residents will be confused by the garden waste service and continue to use it for food waste 	<ul style="list-style-type: none"> Ensuring clear messaging around mandated weekly food collections and environmental benefits of separating these waste streams Provide leaflet/web/app content on what goes in which bin
<ul style="list-style-type: none"> Digitally excluded residents will have insufficient information or opportunities to engage and use the food waste collection service effectively 	<ul style="list-style-type: none"> Distribute leaflets to every household throughout the campaign phases Include printed and broadcast press within campaign Ensure general communications campaign includes 'out of home' advertising Ensure Community Engagement Officer activity e.g. roadshows have a broad geographic coverage and include communities that are less likely to be digitally enabled Provide customer service centre staff with resources to assist face-to-face and telephone enquiries Establish an automated telephone information service to intercept telephone enquiries where this may be helpful
<ul style="list-style-type: none"> Implementation and distribution (phase 3) are the same time as council tax bills and elections 	<ul style="list-style-type: none"> Additional resource support staff in the contact centre

Key messaging

- How residents should participate and when, as well as continued ongoing support and encouragement will support its overall success.
- We will ensure messaging is appropriate, accessible, and inclusive for all residents within the borough, including those living in houses of multiple occupancy, shared accommodations, as well as the multicultural population.
- Benefits of the new food waste collection service and climate change impact.

Communications approach

To achieve a successful rollout of the new food waste service and to promote maximum engagement across all communities, it is essential to adopt a well organised strategy that emphasises direct interaction and feedback collection.

We propose establishing a dedicated community engagement role by appointing a fixed-term Community Engagement Officer for 18 months. This officer will collaborate closely with existing council staff under the guidance of the Communications team.

Rationale:

- **Engagement with residents in multi-occupier premises**

Residents in multi-occupier settings such as flats, HMOs, sheltered accommodation, and almshouses often face unique challenges and may have specific concerns related to communal living and food waste practices. Engaging directly with these residents will allow the Community Engagement Officer to address these issues effectively and ensure that the service is tailored to meet their needs by encouraging effective waste disposal. This interaction can also help build trust and increase participation with these communities.

- **Engagement with seldom-heard communities**

Seldom-heard communities often feel marginalised and may not be adequately represented in broader engagement efforts. By focusing on these groups, the initiative seeks to be more inclusive. This targeted engagement helps in addressing any barriers these communities might face and ensures their voices are heard in the project's implementation.

- **Organising and running community roadshows**

Community roadshows are an effective way to reach a broad audience and provide information in an engaging and more personal manner. They allow for face-to-face interaction, where residents can ask questions and receive immediate answers. Roadshows also provide opportunities to showcase the benefits of the new service and gather feedback in a dynamic setting.

There is the potential to hold community roadshows alongside partners such as Garden Organic and the Master Composters to promote alternative ways to deal with food waste.

- **Tutorial sessions**

Tutorial sessions offer residents hands-on experience and practical knowledge about the new food waste service. These sessions can resolve any questions associated with the service, thereby reducing uncertainty and increasing user confidence. They are particularly

useful for residents who may be less familiar with technology or new procedures, ensuring everyone is included.

- **Analysing resident feedback**

A structured method for gathering feedback from residents. By analysing the data, the Community Engagement Officer can identify common concerns or areas where the service could be improved. Feedback offers residents a voice in the process, making them feel valued and heard, which can enhance trust and engagement with the initiative.

- **Creation of artwork**

To develop artwork for marketing and communication channels including billboards, bin lorries, buses, newspaper and magazine advertising, social media campaigns and other appropriate activities. Contact suppliers and manage the allocated communications budget, ensuring an effective implementation.

Campaign activities/timescales

The project is structured into four phases to ensure smooth transition and successful implementation.

Phase 1 – Immediate Response

The key messaging will highlight it’s advantages and clearly communicate how the changes will impact residents.

Phase 2 – Pre-Implementation

Conducting workshops, roadshows, etc. to equip residents with the knowledge for effective waste management and implementation of the new food waste service.

Phase 3 – Implementation and Distribution

Practical execution across communications channels, addressing any challenges from previous phases and distribution of new food waste caddies and informational materials.

Phase 4 – Go Live

The official launch of the campaign, focusing on maintaining momentum and evaluating the effectiveness of our efforts. Reinforcing the project has had a positive impact on residents and the environment.

Activity	Audience	Quantity/duration	Desired outcome	Cost	Notes
Phase 1 Immediate Response (June – September 2025)					

Webpage with details of the waste service / FAQs	All	Drip feeding	Website visits to get more information	No cost	Once papers are published (June)
Press release	All	1x edition	Views, clicks to associated webpages	No cost	Once papers are published (June)
Social media (organic)	All	Drip feeding	Engagement, reach, click throughs to website and app	No cost	Once proposal is approved (June) Messaging: Introducing the new caddy / changes to waste collections
Video tutorials	All	Videos 1) introducing the caddy and collection service 2) what can/can't be disposed of 3) the benefits	To be used on social media, website, app to support use of new caddies and engagement	£2,000	
Social media (paid)	All	Drip feeding	Engagement, reach, click throughs	£750	
Direct emails	Residents we have contact details for	Drip feeding	Open rates, link click throughs	£1,000	
Postcard with service details	All	Drip feeding	Open rates, link click throughs	£1,000	Community Engagement Officer/Councillors to distribute
Council staff/Councillor or training pack/social media packs	All	Drip feeding	Engagement, reach, click throughs to website / app	£200	Displaying in ward community spaces, etc.
Evaluation and lessons learned from phase 1					
Phase 2 Pre-Implementation (October - December 2025)					
Tenant Times Newsletter	Council house/flat tenants	1x edition	Views, clicks, distributions	No cost - internal	
Billboards	All	2 months	Click throughs	£3,000 (Based on 2 boards)	

Roller banners	All	6 x for events/roadshows	QR code scans, click throughs	£500	
Bus advertising	All	Bus streetliners	Click throughs	£15,000 (Based on 8-week campaign 10 buses and 12-week campaign (6 buses))	
		Bus rears			
Posters (warm hubs, community centres, etc.)	Digitally excluded residents/HMOs/landlords	Drip feeding	QR code scans, click throughs	£500	
Bin lorry advertising (existing waste lorries)	All	18	Click throughs	£7,000 (Based on 18 designs)	
Customer services	All	1x automated message	Reduce number of calls	No cost	Automated message
Newspaper/magazine advertising	All	Multiple editions across printed publications	QR code scans, click throughs, reach	£1,600	
Resident feedback	All	To explore appropriate ways to gather feedback	Qualitative and quantitative data	£2,000	
Roadshows	All	To identify suitable events	Qualitative, quantitative data, QR code scans, click throughs, reach	£6,000	
Big belly bins	All	To identify number of bins available	QR code scans, click throughs, informational	£2,000	 town centre (posters on side)
Social media (paid/organic)	All	Drip feeding	Engagement, reach, click throughs to website/app	£750	
Optional: resident leaflet	All	Distributed to all households	QR code scans, click throughs, reach	£25,000	
Evaluation and lessons learned from phase 2					
Phase 3 Implementation and Distribution (January – April 2026)					

Additional support staff in contact centre					
Roadshows	All	To identify relevant roadshows/dates	Qualitative, quantitative data, QR code scans, click throughs, reaches	£6,000	
Billboards	All	2 months	Click throughs	£3,000	(Based on 2 boards)
Caddy leaflets or postcards (delivered inside caddy)	All	Distributed to all households	Instructional, QR code scans, click throughs	£5,000	Specific instructions including new collection dates To be distributed by collection crews.
Caddy labels/printed on caddy	All	Distributed to all households	Instructional, QR code scans, click throughs	£12,700	
Newspaper/magazine advertising	All	Multiple editions across printed publications	QR code scans, click throughs, reach	£1,600	
Circulation of video guides (via social media/website)	All	Drip feeding	Views, engagement, shares	Free	
RBC app - notification	All	Update app	Views, click throughs	Free	
E-newsletter content	Multicultural residents, council house tenants	1x edition	QR code scans, click throughs	£1,000	For community organisations/Parish Councillors, etc.
Resident feedback	All	Explore appropriate ways to gather feedback	Qualitative and quantitative data	£2,000	
Roller banners	All	Drip feeding	QR code scans, click throughs	Reuse banners produced in phase 2	
Social media (organic)	All	Drip feeding	Engagement, reach, click throughs to website/app	No cost	
Social media (paid)	All	Drip feeding	Engagement, reach, click throughs to website/app	£750	

Tenant Times Newsletter	Council house tenants	1x edition	Views, clicks, distributions	No cost	
Evaluation and lessons learned from phase 3					
Phase 4 Go-Live (May – September 2026)					
Additional support staff in contact centre					
Newspaper/magazine advertising	All	Multiple editions across printed publications	QR code scans, click throughs, reach	£1,800	
Social media (paid and organic)	All	Drip feeding	Engagement, reach, click throughs to website/app	£750	
Tenant Times Newsletter	Council house/flat tenants	1x edition	Views, clicks, distributions	No cost	
Updated web content	All	Ongoing	Clicks, views, time spent on webpages	No cost	
RBC app/next bin day updates	All	As required	Views, clicks, app downloads	No cost	
Resident feedback	All	Explore appropriate ways to gather feedback	Qualitative and quantitative data	£2,000	
Evaluation and lessons learned from phase 4					

Communications plan budget

The proposed budget for the communications plan has been developed as per prices of previously quoted artwork in November 2024 and estimates from recent communications activities. An additional 10% uplift has been added to allow for cost increases or unforeseen changes as we progress into 2025/26.

Total proposed budget = £102,000 - split as £86,000 for 2025/26 and £16,000 for 2026/27 (including a 10% uplift) - as requested for approval within the council report.

Additional resource required

- One Community Engagement Officer (fixed term for 18 months) to lead community engagement and communications efforts, this role will start in phase 1 to phase 4 and possibly beyond, with a start date in August 2025. The position will be in pay grade D. Requirements: A full driver’s license and access to a personal vehicle (with milage allowance).
- In phase 3, the contact centre will require additional support staff (fixed term) to manage increasing volumes of enquiries across services at a time when council tax bills and elections are being managed alongside the food waste campaign.

The proposed budget for this campaign are being requested within the council report.

Monitoring and evaluation

We will continuously monitor and evaluate activities to ensure the successful implementation of the new food waste service. We will use feedback to facilitate timely adjustments and improvements to the campaign, ensuring that the messages remain relevant and resonate with our target audiences.

Communication measures	
<p>Customer service call analysis</p> <p>Objective: compare the number of calls to customer services regarding recycling issues to data from previous years.</p> <p>Purpose: identify trends, increase in inquiries, and areas requiring additional information or support.</p>	<p>Food waste web pages</p> <p>Objective: track visits to the food waste web pages.</p> <p>Purpose: assess the effectiveness of online content in raising awareness.</p>
Social media campaign analytics	Social media monitoring

<p>Objective: measure reach, and engagement of posts related to food waste recycling.</p> <p>Purpose: evaluate the impact and reach of social media content.</p>	<p>Objective: monitor comments on social media to identify recurring themes, gaps, and misunderstandings.</p> <p>Purpose: address misconceptions and enhance communication strategies.</p>
<p>Increase users of the Rugby Borough Council app</p> <p>Objective: monitor visits to the app and associated web pages.</p> <p>Purpose: determine the app's effectiveness as a resource for service information.</p>	<p>Caddy usage participation rates</p> <p>Objective: measure participation rates in caddy usage.</p> <p>Purpose: gauge service adoption and identify potential areas for improvement.</p>
<p>Resident feedback</p> <p>Objective: gather resident feedback.</p> <p>Purpose: address issues effectively, as and when they are required throughout the campaign phases.</p>	<p>Engagement with seldom heard communities</p> <p>Objective: Monitor engagement with groups that are typically less heard.</p> <p>Purpose: Ensure inclusivity and access to service information and resources.</p>

Key performance measures:

- **Comparison of residual waste tonnage**
Analyse the amount of residual waste collected before and after the implementation to assess the effectiveness of the new food waste service rollout.
- **Impact on recycling rates**
Evaluate the amount of food waste collected and determine its contribution to improving overall recycling rates compared to previous years.
- **Community participation rates**
Measure engagement through community events and face-to-face interactions to gauge the level of public involvement and support.
- **Resident feedback and service adaptation**
Gather insights from resident surveys to refine and tailor the service according to community needs.

Conclusion

The success of the food waste service will largely depend on phase 4, the go-live stage, which will act as a key benchmark for assessing the overall impact after service launch. Throughout the campaign, from phase 1 to phase 4, we will continuously assess each

stage, making adjustments and enhancements as required. This approach ensures the most effective execution of the communications plan and maximises the successful adoption of the new food waste service.

Rugby Borough Council

Climate Change and Environmental Impact Assessment

CONTEXT

In 2019 the UK Parliament set a commitment in law to reach net zero carbon emissions by 2050. Achieving this target will require considerable effort with public bodies, private sector organisations, the third sector and individuals working together to take action.

Rugby Borough Council declared a climate emergency in 2019 and the Council's Corporate Strategy (2025-2035) [link](#) sets ambitious outcomes in relation to Climate Change. These ambitions are further defined through the Council's Climate Change Strategy [link](#) and must now be progressed through the decisions which the Council makes.

It is therefore important that Rugby Borough Council gives due regard to climate change when making decisions. In the context of the Council's business, Climate Change includes greenhouse gas emissions, biodiversity, habitat loss and environmental destruction. When putting forward recommendations for decision, officers must assess how these recommendations are likely to influence our climate change commitments by completing the following Climate Change and Environmental Impact Assessment.

To help you complete this assessment, please see the following guidance on SharePoint [here](#).

A copy of this Climate Change and Environmental Impact Assessment, including relevant data and information should be forwarded to your Chief Officer for approval.

If you require help, advice and support to complete the form, please contact your Chief Officer.

SECTION 1: OVERVIEW

Portfolio and Service Area	Operations and Traded Services, Waste Services
Policy/Service/Change being assessed	Communications Plan and officer for Food Waste collections
Is this a new or existing Policy/Service/Change?	New
If existing policy/service please state date of last assessment	N/A
Ward Specific Impacts	All
Summary of assessment Briefly summarise the policy/service/change and potential impacts	<p>The success of the mandatory Food Waste collection service relies heavily on a strong Communications Plan and a dedicated officer. Effective communication will raise community awareness, encourage proper participation, and reduce contamination, maximising organic waste diversion and cutting methane emissions from landfill.</p> <p>A dedicated officer will manage community engagement, provide education and support, monitor participation, and address operational issues, ensuring smooth implementation and sustained success.</p> <p>Potential impacts include:</p> <ul style="list-style-type: none"> • Positive: Increase in recycling, reduction in residual waste and in landfill methane emissions and increased community engagement in sustainable waste practices. • Challenges: Risk of initial confusion or resistance; requires sufficient resources and adaptive communication to maintain participation and program effectiveness.
Completed By	Claire Owen
Authorised By	Claire Owen
Date of Assessment	28.5.25

SECTION 2: GREENHOUSE GAS EMISSIONS

	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Scope 1 Emissions Direct emissions from council owned resources, for example through boilers or vehicles.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Greenhouse gas emissions from council-operated vehicles and facilities. For the mandatory food waste collection service, this primarily relates to the collection fleet's fuel use and any onsite processing emissions.	The Communications Plan and Dedicated Officer indirectly mitigate Scope 1 emissions by ensuring high participation and proper waste separation, which reduces contamination helping optimise collection routes. This can lead to fewer collection trips and less vehicle fuel consumption. Additionally, minimising contamination improves organic waste processing outcomes, reducing the need for additional treatment or repeat collections.	Communications Team	12 months
Scope 2 Emissions Indirect emissions occurring at the location energy is produced for council activities. For example, electricity generation for council buildings.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Promoting proper food waste separation, which enhances the efficiency of organic waste processing facilities (e.g., composting or anaerobic digestion). Efficient processing reduces energy demand per tonne of waste treated.	To mitigate these negative impacts, the council can implement energy efficient practices in offices, encourage remote work, and prioritise low energy digital communication tools over physical events.	Waste Services Manager	On-going

SECTION 3: CLIMATE CHANGE STRATEGY

	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Workplaces and the Economy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	NA			
Transport	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The Communications Plan and Dedicated Officer may lead to increased transport related emissions due to travel for community engagement, site visits, monitoring, and events. These activities could result in additional fuel use and associated greenhouse gas emissions, particularly if conventional council vehicles are used.	These emissions are typically small and are outweighed by the broader climate benefits of improved food waste diversion, which the officer and communications enable through higher participation and reduced contamination.	Communications team	12 months
Natural Environment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	The Communications Plan and Dedicated Officer indirectly support positive environmental outcomes by ensuring more food waste is correctly separated and diverted from landfill which reduces methane emissions. Diverted food waste can be transformed into gas energy and liquid digestate contributing to healthier soils and reducing reliance on synthetic fertilizers.	Minor negative impacts may arise from increased travel, use of printed materials, or energy used in communications activities, which could contribute to emissions and resource use if not managed sustainably.	Communications team	12 months
Homes and Energy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA			

	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Waste, Resources and the Circular Economy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Vital for advancing waste reduction, resource efficiency, and the circular economy within communities. By raising awareness and promoting behaviour change, they encourage residents to reduce waste, reuse materials, recycle properly, and participate in composting or food waste collections minimising environmental impact and conserving resources.</p> <p>The communications role acts as a bridge between circular economy goals and community action, enabling widespread participation and driving the systemic changes needed for a more sustainable and resource efficient future. Without this engagement, progress toward circularity and waste reduction would be slower and less effective.</p>		Communications team	12 months
Climate and Nature Positive Communities	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>By raising awareness, motivating behaviour change, and fostering collective action. Through targeted outreach, they help residents understand the importance of sustainable living</p>		Communications team	12 months

	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
				practices such as composting or recycling food waste			
Adaptation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Effective communication ensures households understand how to properly separate food waste, which supports stable and efficient waste management systems, critical during climate stresses like wind, heavy rains or heatwaves. This reduces risks of service disruption and related health hazards, contributing to overall community adaptation capacity.		Communications Team	12 months

SECTION 4: REVIEW

Where a negative impact is identified, the proposal and/or implementation can be adapted or changed; meaning there is a need for regular review. This review may also be needed to reflect additional data and evidence for a fuller assessment (proportionate to the decision in question). Please state the agreed review timescale for the identified impacts of the policy implementation or service change.

Review date	6 months after the communications officer has started (around Jan 2026)
Key points to be considered through review	Alterations needed to communications plan and its delivery
Person responsible for review	Matt Deaves
Authorised by	Claire Owen

EQUALITY IMPACT ASSESSMENT (EqIA)

Context

1. The Public Sector Equality Duty as set out under section 149 of the Equality Act 2010 requires Rugby Borough Council when making decisions to have due regard to the following:
 - eliminating unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Act,
 - advancing equality of opportunity between people who share a protected characteristic and those who do not,
 - fostering good relations between people who share a protected characteristic and those who do not, including tackling prejudice and promoting understanding.
2. The characteristics protected by the Equality Act are:
 - age
 - disability
 - gender reassignment
 - marriage/civil partnership
 - pregnancy/maternity
 - race
 - religion/belief
 - sex/gender
 - sexual orientation
3. In addition to the above-protected characteristics, you should consider the crosscutting elements of the proposed policy, such as impact on social inequalities and impact on carers who look after older people or people with disabilities as part of this assessment.
4. The Equality Impact Assessment (EqIA) document is a tool that enables RBC to test and analyse the nature and impact of what it is currently doing or is planning to do in the future. It can be used flexibly for reviewing existing arrangements but in particular should enable identification where further consultation, engagement and data is required.
5. The questions will enable you to record your findings.
6. Where the EqIA relates to a continuing project, it must be reviewed and updated at each stage of the decision.
7. Once completed and signed off the EqIA will be published [online](#).
8. An EqIA must accompany all **Key Decisions** and **Cabinet Reports**.
9. For further information, refer to the EqIA guidance for staff.
10. For advice and support, contact:
Rebecca Ewers
Corporate Equality & Diversity Officer
rebecca.ewers@rugby.gov.uk
01788 533509

Equality Impact Assessment

Service Area	Waste Services
Policy/Service being assessed	Communications Plan and officer for the introduction of food waste collections
Is this a new or existing policy/service? If existing policy/service please state date of last assessment	New
EqIA Review Team – List of members	Claire Owen & Andy Kelly
Date of this assessment	28/5/2025
Signature of responsible officer (to be signed after the EqIA has been completed)	

A copy of the completed and signed Equality Impact Assessment report, including relevant data and information to be forwarded to the Corporate Equality & Diversity Officer.

Details of Strategy/ Service/ Policy to be analysed

<u>Stage 1 – Policy to be analysed</u>	
(1) Describe the main aims, objectives and purpose of the Strategy/Service/Policy (or decision)?	The communications plan for the new mandatory food waste collection service aims to ensure all residents are informed, understand how to participate, and feel supported. The service is intended to boost recycling rates and contribute to the council’s net zero targets by improving resource recovery, reducing landfill use, and cutting disposal costs. Clear, accessible, and inclusive information will be shared in multiple formats and languages. The plan will encourage positive behaviour change through practical guidance, community engagement, and collaboration with local partners. Progress will be monitored and used to refine communications as needed.
(2) How does it fit with Rugby Borough Council’s Corporate priorities and your service area priorities?	<p>Greener Rugby and Fairer Rugby</p> <ul style="list-style-type: none"> • The Communication plan and officer support the council’s greener priorities by ensuring the food waste collection service is accessible to all residents. By identifying and addressing barriers faced by different groups, the Communications Plan and officer help maximise participation in recycling, making the environmental benefits of the scheme more effective and inclusive. This ensures the council’s drive towards net-zero is both fair and community-wide.
(3) What are the expected outcomes you are hoping to achieve?	The food waste communications plan aims to ensure high awareness and inclusive engagement across all communities, enabling all residents including those with protected characteristics to understand and access the new mandatory food waste collection service. Expected outcomes include widespread participation, increased recycling rates, reduced contamination, and improved public understanding of the environmental benefits of food waste recycling.

<p>(4) Does or will the policy or decision affect:</p> <ul style="list-style-type: none"> • Customers • Employees • Wider community or groups 	<p>The decision will affect:</p> <p>This approach promotes equity by providing clear, accessible information tailored to diverse needs, helping to remove barriers to participation.</p> <p>For customers - the plan will offer straightforward guidance that supports correct food waste separation and presentation, encouraging sustainable behaviour and improving their overall experience.</p> <p>Employees - The communications plan will positively affect food waste collection staff by reducing contamination in food waste bins, making collection safer and more efficient. Clearer separation of food waste will minimise the risk of handling inappropriate or hazardous materials during collection, improving workplace safety. Increased resident participation and understanding will also help streamline collection routes and schedules, enabling staff to perform their duties more effectively and with fewer disruptions.</p> <p>Wider community - The communications plan and dedicated officer will ensure inclusive, accessible information reaches all community members, including those with protected characteristics, promoting equal access and participation. This will boost recycling rates, reduce landfill waste, and support environmental and net zero goals, benefiting the wider community. Ongoing engagement will help identify and address barriers, ensuring the service continues to meet diverse community needs.</p>
<p>(5) Will the policy or decision involve substantial changes in resources?</p>	<p>The communications plan and dedicated officer represent a targeted investment funded by government to support the food waste collection rollout but do not involve substantial changes in overall resources. They are focused additions to ensure effective communication and smooth implementation rather than a major resource shift.</p>
<p><u>Stage 2 – Evidence about user population and consultation</u></p>	<p>As a minimum you must consider what is known about the population likely to be affected which will support your understanding of the impact of the policy, e.g. service uptake/usage, customer satisfaction surveys, staffing data, performance data, research information (national, regional and local data sources).</p>

<p>(1) What does the data tell you about the groups this policy or decision impacts?</p> <p>Possible data sources:</p> <ul style="list-style-type: none"> • national statistics/census data • local statistics • evaluations • analysis of complaints • user feedback • outcomes from consultation/community voice • Council published information, service data • District and Ward Profile – Warwickshire Observatory • Office of National Statistics • Fingertips health profiles • Indices of Multiple Deprivation • RBC Annual Workforce Equality Report 	<p>The data shows that the food waste communications plan and dedicated officer will affect all residents across diverse groups, including those with protected characteristics such as age, disability, ethnicity, language proficiency, and socioeconomic background. It highlights potential barriers faced by some groups such as seldom heard groups, accessibility requirements, or lack of digital access that the plan must address to ensure everyone can understand and participate equally. The data also reveals varying levels of awareness and engagement among different communities, underlining the need for targeted, inclusive communication to reduce inequalities and support equal access to the new food waste collection service.</p>
<p>(2a) Have you consulted or involved those groups that are likely to be affected by the strategy/ service/policy you want to implement?</p> <p>If yes, please state which groups were involved in the consultation and what were their views and how have their views influenced the policy/decision?</p>	<p>The introduction of this new service is a mandatory requirement under the Environment Act 2021 and is not influenced by views of the Public or the Council therefore no consultation has taken place.</p>

<p>(2b) If you have not consulted or engaged with communities that are likely to be affected by the policy/decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary.</p>	<p>The introduction of a food waste collection service is a mandatory requirement and will not adversely affect individual communities directly; therefore, consultation has not taken place.</p> <p>Planned engagement with residents including specially designed resources for residents in communal housing, adapting communication to local needs in rural areas by working with community groups, and produce translated, easy read, and visual materials to overcome language and literacy barriers.</p>
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Stage 3 – Analysis of impact

<p>(1) <u>Protected Characteristics</u> From your data and consultations is there any positive, adverse or negative impact identified for any particular group, which could amount to discrimination?</p> <p>If yes, identify the groups and how they are affected.</p>	<p>Protected Characteristic</p>	<p>Nature of Impact Positive, Neutral, Adverse (explain why)</p>	<p>Extent of impact Low, medium, high</p>
	<p>Age</p>	<p>Positive - Different age groups may require varied communication formats. The plan ensures accessibility for both older and younger residents through multiple channels.</p>	<p>Medium</p>
	<p>Disability</p>	<p>Positive - People with physical, sensory, or cognitive impairments may face barriers. The plan addresses this with accessible formats and tailored support.</p>	<p>High</p>

	Sex	Neutral - No differential impact identified. Communications will be inclusive of all sexes.	Low
	Gender reassignment	Neutral to positive - No direct impact, but inclusive language and representation in communications promote equality and inclusion.	Low
	Marriage/civil partnership	Neutral - No specific impact expected. The service is accessible regardless of marital status.	Low
	Pregnancy/maternity	Positive - Communications will consider the needs of individuals with caring responsibilities, ensuring access and ease of participation.	Medium
	Race	Positive - Language and cultural barriers may exist. The plan includes translated materials and culturally sensitive messaging to support inclusion.	High
	Religion/belief	Neutral to positive - While not directly affected, inclusive and respectful messaging ensures engagement across all faiths and beliefs.	Low

	Sexual Orientation	Neutral - No specific impact identified. Inclusive language and imagery will ensure all feel respected.	Low
(2) <u>Cross cutting themes</u> (a) Are your proposals likely to impact on social inequalities e.g. child poverty, geographically disadvantaged communities? If yes, please explain how?	Description of impact	Nature of impact Positive, Neutral, Adverse (explain why)	Extent of impact Low, medium, high
	To improve access to information and opportunities for socially disadvantaged groups, by employing inclusive communication methods, such as translated materials, accessible formats, and targeted outreach supporting equitable engagement with services.	Positive - The proposals actively promote inclusion, reduce informational inequalities, and support more equitable participation from underrepresented communities.	Medium – The impact is meaningful, particularly in addressing communication barriers, but will require sustained effort, tailored outreach, and ongoing evaluation to achieve long term and widespread change.
	Residents in flats or shared housing may have limited access to bins and challenges with shared facilities causing contamination issues. Those with limited access to services or digital channels may miss key information, reducing participation and the environmental effectiveness of the scheme.	Neutral - While the initiative supports long term environmental improvements (e.g., reduced residual waste and increased recycling), short-term challenges in communication could limit its effectiveness and create disparities.	Medium - The overall impact is moderate, with potential for significant environmental benefits if inclusive communication mitigates access and awareness barriers across different communities.

<p>(3) Using the information gathered in stages 2 and 3, please describe how the policy/strategy/service will:</p> <ul style="list-style-type: none"> a. Eliminate unlawful discrimination, harassment, victimisation and any other unlawful conduct prohibited by the act b. Advance equality of opportunity between people who share and people who do not share a relevant protected characteristic c. Foster good relations between people who share and people who do not share a relevant protected characteristic 	<ul style="list-style-type: none"> a. The communications plan will ensure all messaging and engagement activities are inclusive, respectful, and free from bias. Materials will be carefully reviewed to avoid any language or imagery that could discriminate or marginalise groups based on protected characteristics. The communications officer will receive training on equality and diversity to identify and prevent any unlawful conduct in interactions with the public and stakeholders. b. The plan will actively address barriers faced by people with protected characteristics by providing information in accessible formats (e.g., translations, easy-read, audio), using diverse communication channels, and targeting outreach to seldom heard communities. This ensures equal access to information about food waste collections, enabling everyone to participate fully and benefit from the service. c. The communications approach will promote understanding and community cohesion by highlighting the collective environmental benefits of food waste collection and encouraging inclusive participation. Engagement efforts will involve community groups representing diverse populations to build trust and mutual respect across different groups.
<p>(4) Are there any obvious barriers to accessing the service? If yes, how can they be overcome?</p>	<p>Barriers to accessing the food waste collection service include limited bin space in flats or shared housing, digital exclusion, and language or literacy difficulties. The communications plan and officer address these by delivering targeted, inclusive messages through multiple channels such as print, digital, and in-person outreach to ensure broad reach. They provide clear guidance and specially designed resources for residents in communal housing, adapt communication to local needs in rural areas by working with community groups, and produce translated, easy read, and visual materials to overcome language and literacy barriers. This approach ensures everyone receives accessible information and support, improving participation and equitable access to the service.</p>

<p>(5) What Equality Monitoring Data will be collected to analyse impact? How will the Equality Monitoring Data collected be used?</p> <p>If no Equality Monitoring Data is being collected, why not?</p> <p>For support with this section, please refer to the Equality Monitoring Guidance.</p>	<p>Data will be collected on key protected characteristics such as age, gender, ethnicity, disability status, and geographic location of residents.</p> <p>The data will be analysed to identify any disparities in awareness, engagement, or participation among different groups. This insight will inform ongoing adjustments to the communications strategy to better target underrepresented or disadvantaged communities, ensuring the service is accessible and effective for all. Monitoring will also help demonstrate compliance with equality duties and support transparent reporting.</p>
<p>(6) Complete this section if any adverse impacts were identified in 3.1.</p> <p>Outline any actions that will be taken to remove or mitigate the adverse impacts identified in 3.1 to ensure that no discrimination is taking place. If removing or mitigating the impact is not possible, you may in certain circumstances, justify the discrimination. If that is the case, please give evidence for why justifying is possible in this case.</p>	<p>N/A</p>

<p><u>Stage 4 – Action Planning, Review and Monitoring</u></p>	
<p>(1) Data analysis What does feedback from Equality Monitoring Data gathered tell you about impact on groups? Were there any unforeseen impacts (positive or negative)?</p> <p>The feedback/data should be used to inform your Action Plan in (2)</p>	

<p>If No Further Action is required then go to – Review and Monitoring</p> <p>(2) Action Planning – Specify any changes or improvements that can be made to the service or policy to mitigate or eradicate negative or adverse impact on specific groups, including resource implications.</p>	<p>EqlA Action Plan</p> <table border="1" data-bbox="875 352 2112 579"> <thead> <tr> <th data-bbox="875 352 1120 427">Action</th> <th data-bbox="1120 352 1364 427">Lead Officer</th> <th data-bbox="1364 352 1615 427">Date for completion</th> <th data-bbox="1615 352 1865 427">Resource requirements</th> <th data-bbox="1865 352 2112 427">Comments</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>					Action	Lead Officer	Date for completion	Resource requirements	Comments																				
Action	Lead Officer	Date for completion	Resource requirements	Comments																										
<p>(3) Review and Monitoring</p> <p>State how and when you will monitor policy and Action Plan. Will you make any changes to the Equality Data that you are collecting or how you are collecting/using the data?</p>	<p>The new service will be monitored and reviewed to consider any need to revisit communications and engagement, or service-level adjustments as necessary.</p>																													

Please annotate your policy with the following statement:

‘An Equality Impact Assessment on this policy was undertaken on 28th May 2025 and will be reviewed on 28th November 2025’

AGENDA MANAGEMENT SHEET

Report Title: Councillors' Allowances 2024-25

Name of Committee: Cabinet

Date of Meeting: 24 June 2025

Report Director: Chief Officer - Finance and Performance

Portfolio: Finance and Performance, Legal and Governance

Ward Relevance: N/A

Prior Consultation: N/A

Contact Officer: Lisa Marshall, Lead Accountant

Public or Private: Public

Report Subject to Call-In: Yes

Report En-Bloc: Yes

Forward Plan: Yes

Corporate Priorities: This report relates to the following priority(ies):
 A Healthier Rugby – To support people to live healthier, longer, and more independent lives.
 A Thriving Rugby – To deliver a thriving economy which brings Borough-wide investment and regenerates Rugby Town Centre.
 A Greener Rugby – To protect the environment and ensure the Borough adapts to climate change.
 A Fairer Rugby – To reduce inequalities and improve housing across the Borough.
[Corporate Strategy 2025-2035](#)
 This report does not specifically relate to any Council priorities but is a statutory requirement

Summary: The Local Authorities (Members' Allowances) (England) Regulations 2003 require each local authority to publish details of allowances paid to each councillor for the previous financial year. The report details allowances claimed for 2024/25 financial year.

Financial Implications:

The maximum amounts able to be claimed by councillors for basic allowance, special responsibility allowance and travel and subsistence are stipulated in the Members' Allowance Scheme.

Risk Management/Health and Safety Implications:

All claims made by councillors are rigorously checked for accuracy and compliance with the Council's Members' Allowance Scheme

Environmental Implications:

N/A

Legal Implications:

The Members' Allowance Scheme is required to comply with the Local Authorities (Members' Allowances) (England) Regulations 2003.

Equality and Diversity:

N/A

Options:

N/A

Recommendation:

The allowances claimed by Councillors for 2024/25 as detailed at Appendix 1 to the report, be noted.

Reasons for Recommendation:

To satisfy the legislative requirement to publish the list of allowances claimed.

Cabinet - 24 June 2025

Councillors' Allowances 2024/25

Public Report of the Chief Officer - Finance and Performance

Recommendation

The allowances and expenses claimed by Councillors for 2024/25 as detailed at Appendix 1 to the report, be noted.

1. Introduction

The Local Authorities (Members' Allowances) (England) Regulations 2003 require each local authority to publish details of allowances and expenses paid to each councillor for the previous financial year.

The required information for 2024/25 financial year is shown in Appendix 1. A list of details of all Special Responsibility Allowances for this financial year is attached in Appendix 2.

2. Allowances and Expenses Paid

The amounts paid to councillors include basic allowance and special responsibility allowance (if applicable).

Councillors can also claim travel and subsistence allowances for meetings and conferences as determined by the Council. However, these amounts may vary as:

- i) Some councillors prefer not to claim these allowances
- ii) They are often dependent on the frequency of journeys a councillor undertakes; and
- iii) They are dependent on how far councillors have to travel from their homes to the Town Hall

Name of Meeting: Cabinet
Date of Meeting: 24 June 2025
Subject Matter: Councillors Allowances 2024/25
Originating Department: Finance and Performance

DO ANY BACKGROUND PAPERS APPLY YES NO

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A

Councillors Allowances 2024/25

Appendix 1

Councillor Surname	Councillor Forename	Ward	Start Date (where became a Councillor mid-year)	Leaving Date (where ceased being a Councillor mid-year)	Basic Allowance £	Special Resp Allowance £	Conference Fees £	Mobile Phones £	Subsistance £	Travel £	Total £
A'Barrow	Julie	Bilton		06/05/2024	766.68	447.40					1,214.08
Barnett	Robert	Benn			7,900.92						7,900.92
Bennett	Jonathan	Dunsmore			7,900.92						7,900.92
Brown	Barbara	New Bilton			7,900.92	5,413.64					13,314.56
Daly	Adam	Hillmorton			7,900.92	1,170.52					9,071.44
Douglas	Timothy	Paddox		06/05/2024	766.68						766.68
Dumbleton	Carie-Anne	Rokeby & Overslade			7,900.92						7,900.92
Edwards	Samuel	Eastlands			7,900.92						7,900.92
Edwards	Claire	Coton & Boughton	06/05/2024		7,136.31	5,413.64					12,549.95
Freeman	Tony	Newbold & Brownsover	06/05/2024		7,136.31						7,136.31
Garcia Maures	Belinda	Revel & Binley Woods			7,900.92	3,790.97					11,691.89
Gillias	Anthony	Revel & Binley Woods			7,900.92	4,610.64					12,511.56
Harrington	Richard	Benn			7,900.92						7,900.92
Hassell	Evelyn	Clifton, Newton & Churchover			7,900.92						7,900.92
Henderson	Amanda	Admirals & Cawston	06/05/2024		7,136.31						7,136.31
Howling	Michael	Bilton	06/05/2024		7,136.31						7,136.31
Karadiar	Senthil	Coton & Boughton			7,900.92						7,900.92
Keeling	Dale	Leam Valley			7,900.92						7,900.92
Keeling	John	Dunsmore			7,900.92						7,900.92
Lawrence	Toby	Bilton			7,900.92						7,900.92
Lewis	William	Rokeby & Overslade			7,900.92						7,900.92
Livesey	Alison	Coton & Boughton			7,900.92	5,413.64	2,922.00				16,236.56
Maoudis	Rebecca	Wolvey & Shilton			7,900.92						7,900.92
Mckenzie	Isabelle	Rokeby & Overslade			7,900.92		2,922.00			66.06	10,888.98
Mistry	Ish	New Bilton			7,900.92	6,115.95				169.78	14,186.65
Moran	Michael	Admirals & Cawston			7,900.92	12,888.85					20,789.77
New	Noreen	Paddox			7,900.92						7,900.92
O'Rourke	Margaret	Benn			7,900.92	5,782.98	3,187.60				16,871.50
Parker	Lisa	Bilton			7,900.92						7,900.92
Picker	Ian	Hillmorton			7,689.60	1,170.52				72.38	8,932.50
Poole	Derek	Wolston & The Lawfords			7,900.92	5,368.19	2,658.00	89.25	15.20	293.58	16,325.14
Rabin	Wayne	Newbold & Brownsover		06/05/2024	766.68						766.68
Robbins	Carolyn	Coton & Boughton		06/05/2024	766.68	638.91					1,405.59
Robinson	Louise	Admirals & Cawston			7,900.92	5,413.64	1,578.00				14,892.56
Roodhouse	Susan	Eastlands		06/05/2024	766.68						766.68

Roodhouse	Jerry	Paddox			7,900.92	1,181.28	1,578.00				10,660.20
Russell	Luke	Hillmorton			7,900.92						7,900.92
Sandison	Neil	Eastlands			7,900.92				72.38		7,973.30
Sayani	Noorjahan	Newbold & Brownsover			7,900.92						7,900.92
Simpson-Vince	Jill	Dunsmore			7,900.92						7,900.92
Slinger	John	New Bilton		05/05/2025	2,060.19						2,060.19
Srivastava	Ramesh	Newbold & Brownsover			7,900.92						7,900.92
Thomas	Mark	Paddox		06/05/2024	7,136.31						7,136.31
Timms	Heather	Revel & Binley Woods			7,900.92	3,248.21					11,149.13
Trimble	Patricia	Eastlands		06/05/2024	7,136.31						7,136.31
Ward	Simon	Wolston & The Lawfords			7,900.92	3,667.40	1,578.00			60.30	13,206.62
Watson-Merret	Carolyn	Admirals & Cawston		06/05/2024	766.68	638.91					1,405.59
Willis	Timothy	Wolston & The Lawfords			7,900.92	1,170.52					9,071.44
Total					325,799.01	73,545.81	16,423.60	89.25	15.20	734.48	416,607.35

Independents

Councillor Surname	Councillor Forename	Committee	Special Resp Allowance £	Travel £	Subsistance £	Total £
Dudfield	Paul	Audit & Ethics	3,805.56			3,805.56
Eves	John	Audit & Ethics	1,622.64	70.65	3.60	1,696.89
Shackley	Paul	Shareholder	0.00			0.00
Total			5,428.20	70.65	3.60	5,502.45

SPECIAL RESPONSIBILITY ALLOWANCES

2024/25 – with effect from 5 June 2024

Special responsibility	Name of Councillor
Mayor	Cllr Simon Ward
Leader of the Council and Chair of Cabinet	Cllr Michael Moran
Deputy Leader of the Council (plus Finance and Performance, Legal and Governance Portfolio Holder)	Cllr Ish Mistry
Cabinet Members/portfolio holders:	
Growth and Investment Partnerships and Wellbeing Communities and Homes, Regulation and Safety Organisational Change Operations and Traded Services	Cllr Louise Robinson Cllr Maggie O'Rourke Cllr Claire Edwards Cllr Barbara Brown Cllr Alison Livesey
Licensing and Safety Committee Chair	Cllr Belinda Garcia
Planning Committee Chair	Cllr Tony Gillias
Scrutiny Committee Chair	Cllr Heather Timms
Appeals Committee Chair	No appointment
Grievance Committee Chair	No appointment
Opposition Group Leader (Conservative)	Cllr Derek Poole
Opposition Group Leader (Lib Dem)	Cllr Jerry Roodhouse
Audit and Ethics Committee Chair	Mr Paul Dudfield
Audit and Ethics Committee Vice-Chair	Mr John Eves
Shareholders Committee Chair	Mr Paul Shackley – SRA paused