

# Public Document Pack

Daneshill House  
Danestrete  
Stevenage  
Hertfordshire

18 February 2025

Dear Sir/Madam

Notice is hereby given that a meeting of the Stevenage Borough Council will be held in the Council Chamber, Daneshill House, Danestrete, Stevenage on Wednesday, 26 February 2025 at 7.00pm and you are summoned to attend to transact the following business.

Yours faithfully

Matthew Partridge  
Chief Executive

---

## AGENDA

**1. APOLOGIES FOR ABSENCE AND DECLARATIONS OF INTEREST**

**2. MINUTES - 22 JANUARY 2025**

To approve the minutes of the Council Meeting held on 22 January 2025.

Page Nos. 5 - 14

**3. GENERAL FUND AND COUNCIL TAX SETTING 2025/26**

To approve the Council's Final General Fund Budget 2025/26 and Capital Strategy for 2024/25 to 2029/30

Page Nos. 15 - 84

**4. FINAL CAPITAL STRATEGY 2024/25 - 2028/29**

To approve revisions to the 2024/25 General Fund (GF) and Housing Revenue Account (HRA) Capital Programme and Strategy and approve the Capital Programme for 2025/26.

Page Nos. 85 - 116

**5. ANNUAL TREASURY MANAGEMENT STRATEGY INCLUDING PRUDENTIAL INDICATORS 2024-25**

To approve the Treasury Management Strategy 2025/26, including its Annual Investment Strategy, Prudential Indicators and Minimum Revenue Provision

(MRP) policy following considerations from Audit and Cabinet committees.

Page Nos. 117 - 154

**6. PAY STATEMENT POLICY 2025/26**

To approve the Council's Pay Policy Statement for financial year 2025/26.

Page Nos. 155 - 164

**7. LICENSING ACT 2003 POLICY REVIEW**

To consider and adopt the Council's proposed Statement of Licensing Policy as required under the Licensing Act 2003 (the Act).

Page Nos. 165 - 264

**8. GAMBLING ACT 2025 POLICY REVIEW**

To consider and adopt the Council's draft Statement of Principles as required under the Gambling Act 2005.

Page Nos. 265 - 416

**9. SO SAFE (COMMUNITY SAFETY) STRATEGY**

To consider a final version of the draft Community Safety Strategy 2025-28, Appendix A, which outlines the emerging priorities of the SoSafe partnership for the next three years.

Page Nos. 417 - 480

**10. MEMBERS ALLOWANCES SCHEME 2025/26**

To receive the report of the Independent Panel (IRP) on Members' Allowances and, subject to consideration, approve the Scheme of Allowances for 2025/26 onwards.

Page Nos. 481 - 494

**11. CONTRACT PROCEDURE RULES**

To approve the revision to the Council's Contract Standing Orders, now known as Contract Procedure Rules.

Page Nos. 495 - 548

STEVENAGE BOROUGH COUNCIL

## COUNCIL MINUTES

Date: Wednesday, 22 January 2025

Time: 7.00pm

Place: Council Chamber

**Present:** Councillors: Jim Brown, (Mayor), Myla Arceno, Julie Ashley-Wren, Philip Bibby CC, Stephen Booth, Robert Boyle, Leanne Brady, Lloyd Briscoe, Rob Broom, Kamal Choudhury, Forhad Chowdhury, Peter Clark, Akin Elekolusi, Alistair Gordon, Lynda Guy, Richard Henry, Jackie Hollywell, Coleen De Freitas, Lin Martin-Haugh, Conor McGrath, Andy McGuinness, Sarah Mead, Claire Parris, Ellie Plater CC, Tom Plater, Ceara Roopchand, Loraine Rossati, Simon Speller, Jeannette Thomas, Carolina Veres, Anne Wells, Nigel Williams, Jade Woods and Tom Wren

**Start / End** Start Time: 7.00pm  
**Time:** End Time: 8.50pm

### 1 **APOLOGIES FOR ABSENCE AND DECLARATIONS OF INTEREST**

Apologies for Absence were received on behalf of Councillors Sandra Barr, Nazmin Chowdhury, Akin Elekolusi, Robin Parker CC and Tom Wren.

There were no declarations of interest.

### 2 **MINUTES - 18 DECEMBER 2024**

It was **RESOLVED** that the Minutes of the Council Meeting held on 18 December 2024 be approved as a correct record and signed by the Mayor.

### 3 **MAYOR'S COMMUNICATIONS**

The Mayor spoke of the recent sad death of former Councillor, Alderman David Cullen. David had been a Stevenage Borough Councillor for over 36 years and an Alderman for the past 3 years. The Mayor said that David would be remembered for his contribution to the Council and the Town, particularly in his role as Chair of the Planning and Development Committee and Overview and Scrutiny Committee. David's funeral service would be held at St Hilda's Church on Wednesday 5 February followed by refreshments at The Poacher Pub on Bedwell Crescent.

The Leader of the Council spoke of David's outstanding contributions to Stevenage which had resulted in the title of Honorary Alderman being awarded in 2021. He remembered David's political passion and knowledge of political history.

Councillor Stephen Booth, Leader of the Opposition and the Lib Dem Group recalled

David as a formidable opponent with a fine record for the Council.

Councillor Phil Bibby advised that David was also highly thought of by the County Council and sent condolences to his family.

Councillor Simon Speller said that David was a sharp, intelligent councillor but approachable and easy to work with particularly in his role as Chair of the Planning and Development Committee, as well as a passionate follower of Stevenage Borough Football Club.

A number of other Members spoke in tribute to Alderman Cullen following which the Council stood to observe a minute's silence.

The Mayor then referred to a list of events he had supported since the last Council meeting on 18 December which had been circulated at the meeting. He gave particular thanks to Hilary Spiers at the Arts Guild who was helping to organise a number of his upcoming events.

#### 4 **COMMUNITY PRESENTATIONS**

There was no community presentation.

#### 5 **PETITIONS AND DEPUTATIONS**

There were no petitions or deputations.

#### 6 **QUESTIONS FROM THE YOUTH COUNCIL**

There were no questions from the Youth Council.

#### 7 **QUESTIONS FROM THE PUBLIC**

There were no questions from the Public.

#### 8 **LEADER OF THE COUNCIL'S UPDATE**

The Leader of the Opposition, Councillor Stephen Booth, asked the following question: Does the Leader of the Council agree that the Council should be fitting solar panels to all new Council homes as standard and run a programme to retrofit all Council homes with solar panels. Would he also agree to join the campaign with the Liberal Democrat Group to get developers to fit solar panels as a standard feature for all new houses?

The Leader of the Council said that the Council was working hard to meet the net zero targets. He would ensure that Councillor Booth received a written response in relation to the specific issue of solar panel installation.

The Council then received updates from the relevant Cabinet Portfolio Holders on the following matters:

- Build a Better Bedwell;
- Stevenage Green Business Grants;
- Simpler Recycling;
- National Planning Policy Framework (NPPF);
- Older People/Age Friendly Communities;
- Stevenage Works Update;
- Severe Weather Emergency Protocol;
- Budget Consultation;
- Regeneration of the Town Centre.

## 9 **UPDATE FROM SCRUTINY CHAIRS**

Councillor Lin Martin-Haugh, Chair of the Overview and Scrutiny Committee advised that at its December meeting, the Committee had considered the following issues:

- Corporate Performance – Quarter 2 2024/25
- Council Tax Base 2025/26
- Housing Revenue Account (HRA) – Draft Budget and Rent Setting 2025/26
- Housing Inspection Outcome
- Repairs and Maintenance Policy – Approval
- Homelessness and Rough Sleeper Strategy

Members asked several questions on the Repairs and Maintenance Policy particularly around the clarity of the consultation process and how it would be communicated with the public. Members highlighted the need to produce a simplified version of the policy to increase accessibility for tenants, particularly those with complex needs. Members had also stressed the importance of identifying and supporting vulnerable tenants.

Regarding the Homelessness and Rough Sleepers Strategy, Members commended the Rough Sleeper Team for their hard work and dedication in addressing homelessness and complex cases within Stevenage.

The meeting held on 21 January considered the decisions of the Cabinet held on 15 January which included:

- Garages Asset Management Report
- Community Safety Strategy 2025 – 28
- Licensing Act 2003 - Review of Statement of Licensing Policy
- Gambling Act 2005 - Review of Statement of Principles
- Consultation on an amendment to two article 4 directions
- Community Infrastructure Levy (CIL): draft charging schedule – public consultation
- Housing Revenue Account (HRA) - Final Budget and Rent Setting 2025/26
- Draft General Fund and Council Tax Setting 2025/26
- Draft Capital Strategy 2024/25-2029/30

Members asked a number of questions regarding these items.

The Chair of the Community Select Committee gave an update on the work of the Committee. A presentation had been received from Officers regarding the Council's work with regards to its Equalities, Diversity and Inclusion Strategy and had direct guest speaker input from the Chair of the Equalities Commission Legacy Group, Errol John and the Chair of Stevenage World Forum, Kate Belinis regarding race equality, John Preamble from Junction 7 Creatives and Coco Brinda representing local LGBTQ+ community.

The Chair advised that Committee would be continuing its work on this theme with a meeting on 29 January focusing on Age and Disability.

The Chair of the Environment and Economy Select Committee updated the Council on a meeting of the Environment & Economy Select Committee held in December. The Committee heard from the Council's CEO, Matt Partridge regarding his role as the District and Borough Council Step2Skills Board Member. The Committee also considered its draft report and recommendations relating to the Skills Agenda review.

The Chair then updated the Council on a meeting of the Environment & Economy Select Committee held in January 2025. The Committee had considered the final report and recommendations of the Skills Agenda Review, building on the great work that the Council was doing through its Stevenage Works Programme, Skills Framework and activities with partners in this area.

## 10 **NOTICE OF MOTIONS**

### **Local Government Devolution**

Councillor Richard Henry moved and Councillor Ceara Roopchand seconded the following motion:

'Labour councils and councillors across the East of England have, for years, been a beacon of hope in contrast to a disastrous and divisive Conservative Government.

Labour Councils have protected key services and delivered for residents' time and time again despite the difficult financial circumstances.

It is exciting to now have a Labour Government working with us hand in hand.

However Council does not underestimate the scale of the challenges ahead. The Conservative government left the NHS, Local Government and the economy in ruin, and it will take time to rebuild the foundations in the East and across the country.

#### **Council resolves to:**

1. Recognise the benefits of working with our new Government to fulfil its vital commitment of devolving power into the hands of local communities and;
2. Resolves to agree to play its part in supporting the Government in delivering on its mission to realise genuine devolution to councils across the East of

England thereby supporting and empowering our residents and businesses.’

In moving the Motion, Councillor Richard Henry highlighted his passion for Stevenage, being ambitious for its communities and noted that the Council would fight for the very best outcome for the town. Meetings and briefings across the County had been held and would continue over the next few weeks. He advised that the Government was determined in its view to deliver devolution and local government reform. He advised that having more powers in the areas of adult skills/travel to work and more money for affordable homes was to be welcomed and would be a positive outcome for Stevenage.

Cllr Henry informed Council that it would take some time for all partners to consider the best options for Hertfordshire to become a Mayoral level authority. He confirmed that the earlier announcement from the County Council Leader that a single Unitary Council was his preferred option was not supported by any of the District Leaders in Hertfordshire.

It was noted that further information was expected imminently from the Minister on the detail of what the Government would be asking of local Councils. A County level working party made up of all Council Leaders and the Police and Crime Commissioner had been convened to gather the data necessary to inform options for submission to the Government by the end of March 2025.

Cllr Henry concluded by confirming that his priority would be to make sure any proposals put the needs of Stevenage first.

In seconding the motion, Councillor Roopchand advised that the devolution proposals were a unique opportunity to shape the future of Stevenage and help to provide solutions to challenges. Services such as Health Care and Education would be able to be tailored to better suit the needs of the community. Residents would have more involvement in decisions affecting their daily lives as there would be stronger ownership and responsibility. There would also be opportunities to boost the local economy and the local infrastructure.

Councillor Booth, Leader of the Opposition stated that the Government’s plans for devolution and reform had no guarantees that powers would be devolved locally and, in his view, the reason this was being proposed was to save money. He suggested that it would have been more useful if a campaign for electoral reform rather than local government reform was the concern for the government.

Councillor Bibby stated that a devolution package was needed but was concerned about the potential and associated impacts of the County being broken up. In his opinion, a single Unitary Council would provide all services cutting out public confusion regarding responsibility.

Councillor McGuinness stated that he did not doubt the Leader’s commitment to the Town but the proposals from this Government would take the powers away from local Councils and voting for this motion would be a vote for the dissolution of Stevenage Borough Council.

Councillor Speller advised that although he had concerns around neighbourhood governance and the distance between the service suppliers and the public, there were benefits of economies of scale for services such as recycling and refuse, housing and social care, workforce skills and Town and Country Planning.

Upon being put to the vote, the Motion was carried.

## 11 **QUESTIONS FROM MEMBERS TO CHAIRS/PORTFOLIO HOLDERS**

The Council received a question from Councillor Julie Ashley-Wren regarding pavements and footpaths. The response to the question had been published in the supplementary agenda for the meeting.

Supplementary Question: What plans does the Council have to address the issue of pavement parking in the Old Town part?

The Portfolio Holder for Environment and Performance agreed that there were issues of pavement obstruction in the Old Town and design solutions did exist to help but that he would be happy to meet with any Members with concerns about specific areas.

The Council received a question from Councillor Andy McGuinness regarding Local Community Budgets. The response to the question had been published in the supplementary agenda for the meeting.

Supplementary Question: What consideration has been made to ensure that a further increase of locality budgets and ensure the power to spend the budgets remained in the hands of local communities in conjunction with the neighbourhood teams?

In the absence of the Portfolio Holder for Communities and Neighbourhoods the Leader of the Council advised that if possible and a greater Government settlement was awarded, he would like to look at the levels of LCB funding as he valued the local spending the budgets allowed. The Portfolio Holder for Environment and Performance agreed that an increase would be welcomed but that Councillors should be encouraged to identify ward priorities and use the money in conjunction with the Climate Change Community Fund and where possible the UK Shared Prosperity Fund to make a difference in those areas.

## 12 **HOUSING REVENUE ACCOUNT (HRA) - FINAL BUDGET AND RENT SETTING 2025/26**

The Council considered a report seeking approval to the Housing Revenue Account (HRA) Budget and Rent Setting for 2025/26.

In moving the motion, Councillor Jeannette Thomas, Deputy Leader and Cabinet Member for Resources and Transformation advised that the aim of the budget was to balance the Council's money with the needs of the existing housing stock, while allowing investment in new homes to replace those lost under the Right to Buy system. There was also an ongoing need to provide homes for residents on the



council home waiting list.

She advised that the budget included funding of £39Million for revenue and capital works to existing council homes and £28Million of investment to enable the delivery of new social and affordable homes. This was part of the ongoing plan over the next ten years to improve the maintenance of council homes, to ensure that tenants had the good quality, safe and sustainable homes they deserved.

The report set out the requirements for revenue growth for 2025/26 HRA totalling £4.8 Million. The biggest area of growth was on responsive repairs, where the budget had been increased by over £2Million in response to increased demand for repairs and much higher costs. Work was ongoing to contain this budget pressure, but nationally social housing providers had all been reporting much higher costs for repairs and maintenance partly due to an increase in service demand and additional regulatory burdens.

Council noted the continuing improvements to the Council's Void Property Service, and a further budget of £704,000 which had been allocated to introduce an in-house team, to improve performance and the void turn-around time.

The Portfolio Holder informed Council that the local authority housing sector had come under increased regulation in recent years and that it was important to have the resources in place to meet those demands, manage the process and improve areas such as data quality, resident engagement and digital services.

The portfolio Holder advised that the medium term forecasts for the HRA showed that significant savings would have to be made in the coming years in order to balance the fund. To help achieve those savings a further £200,000 had been added to next year's budget to help identify and implement the major savings required.

Rental income provided the main source of funding for the HRA and it was recommended that rents should be increased by 2.7% for 2025/26, in line with the Government's rent setting guidelines of September CPI figure plus 1%. This would increase average weekly rents by £3.21 for social rents, £3.94 for Low Start Shared Ownership homes and £5.02 for affordable rents. The net rental income increase for 2025/26 was estimated to be £1.9Million which would take into account the likely impact of future right to buys, the timing of new stock coming on stream and properties taken out of management that were awaiting redevelopment.

It was noted that for homes that had service charges, these would not be subject to the rental increase of 2.7% but were based on actual cost of the services provided. Of the 2,757 properties that received service charges, 68% would see an increase of less than 50p per week. The remaining properties would receive higher increases, due to utility cost increases which were still projected to be higher than general inflation.

Lastly, the Portfolio Holder for Resources advised that the cost to deliver services next year would result in a deficit for the year of £668,000 which would be funded from balances.

In seconding the motion, Councillor Jackie Hollywell, Portfolio Holder for Housing advised that housing continued to be a top priority for the Council, as evidenced through the recent housing inspection where a C2 regulatory judgement from the Regulator for Social Housing had been awarded.

Key priorities included maintaining full compliance with all statutory and regulatory requirements to ensure tenants' homes remained safe and complied with the requirements of the Social Housing Regulations Act, Building Safety Act and the Fire Safety Act.

It was noted that the Council's decent homes programme, would include installation of 1,316 new kitchens and bathrooms, 3,936 heating upgrades, 1,014 window or door upgrades and 500 properties would receive works to improve energy efficiency.

The 2025/26 budget would contribute towards the delivery of 341 new Council homes over the next 5 years in addition to the 497 new homes the council had already delivered to date.

The Portfolio Holder for Housing confirmed that the Chief Finance Officer was content with the projected level of balances, and that the budget proposed was robust, noting though that, for future years, the allocation of resources would be prioritised and service-related savings identified to reflect the level of funding available.

Upon the motion being put to the vote, it was **RESOLVED:**

1. That HRA dwelling rents be increased (week commencing 1 April 2024) by 7.7%. This equates to an average increase of £8.56 for social rents, £13.30 for affordable rents and £10.09 for Low Start Shared Ownership homes per week (based on a 52-week year).
2. The 2024/25 service charges be approved as set out in paragraph 4.2.
3. That the HRA budget for 2024/25 as set out in Appendix A and as revised from the January 2024 draft budget report (as set out in para. 4.8.1) be approved.
4. The 2024/25 growth options as set out in section 4.4 be approved.
5. That the 2024/25 Fees and Charges as set out in Appendix B be approved.
6. That the minimum levels of balances for 2024/25 as shown in Appendix C be approved.
7. That the Rent Increase Equalities Impact Assessments appended to this report in Appendix D be noted.
8. That the contingency sum of £400K, within which the Cabinet can approve supplementary estimates, for 2024/25 (unchanged from 2023/24) be approved.
9. That the comments from Overview and Scrutiny be noted
10. That key partners and other stakeholders be consulted and their views

considered as part of the 2024/25 budget setting process.

13 **AUDIT COMMITTEE MINUTES**

The Minutes of the meeting of the Audit Committee held on 27 November 2024 were received.

14 **APPOINTMENT OF CHIEF EXECUTIVE**

The Council considered a report in respect of the appointment to the post of Chief Executive and Head of Paid Service, Electoral Registration Officer and Returning Officer upon the recommendation of the Appointments Committee.

In moving the report, Councillor Richard Henry advised that following the extended notice given by the current Chief Executive Matt Partridge the appointments process had been undertaken and would allow a seamless transition to the post of Chief Executive. The Leader placed on record his sincere thanks to Matt for his dedicated and outstanding service as Chief Executive since his appointment to the role in 2019. He thanked Matt for his support and advice particularly since taking up his role as Leader of the Council 2 years ago.

Council was advised that following a comprehensive and robust appointments process he was pleased to recommend to Council the appointment of Dr Thomas Pike to the role. Tom would bring a wealth of experience and skills to the role and he had already demonstrated considerable strategic vision and operational excellence and commitment to public service.

In seconding the report Councillor Jeannette Thomas also thanked Matt Partridge for his work and support to her and reiterated the robustness of the appointments process.

A number of Members spoke and gave thanks to Matt Partridge for his work and commitment in his role as Chief Executive and also congratulated Tom Pike for his appointment.

Following debate and upon the motion being put to the vote, it was **RESOLVED** that:

1. The appointment of Thomas Pike be approved, with effect from 14 April 2025 as:

Chief Executive  
Head of the Paid Service  
Returning Officer  
Electoral Registration Officer and

2. Thomas Pike be appointed to the Chief Executive Salary range of £145000-£165000

15 **EXCLUSION OF PRESS AND PUBLIC**

Not required.

**CHAIR**

Part 1



Agenda item:

---

**CABINET/COUNCIL**

**Meeting**

**Portfolio Area** RESOURCES AND TRANSFORMATION

**Date** 26 February 2025



## FINAL GENERAL FUND AND COUNCIL TAX SETTING 2025/26

### KEY DECISION

**Author** Clare Fletcher

**Contributors** Senior Leadership Team

**Lead Officer** Clare Fletcher

**Contact Officer** Clare Fletcher

### 1 PURPOSE

- 1.1 To consider the Council's draft 2025/26 General Fund Budget, Council Tax Support Scheme and draft proposals for the 2025/26 Council Tax.
- 1.2 To consider the projected 2024/25 General Fund Budget.

### 2 RECOMMENDATIONS

That Council approve:

- 2.1 The 2024/25 revised net expenditure on the General Fund of **£12,251,910** is approved as set out in paragraph 4.8.1 as summarised in Appendix B.
- 2.2 The draft General Fund Budget for 2025/26 of **£10,753,540** is proposed for consultation purposes, with a contribution to balances of **£6,053** and a Band D Council Tax of **£246.41**, (assuming a 2.99% Council Tax increase), as summarised in Appendix B and included in the Council tax resolution in Appendix F.

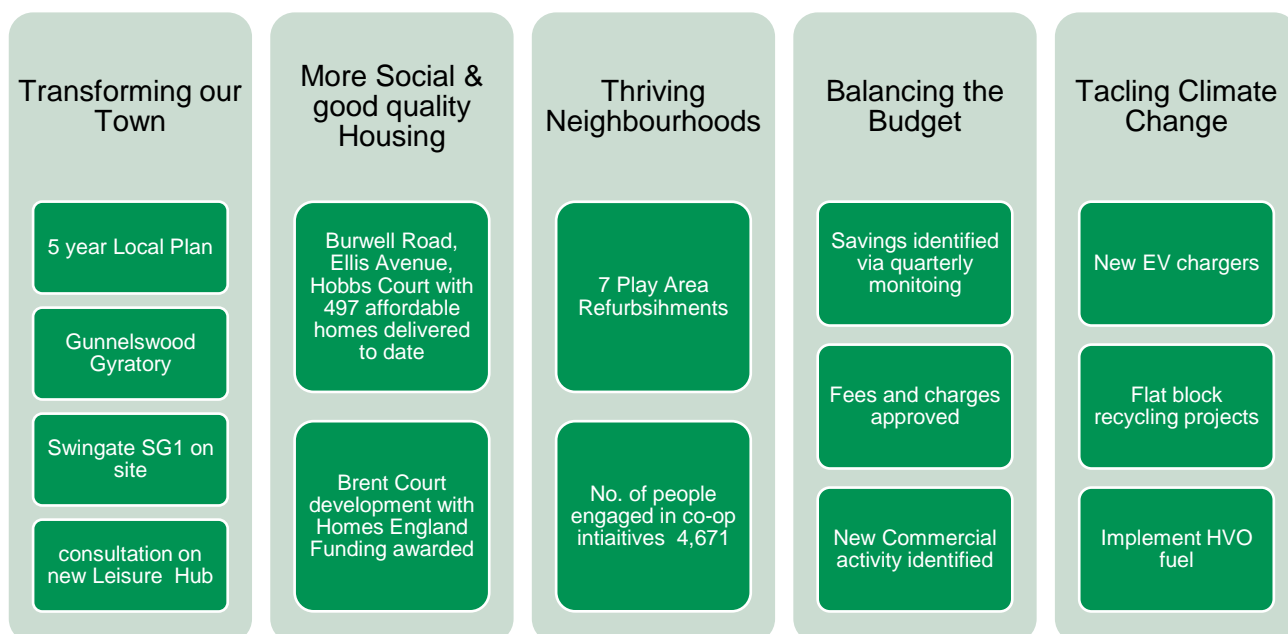
- 2.3 The updated position on the General Fund Medium Term Financial Strategy (MTFS) as summarised in section 4.10 be noted.
- 2.4 The minimum level of General Fund reserves of **£3,421,625**, which is in line with the 2025/26 risk assessment of balances, as shown at Appendix C to this report, is approved.
- 2.5 The contingency sum of **£500,000** within which the Cabinet can approve supplementary estimates, be approved for 2025/26, (reflecting the level of balances available above the minimum amount).
- 2.6 The 2025/26 Balancing the Budget options as set out in section 4.5 and Appendix A, totalling **£275,907** and **£29,651** for the General Fund and HRA respectively, be approved.
- 2.7 The use of the Business Rate reserve to fund a Graduate and Apprentice scheme as set out in section 4.6 is approved for inclusion in the 2025/26 General Fund (**£202,760**).
- 2.8 That a first call on underspends of **£150,000** (in total from the General Fund and HRA) is approved to support the Graduate and Apprentice scheme as set out in section 4.6.
- 2.9 That the growth bid for graffiti removal of **£75,000** as set out in section 4.6 is approved.
- 2.10 That the pressures identified in sections 4.2 and 4.7 to this report are noted.
- 2.11 That Members approve the Council Tax Support scheme for 2025/26 as set out in paragraphs 4.3.8-4.3.9
- 2.12 That the Section 25 Statement on Robustness of Estimates and Adequacy of Reserve as set out in Appendix D is approved.
- 2.13 That Members note the Equalities Impact Assessment appended to this report for the Council Tax increase (Appendix E).
- 2.14 That Members note the feedback on the budget from Overview and Scrutiny as set out in Para.4.13.1 and public consultation in Para. 4.13.2 onwards.

### **3. BACKGROUND**

- 3.1 This report is an update on the January 2025 Draft budget report and sets out the latest position for the 2024/25 and 2025/26 General Fund Budget. The General Fund Budget forms part of the Council's Budget and Policy Framework. Under Article 4 of the Constitution, the Budget includes: the allocation of financial resources to different services and projects; proposed contingency funds; setting the council tax; the council tax support scheme; decisions relating to the control of the Council's borrowing requirement; the control of its capital expenditure; and the setting of virement limits.
- 3.2 The Council approved an ambitious new Making Stevenage Even Better Corporate Plan in February 2024. It is essential that the Council employs a robust budget review and setting process in order to ensure that both front line service and Making Stevenage Even Better Corporate Plan priorities can be achieved. As such the budgets both revenue and capital provide the means

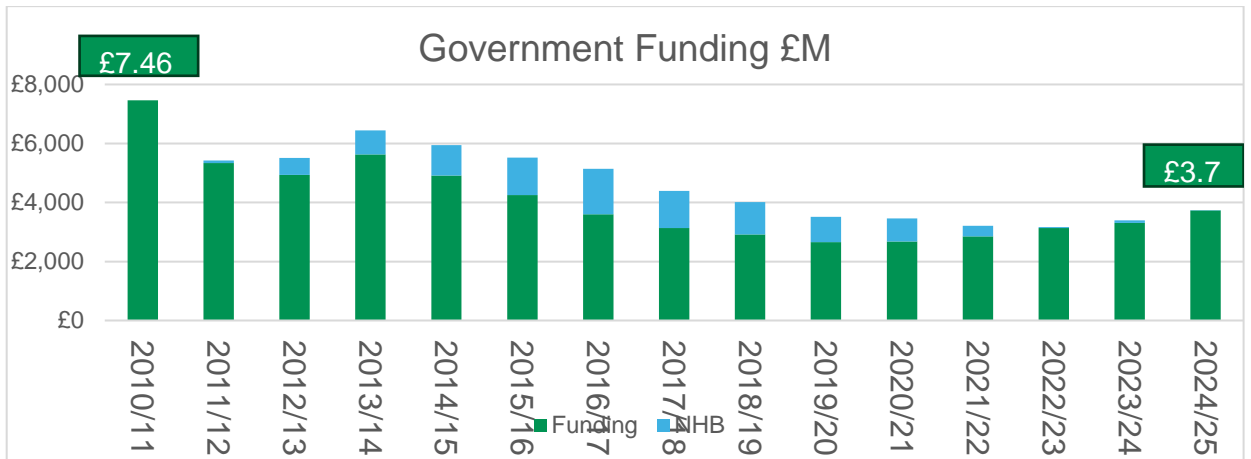
through which delivery of core service and Corporate Plan objectives can be achieved.

3.3 A summary of some of the service and MSEB priority activities which have been delivered as a result of the budget setting activity for 2024/25 is set out below:

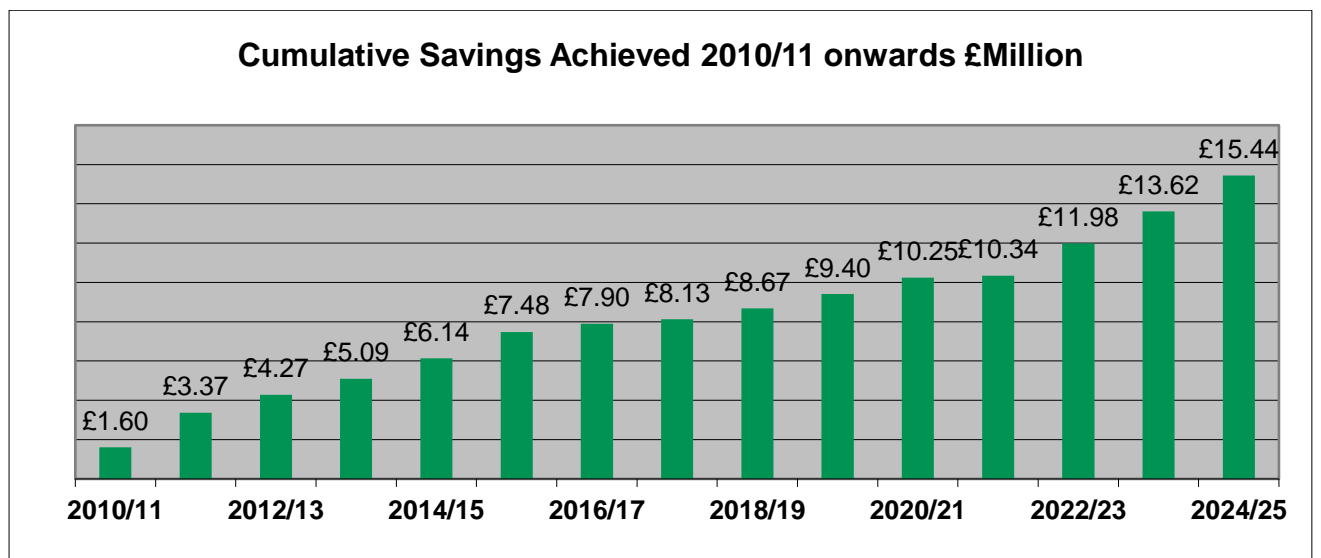


3.4 As set out in the November 2024 Cabinet Balancing the Budget report, the financial landscape for Councils is increasingly difficult due to historic funding cuts, inflationary pressures and increased demands on services. The LGA stated in their response to the provisional settlement *'We welcome both the increase in Core Spending Power and those resources outside Core Spending Power such as the extra £1.1 billion in extra resources for 2025/26 from the new Extended Producer Responsibility for packaging scheme and the extra £515 million to compensate for increases in employer national insurance contributions (NICs). This extra funding, inside and outside Core Spending Power, will help councils meet some - but not all - of the cost and demand pressures councils face. Councils of all types will continue to struggle to balance the books. Many face having to increase council tax bills to bring in desperately needed funding next year but will still be forced to make further cuts to services'*.

3.5 The need to find year on year savings since 2010/11 is illustrated within the chart below. In summary Government funding for SBC (adjusted for subsequent changes for council tax support etc) fell from £7.46Million in 2010/11 to £3.72Million in 2024/25. The impact of this significant reduction in funding was further compounded by a 10% growth of the population in this period and 14 years of unfunded inflationary pressures.



3.6 The Council has a major focus on addressing the resulting financial funding gap through its 'Balancing the Budget' priority and this report sets out the options identified through the Efficiency, Transformation and Commercial / Insourcing elements of the budget setting programme. The Cabinet and Senior Leadership Team recognise the need to plan on the basis of a three year savings horizon to both balance the budget and ensure that there are options identified which can be delivered within the timescales required. Taking such an approach should minimise the need for service cuts. The cumulative savings identified to date since 2010/11 are circa £15Million as shown in the chart below.



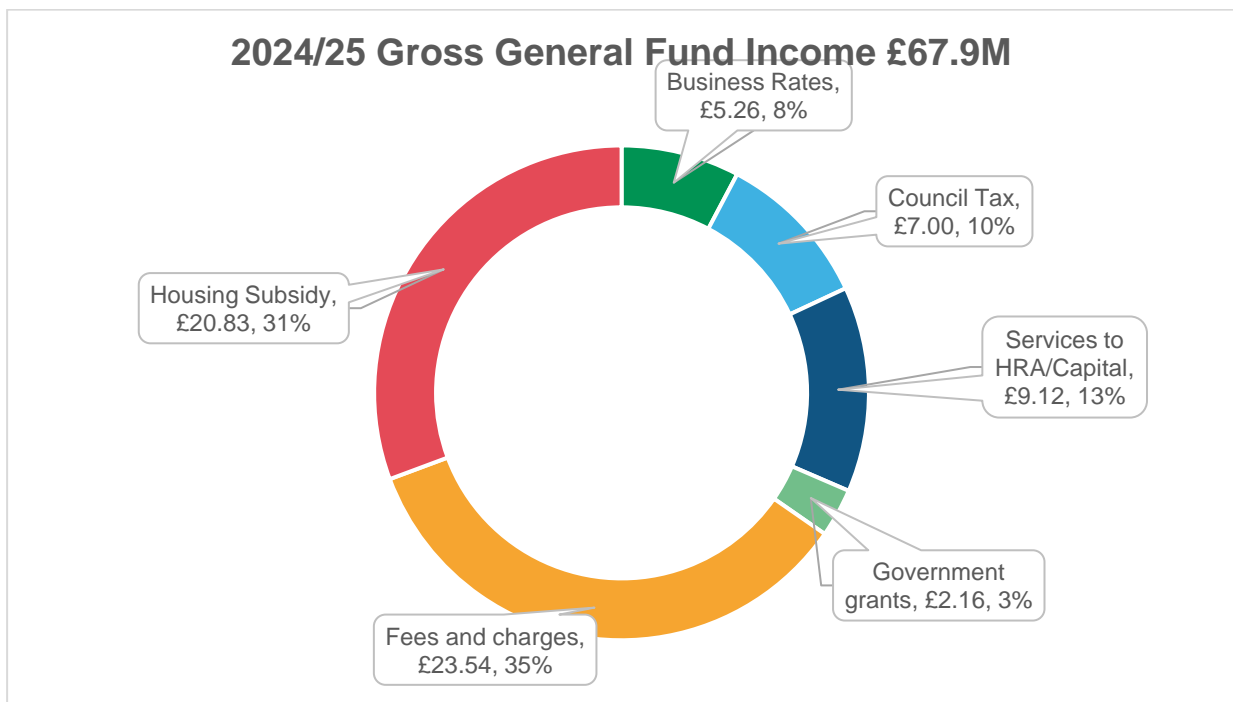
3.7 The 'Balancing the Budget' (BTB) funding gap identified in the September Medium Term Financial Strategy (MTFS) was £2.98Million for 2025/26-2027/28. This was updated in the January 2025 report leaving a residual £1.172Million gap for the period, however the January 2025 report highlighted that sufficient savings for 2025/26 had been identified due to other favourable budget changes. In addition, further Transformation options are anticipated to come forward in 2025 which will further reduce the savings gap.



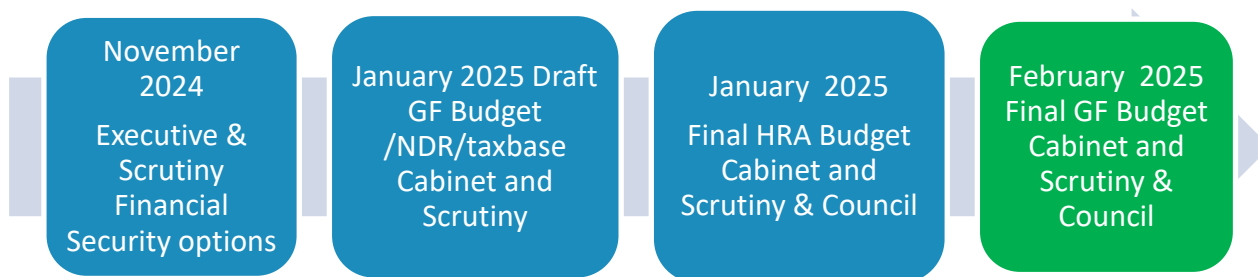
Future Years Savings	2025/26	2026/27	2027/28	Total
Projected Fees and Charges modelled	£493,005	£267,497	£260,062	£1,020,564
Transformation	TBC	TBC	TBC	TBC
Other	£678,677			£678,677
2025/26 Compensating budget adjustments	£113,318			£113,318
<b>Total</b>	<b>£1,285,000</b>	<b>£267,497</b>	<b>£260,062</b>	<b>£1,699,241</b>
Target	£1,285,000	£900,000	£800,000	£2,985,000
<b>Shortfall per year</b>	<b>£0</b>	<b>£632,503</b>	<b>£539,938</b>	<b>£1,172,441</b>

3.8 The January 2025 report summarised the 2025/26 provisional Finance Settlement for Councils (published 18 December 2025), which gave a national increase in core spending power (CSP) of 6%. An update on the final settlement is detailed at paragraphs 4.1.1-4.1.12 and General Fund resource projections have been updated accordingly in the 2025/26 budget.

3.9 The original 2024/25 SBC General Fund budget was £67.9Million but after taking into account fees and charges, government grants, services to the HRA/Capital and housing subsidy resulted in a net budget of £12.78Million and is funded as set out below.



3.10 The Budget and Policy Framework Procedure Rules in the Constitution, prescribe the Budget setting process, which includes a consultation period. The timescale required to implement this process is outlined below.



- 3.11 Since the February Cabinet report was published the report has been updated to include the other preceptors council tax bands (subject to the County budget being approved on the 25 February 2025 and a review of the summary budget has led to a number of coding corrections including the inclusion of the UKSPF funding for 2025/26.

#### 4. REASONS FOR RECOMMENDED COURSE OF ACTION AND OTHER OPTIONS

##### 4.1 Stevenage Borough Finance Settlement 2025/26

- 4.1.1 On 18 December 2024, the Secretary of State for the Ministry for Housing and Communities Local Government (MHCLG) released a written statement to Parliament on the provisional local government finance settlement 2025/26. The final settlement was published on the 3 February 2025. The settlement is for one year with a proposed move to multi-year settlements planned beyond 2025/26.
- 4.1.2 There were a few differences between the provisional and final settlements which included a change to the Employer National Insurance Contributions (NICs) Grant in Core Spending Power. The original announcement was for £515 million, but £13Million is being allocated to Mayoral Combined Authorities. Also announced, was a change in the method for allocating the Employer NICs Grant since this funding was announced in the provisional settlement. The allocation method now includes spend on certain aspects of councils' Housing Revenue Accounts. **SBC received £200,820 in the final settlement versus £85,530 estimated in the provisional announcement.** Members should note there was no additional overall funding at national level for this allocation adjustment. When setting the 2025/26 Housing Revenue Account budget, an adjustment was made to recharges of £200,000 to insulate the impact of the additional NI on the HRA and any subsequent retention of the full NI grant in the General Fund.
- 4.1.3 An extra £19.7 million for the Children's Social Care Prevention Grant. Some £13Million of this was announced at the provisional settlement, but not formally included in Core Spending Power at that point. A minimum of £30,000 has been introduced and the sum subject to an equalisation adjustment has increased from £75Million to £80Million.
- 4.1.4 An increase in New Homes Bonus of £448,000 and a reduction in the support provided through the Funding Floor (or minimum amount of grant awarded) of £275,000, **with no change for SBC.**

- 4.1.5 The Government has confirmed £5Million, an extra £2 million compared to the provisional settlement, for authorities facing high Internal Drainage Board levies. This is not included within Core Spending Power and **has no impact on SBC.**
- 4.1.6 The statement also mentioned £60Million for long-term improvements over the next year, including for devolution and fixing the local audit system. Further details of this funding will be made available in due course.
- 4.1.7 The National Core Spending Power (CSP) figures for Councils shows an increase of 6.0% for 2025/26 (excluding national insurance grant), however this includes assumptions about increases in council tax, which accounts for 5.97% of that increase nationally.

Funding Settlement	Final 2024-25 £Million	Provisional 2025-26 £Million	Final 2025/26	Final V Final Variance £Million	% change of total increase
Settlement Funding Assessment	£16,563	£16,841	£16,841	£278	
Under-indexing the business rates multiplier	£2,581	£2,696	£2,696	£115	
Council Tax Requirement exc. parish precepts	£36,154	£38,312	£38,312	£2,158	<b>5.97%</b>
New Homes Bonus	£291	£290	£290	(£1)	
Services Grant	£87	£0		(£87)	
Funding Guarantee	£269	£0		(£269)	
Rural Services Delivery Grant	£110	£0		(£110)	
Improved Better Care Fund	£2,140	£2,640	£2,640	£500	
Social Care Grant	£5,044	£5,924	£5,924	£880	
ASC Mkt Sustainability and Improvement Fund	£1,050	£1,050	£1,050	£0	
Adult Social Care Discharge Fund (2025/26 now in better care grant)	£500	£0	£0	(£500)	
Recovery grant	£0	£600	£600	£600	
Children's Social Care Prevention Grant	£0	£250	£270	£270	
Domestic Abuse Grant	£130	£160	£160	£30	
Funding Floor		£121	£121	£121	
Grants rolled in	£64	£0	£0	(£64)	
<b>Core Spending Power</b>	<b>£64,983</b>	<b>£68,884</b>	<b>£68,904</b>	<b>£3,921</b>	<b>6.03%</b>
National Insurance grant *1	£0	£515	£502	£502	
<b>Grand Total</b>	<b>£64,983</b>	<b>£69,399</b>	<b>£69,406</b>	<b>£4,423</b>	<b>6.81%</b>

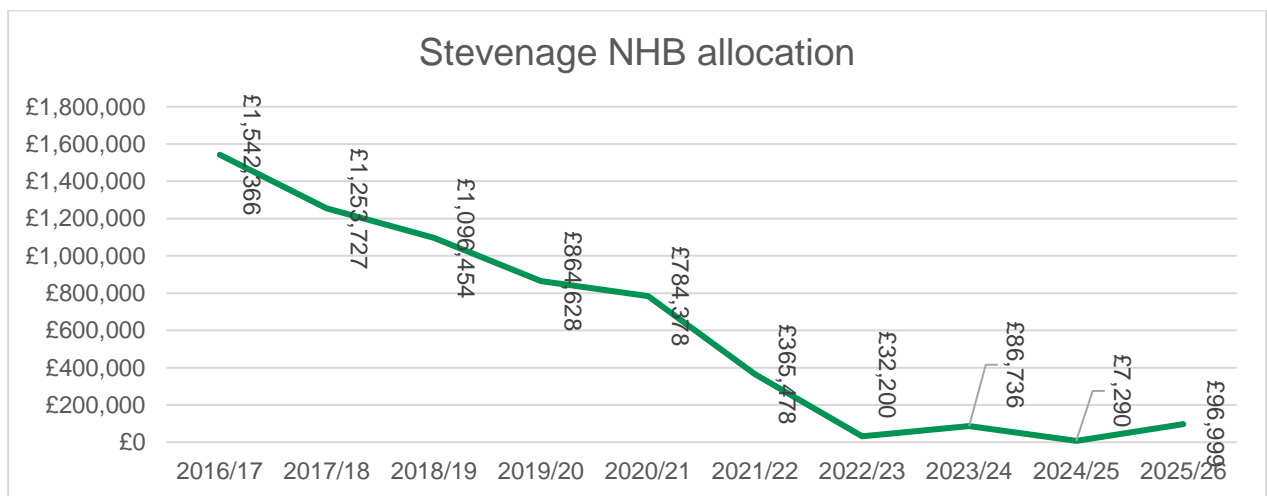
*NB () = less funding \*1 £13Million of National insurance grant was top sliced for combined authorities.*

- 4.1.8 The council tax referendum limit remained at 3% or £5 on a Band D, whichever is the greater for local authorities, with social care authorities allowed to collect an additional 2% social care precept and the Police and Crime Commissioner

(PCC) up to £14 on a Band D. For Stevenage £5 equates to a 2.09% increase versus 2.99% or £7.15 on a Band D property. However, the Government did announce in the final settlement additional council tax flexibility for: Windsor and Maidenhead Borough Council (+4%); Birmingham City Council (+2.5%); Bradford Council (+5%); Newham Council (+4%); Somerset Council (+2.5%); and Trafford Council (+2.5%). This is outside of Core Spending Power.

4.1.9 For 2025/26 the small business multiplier (SBRR) in England will be frozen for a fifth consecutive year at 49.9p, which applies to businesses with a rateable value of less than £51,000, while the standard multiplier (for all other businesses) will be uprated by September 2024 CPI (1.7%) to 55.5p. The under-indexing of the SBRR means the Council will collect less NNDR but the government has committed to funding these policy changes by giving Council's Section 31 grants to compensate for the reduction in income collected.

4.1.10 The Stevenage New Homes Bonus (NHB) allowance for 2025/26 is unchanged at £96,999, (2024/25 £7,290). The government indicated in the Finance Policy Statement that having a portion of the Settlement allocated on a payments-by-results basis negatively interacts with the remainder of the Settlement. The government will therefore be consulting on proposals for reforming the NHB beyond 2025-26 in due course. The potential change to the rules around NHB awards does not impact the Council significantly as Stevenage does not account for NHB in the base budget and has only received relatively small amounts in recent years.



4.1.11 Top Up/Tariff Adjustments (Negative Revenue Support Grant RSG) – As in previous years, the government has not included any negative RSG in this year's settlement and the review of funding the government has announced from 2026/27 will supersede this. As part of previous funding deals Councils were due to have their funding reduced by negative RSG which essentially cuts the amount of monies retained via business rates. This would have resulted in a cost of £27,146 to SBC in 2025/26 before any inflation indexing was added.

4.1.12 A summary of the 2025/26 settlement versus 2024/25 and the November MTFS assumptions is shown in the table below. The final and provisional settlement is **£61.7K higher** (before ringfenced grants) **than 2024/25** and **£348K higher**

than the MTFS assumptions which is to be welcomed (excluding National Insurance grant).

	Final 2024/25 Settlement	November MTFS Assumptions	Final Settlement	MTFS V Provisional Variance
Business Rates	(£2,812,960)	(£2,860,780)	(£2,851,146)	£9,635
Under indexing	(£509,446)	(£529,087)	(£527,879)	£1,208
<b>Total Business Rates</b>	<b>(£3,322,406)</b>	<b>(£3,389,867)</b>	<b>(£3,379,025)</b>	<b>£10,842</b>
Revenue Support Grant	(£108,811)	(£110,661)	(£149,048)	(£38,387)
New Homes Bonus (NHB)	(£7,290)	(£60,000)	(£96,999)	(£36,999)
Services Grant	(£17,960)	£0	£0	£0
3%/4%guarantee	(£390,740)	£0	£0	£0
Recovery grant	£0	£0	(£283,819)	(£283,819)
<b>Total</b>	<b>(£3,847,207)</b>	<b>(£3,560,528)</b>	<b>(£3,908,891)</b>	<b>(£348,363)</b>
<b>Increase from 2024/25 to 2025/26</b>			<b>(£61,684)</b>	
<b>Ring fenced Grants:</b>				
Domestic Abuse	(£37,162)	(£37,162)	(£37,663)	(£501)
Homeless & Rough Sleeper	(£945,845)	(£945,845)	(£1,395,414)	(£449,569)
<b>Ring Fenced Grants increase from 2024/25 to 2025/26</b>			<b>(£449,569)</b>	
<b>Total increase in real funding</b>			<b>(£511,253)</b>	<b>(£798,433)</b>

4.1.13 The 2025/26 grant funding for homelessness directly awarded to Stevenage is significantly higher and a further £228,000 of rough sleeper accommodation programme funding for Stevenage has been allocated to Homes England.

4.1.14 In addition to the Finance Settlement, Councils were advised on the 29 November 2024 about funding relating to Extended Producer Responsibility (EPR). The funding will come from the collection of producer fees which may change, but to provide certainty to authorities, the government is only guaranteeing the 2025/26 amount which for Stevenage is £1.078Million. The intention is the funding will enable Councils to drive the changes needed to deliver an efficient recycling service. Further notice of assessment will be provided once the draft Producer Responsibility Obligations (Packaging and Packaging Waste) Regulations are in force.

4.1.15 The Government has also made announcements about simpler recycling or the four bin approach, which the Council will need to consider the impact of. The future years EPR funding is not guaranteed and will be subsumed into the Finance Settlement from 2026/27 onwards. The CFO recommends ring-fencing this money into a reserve and using it to fund recycling improvements or meet any associated increase in costs. Officers are currently looking at options including recycling for flat blocks and will bring recommendations forward for approval.

4.1.16 The Local Government Association has stated that *'We welcome both the increase in Core Spending Power and those resources outside Core Spending Power such as the extra £1.1 billion in extra resources for 2025/26 from the new Extended Producer Responsibility for packaging scheme and the extra £515 million to compensate for increases in employer national insurance*

*contributions (NICs). This extra funding, inside and outside Core Spending Power, will help councils meet some - but not all - of the cost and demand pressures councils face. Councils of all types will continue to struggle to balance the books. Many face having to increase council tax bills to bring in desperately needed funding next year but will still be forced to make further cuts to services’.*

4.1.17 In addition to the government monies set out above, Stevenage will also receive a UK Shared Prosperity Fund allocation for 2025/26 totalling **£327,146**, comprised of **£60,401** for capital and **£266,745** for revenue. A number of proposals are being worked up for Members consideration in the 3<sup>rd</sup> quarter monitoring report to the March Cabinet for approval.

## 4.2 Pressures Projected in the General Fund 2025/26

4.2.1 The General Fund budget assumptions for 2025/26 now include growth pressures of £1.336Million (draft budget £1.474Million) as set out below which are included in section 4.7 of this report.

Pressures	2024/25 MTFS	2025/26 Final Budget	+/-	Comments
Inflation	£1,102,380	£886,781	(£215,599)	Reduction in utility, salary inflation and lower software costs
Inflation National Insurance increased rate and threshold	£0	£426,279	£426,279	para 4.1.2 refers
National insurance compensation projected for changes to the rate and threshold from April 2025	£0	(£200,820)	(£200,820)	para 4.1.2 refers
Council Tax Support - Cost of new scheme	£0	£33,250	£33,250	As approved by Cabinet in the November 2024 Council Tax support report
Bat survey Fairlands Park	£0	£15,000	£15,000	Survey required prior to any lighting solutions at Fairlands Valley Park
Reduction in Benefit Subsidy & net cost of housing Benefit	£10,000	(£24,020)	(£34,020)	Reduction in subsidy due to the reducing caseload, formal notification not yet received £10K offset by reduction in net cost of benefits £34K
Car Park income	£200,000	£200,000	£0	Although income is improving year on year, it is still not achieving income levels pre-COVID.
<b>Total Identified</b>	<b>£1,312,380</b>	<b>£1,336,470</b>	<b>£24,090</b>	

### 4.3 Council Tax and Council Tax Support

- 4.3.1 The December 2024 Cabinet Council Tax base report showed a decrease in the tax base of 0.3% compared to 2024/25. This is because some of the anticipated growth in housing numbers did not materialise due to slower than anticipated scheme delivery and the taxbase now includes a reduction of 2% (2024/25 1.75%) for bad debt provision as a result of lower in year collection rates and higher arrears. The growth in the taxbase assumed by the government was higher when the Core Spending Power (CSP) was calculated for Stevenage. This meant the government assumed £52,395 more council tax income than Stevenage is projecting for 2025/26.
- 4.3.2 The January 2025 Cabinet Draft Budget report recommended a 2.99% increase in council tax (1% higher than included in the MTFs) following the November Finance Policy statement which allowed for up to a 3% increase before a referendum threshold is triggered. This gives an additional £68,361 in council tax income and contributes to the BTB savings target and the CFO recommends increasing council tax by 2.99%.
- 4.3.3 Members will recall that SBC retains the lowest share of the overall Council Tax raised each year. To illustrate this, taking a Band C property, (which is the biggest proportion of properties in Stevenage) the relative shares of council tax for a band C property are shown below. The Council tax resolution included at Appendix F has been updated since the February Cabinet for the PCC and HCC precept demands.

Authority	2023/24	2024/25	Cost per week	Increase	Share
Hertfordshire County Council	£1,427.23	£1,498.45	£28.82	4.99%	77.47%
Stevenage Borough Council	£206.50	£212.68	£4.09	2.99%	11.00%
Police Crime Commissioner	£211.56	£223.11	£4.29	5.46%	11.53%
<b>Total</b>	<b>£1,845.29</b>	<b>£1,934.24</b>	<b>£37.20</b>	<b>4.82%</b>	<b>100.00%</b>

- 4.3.4 An estimate of the 2.99% increase in council tax for Stevenage Borough Council is summarised in the table below.

Council Tax increase modelled for Stevenage Precept 2025/26				
Council Tax band	2024/25	2.99% increase	Total cost per year	Total cost per week
A	£159.51	£4.76	£164.27	£3.16
B	£186.09	£5.56	£191.65	£3.69
C	£212.68	£6.35	£219.03	£4.21

Council Tax increase modelled for Stevenage Precept 2025/26				
Council Tax band	2024/25	2.99% increase	Total cost per year	Total cost per week
D	£239.26	£7.15	£246.41	£4.74
E	£292.43	£8.74	£301.17	£5.79
F	£345.60	£10.33	£355.93	£6.84
G	£398.77	£11.91	£410.68	£7.90
H	£478.52	£14.30	£492.82	£9.48

4.3.5 Since the publication of the January 2025 Draft Budget report the 2024/25 projected council tax income collectable in year versus the amount due has been reviewed showing a projected deficit of £1.5Million of which Stevenage's share is £169K, an increase of £33,575 to be repaid in 2025/26. This has been included in the General Fund core resources.

### Council Tax Support

4.3.5 A local CTS scheme cannot be revised for at least one financial year. Billing Authorities (such as SBC) must consider whether to revise or replace their scheme with another on an annual basis.

4.3.6 Any revision to a scheme must be made by the Council by the 11 March, immediately preceding the financial year in which it is to take effect and will require consultation with those affected. Additionally, consideration should be given to providing transitional protection where the support is to be reduced or removed.

4.3.7 The Council must, in the following order, consult with major precepting authorities, (i.e. Hertfordshire County Council and Police and Crime Commissioner (PCC) for Hertfordshire), publish a draft scheme in such manner as it thinks fit, and consult such other persons as it considers are likely to have an interest in the operation of the scheme. The CFO wrote to both precepting authorities regarding the proposal for 2025/26.

4.3.8 The current **working age** scheme requires those on maximum benefits only to pay 8.5% of their council tax bill for the year. This equated to £164.41 for a Band C council home in 2024/25 on the total bill (with an additional 25% discount for a single person) or £3.16 per week.

4.3.9 In November 2024 Members approved the retention of the existing scheme for next year (uprated to reflect benefit changes for 2025/26) and agreed that officers should look at a banded scheme for proposal to include engagement / consultation with residents.

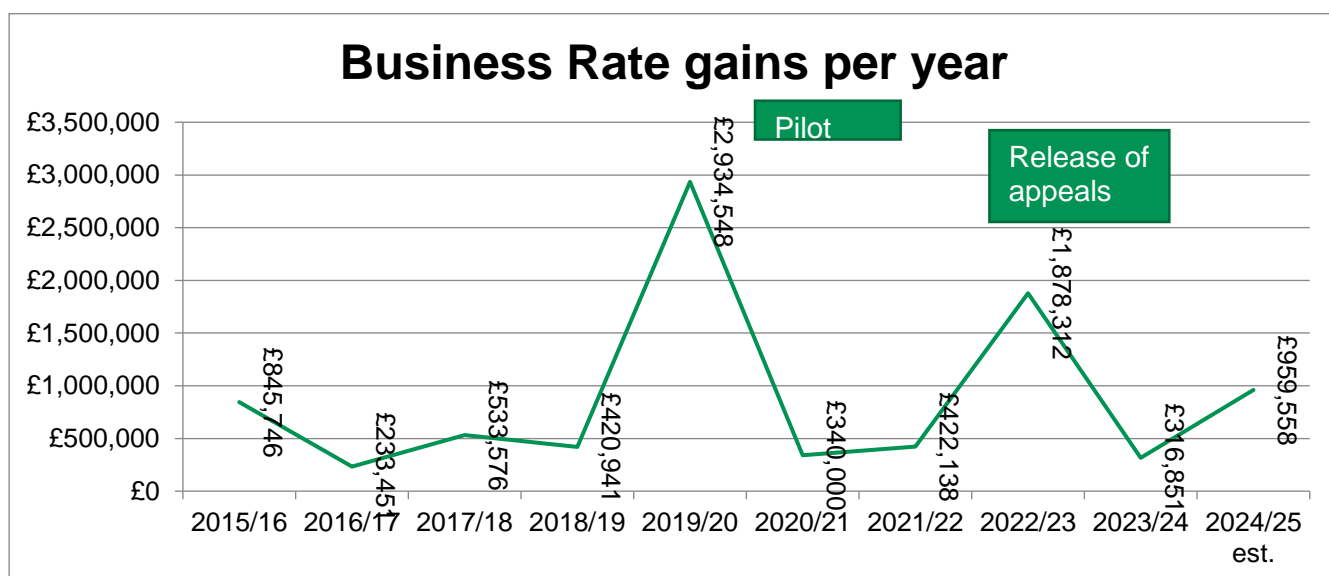
### 4.4 Business Rates Income

4.4.1 The MTFs and draft General Fund budget only includes the 2025/26 baseline funding for business rates, or the amount the government has assessed the



Council needs under its funding formula, plus an assumption of £200K gains per year for the period 2025/26-2028/29.

- 4.4.2 Any NDR gains above the baseline have been used previously to fund time limited growth and regeneration objectives. The rules governing NDR accounting mean any estimated gains are taken in year and any difference between the actual and the estimate are taken from or, in the case of losses refunded to, the Collection Fund in future years.
- 4.4.3 Business rate gains fluctuate between financial years as shown below and as they cannot be guaranteed. Above the threshold of £200K they are used to help maintain the financial resilience of the General Fund, (i.e. in year shortfall on savings due to part year implementation), rather than to fund the running of day to day services.



*Note: Pilot -75% of gains retained in Hertfordshire. Pool-A number of Hertfordshire Councils join and retain more gains through a lower levy*

- 4.4.4 The level of business rates that the Council keeps each year is determined once the NDR1 form issued by the government is completed. This calculates business rates collectable, level of reliefs to be given in 2025/26 and S31 grants due. The November BTB report recommended this be delegated to the CFO after consultation with the Resources & Transformation Portfolio Holder due to the need to complete by the 31 January 2025 with the data not being available to the 13 January 2025.
- 4.4.5 The 2024/25 revised NNDR estimate has now been completed and this projects a reduction of £124,439 in 2024/25 business rate gains and the impact is shown in the table below. Changes to grants and the levy are always paid in the year they relate (from/to the government) and business rate gains and losses paid in the following year when the estimate is revised.

	Compare 2024/25 Original v Projected			Changes required based on projection	
	NNDR 1 2024/25 £	Projection 2024/25 £	Var to NNDR 1 £	2024/25	2025/26
Net yield	(54,797,341)	(54,357,860)	439,481		
Stevenage share of yield	(21,918,936)	(21,743,144)	175,793	0	175,793
Tariff	19,227,311	19,227,311	0		
<b>Share net of tariff</b>	<b>(2,691,626)</b>	<b>(2,515,833)</b>	<b>175,793</b>	<b>0</b>	<b>175,793</b>
S31 grant payable*	(2,526,046)	(2,529,981)	(3,935)	(3,935)	
Baseline Funding Level	(2,812,960)	(2,812,960)	0		
Gains before levy applied	(2,404,712)	(2,232,854)			
Gains applicable for levy	(1,622,536)	(1,527,698)		0	
Levy due 50%	811,268	763,849	(47,419)	(47,419)	
			0	0	
<b>Retained Business Rates</b>	<b>(4,406,404)</b>	<b>(4,281,966)</b>	<b>124,439</b>	<b>(51,354)</b>	<b>175,793</b>
Variance				<b>(51,354)</b>	<b>175,793</b>

4.4.6 The 2025/26 NNDR estimates have been completed and show that the total estimated gains for 2025/26 are £1.24Million (summarised below) with £200K budgeted to be retained in the General Fund for next year. Further detail can be found in the NNDR1 report on the Council's website.

Stevenage Share	NNDR 1 2025/26 £
Stevenage share (40%)	(22,824,068)
Tariff	19,488,317
<b>Share net of tariff</b>	<b>(3,335,750)</b>
S31 grant payable	(2,210,192)
Baseline Funding Level	(2,851,146)
Gains before levy applied	(2,694,797)
Gains applicable for levy	(1,854,678)
Levy that would be due	927,339
<b>Retained rates</b>	<b>(4,618,603)</b>
<b>Draft Budget:</b>	
Baseline Funding Level	(2,851,146)
Allowance for under-indexing	(527,879)
<b>Total Draft Budget</b>	<b>(3,379,025)</b>
<b>Increase above the Draft Budget</b>	<b>(1,239,578)</b>

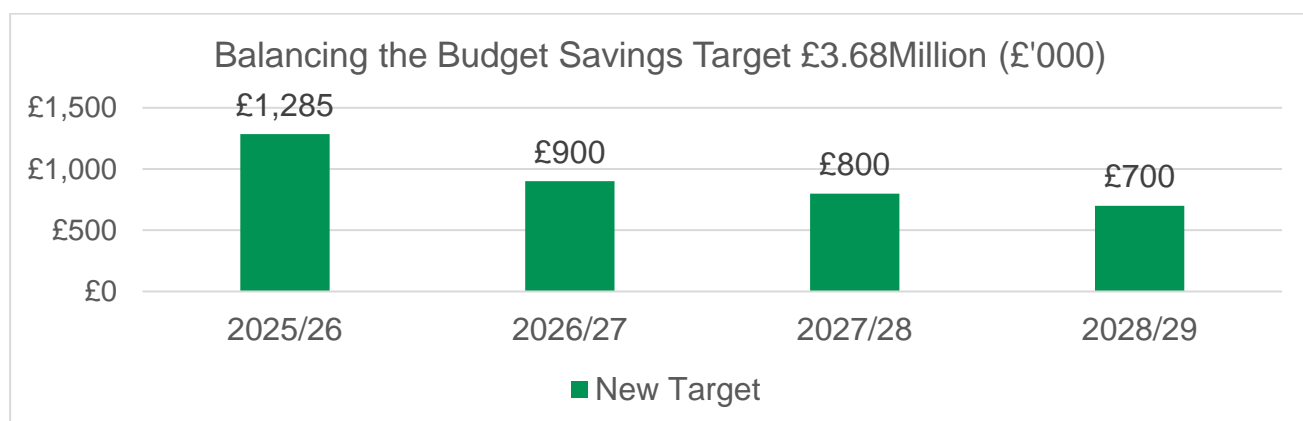
4.4.7 The CFO recommends that the additional gains of £1,039,578 are transferred to Business Rates earmarked reserve until realised and retained for financial

resilience. Business rate gains can fluctuate between estimate and actual and of 2023/24 £1Million of assumed gains have to be returned to the Collection Fund in 2025/26 due to a large valuation change.

- 4.4.8 From 2026/27, the government wants to fundamentally change the way Councils are funded and the intention is to direct funding to where it is most needed, based on an up-to-date assessment of need and local resources. The government will move gradually towards an updated system and will invite views on possible transitional arrangements to determine how local authorities reach their new funding allocations.
- 4.4.9 Part of the needs assessment will include a 'reset' for the business rates retention system, as was originally intended when the previous government established the system. There has been no reset of the system since its introduction in 2013/14. The government intends to use this reset to do the allocation of funding where it is most needed and the reset will apply nationally. It should be noted that Stevenage Borough Council has gained under the current regime with as set out in para. 4.4.3 and a re-set will undoubtedly reduce the amount NNDR retained by the Council.

#### 4.5 The Balancing the Budget Savings Target to Find

- 4.5.1 As set out in paragraph 3.7 there was a savings shortfall of £1.172Million for the period 2026/27-2027/28 once projected fees and charges increases (which for 2026/27 onwards are still to be approved) have been included. Because of the size of the annual funding financial challenge for Councils, SBC takes a three-year view to ensure that any annual savings target is achievable. This provides for sufficient time to bring options forward and to minimise reductions to services. The Council has a number of initiatives/options lined up to bridge that gap.
- 4.5.2 The Balancing the Budget annual savings target is kept under constant review as changes to inflation, new service pressures and government funding may have an impact on the level of savings needed and the subsequent level of reserves to retain. The level of reserves has improved since the September 2024 MTFS and draft budget presented to the January 2025 Cabinet meeting. The current targets are shown below and will be reviewed as part of the next MTFS update.



4.5.3 The risks to the General Fund are summarised below.

Expenditure and Income	Impacted by	Risk (to increase cost)
<b>Inflation</b>	Although price increases around utilities and fuel have fallen, there is still huge volatility in the market with the continual war in Ukraine.	medium
	The MTFS assumes a 3% pay award for 2025/26, however previous years deals have been higher and the need for the pay grades to have due regard to inflation and the minimum wage may drive much higher pay negotiation outcomes.	medium
	The MTFS assumes a CPI inflation of 2% during the MTFS and although September CPI fell to 1.7%, this has subsequently risen above the MTFS target	high
<b>Demand for services</b>	There may be an increase for support services such as homeless and advice and this puts further pressure on the Council's budgets	medium
<b>Local Government Reform</b>	There is a risk that the Council will incur more costs associated with LGR following the submission for Hertfordshire in March 2025 (£50K assumed in the budget). This may also affect the ability to attract staff which could lead to the need to pay higher salaries	high
<b>Fees and Charges</b>	The impact of the current economic climate may impact the Council's fees and charges income which is required to support the funding of services.	medium
<b>Core funding</b>	The new Labour government has signalled changes to funding from 2026/27 which includes a reset of business rates which may result in a reduction in business rate gains to SBC. Currently the Council uses £200K of gains in the General Fund and uses the remainder to fund key priorities or to support the financial resilience of the General Fund. However, a multi-year settlement will help future financial planning.	high
	Business rate gains estimated for 2025/26 will not be realised, however this will impact the level of projected reserves in the earmarked reserve as only £200K is included in the General Fund budget.	medium
	Grant funding for new burdens is announced annually such as that for homelessness and rough sleepers which makes recruitment and retention difficult on a permanent basis, however a multi-year settlement is expected for 2026/27.	medium
	National Insurance compensation formula will not change for future years and will not meet the increased costs for the General Fund and HRA which is estimated to be £711K per annum	High

4.5.4 In the January 2025 Draft Budget report BTB savings options were identified and recommended of £1.172Million for 2025/26. These are summarised below and included in Appendix A.

Savings Identified	Approved	Approved GF	Approved HRA
Efficiency savings	1st Quarter Monitoring Sept 2024	£422,770	
Indoor Market changes (dependent on the timing of the new market opening)	July 2024 Cabinet updated November 2024 (BTB)	£40,000	
Fees and Charges	October 2024 Fees and Charges report updated November 2024 (BTB)	£438,884	£2,478
Cease skip service (Appendix A)	November 2024 (BTB)	£50,000	£4,000
Star Chamber process (full year) (Appendix A)	November 2024 (BTB)	£34,045	£9,005
Shared Service savings (Appendix A)	November 2024 (BTB)	£89,150	
increase Council Tax to 2.99%	Recommended in the Draft January 2025 Cabinet report	£68,361	
ICT software savings (Appendix A)	Recommended in the Draft January 2025 Cabinet report	£16,290	11,710
Payroll Administration Savings (Appendix A)	Recommended in the Draft January 2025 Cabinet report	£8,060	4,940
Legal Admin charges	Approved January 2025 Cabinet	£4,121	
<b>Total Savings Identified</b>		<b>£1,171,682</b>	<b>£32,133</b>

4.5.5 The November Balancing the Budget report also identified that Transformation savings were currently being finalised. Subject to the associated proposals being recommended for Member approval by the Senior Leadership Team, they will be considered by Members in a separate report to the Cabinet in March 2025. The CFO recommends that only identified savings should be included in the 2025/26 General Fund budget. Therefore, the Transformation options relating to Community Advice and Support and Localities will contribute to the future savings gaps subject to consideration by Members.

#### 4.6 Growth Options

4.6.1 The 2025/26 Draft General Fund budget presented to the January 2025 identified two new growth bids for consideration (see also paragraph 4.13.1 for Overview and Scrutiny comments).

4.6.3 The first option related to addressing the recruitment and retention challenges the Council has experienced in recent years being cognisant of the additional associated costs which are incurred. Taking this into consideration, the Senior Leadership Team recommends introducing a graduate and apprentice scheme for six placements in hard to recruit service areas. To ensure it is affordable for both the General Fund (and HRA), it is proposed that business rate gains already received of £757,940 are utilised for this purpose. In addition, the CFO recommends that a total of £150,000 year end underspends from the General Fund and HRA are identified and transferred to a ring-fenced reserve to ensure the ongoing delivery of the scheme. This will need to be monitored to ensure the anticipated underspends are achieved.

Graduate & Apprentice Programme	2024/25	2025/26	2026/27	2027/28	2028/29	Total
<b>Total Annual Cost</b>		£202,760	£254,507	£300,673	£307,839	<b>£1,065,778</b>
<b>Funding Reserve</b>						
<b>Brought Forward</b>	£0	(£150,000)	(£300,000)	(£450,000)	(£600,000)	
<b>NNDR reserve</b>		(£202,760)	(£254,507)	(£300,673)	£0	<b>(£757,940)</b>
<b>Underspends</b>	(£150,000)	(£150,000)	(£150,000)	(£150,000)	(£150,000)	<b>(£750,000)</b>
<b>Used in year</b>	£0	£202,760	£254,507	£300,673	£307,839	<b>£1,065,778</b>
<b>Carried Forward</b>	(£150,000)	(£300,000)	(£450,000)	(£600,000)	(£442,161)	

4.6.4 The impact on the NNDR reserve is shown in the chart below and reflects all balances budgeted and commitments on the fund and assumes no business rate gains beyond 2025/26. The table below shows there are sufficient balances to fund the scheme.

Business Rates Reserve £'000	2024/25	2025/26	2026/27	2027/28	2028/29
<b>Opening Balance</b>	(£2,711)	(£4,368)	(£3,659)	(£3,303)	(£4,745)
<b>Changes to Business Rate Gains/losses</b>	(£1,823)	£193	£0	£0	£0
<b>Local Plan</b>	£100	£0	£0	£0	£0
<b>Swingate holding costs/surplus</b>	£66	£313	£102	(£1,742)	£0
<b>Graduate &amp; Apprentice Programme</b>	£0	£203	£255	£301	£0
<b>Closing Balance</b>	(£4,368)	(£3,659)	(£3,303)	(£4,745)	(£4,745)

4.6.5 A second growth bid has been developed related to the Council's ongoing efforts to address graffiti removal. In the current year an additional employee and a specialist contractor were funded from the UKSPF. However, the allocation for 2025/26 reduced to £327K from £656K. A key Making Stevenage Even Better Corporate Plan priority of the Council is to deliver thriving and clean neighbourhoods, ensuring residents can be proud of where they live. To support this desired ambition the Council has committed to continue to deliver improvements in graffiti reduction over the lifetime of the plan. As part of the graffiti removal programme in 2024/25, which was funded through UKSPF resources, the Council's Environmental Services team and support contractor

removed over 1,000 incidences of graffiti between March and October. Despite these best efforts the Council is receiving on average 18 reports of new graffiti per month. To continue the graffiti removal programme, it is recommended that the Council funds a dedicated in-house cleansing operative during 2025/26 to undertake reported and ad hoc graffiti removal, predominantly from SBC owned assets and to appoint a specialist graffiti remover support contractor to undertake tasks which will supplement the Council's own function to include undertaking removal works during non-working hours at a cost of **£75,000** to the General Fund.

#### 4.7 Changes to the 2025/26 General Fund budget versus the September MTFS

4.7.1 The General Fund budget is now projected to be £10,656,540, (with a contribution to balances of £6,053, draft January budget £77,950), versus the September General Fund projection of £9,716,380 (and a draw on balances of £100,900). The changes to the September MTFS net budget and resources are set out below.

Changes to the 2025/26 Budget Versus MTFS			
<b>September MTFS</b>		<b>£9,716,380</b>	
<b>Inflation:</b>			
Lower pay inflation	(£17,850)		Reduced by £28.6K from draft budget report
Lower contractual inflation	(£26,005)		Increased by £16.9K from draft report due to lower shared Revenue and Benefits SLA for 2025/26
Lower business rates	(£35,870)		
Lower utility and fuel inflation	£2,040		
Higher Shared service income	(£138,235)		higher recharges to ICT service due to increase head count and NI increases
Lower HRA recharges	£70,320	(£145,601)	
<b>Pressures:</b>			
Increase in pressures		£355,179	Para. 4.2.1 refers
<b>Growth Options:</b>			
Increased growth		£277,760	Para. 4.6.4 refers
<b>Balancing the Budget Savings Options:</b>			
Options recommended for approval		£181,680	Section 4.5 refers (council tax saving shown in core resources)
increase commercial rental income		(£49,700)	Increase in commercial rental partly offset by lower bus station income
<b>Government Grant funding:</b>			
Extended Producer responsibility	(£1,078,000)		

Changes to the 2025/26 Budget Versus MTFS			
NI compensation	(£200,820)	(£1,375,819)	Para 4.1.2 refers
<b>Use of Reserves:</b>			
Transfer of NNDR reserve to fund apprentice programme	(£202,760)		Para. 4.6.2-4.6.3 refers
Transfer of NNDR net gains	£863,790		Para 4.45 & para 4.4.7 refers
Transfer of EPR grant to ring-fenced reserve	£1,078,000	£1,739,030	Para. 4.1.14-4.1.15 refers
On-going impacts of 2024/25 Changes			
Other:		(£42,369)	Small budget variances including impact of 2024/25 changes on-going and £50K for LGR costs.
<b>Total Changes</b>		<b>£940,160</b>	
<b>Revised General Fund budget</b>		<b>£10,753,540</b>	

4.7.2 Although the General Fund net expenditure has increased and core resources are also higher compared to the September MTFS as set out below.

Core Resources	MTFS Assumptions	Final Budget	MTFS V Settlement Variance
Business Rates (note 1)	(£2,869,578)	(£2,851,147)	£18,432
Under indexing (note 1)	(£529,087)	(£527,879)	£1,208
<b>Total Business Rates</b>	<b>(£3,398,665)</b>	<b>(£3,379,026)</b>	<b>£19,639</b>
New Homes Bonus (7)	<b>£0</b>	(£97,000)	(£97,000)
Revenue Support Grant (2)	(£110,282)	(£149,048)	(£38,766)
Recovery grant (2)	£0	(£283,819)	(£283,819)
Business rate gains (3)	(£200,000)	(£1,239,578)	(£1,039,578)
<b>Total</b>	<b>(£3,708,948)</b>	<b>(£5,148,472)</b>	<b>(£1,439,524)</b>
Council Tax (4)	(£6,991,438)	(£7,040,510)	(£49,072)
Transfers to Collection Fund NNDR (5)	£1,056,964	£1,232,757	£175,793
Transfers to Collection Fund council tax (6)	£27,939	£196,632	£168,693
<b>Total Collection Fund changes</b>	<b>(£5,906,535)</b>	<b>(£5,611,121)</b>	<b>£295,415</b>
<b>Total Funding</b>	<b>(£9,615,483)</b>	<b>(£10,759,592)</b>	<b>(£1,144,109)</b>
<b>Use of Balances</b>	<b>£100,897</b>	<b>(£6,053)</b>	<b>(£106,950)</b>

4.7.3 The reason for the changes is summarised below:

1. The MTFS had assumed an increase of 2% for September CPI which was 0.3% lower at 1.7%, which is used for the increase in business rates for the following year.



2. Paragraph 4.1.12 refers.
3. The MTFs only assumed a £200K retained business rate gain. Gains fluctuate between years as shown in paragraph 4.4.3, following completion of the 2025/26 NNDR 1 there are £1.239M gains for the year, however these have yet to be realised and are subject to change. The estimated gains above the £200K approved for retention in the General Fund have been transferred to the business rates earmarked reserve.
4. The MTFs assumed an increase of 1.99% in council tax and a slightly higher taxbase for 2025/26.
5. The £1.23Million is made up of a reduction in gains of £1.056Million for 2023/24 versus estimate plus a further £175K reduction projected for 2024/25, (see also paragraph 4.4.5)
6. The collection rate for council tax is projected to be below 95% for 2024/25 and the taxbase has not increased in line with expected housing growth numbers requiring all preceptors to return monies.
7. New homes Bonus is now shown in core resources and not net expenditure (as it is an un-ringfenced grant), this has been changed since the February Cabinet report.

#### 4.8 2024/25 Budget changes

4.8.1 The 2024/25 General Fund budget is projected to increase by £2,940. A summary of the changes is detailed below.

Changes to the 2024/25 Budget			
<b>General Fund quarter 2 budget</b>		<b>£12,414,510</b>	
Changes approved in January draft budget		(£165,540)	The reduction was predominately lower salary costs
<b>Revised Budget</b>		<b>£12,248,970</b>	
<b>Fees and Charges changes:</b>			
Reduction in skip income	£19,000		The skip service has been ceased as part of the 2025/26 savings options and actual in-year income levels are lower than the budget.
Reduction in bus station income	£42,300	£61,300	Departure charges are estimated to be lower for 2024/25 (and 2025/26) due to lower estimated bus journeys than estimated.
<b>Reserve Movements:</b>			
Future Councils spend	(£140,000)		The remaining part of the grant funding is planned to be spent in 2025/26 and has been returned to the earmarked reserve.

Changes to the 2024/25 Budget			
Transfer to reserves	£140,000	£0	see above
<b>Other:</b>			
Reduction in insurance provision	(£40,000)		The provision is based on current and projected claim excesses and the amount required for 2024/25 has reduced.
Reduction in the net cost of housing benefit	(£18,360)	(£58,360)	The council distributes housing benefit payments of circa £20Million and claims housing subsidy from the DWP. The net cost is now projected lower than the budget.
<b>Total changes February Cabinet</b>		<b>£2,940</b>	
<b>Revised General Fund budget</b>		<b>£12,251,910</b>	

#### 4.9 Level of Balances required for General Fund and projected balances

- 4.9.1 The September 2024 MTFS assumed that the minimum level of balances required would be £3.45Million. A full assessment was carried out for the Draft General Fund budget which is detailed in Appendix C totalling £3,421,625, this has remained unchanged for the final budget report.
- 4.9.2 The projected General Fund balances and council tax requirement are set out below. This table now include assumptions regarding business rate gains for 2025/26.

General Fund Budget	2024/25 Estimate	2024/25 Projected	2025/26 Estimate
Net Expenditure	£12,788,410	£12,251,910	£10,753,540
Use of/ (Contribution) to Balances	£0	(£596,801)	(£6,053)
<b>Budget Requirement</b>	<b>£12,788,410</b>	<b>£11,655,109</b>	<b>£10,747,487</b>
New Homes Bonus	£0	£0	(£97,000)
Revenue Support Grant	(£108,811)	(£108,811)	(£149,048)
Service Grant	(£17,960)	(£17,960)	£0
4 % guarantee grant	(£390,740)	(£390,740)	£0
Recovery grant	£0	£0	(£283,819)
Total grant support	<b>(£517,511)</b>	<b>(£517,511)</b>	<b>(£529,867)</b>
Business Rates net of tariff and levy	(£1,906,463)	(£1,940,830)	(£2,408,412)
Distribution of levy surplus	£0	(£22,000)	£0
S31 grants NNDR	(£2,526,046)	(£2,529,981)	(£2,210,192)

General Fund Budget	2024/25 Estimate	2024/25 Projected	2025/26 Estimate
Total in year business rates	<b>(£4,432,510)</b>	<b>(£4,492,811)</b>	<b>(£4,618,604)</b>
(Return) /Contribution to Collection Fund (NDR) re 2022/23 & 2023/24 & 2025/26	(£838,057)	(£838,057)	£1,232,757
Collection Fund Surplus (ctax)	(£162,403)	(£162,403)	£196,632
Council Tax Requirement	(£6,837,929)	(£6,837,929)	(£7,040,510)
Council Tax Base	£28,579	£28,579	£28,572
Council Tax Band D	£239.26	£239.26	£246.41
Council Tax Band C	£212.68	£212.68	£219.04

4.9.3 At first glance there appears to be a significant variation between the 2024/25 and 2025/26 Original net budget, however this relates to the impact of business rates being transferred to or from the Collection Fund, depending on whether there were additional losses or gains actually realised in a particular year. When this transfer is removed the difference between the 2024/25 and 2025/26 original budgets is only £18,225, (Draft budget £2,353). This has changed from the February Cabinet report as New Homes Bonus is now shown in core resources and not net expenditure.

General Fund Budget	2024/25 Estimate	2024/25 Projected	2025/26 Estimate	2025/26 OR V 2024/25 OR
Net Expenditure	£10,964,941	£9,997,811	£10,946,716	(£18,225)
NNDR gains/(losses) to/(from) reserve	£1,823,469	£1,823,469	(£193,176)	(£2,016,645)
Carry Forwards	£0	£430,630	£0	£0
<b>Total Net Expenditure</b>	<b>£12,788,410</b>	<b>£12,251,910</b>	<b>£10,753,540</b>	<b>(£2,034,870)</b>

#### 4.10 Medium Term Financial Strategy General Fund Summary

4.10.1 The MTFs modelling has been updated to reflect the contents of this report as summarised below. Assuming that for 2026/27 onwards there is a similar level of government funding (to 2025/26) and only £200K business rates gains per year, the General Fund reserve balances position will have improved. For note the savings targets remain unchanged.

General Fund balances £'000	2024/25	2025/26	2026/27	2027/28	2027/28
<b>Opening Balance</b>	£5,303	£5,900	£5,906	£6,048	£6,105
<b>In Year</b>	£597	£6	£142	£56	£218
<b>Closing Balance</b>	£5,900	£5,906	£6,048	£6,105	£6,323
<b>Minimum balances</b>	£3,450	TBA	TBA	TBA	TBA

4.10.2 The risks to setting a balanced budget going forward are that:

- The business rates re-set planned by the government for 2026/27 reduces retained NNDR for Stevenage. In mitigation the Council only

assumes a £200K gain each year which is lower than the average gains secured over the last few years (see also para.4.4.3).

- There is a need to make on-going annual savings for the reasons set out in sections three and 4.5 to this report.
- Government Funding reduces from that received in 2025/26 in the finance settlement and is not on-going at the same level.
- The General Fund Capital Strategy has a future funding shortfall and the capital spend in recent years has been rationalised and may require contributions from the General Fund to support meeting the Council's investment objectives. The CFO recommends if this were to happen that the business rate gains reserve should be used as a part mitigation.
- Inflation increases which results in the need for higher BTB savings targets to be set.

4.10.3 In addition to the risk assessment of balances to support the General Fund's financial resilience, there are two further allocated reserves available which are summarised below. The CFO recommends they are retained at the projected levels in case they are needed to support the General Fund in year.

Reserves £'000	Closing 2023/24	Use/(to)	Closing 2024/25	Use/(to)	Closing 2025/26
Gains (NNDR)	(£2,711)	(£1,657)	(£4,368)	£709	(£3,659)
Income equalisation Reserve	(£758)	£0	(£758)	£200	(£558)
<b>Total Available to support the GF</b>	<b>(£3,469)</b>	<b>(£1,657)</b>	<b>(£5,126)</b>	<b>£909</b>	<b>(£4,217)</b>

4.10.4 The General Fund reserves allocated for specific purposes are summarised below.

Reserves £'000	Closing 2023/24	Use/(to)	Closing 2024/25	Use/(to)	Closing 2025/26
NHB reserve <i>note 1</i>	(£253)	£243	(£10)	£0	(£10)
Transformation Reserve <i>note 2</i>	(£690)	£70	(£619)	£0	(£619)
Homeless reserve <i>note 3</i>	(£390)	£150	(£240)	£0	(£240)
Planning Delivery <i>note 4</i>	(£287)	£110	(£177)	£95	(£82)
Queensway monies <i>note 5</i>	(£122)	(£93)	(£215)	(£143)	(£358)
Regeneration Reserve <i>note 7</i>	(£225)	£0	(£225)	£100	(£125)
Town square reserve <i>note 6</i>	(£1,507)	(£183)	(£1,689)	(£125)	(£1,815)
Insurance reserve <i>note 8</i>	(£72)	£10	(£62)	£0	(£62)
ICT reserve <i>note 9</i>	(£190)	£62	(£128)	£0	(£128)
New Leisure <i>note 15</i>	(£340)	£340	£0	£0	£0
Stevenage works <i>note 11</i>	(£20)	£0	(£20)	£0	(£20)
Asylum seekers reserve	(£197)	£50	(£147)	£0	(£147)
Future Councils reserve <i>note 10</i>	(£459)	£235	(£224)	£224	(£0)
Commercial Property repair reserve <i>note 13</i>	(£41)	£0	(£41)	£0	(£41)
Ukraine reserve <i>note 12</i>	(£20)	£0	(£20)	TBA	(£20)
Syrian Refugees <i>note 12</i>	(£185)	£0	(£185)	TBA	(£185)

Reserves £'000	Closing 2023/24	Use/(to)	Closing 2024/25	Use/(to)	Closing 2025/26
Afghan Refugees <i>note 12</i>	(£97)	£0	(£97)	TBA	(£97)
Domestic abuse reserve	(£196)	£0	(£196)	TBA	(£196)
Extended Producer Pays grant <i>note 14</i>	£0	£0	£0	(£1,078)	(£1,078)
<b>Total Allocated for use</b>	<b>(£5,289)</b>	<b>£995</b>	<b>(£4,294)</b>	<b>(£927)</b>	<b>(£5,222)</b>

4.10.4 There is a planned contribution to reserves of £662K and £18K for 2024/25 and 2025/26 respectively. The established reserves are as follows:

1. NHB reserve was created to hold NHB allocations so that the General Fund did not become reliant on the funding. This reserve has reduced from its peak of £1.6Million to £10K in 2024/25.
2. Transformation Reserve is used to hold the monies set out for the Council's Transformation programme including improving the Council's digital offer and streamlining processes to give better outcomes and improved service delivery for residents.
3. These are ringfenced government Homeless grants which are used to support the Council's homeless function including additional staff resources. The 2025/26 allocation has been assumed to be spent in the 2026/26 budget.
4. Planning Delivery is required to support the surveys for the Local Plan and is used over and above the General Fund allocation in 2024/25 of £100K and a further £95K is projected to be spent in 2025/26.
5. Queensway Car Park Monies - this is the income from the Queensway Limited Liability Partnership (LLP) for parking income and the allowance for future costs for the LLP as agreed in the September 2024 MTFS. This money has been ringfenced to support the fit out of future commercial tenancies on Queensway North.
6. Town Square Reserve - the monies are held to support the running costs of assets acquired for regeneration purposes.
7. The Regeneration reserve is used to fund one off additional costs incurred by the Regeneration Team to support the teams projects including professional and legal advice.
8. The Insurance reserve is used to support adhoc preventative works to reduce potential future claims where no core budget is in place.
9. The ICT reserve - this was used to absorb pressures in year.
10. The Future Councils Reserve is used to ringfence the £750K grant funding received by the government, part of which is being spent in the current year for digital improvements and cyber security. £140K has been returned to the reserve in 2024/25 (budget setting 2025) and there is planned use of £223K in 2025/26. The Council was one of only eight Councils to successfully bid for funding.
11. Stevenage Works Reserve – this is the flagship job and training hub / partnership which comprises SBC, North Herts College and Job Centre Plus.
12. These are ringfenced Asylum grants which are used to support the Council's homeless function including the provision of additional staff resources.

13. The Commercial Property Reserve is a reactive pot which can be used to support works to the commercial estate if expenditure is above the in-year budget allocation.

14. The Extended Producer Pays reserve see para. 4.1.14-4.1.15

4.10.5 There is one reserve where the monies will be spent by 31 March 2025 which is the Leisure reserve;

15. This Reserve was set up to support the retendering and delivery of the new leisure management contract and the remaining balance has been used to support capital improvements to the Council's leisure assets.

4.10.6 The Council also has a number of subsidiaries which are summarised below:

- Queensway LLP- this is an income strip for 37 years for which the council holds the head lease to a pension company. The Council pay the lease each year and retains the income from residential and commercial in Queensway North and 'buys' the asset for a £1 after the lease term.
- Marshgate Ltd – this is the Councils housing company which has 10 properties leased to the HRA and is developing a site in Stevenage for sale. The balances in the company are projected to reduce as the current housing development is completed and the loans are repaid to the Council and properties are sold.
- CCTV Ltd - this company is held for private sector clients of the service and the Council has current commissioned a review of whether the company is required or the business within it can be subsumed into the General Fund.
- Swingate LLP - this is a joint venture with Mace on the former Swingate site building. This is first year of the operation and the Council will be committing an estimated £4Million into the LLP in 2024/25 with Mace committing an equivalent figure. The General Fund uses the NNDR reserve to fund the cost of lending the equity to the LLP.

4.10.7 The Council needs to ensure that these companies have sufficient funds to remain operational and the Council has set aside monies in an earmarked reserve for additional funding for Queensway LLP as set out in the September 2024 MTFS, to allow investment in the asset over the lease term. Estimated company cash balances at year end are summarised below.

<b>SBC subsidiaries</b>	<b>Closing 2023/24 £'000</b>	<b>Use £'000</b>	<b>Closing 2024/25 £'000</b>
Queensway LLP	£1,945	(£14)	£1,931
Marshgate Ltd (WOC)	£3,175	(£1,564)	£1,611
CCTV Ltd	£238	£38	£276
Swingate LLP	£0	£0	(£230)
<b>Total</b>	<b>£5,358</b>	<b>(£1,540)</b>	<b>£3,588</b>

4.10.8 The CFO is content the Council's companies have sufficient cash reserves to operate without further support from the General Fund other than that already approved.

#### **4.11 Chief Finance Officer's Commentary**

4.11.1 The Chief Finance Officer is the Council's principal financial advisor and has statutory responsibilities in relation to the administration of the Council's financial affairs (Section 151 of the Local Government Act 1972 and Section 114 of the Local Government Finance Act 1988). This commentary is given in light of these statutory responsibilities, (see also Appendix D).

4.11.2 The Council has evolved its budget strategy to meet multiple challenges as set out in this report and the financial strategy to deal with this is the 'Balancing the Budget' priority of 'Stevenage Even Better' Corporate Plan.

4.11.3 Officers regularly update the MTFS to ensure that a clear financial position for the Council can be demonstrated over the next five years. This medium-term view of the budget gives a mechanism by which future 'budget gaps' can be identified allowing for a measured rather than reactive approach to reducing net expenditure. Work is ongoing throughout the year to seek to bridge the BTB Medium Term funding gap.

4.11.4 The Council has taken significant steps over recent years to balance its budget and the current projections show that from 2025/26 currently there is a contribution to reserves ensuring inflationary pressures are matched by increases in fees and income or reductions in expenditure. However, this relies on a significant savings target being achieved (see section 4.5) and inflation reducing in the medium term and government funding in line with that projected in the MTFS.

4.11.5 Events such as COVID and the Cost of Living crises have increased financial risks to Councils which has seen spikes in inflation and lower fees and charges, some of which has become baselined within the budget. The Council has however taken a number of financial resilience measures which seek to increase the resilience of the Council's position including:

- A risk assessment of balances to ensure general reserves held take the increased risk from recessionary pressures into account.
- Establishment of the income equalisation reserve (£558K by 31 March 2025) which can be returned to the General Fund if fees and charges are lower than projected.
- The opportunity to reduce the use of reliance on Revenue Contributions to Capital (RCCO) by identifying sites for disposal and using capital receipts rather than revenue (September 2020 MTFS report). However, the Capital Strategy report to the October 2023 Executive set out a number of steps that needed to be taken and in the interim RCCO may need to be used to fund any capital resourcing gap.
- Identification of a sufficient level of on-going BTB options to ensure the General Fund is above or at the minimum level of balances.

- Use of any business rate gains only when realised above the £200K identified and ring fenced to maintain the financial resilience of the General Fund and thereafter Stevenage Even Better priorities. The projected balance as at 31 March 2026 projected to be £3.6Million
- Introduction of a transformation programme to deliver savings for both the General Fund and HRA.
- Implementation of a Commercial and Insourcing Strategy which looks for opportunities to increase the Council's net income from new commercial options, ensuring fees and charges are set based on the cost of services and any insourcing opportunities.
- Setting aside monies in the Queensway reserve to ensure there is sufficient monies available to Queensway LLP for future investment and support.

4.11.6 The current projections of balances and the measures the Council has taken to date as set in this report mean that the level of balances projected are sufficient to set the 2025/26 budget.

4.11.7 As a result of its planned and prudent budget setting activities, the Council is able to continue the delivery of its ambitious programmes to redevelop and regenerate the town centre and to provide more social, affordable, aspirational and good quality homes. Amongst other schemes 2024/25 has seen the Council partner with Mace through an innovative 50:50 Joint Venture initiative to deliver the first SG1 site. Whilst both programmes offer great opportunities for the town and local residents they may also require more resources due to a number of reasons. There is a ring-fenced reserve for Regeneration and further estimates of resources have been included in the General Fund MTFS.

4.11.8 The priority use of the business rates reserve has also meant the Council can tackle issues such as recruitment and retention through the apprentice and graduate scheme set out in this report. This also allows the Council to afford the holding costs associated with the SG1 joint venture with Mace on the Swingate site.

4.11.9 Further commentary can be found in Appendix D to this report (Section 25 Statement including Robustness of Estimates and Adequacy of Reserves) which Members are asked to approve.

## **4.12 Contingency Sums**

4.12.1 Cabinet Members will recall that a Contingency Sum needs to be determined by the Council as part of the Budget and Policy Framework in order to avoid the need for Council to consider all supplementary estimates during the course of the year. This contingency sum constitutes an upper cumulative limit during the financial year within which the Cabinet can approve supplementary estimates, rather than forming part of the Council's Budget Requirement for



the year. A sum of £500,000 is proposed for 2025/26, this has increased from £400,000 in the current year as the amount has remained unchanged for a number of years, however, as always, due regard will need to be given to breaching minimum balances.

#### 4.13 Consultation

4.13.1 The Draft General Fund report was presented to the 21 January 2025 Overview and Scrutiny Meeting and Members considered the report and there was support for the growth bids. A Member asked about the proposed council tax increase of 2.99% versus the MTFs assumption of 1.99%. The Chief Financial Officer explained that the additional 1% made a contribution to the General Fund's savings target and this helped avoiding service reductions. The CFO also identified that in previous year's increases had been below inflation rises.

4.13.2 The Council consulted on the 2025/26 budget via an on-line form on the SBC's website the responses were a small sample of 30 so not statistically sound. The growth for apprentices was supported and the graffiti growth was only narrowly not supported.

2025/26 Budget Feedback	Yes	No
Stevenage Resident	87%	13%
Stevenage business owner	3%	97%
Agree to increase council tax by 3%	63%	37%
Pay more council tax for more services	43%	57%
Support Apprentice growth	70%	30%
Support graffiti growth	47%	53%
Support savings delivered through more digital and on-line	67%	33%
savings delivered from more commercial income	40%	60%
Only cutting services if no other options available	67%	33%

4.13.2 The consultation asked respondents to comment on future areas to invest in and the following areas were identified in a free form text box, with Council responses in *italics* to the comments.

- Improving the Town Centre and parks and open spaces- *the Council has a regeneration programme for the Town Centre and work has started on the former Swingate site in 2024. The Council is working on both a Green Spaces and Trees & Woodland strategy which will be reported to cabinet in the summer of 2025. This will outline our approach to enhance our parks and open spaces going forward. The*

*Council will also be spending an estimated £830K on parks and open spaces in 2025/26*

- Pavements cleaning generally and landscaping and maintaining the overall appearance of the streets across the town. –*Funding from the UK Shared Prosperity Fund has been utilised to undertake an enhanced cleansing routine of Stevenage’s neighbourhood centres and pathways over the last two years. The Council will also be spending £1.5Million in 2025/26 on street cleansing and litter picking.*
- Hedge and verge trimming to keep cycleways clear and accessible. - *The council is currently delivering a 10-year programmed Shrub Bed Improvement programme to remove old, tired, or operationally constrictive shrub beds to help keep pathways and cycleways clear and accessible.*
- Regeneration culture and leisure -*The Council has jointly invested in a JV with their Development Partner Mace to build new homes in the town centre and has consulted the public on a new leisure centre.*
- Solar panels to reduce energy costs. Improved bus service so residents are less reliant on cars.- *The Council has installed solar panels on refuse freighters and new buildings such as the bus interchange.*
- Council housing- *The Council is investing £51Million into existing and new homes in 2025/26*
- Town centre events - make the space more welcoming out of hours and provide a safer environment to encourage more evening venues- *The council has invested in ‘Events Island’ in the Town Centre and has a programme of events throughout the year.*
- more investment in digital logging/ online services -*The Council has a digital team and Transformation Plan to improve the on-line offer.*

4.13.3 The consultation also asked respondents what areas the council should make savings in the future:

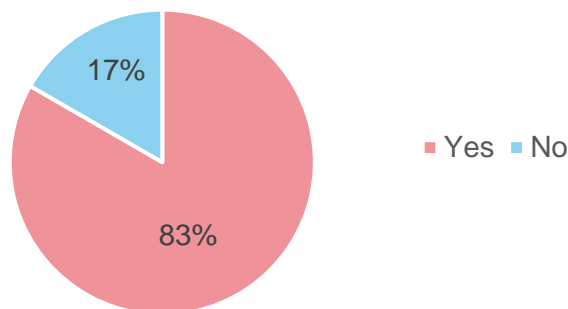
- High street- *The Council is working with businesses in the Indoor Market to transfer their services into the empty shopping units along the new Park Place development in the town centre. This will bring greater attention to local businesses in the council’s high street. This builds on the new ‘Event Island’ space in the town centre, which has a busy event schedule throughout the coming year.*
- Repairs -*Members approved a further £2Million spend on council home repairs in 2025/26.*
- Council should use the staff they currently have to tackle the graffiti problem in the town and invest in more artwork in underpasses to prevent it- *The Council successfully tested an enhanced Graffiti response, utilising funding from the UK Shared Prosperity Fund over the last year. This growth request establishes that level of response within core budgets going forward rather than relying on time limited external funding. The Council has a programme of artwork installations in underpasses and buildings as part of the Councils Towns Fund works.*
- Black bin collection once a month- *In setting the frequency of residual waste collections, Council’s need to consider a range of factors including the size of the bin, the number of occupants and storage*

*facilities, for example, the Council wants to increase recycling rates and reduce residual waste volumes going forwards, and will be looking to improve recycling facilities in a number of locations, including flat blocks.*

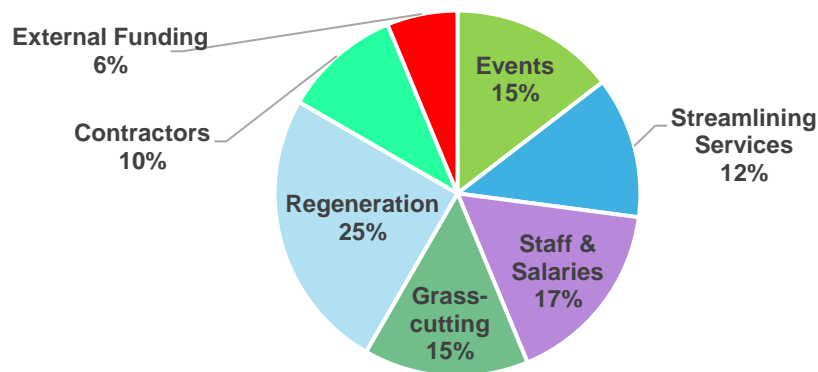
- *Stop investing in car infrastructure – The Council has invested in the Stevenage cycle ways through the new Arts & Heritage trail as part of its ambitious Regeneration programme of the town centre. This reemphasises the council’s commitment and investment into alternative travel options in the town.*
- *Outdated and incompatible ICT systems The Council along with East Herts Authority have jointly invested in the shared ICT service in 2024/25 & 2025/26 to ensure that both Councils have fit for purpose software.*
- *Staffing and pensions -staff pay is governed by the collective pay agreements as agreed with the unions.*

4.13.4 Development of the Councils 2024/25 Corporate Plan included a period of public and stakeholder engagement and consultation to include ascertaining if

- Agree that Balancing the Budget should be a priority so that the Council can remain financially resilient and continue to deliver key services as set out in the Corporate Plan?
- If no, is the alternative is to reduce services and provide less?
- If yes, what should the Council stop doing to generate £1.23Million savings?
- 83% of respondents to the consultation agreed that Balancing the Budget should be a priority:



4.13.5 All survey respondents were asked for financial savings suggestions. The responses can be categorised into seven themes:



- The Transforming Our Town programme will attract new businesses to the area which would increase business rate revenue and car parking income (25%). – *The Council has opened a new Multi Storey car park and is working with partners to bring new business into the town, also improving the business rates collected and retained by the Council.*
- Reduce Staff and Councillor salaries (17%). – *The Council’s Member allowances are reviewed and agreed by an Independent Remuneration Panel and staff pay is governed by the collective pay agreements as agreed with the unions.*
- The Council should consider selective grass-cutting allowing green spaces to grow wilder (within safe reasons) and reduce maintenance costs for grass cutting etc. (15%) – *The Council has already implemented this as a measure with an associated cost reduction.*
- Streamlining services (12%) – *The Council has a transformation programme which is targeted at streamlining processes and reducing costs.*
- Reduce use of Contractors (10%) – *The Council has a Commercial and Insourcing Strategy which includes reviewing contracts to see if they can be brought back in-house where deemed viable to do so at the point of re-tendering.*
- Reducing or cancelling events such as the November Fireworks Display, or those held on the Event Island and the Stevenage Museum. (15%) – *the Council has been looking at how it manages and delivers future event activity with a view to driving out efficiencies where possible.*
- Seeking external funding to plug the financial gap (6%). *The Council has actively sought external funding and has received circa £80Million of revenue and capital funding over the last few years.*

### **Resident Survey (2021)**

4.13.6 The 2021/22 Residents survey shows that resident’s preferences with regards to achieving budget savings are firstly to reduce costs through the provision of more online services. This was ranked the highest (out of five options in 2021 and 2017) with 41%. This first rate ranking has increased from 2017 and supports the Transformation programme as a method to reduce costs and improve efficiency / productivity.

<b>Please tell us your order of preference for each of the following options by ordering them 1 to 5</b>	<b>2021 rank</b>	<b>2017 rank</b>	<b>1st</b>
Reduce time and money spent on paperwork by interacting with more residents and customers online	1	1	41%
Increase income from fees and chargeable services, to keep the council's element of Council Tax as low as possible	2	3	24%
Spend less by reducing or cutting the services that you tell us are not a priority	3	2	16%
Make money by selling more of our services to residents and customers	4	5	9%
Increase our element of Council Tax (for example from 51p per day to 55p per day)	5	4	10%

4.13.7 The 2021 residents' survey asked residents whether the council tax represented value for money. While strongly disagree has increased (from 7% to 15%), overall 52% up from 46% of residents agree it represents value for money as shown in the chart below.

	<b>Responses</b>	<b>2021</b>	<b>2017</b>	<b>2015</b>	<b>2013</b>	<b>2011</b>
<b>To what extent do you agree or disagree that the Council Tax paid to Stevenage Borough Council provides good value for money?</b>	Strongly agree	16%	10%	7%	6%	6%
	Tend to agree	36%	36%	39%	39%	40%
	Neither	18%	30%	30%	35%	33%
	Tend to disagree	10%	17%	18%	17%	16%
	Strongly disagree	15%	7%	6%	5%	5%
	Don't know (DNRO)	4%				
	<b>Summary: Agree</b>	<b>52%</b>	<b>46%</b>	<b>46%</b>	<b>45%</b>	<b>46%</b>
	<b>Summary: Disagree</b>	<b>26%</b>	<b>24%</b>	<b>24%</b>	<b>22%</b>	<b>21%</b>

4.13.8 The Council is commissioning a new Residents survey which is likely to be published for consultation in 2025/26.

4.13.9 Due to the level of savings required the CFO, in conjunction with the Leader, Portfolio Holder for Resources and Transformation and Comms colleagues intends to set out the issues in a media communication campaign so that residents and businesses understand why the Council is facing budgetary challenges as well as how it is seeking to respond.

## **5 IMPLICATIONS**

### **5.1 Financial Implications**

5.1.1 The report deals with Council finances and as such all implications are contained in the main body of the report.

5.1.2 Savings options are required to follow the Budget and Policy Framework as set out in this report. Fees and charges require a report to the Cabinet and were

included in the Commercial and Insourcing Strategy which was considered by the Cabinet in October 2024.

## **5.2 Legal Implications**

- 5.2.1 The Council is required to set a balanced budget each year. The Local Government Finance Act 1992 requires the Council to estimate revenue expenditure and income for the forthcoming year from all sources, together with contributions from reserves, in order to determine a net budget requirement to be met by government grant and council tax.

## **5.3 Policy Implications**

- 5.3.1 The report deals with Council policy and as such all implications are contained in the main body of the report.

## **5.4 Staffing and Accommodation Implications**

- 5.4.1 The 2025/26 budget growth options include the graduate and apprentice scheme which is designed to have a positive impact on staff recruitment and retention in hard to recruit to areas through adopting a 'grow your own' approach.
- 5.4.2 The report does indicate that Transformation options will be coming forward and any future report will set out staffing implications and any required EQIA.

## **5.5 Equal Opportunities Implications**

- 5.5.1 In carrying out or changing its functions (including those relating to the provision of services and the employment of staff) the Council must comply with the Equality Act 2010 and in particular section 149 which is the Public Sector Equality Duty. The Council has a statutory obligation to comply with the requirements of The Act, demonstrating that as part of the decision-making process, due regard has been given to the need to:

- Remove discrimination, harassment, victimisation and any other conduct that its unlawful under this Act
- Promote equal opportunities between people who share a protected characteristic and those who do not
- Encourage good relations between people who share a protected characteristic and those who do not.

- 5.5.2 These duties are non-delegable and must be considered by Council when setting the Budget in February 2025.

- 5.5.3 To inform the decisions about the Budget 2025/26 an EQIA has been completed for the 2025/26 council tax increase and can be found in Appendix E to this report. There are no service cuts included in the 2025/26 budget and an

EQIA was completed for the fees and charges increases and appended to the October 2024 Cabinet report.

## **5.6 Risk Implications**

5.6.1 There are risk implications to setting a prudent General Fund budget if the Balancing the Budget options identified in Appendix A and within the report are not achieved and crucially if future options are not found to meet the targets outlined in the report.

5.6.2 There are a number of risks that have been identified and these are set out in the report.

## **5.7 Climate Change Implications**

5.7.1 The Council declared a climate change emergency at the June 2019 Council meeting with a resolution to work towards a target of achieving net zero emissions by 2030. The Transformation programme and the digital on-line agenda will contribute to reducing the Councils carbon footprint. In 2023/24 the Council approved an additional officer post to support its efforts meet its climate change goals. Included in the 2024/25 options was a growth bid to convert the Council's fleet from diesel to use hydrogenated vegetable oil (HVO) in order to reduce the Councils carbon emissions, the full year impact is included in the 2025/26 General Fund budget. A further update concerning the Council's Climate Change activities was presented to the Cabinet in October 2025.

## **BACKGROUND DOCUMENTS**

BD1 General Fund Medium Term Financial Strategy (2024/25-2028/29) September 2024 Cabinet

BD2 Balancing the Budget November 2024 Cabinet

BD3 Fees and Charges October 2024 Cabinet

BD4 Draft General Fund and Council Tax setting report January 2025 Cabinet

## **APPENDICES**

Appendix A General Fund and HRA Budget Options

Appendix B Budget Book summary

Appendix C Risk Assessment of Balances

Appendix D Section 25 Statement including Robustness of Estimates and Adequacy of Reserves

Appendix E Council Tax EQIA

Appendix F Council Tax resolution





APPENDIX A BALANCING THE BUDGET 2025-26

Ref No	Name of Service	Description of Savings Proposal	2025/26 Savings	2026/27 savings	2027/28 savings	Ongoing (Y/N) or No of further years available	Impact of Saving Proposal on Public/ Customers/ Staff/ Members/Partnerships etc. (include any impact on key corporate programmes/performance indicator measures) .	Potential Timing (put the date you estimate it will be implemented, consider any consultation required)	£ General Fund Year 1	£ General Fund Year 2	£ HRA Year 1	£ HRA Year 2
S1	Planning & Regulatory	Increase the use of Community Infrastructure Levy (CIL) to cover increased staff costs of administration	£10,000	£10,000	£10,000	y	The Council can utilise 5% of the CIL received to support the administration of the scheme, this increase will ensure that the cost of administering CIL is fully recovered.	April 2025	10,000	10,000	0	0
S2	HR, H&S & Payroll	Replacement of the standalone Health and Safety reporting system (Mworker) by reporting via the existing Council platform (Granicus)	£11,500	£11,500	£11,500	Y	No impact on service or Council responsibility, Officers will be transferring the reporting requirements for Health & Safety on to Granicus	April 2025	7,245	7,245	4,255	4,255
S3 amend ed	HR, H&S & Payroll	Reduction in the use of the external Payroll Officer (2 days per month) by automating pension report and £13K saving based on current spend levels	£23,000	£23,000	£23,000	Y	Through using the capacity within reports being generated from HR system, this reduces the need / external support required	April 2025	14,260	14,260	8,740	8,740
S4	HR, H&S & Payroll	Re-basing training budgets	£7,500	£7,500	£7,500	y	A review of historical spend versus training budgets have identified opportunity to reduce budget by 10% across all services – protecting safeguarding and health & safety training. With emphasis to maximise the usage of the Apprenticeship Levy	April 2025	7,500	7,500	0	0
S5	HR, H&S & Payroll	Reduction in the use of Payroll Officer (from other Council) with additional duties being undertaken in-house	£2,500	£5,000	£5,000	Y	Following the decision last year to introduce a payroll apprentice into the Council, this will result from September 2025 to be able to reduce the requirement of the Payroll Officer (other Council) reliance with more activity being undertaken in-house	September 2025	1,550	3,100	950	1,900
S6	SDS	The cessation of the skips service to be implemented at end of December 2024	£54,000	£54,000	£54,000	Y	Following a review of the service and the competition in the market the Commercial Insourcing Working Group supported this decision	January 2025	50,000	50,000	4,000	4,000
S7	Shared Revenues and Benefits Service	Reduction in 3 vacant posts in Shared Revenues and Benefits posts and reduction in contract price due to lower pay award than budgeted for	£89,150	£89,150	£89,150	Y	Following the reduction in benefit case load an overpayments officer and benefits role have been deleted plus a .75FTE of a revenues post. The contract cost reduction equates to a further £18K. (the value of saving represents the SBC share only)	April 2025	89,150	89,150	0	0
S8	Commercial	This includes additional filming, advertising and parcel lockers income to be generated	£11,550	£11,550	£11,550	Y	Following a review of income achieved in-year and from works on promoting opportunities, this increase in budget has been proposed	April 2025	11,550	11,550	0	0
S9 NEW	ICT	Cease software Licence for robotics enabling (NDL software)	£28,000	£28,000	£28,000	Y	The cost of the software is set to double in 2025/26 and has not been fully utilised following a review of software purchased	April 2025	16,290	16,290	11,710	11,710
S10 NEW	Council Tax	Increase council tax by 2.99% (an increase of 1% over that assumed in the September MTFS)	£68,361	£68,361	£68,361	Y	The cost of the software is set to double in 2025/26 and has not been fully utilised following a review of software purchased	April 2025	68,361	68,361	0	0
<b>TOTAL</b>			<b>£305,561</b>	<b>£308,061</b>	<b>£308,061</b>				<b>£275,907</b>	<b>£277,457</b>	<b>£29,655</b>	<b>£30,605</b>

Page 49

**Summary of savings identified:**

Quarterly Monitoring savings already approved (Qtr. 1)  
 Fees and Charges already approved  
 Indoor Market changes already approved  
 New Fees and Charges legal admin approved January 2025 Cabinet  
 Appendix A

£422,770	£422,770		
£427,334	427,334	£2,478	£2,478
£40,000	£40,000		
£4,121	£4,121		
£275,907	£277,457	£29,655	£30,605
<b>£1,170,132</b>	<b>£1,171,682</b>	<b>£32,133</b>	<b>£33,083</b>

This page is intentionally left blank

**General Fund Summary**

	Actual 2023/24 £	Original Budget 2024/25 £	Working Budget 2024/25 £	Gross Expenditure 2025/26 £	Gross Income 2025/26 £	Original Budget 2025/26 £
<b>Summary of Expenditure</b>						
<b>Portfolio:</b>						
Community Services	3,204,734	3,696,020	3,300,910	4,886,430	(1,389,050)	3,497,380
Housing Services	2,415,650	2,837,580	3,050,490	25,502,340	(22,649,890)	2,852,450
Environmental Services	16,036,515	9,430,800	9,735,372	24,732,810	(15,839,640)	8,893,170
Local Community Budgets	60,500	60,500	60,500	60,500	0	60,500
Resources	(8,531,986)	(3,448,360)	(4,171,832)	14,610,580	(19,548,080)	(4,937,500)
Resources - Support	209,515	162,850	252,770	24,596,990	(24,204,910)	392,080
Trading Accounts - Direct Services *	2,634	49,020	23,700	4,143,720	(4,148,260)	(4,540)
<b>Net General Fund Expenditure</b>	<b>13,397,561</b>	<b>12,788,410</b>	<b>12,251,910</b>	<b>98,533,370</b>	<b>(87,779,830)</b>	<b>10,753,540</b>
<b>Government Baseline Funding</b>						
Government Support - Retained Business Rates (NDR)	(2,054,453)	(1,880,358)	(1,914,723)	19,488,320	(21,896,732)	(2,408,413)
S31 Grants	(2,082,370)	(2,526,046)	(2,529,981)		(2,210,192)	(2,210,192)
Business rates in Year Gains						0
Levy Surplus	(21,574)	0	(22,000)			0
Compensation grant for business rates exemption for green plant and machinery	(23,748)	(26,105)	(26,106)			0
Transfer to/from S31 reserve		0				0
Transfer to/from Collection Fund reserve (NDR previous years)	(1,668,201)	(838,057)	(838,058)	1,232,757		1,232,757
Hertfordshire Pooling Gains	0	0				0
Transfer to/from Collection Fund (Council Tax previous years)	(46,290)	(162,404)	(162,403)	196,632		196,632
Redmond Review	(25,807)	0				0
Revenue Support Grant	(102,052)	(108,811)	(108,811)		(149,048)	(149,048)
Recovery Grant					(283,819)	(283,819)
Service Grant	(104,040)	(17,960)	(17,960)		0	0
3%/4% quarantine increase in core spending	(78,399)	(390,740)	(390,740)		0	0
New Homes Bonus	0	0	0		(97,000)	(97,000)
District Precept	(6,540,369)	(6,837,929)	(6,837,929)		(7,040,510)	(7,040,510)
<b>Use of General Fund Balances</b>	<b>(12,747,303)</b>	<b>(12,788,410)</b>	<b>(12,848,711)</b>	<b>20,917,709</b>	<b>(31,677,301)</b>	<b>(10,759,593)</b>
<b>General Fund Balance:</b>						
Balance 1 April	(5,953,625)	(4,762,544)	(5,303,367)			(5,900,168)
Use of Balances in Year	650,258	0	(596,801)			(6,053)
<b>General Fund Balance 31 March</b>	<b>(5,303,367)</b>	<b>(4,762,544)</b>	<b>(5,900,168)</b>	<b>0</b>	<b>0</b>	<b>(5,906,221)</b>
<b>Allocated Revenue Reserves:</b>						
Balance 1 April	(5,556,446)	(6,682,988)	(8,758,063)			(9,420,450)
Use of Balances in Year	(3,201,617)	(88,056)	(662,387)			(18,623)
<b>Allocated Revenue Reserves Balance 31 March</b>	<b>(8,758,063)</b>	<b>(6,771,044)</b>	<b>(9,420,450)</b>	<b>0</b>	<b>0</b>	<b>(9,439,073)</b>
<b>Total Revenue Reserves</b>	<b>(14,061,430)</b>	<b>(11,533,588)</b>	<b>(15,320,618)</b>	<b>0</b>	<b>0</b>	<b>(15,345,293)</b>
<b>Council Tax Bands for 2024/25</b>		<b>2024/25</b>				<b>2025/26</b>
2.99% Increase on Band D Property:						
BAND A		159.51				164.27
BAND B		186.09				191.65
BAND C		212.68				219.03
BAND D		239.26				246.41
BAND E		292.43				301.17
BAND F		345.60				355.93
BAND G		398.77				410.68
BAND H		478.52				492.82

	Actual 2023/24 £	Original Budget 2024/25 £	Working Budget 2024/25 £	Gross Expenditure 2025/26 £	Gross Income 2025/26 £	Original Budget 2025/26 £
<b>Summary of Expenditure</b>						
7 Safeguarding Services	0	6,650	(6,320)	91,740	(91,190)	550
10 Sports & Recreational Facilities	838,005	1,179,570	1,023,010	911,650	0	911,650
11 Sports Development	76,957	111,380	137,160	135,740	(11,540)	124,200
12 Leisure Management and Leisure Promotions	209,392	274,620	142,520	898,150	(650,290)	247,860
14 Community Services General	571,294	530,550	455,280	1,016,570	(375,500)	641,070
14a Neighbourhood Wardens	166,328	185,190	196,340	290,870	(87,410)	203,460
15 Community Associations	334,291	342,550	342,550	308,420	0	308,420
16 Community Safety	238,932	211,280	212,600	250,000	0	250,000
16a Domestic Abuse Service	9,635	68,570	19,400	162,410	(141,590)	20,820
16b No More Service	53,700	68,480	68,440	99,020	(24,850)	74,170
17 Museums	348,880	361,900	354,650	356,270	(6,680)	349,590
18 Grants to Sundry Bodies	357,086	355,280	355,280	365,590	0	365,590
<b>Total Cost of Portfolio</b>	<b>3,204,500</b>	<b>3,696,020</b>	<b>3,300,910</b>	<b>4,886,430</b>	<b>(1,389,050)</b>	<b>3,497,380</b>

	Actual 2023/24 £	Original Budget 2024/25 £	Working Budget 2024/25 £	Gross Expenditure 2025/26 £	Gross Income 2025/26 £	Original Budget 2025/26 £
<b>Summary of Expenditure</b>						
20 Homelessness	806,720	1,283,320	1,286,500	2,611,600	(1,473,260)	1,138,340
20a Ex-Offenders & Refugees	(282,534)	7,520	7,520	170,100	(170,100)	0
21 Housing Advice	265,611	267,730	262,290	353,240	(68,490)	284,750
23 Wholly Owned Company	35,332	(181,690)	2,200	260,880	(305,550)	(44,670)
24 Private Houses Rent Allowance	720,867	371,660	649,760	9,794,800	(9,111,480)	683,320
25 Rent Rebates Administration	221,477	468,100	171,640	11,685,750	(11,482,000)	203,750
26 Health & Safety and Food Safety	648,177	620,940	670,580	625,970	(39,010)	586,960
<b>Total Cost of Portfolio</b>	<b>2,415,650</b>	<b>2,837,580</b>	<b>3,050,490</b>	<b>25,502,340</b>	<b>(22,649,890)</b>	<b>2,852,450</b>

	Actual 2023/24 £	Original Budget 2024/25 £	Working Budget 2024/25 £	Gross Expenditure 2025/26 £	Gross Income 2025/26 £	Original Budget 2025/26 £
<b>Summary of Expenditure</b>						
28 Abandoned Vehicles	7,202	12,870	1,000	4,180	(1,000)	3,180
29 Allotments	250	(2,710)	8,780	90,610	(88,490)	2,120
30 Cemeteries	290,342	350,030	244,280	580,440	(311,910)	268,530
31 Pavilions	442,675	450,760	450,060	286,630	(3,500)	283,130
31a Parks Playing Fields & Open Spaces	443,837	408,160	308,190	597,110	(208,220)	388,890
31b Verge Maint	293,141	306,010	497,730	1,366,930	(700,780)	666,150
31c Landscape Maint	493,347	497,790	724,600	1,198,290	(455,930)	742,360
31d Fairlands Park	229,043	228,930	236,870	233,010	(10,800)	222,210
31e Play spaces	258,226	269,660	280,610	299,950	0	299,950
31f Amenity Woodland	537,538	489,240	559,510	638,130	(111,090)	527,040
32 Drainage	5,970	8,160	7,990	11,520	0	11,520
33 Town Centre	624,038	700,140	689,750	778,400	(20,850)	757,550
33a Town Centre Conveniences	54,438	58,340	56,910	52,110	0	52,110
33b Street Cleansing/Graffiti	543,099	383,780	253,810	1,550,410	(1,179,250)	371,160
33c Environmental Development	66,311	150,040	188,140	188,890	(24,410)	164,480
33d Neighbourhood Centres	292,602	314,940	314,940	328,600	0	328,600
35 Local Highway Services	456,624	519,720	508,450	559,230	(13,950)	545,280
36 Christmas Illuminations	29,373	27,060	33,380	25,490	0	25,490
37 Recycled Waste	1,126,856	1,357,830	1,096,650	1,695,980	(1,827,960)	(131,980)
38 Refuse Services	1,803,833	1,499,320	1,974,040	2,042,040	(48,750)	1,993,290
39 Animal Control & Environmental Health Management	195,762	183,250	181,980	248,660	(52,990)	195,670
40 E-car Club and Travel Plan	22,087	12,890	12,140	15,010	0	15,010
41 Parking Facilities - Off Street	(1,354,029)	(2,224,860)	(2,134,880)	2,223,560	(4,522,650)	(2,299,090)
42 Parking Facilities (On Street)	(228,112)	(202,360)	(305,180)	876,220	(1,157,160)	(280,940)
43 CCTV	261,588	262,670	264,400	367,760	0	367,760
44 Planning Policy	1,174,181	1,386,060	1,393,500	1,382,590	0	1,382,590
44a Climate Change	99,730	121,730	204,390	224,610	(120,540)	104,070
44b CIL	(7,051)	10,430	10,400	25,860	(28,930)	(3,070)
44c Town Centre Management	2,281,245	249,670	277,442	516,520	(76,430)	440,090
46 Regeneration	5,588,103	1,437,460	1,318,140	1,633,390	(240,000)	1,393,390
47 Development Control	(21,199)	(66,480)	(122,550)	549,570	(561,220)	(11,650)
48 Building Control	23,579	39,520	39,520	57,800	(4,280)	53,520
49 Engineers and on-street parking	0	(2,130)	(2,620)	545,130	(546,050)	(920)
50 Property & Design	1,742	203,030	199,040	787,550	(788,620)	(1,070)
51 Environmental Health	0	(9,080)	(24,640)	1,053,790	(1,055,330)	(1,540)
52 DSO Admin & Management	0	(1,070)	(11,400)	1,696,840	(1,678,550)	18,290
<b>Total Cost of Portfolio</b>	<b>16,036,372</b>	<b>9,430,800</b>	<b>9,735,372</b>	<b>24,732,810</b>	<b>(15,839,640)</b>	<b>8,893,170</b>

## Local Community Budgets

	Actual 2023/24 £	Original Budget 2024/25 £	Working Budget 2024/25 £	Gross Expenditure 2025/26 £	Gross Income 2025/26 £	Original Budget 2025/26 £
<b>Summary of Expenditure</b>						
54 Local Community Budgets	60,500	60,500	60,500	60,500	0	60,500
<b>Total Cost of Portfolio</b>	<b>60,500</b>	<b>60,500</b>	<b>60,500</b>	<b>60,500</b>	<b>0</b>	<b>60,500</b>

## Resources

	Actual 2023/24 £	Original Budaet 2024/25 £	Working Budaet 2024/25 £	Gross Expenditure 2025/26 £	Gross Income 2025/26 £	Original Budaet 2025/26 £
<b>Summary of Expenditure</b>						
56 Commercial Properties	(859,517)	(2,046,760)	(1,785,240)	3,107,600	(5,109,420)	(2,001,820)
56a Bus Interchange	(47,433)	37,540	42,300	286,060	(199,460)	86,600
57 Garages	(1,164,053)	(2,647,360)	(2,404,750)	1,533,060	(4,318,170)	(2,785,110)
58 Council Tax	760,200	693,400	693,400	1,054,350	(268,750)	785,600
59 Non Domestic Rate (NDR)	162,360	119,950	119,950	251,590	(116,230)	135,360
60 Elections	244,506	219,450	219,450	227,930	0	227,930
61 Electoral Registration	127,707	131,470	147,990	342,060	(204,060)	138,000
62 Indoor Market	193,548	118,530	190,620	386,640	(298,430)	88,210
63 NHC St George	0	0	0	74,000	(118,110)	(44,110)
64 Hackney Carriages	25,463	(22,090)	0	137,290	(137,290)	0
65 Local Licensing	(33,741)	24,740	1,620	150,840	(94,010)	56,830
66 Local Land Charges	23,043	(980)	(980)	81,800	(85,940)	(4,140)
67 Miscellaneous Services	119,904	120,000	157,540	130,000	0	130,000
68 Corporate Projects	62,141	33,220	47,840	41,250	0	41,250
68a Transformation	363,792	338,260	368,360	996,680	(765,760)	230,920
69 Investment Income and Expenditure	(3,801,950)	(773,700)	(2,325,990)	1,444,070	(2,838,280)	(1,394,210)
70 Movement on General Fund Balance	(6,637,247)	(2,197,150)	(2,076,672)	289,150	(3,536,430)	(3,247,280)
71 Corporate & Democratic Core	1,826,172	2,258,250	2,281,200	3,923,740	(1,457,740)	2,466,000
71a Emergency Planning	61,133	87,300	76,560	88,810	0	88,810
71b Civic Links	41,986	57,570	74,970	63,660	0	63,660
<b>Total Cost of Portfolio</b>	<b>(8,531,986)</b>	<b>(3,448,360)</b>	<b>(4,171,832)</b>	<b>14,610,580</b>	<b>(19,548,080)</b>	<b>(4,937,500)</b>



	Actual 2023/24 £	Original Budget 2024/25 £	Working Budget 2024/25 £	Gross Expenditure 2025/26 £	Gross Income 2025/26 £	Original Budget 2025/26 £
<b>Summary of Expenditure</b>						
72 Daneshill House	(77,579)	80,670	85,890	1,488,580	(1,446,340)	42,240
74 Facilities Management	8,043	(22,300)	(66,650)	1,101,510	(1,070,300)	31,210
75 Corporate Management	577	(5,060)	20,580	920,180	(879,780)	40,400
76 Democratic Services	13	30	3,110	599,750	(599,620)	130
76a Members Expenses	0	(13,270)	(28,040)	643,130	(627,890)	15,240
77 Legal Services	18,965	(6,090)	(6,090)	521,940	(521,940)	0
78 Policy	0	20	(86,090)	652,260	(607,390)	44,870
78a Communications	439	(3,810)	6,220	382,570	(392,100)	(9,530)
79 ICT	(40,268)	(18,020)	208,050	6,917,540	(6,934,850)	(17,310)
79a GDPR	0	10	37,980	162,250	(162,530)	(280)
79c Digital	211	22,950	24,790	638,840	(784,870)	(146,030)
80 Human Resources & Organisational Development	65,871	49,600	69,600	278,760	0	278,760
80a Corp Health&Safety	0	20	1,690	189,990	(190,230)	(240)
80b Human Resources and Training	68	(6,060)	(15,100)	1,156,190	(1,155,520)	670
81 Creditors	10,001	970	26,170	399,280	(400,140)	(860)
81a Payroll	0	(740)	(740)	61,730	(71,100)	(9,370)
82 Financial Services	2,304	(2,650)	68,890	2,325,890	(2,314,900)	10,990
82a Financial Services - Procurement	(16)	(13,400)	12,300	250,590	(252,040)	(1,450)
82b Financial Services - Paralegal	0	0	(4,040)	109,830	(114,150)	(4,320)
82c Insurance, Audit, Anti Fraud & Corp Banking Charges	2,192	(700)	(25,830)	529,300	(528,060)	1,240
82d Estates	0	(13,920)	12,230	966,080	(871,970)	94,110
82e Financial Services - Commercial	218,694	5,910	(201,810)	316,840	(317,040)	(200)
83 Revenues, Benefits & Local Taxation	0	122,520	139,620	2,355,200	(2,330,200)	25,000
84 Customer Services	0	(13,830)	(29,960)	1,628,760	(1,631,950)	(3,190)
<b>Total Cost of Portfolio</b>	<b>209,515</b>	<b>162,850</b>	<b>252,770</b>	<b>24,596,990</b>	<b>(24,204,910)</b>	<b>392,080</b>

01	Actual 2023/24 £	Original Budget 2024/25 £	Working Budget 2024/25 £	Gross Expenditure 2025/26 £	Gross Income 2025/26 £	Original Budget 2025/26 £
<b>Expenditure</b>						
<b>Employee Costs:</b>						
Direct Employee Expenses	806,485	899,320	978,850	933,310	0	933,310
Indirect Employee Expenses	11,132	7,920	12,520	8,500	0	8,500
<b>Premises Related:</b>						
Repairs & Maintenance Of Buildings	81,886	86,040	86,570	86,060	0	86,060
Grounds Maintenance	87,702	63,110	83,110	63,110	0	63,110
Energy Costs	186,035	134,420	99,340	100,520	0	100,520
Rents, Rates & Water Services	199,425	221,720	221,720	226,910	0	226,910
Fixtures & Fittings	2,642	3,410	3,410	3,410	0	3,410
Cleaning & Domestic Supplies	943	1,010	1,010	1,010	0	1,010
Apportionment Of Operational Buildings	180,503	138,610	138,610	155,570	0	155,570
Premises Insurance	4,920	5,180	5,180	5,640	0	5,640
<b>Transport Related:</b>						
Fleet Vehicle Recharges	214,167	208,500	251,700	237,300	0	237,300
Hire Of Vehicles	0	0	0	0	0	0
Travelling Expenses	3,021	1,800	1,800	1,840	0	1,840
<b>Supplies &amp; Services:</b>						
Equipment, Tools & Materials	438,854	347,730	420,890	458,700	0	458,700
Catering	1,024	1,800	2,000	1,800	0	1,800
Clothing, Uniforms & Laundry	3,705	2,770	2,770	2,770	0	2,770
Printing, Stationery & General	2,612	1,300	1,300	1,300	0	1,300
Communications & Computing	30,087	18,840	51,840	34,220	0	34,220
Grants & Subscriptions	10,228	6,430	9,200	6,430	0	6,430
Miscellaneous Expenses	10,499	10,100	11,370	11,680	0	11,680
<b>Third Party Payments:</b>						
Contract Services	63,966	18,120	27,780	74,030	0	74,030
Private Contractors	436,717	444,710	445,390	465,600	0	465,600
Consultancy & Agency Fees	454,930	402,350	402,850	384,900	0	384,900
<b>Recharges:</b>						
Support Services	313,510	461,500	454,810	438,440	0	438,440
Contract Services Recharge	383,811	297,980	297,980	374,810	0	374,810
<b>Capital Charges:</b>						
Capital Charges	76,855	74,520	74,520	65,860	0	65,860
<b>Total Expenditure</b>	<b>4,005,658</b>	<b>3,859,190</b>	<b>4,086,520</b>	<b>4,143,720</b>	<b>0</b>	<b>4,143,720</b>
<b>Income:</b>						
Other Contributions & Donations	(327,673)	(328,000)	(371,760)	0	(338,370)	(338,370)
Fees & Charges	(1,116,563)	(1,212,320)	(1,174,050)	0	(1,207,780)	(1,207,780)
Recharge Income	(2,558,789)	(2,269,850)	(2,517,010)	0	(2,602,110)	(2,602,110)
	<b>(4,003,024)</b>	<b>(3,810,170)</b>	<b>(4,062,820)</b>	<b>0</b>	<b>(4,148,260)</b>	<b>(4,148,260)</b>
<b>Net Cost of Service</b>	<b>2,634</b>	<b>49,020</b>	<b>23,700</b>	<b>4,143,720</b>	<b>(4,148,260)</b>	<b>(4,540)</b>

**APPENDIX C : RISK BASED ASSESSMENT OF THE LEVEL OF GENERAL FUND BALANCES 2025/26**

Potential Risk Area	Comments including any mitigation factors		
Income from areas within the base budget where the Council raises "Fees and Charges"	Potential risk that the budgeted level of income from activities where the Council is charging for services will not be achieved. This is anticipated largely to be as a result of the downturn in economy and cost of living crisis, but could also be as a result of poor weather, new competition. All "fees and charges" income is reviewed as part of the monthly/quarterly budget monitoring process. All budgets are profiled over the year based upon previous experience.		
		<b>Calculated Risk</b>	
Specific Areas	Estimated Income	Likelihood Percentage	Balances Required
Parking Income* (on street/off-street)	£5,594,810	4.0%	£223,792
Development Control Income	£561,220	4.0%	£22,449
Recycling Income	£749,960	4.0%	£29,998
Garages	£4,134,200	1.0%	£41,342
Trade Refuse & Skips	£1,308,760	3.0%	£39,263
Indoor Market	£376,510	10.0%	£37,651
Commercial Property Income	£3,795,240	5.0%	£189,762
Lower fees and charges in excess of budgeted from continual post of Cost of Living			£250,000
<b>Total</b>			<b>£834,257</b>

\* The council has a parking account which identifies how parking fees are spent on parking and related costs

Potential Risk Area	Comments		
Demand Led Budgets	Potential risk that spending on parts of the budget where the Council has a legal duty to provide the service increases significantly. Individual budgets reviewed as part of the monthly budget monitoring process. All budgets are profiled over the year based upon previous experience and so any variances should show up during the year.		
		<b>Calculated Risk</b>	
Specific Areas	Estimated Exposure	Likelihood Percentage	Balances Required
Housing Benefit maximum risk based on not meeting threshold for Local Authority errors.	£180,000	40%	£72,000
Loss of Business Rates yield	£3,379,025	maximum loss (7.5%)	£253,427
Lower S31 Grants than anticipated which means the NNDR yield would be higher but would not be returned to the General Fund until 2026/27.	£527,879	5%	£26,394
Increase in bad debts as a economic changes impacting on charging for services	£140,550	100%	£140,550
Bed and Breakfast budget been reduced based on current trends. However, there's a risk that demand could increase.	£80,000	75%	£59,400
risk of capital works requiring funding as a result of rephasing/deferring works in the Capital Strategy	£250,000	100%	£250,000
Housing Benefit overpayment net income reduces and results in a pressure on the General Fund	£576,960	10%	£57,696
<b>Total</b>			<b>£859,467</b>

Potential Risk Area	Comments including any mitigation factors		
Changes since budget was set	Potential risk that things change since the budget estimates were made and the estimates are then under budgeted for.		
		<b>Calculated Risk</b>	
Specific Areas	Estimated Exposure	Likelihood Percentage	Balances Required
Transitional Vacancy Rate 4.5%	£800,540	10.00%	£80,054
Less staff time charged to capital than budgeted	£528,410	5.00%	£26,421
REVISED: pay award is higher than budgeted for 1%	£24,804,893		£218,389
If General Fund underspends not achieved to fund the graduate posts in future years	£150,000	100.00%	£150,000
Contractual inflation 1% increase	£11,233,348	2.70%	£115,764
Utility and fuel inflation usage/costs increase	£1,549,264	10.00%	£154,926
Borrowing costs will be higher than estimated on new borrowing in Capital Strategy	£1,609,610	1% increase in borrowing costs for the garage programme	£16,096
<b>Total</b>			<b>£761,649</b>

Potential Risk Area	Comments including any mitigation factors		
Other Risks	Potential risk that savings options will not be realised as a result of delay or unforeseen circumstances.		
		<b>Calculated Risk</b>	
Specific Areas	Estimated Exposure	Likelihood Percentage	Balances Required
Savings Options	£1,171,682	10.00%	£117,168
<b>Total</b>			<b>£117,168</b>

Potential Risk Area	Comments including any mitigation factors		
Estimated balances required for any over spend or under -recovery of expenditure and income	This calculation replaces the calculation based on Net Expenditure		
		<b>Calculated Risk</b>	
Specific Areas	Estimated Exposure	Likelihood Percentage	Balances Required
Gross Income (excludes specific income listed above)	£26,995,436	1.50%	£404,932
Gross Expenditure (excludes specific expenditure listed above)	£29,610,113	1.50%	£444,152
<b>Total</b>			<b>£849,083</b>

**Level of Balances Assumed in General Fund Based on risk** **£3,421,625**

This page is intentionally left blank

**Statement of the Chief finance Officer Section 25 Statement including Robustness of Estimates and Adequacy of Reserves**

**1 ROBUSTNESS OF ESTIMATES**

The Council process for producing the budget estimates involves responsible budget holders and finance officers reviewing and projecting the Base Budget. The Working Budget Estimates are determined against a background of ongoing quarterly budget monitoring for the current financial year and an evaluation of the outturn position and Budgets carried forward from the previous financial year. The 2025/26 Estimates are determined by evaluating and costing all known changes, including pay and price levels, legislative changes, demands for services and policy developments, projecting inflation has become much more difficult with fluctuating utility costs and pay inflation. The Council has sufficient reserves in order to set a balanced budget for 2025/26 and the current Budget Process has rigorously reviewed current budgets to secure another year of necessary Balancing the Budget (BTB) Savings, the level of which has been compounded by inflationary pressures. As part of the 2025/26 Budget process the Council has had to meet the challenge of historic Government Grant reductions, reducing New Homes Bonus, legacy post COVID issues with fees and charges and in particular parking income, as well as absorbing inflationary and legislative changes within its Medium Term Financial Strategy (MTFS). The overall budget process is co-ordinated by the Accountancy Section in liaison with the various Business Units and the Council's Strategic Leadership Team. The Budget is recommended by the Cabinet, for approval by Council after it has been through the Scrutiny process required by the Council's Constitution. The process includes consideration of risks and uncertainties associated with projections of future pay, prices, interest rates and projected levels and timing of other potential liabilities. The challenge to the budget process is provided by the Scrutiny and Overview Committee.

Financial monitoring arrangements provide the Cabinet with a quarterly update on the performance of the budget, with action plans where significant adverse variances have resulted. The MTFS is under constant review to ensure that a clear financial position for the Council can be demonstrated for the next five years aided by the Council's BTB priority. This is necessary as the significant cuts in public expenditure and funding from the government between 2010/11- 2024/25. The 2025/26 funding settlement was higher than the MTFS projected and more than the 2024/25 funding. Multi-year settlements beyond 2026/27 will improve projecting the level of annual savings required. The revised MTFs assumes that the level of Recovery grant funding will continue into the future and has improved the level of General Fund reserves from the September MTFS position. The CFO has identified that further new BTB savings options are required for 2026/27-2028/29 of £2.4Million to ensure a balanced General Fund budget. This target reflects the impact of a projected £2.4Milion inflation over the three year period and other known pressures a small annual allowance for growth and a 1.99% increase in council tax beyond 2025/26.

The Council's Financial Regulations require responsible budget holders to ensure that net expenditure does not exceed the total of their Service budgets. Where, despite the assessment of risks that forms part of the budget process, a budget comes under pressure during the course of the financial year, the council's

budgetary framework and Financial Regulations lay down appropriate procedures. Where budget variations cannot be contained overall by the use of virements, these have been reported to Members as part of the quarterly budget monitoring process. In addition, requests for supplementary estimates have to be submitted to the Executive or Full Council, as appropriate. Supplementary estimates are met from available balances and reserves, subject to the required level of minimum General Fund balances.

The Strategic Director (S151) considers that the Estimates and the processes used to produce them are sound and robust. A further update on the 2024/25 General Fund and HRA budgets will be presented to the March Cabinet, together with any on-going impacts.

## **2 ADEQUACY OF RESERVES**

The Council's annual budgetary process and the assessment of the adequacy of Reserves are undertaken in the context of robust medium term financial forecasting. Whilst the Council currently has levels of Reserves above the minimum risk assessed level, the Council's Medium Term Financial Strategy acknowledges that there will be a return to balances of £1.02Million (2024/25-2028/29) if the £2.4Million savings are made beyond 2025/26 and the 2025/26 savings are delivered. This is based on the assumption that Recovery grant at 2025/26 level will be maintained during the period. The anticipated 'reset' of business rates from 2026/27 may impact the Council however the Council only uses £200K of business rates gains in anyone year and transfer the rest to a reserve for recommended for one off spend and financial resilience. The Council has not budgeted for any future New Homes Bonus as this is also due for reform from 2026/27.

The Council has risk assessed the level of General Fund balances required, based on information from service managers the level of reserves required for 2025/26 is £3,421,625, (see also Appendix C to the main report).

Total available General Fund balances as at 1st April 2025 are estimated to be £5,900,168 (after 2024/25 contribution to balances of £596,801). Total General Fund balances as at 1st April 2026 are estimated to be £5,906,221 (after 2025/26 contribution to balances of £6,053). (See also paragraph 4.9.2 and paragraph 4.10.1 of the main report). These levels of balances meet the minimum level of risk assessed balances that are needed to meet unforeseen expenditure arising in the year and expenses arising before income is received.

Total available HRA balances as at 1st April 2025 are estimated to be £10.818Million (after 2024/25 contribution to balances of £233K). Total HRA balances as at 1st April 2026 are estimated to be £10.150Million (after 2025/26 contribution from balances to the HRA of £668K). These levels of balances meet the minimum level of risk assessed balances that are needed to meet unforeseen expenditure arising in the year and expenses arising before income is received.

The HRA also has an earmarked reserve for the repayment of debt which is estimated to be £17.2Million as at 1st April 2025 and £16.7Million as at 1 April 2026.

It is estimated that the Council will have General Fund £33,684 capital receipts and £1.408Million regeneration ring fenced receipts and nil capital reserves as at 1st April 2026 and the Council has a need to borrow in 2025/26 £32.784Million including £14.335Million for the HRA.

In assessing the adequacy of the council's reserves, the robustness of its Budgetary Process and Systems of Internal Control, the assumptions and uncertainties discussed in the Budget report, and the levels of special provision have been considered.

In coming to a view on the adequacy of reserves, risks in the area of litigation, business continuity, civil emergency, failure of information systems, budgetary control and interest rate calculations have been considered in terms of the possible maximum financial impact and their probability of occurrence. Ongoing assessment of the financial risks to the council, its budget and MTFS, are embedded as part of the Council's overall Corporate Risk Management processes. On this basis, the Strategic Director (S151) considers the level of general balances to be adequate for the 2025/26 financial year.

### **3 SPECIFIC RESERVES**

As part of the budget preparation process, the current and projected levels of the Council's ringfenced reserves have been considered. Following this review, the Strategic Director (S151) confirms these reserves are £9,420,450 for the General Fund as at 1 April 2025 and £9,439,073 as at 1 April 2026 and continue to be required, (see also paragraph 4.10.4 of the main report for the individual reserve balances and need).

### **4. STATEMENT OF ACCOUNTS**

At the time of publishing this report the Council's last set of published and audited accounts were for the financial year 2022/23 and officers are finalising with the council's auditors Azets the 2023/24 accounts.

Supported by the Financial Reporting Council, The Ministry for Housing Communities and local government (MHCLG) set a backstop date of 13 December 2024 for Local Authorities to publish their audited financial accounts for all financial years up to and including 2022/23. This approach is anticipated to enable Local Authorities and auditors to focus on the most recent year of accounts as quickly as possible and the Council complied with this.

A backstop for 2023/24 audits has been set as 28 February 2025. Backstop dates will also be set for the subsequent four years, with 2027/28 audits expected to be completed by 30 November 2028. Auditors will issue a "disclaimed" or "modified" audit opinion where they are not able to complete audits and for SBC this was for the 2021/22-2022/23 accounts and in all likelihood the 2023/24 accounts. However, the Council has strong financial management and the CFO is confident in the position presented within Budget report.





# Appendix E EQIA Council Tax Increase



Council Tax Increase

## Equality Impact Assessment (EqIA) Form

December 2024

<b>Date created</b>	December 2024
<b>Approved by</b>	Cabinet/SLT
<b>Owner</b>	Clare Fletcher, Strategic Director
<b>Version</b>	1.0
<b>Author</b>	Brian Moldon – Assistant Director of Finance
<b>Business Unit and Team</b>	Finance

Please [click this link](#) to find the EqIA guidance toolkit for support in completing the following form.

For translations, braille or large print versions of this document please email [equalities@stevenage.gov.uk](mailto:equalities@stevenage.gov.uk).

**First things first:**

**Does this policy, project, service, or other decision need an EqlA?**

<b>Title:</b>	<b>Council Tax Increase</b>	
<b>Please answer Yes or No to the following questions:</b>		
Does it affect staff, service users or the wider community?		Yes
Has it been identified as being important to particular groups of people?		Yes
Does it or could it potentially affect different groups of people differently (unequal)?		Yes
Does it relate to an area where there are known inequalities or exclusion issues?		No
Will it have an impact on how other organisations operate?		No
Is there potential for it to cause controversy or affect the council's reputation as a public service provider?		No

<b>Where a positive impact is likely, will this help to:</b>	
Remove discrimination and harassment?	No
Promote equal opportunities?	No
Encourage good relations?	No

**If you answered 'Yes' to one or more of the above questions you should carry out an EqlA.**

Or if you answered 'No' to all of the questions and decide that your activity doesn't need an EqlA you must explain below why it has no relevance to equality and diversity.

You should reference the information you used to support your decision below and seek approval from your Assistant Director before confirming this by sending this page to [equalities@stevenage.gov.uk](mailto:equalities@stevenage.gov.uk).

I determine that no EqlA is needed to inform the decision on the Council Tax increase for 2025/26.

Name of assessor:

Decision approved by:

Role:

Role:

Date:

Date:

# Equality Impact Assessment Form Appendix C

For a policy, project, strategy, staff or service change, or other decision that is new, changing or under review

<b>What is being assessed?</b>		<b>Council Tax Increase</b>			
Lead Assessor	Brian Moldon			Assessment team	Revenues and Benefits
Start date	01/04/2025	End date	31/03/2026		Finance
When will the EqIA be reviewed? (Typically every 2 years)		01/01/26			

Page 67

Who may be affected by the proposed project?	Residents of the borough								
What are the key aims of the proposed project?	<p>To increase Council Tax in 2025/26 by a total 2.99%, this equates to increase of £7.15 to £246.41 for a band D property.</p> <p>Whilst it is recognised that any Council Tax increase will have a negative impact on Council Taxpayers, this is justified as the increases in Council Tax are considered necessary to mitigate against the impact of reductions in central government funding to enable the Council to achieve its' overall savings targets and provision of services and set a balanced budget as required.</p> <p>When Government determines the funding available to each Council as part of the settlement, it presumes that councils will increase up to the maximum allowed. For Stevenage it is 2.99% for 2025/26.</p> <p>It should be noted that majority of residents are in bands C and below and the increase in those properties are as follows:</p>								
		Band A	Band B	Band C	Band D	Band E	Band F	Band G	Band H

	Number of Households	1,703	6,888	21,753	3,369	3,261	981	434	16
	SBC 2024/25 Council Tax	£159.51	£186.09	£212.68	£239.26	£292.43	£346.60	£398.77	£478.52
	SBC Proposed 25/26 Council Tax	£164.27	£191.65	£219.03	£246.41	£301.17	£356.93	£410.68	£492.82
	Increase	£4.76	£5.56	£6.35	£7.15	£8.74	£10.33	£11.91	£14.30

For residents not in receipt of Council Tax Support, they will be liable to pay the full amount of the proposed increase. Resident is full receipts of CTS will only pay a maximum of 8.5% of their Council Tax.

What <b>positive measures</b> are in place (if any) to help <b>fulfil our legislative duties</b> to:				
Remove discrimination & harassment		Promote equal opportunities	The Council has agreed a Council Tax Support Scheme (November 2024 Cabinet) where elderly CTS claimants are protected in law and their wards will always be based on 100% of the council tax charge. Working Age claimants will be based on 91.5% of their council tax liability.	Encourage good relations

			Stevenage also has an exceptional hardship scheme available.		
--	--	--	--	--	--

What sources of data / information are you using to inform your assessment?	<p>Council Tax system (CTB1 form)</p> <p>Financial Settlement confirming the referendum limits for SBC below 3%</p> <p>Herts-Insight data</p> <p>Council Tax Support Scheme</p>
---	---

In assessing the potential impact on people, are there any overall comments that you would like to make?	
--	--

# Evidence and Impact Assessment

Explain the potential impact and opportunities it could have for people in terms of the following characteristics, where applicable:

## Age

Positive impact		Negative impact	Residents may be experiencing exceptional economic hardship as well as increases in energy, food and fuel costs. This may have a greater impact on older people and disabled people, who may have additional needs for heating and to run particular equipment, and may also have lower income / be reliant on pensions and/or benefits.	Unequal impact	The increase is applied to all properties; it is not possible to exempt any particular groups. Residents who are living in single occupancy will receive 25% discount, and elderly residents entitled to Council Tax Support will receive 100% discount, whilst working age entitled to Council Tax Support will receive discount up to 91.5%.
-----------------	--	-----------------	--	----------------	--

Please evidence the data and information you used to support this assessment	This affects all adults that live within the Borough. There is support available through the Councils CTS scheme and the discretionary hardship fund. The Council are continuing to provide the current CTS scheme at a maximum 8.5% for working age person and up to 100% for older persons. Council Tax payment options, such as 12 monthly and 44 weekly instalments in a year via direct debit and standing order are offered at the billing stage. The availability of the Discretionary Council Tax Hardship fund is promoted through Council Tax Support notification letters, in Council Tax reminder and final notices, on the Council's website. Applications for assistance from other
--	---

discretionary schemes such as Discretionary Housing Payment and where appropriate assistance is awarded under the Discretionary Council Tax Hardship fund as well.

Stevenage has an estimated total population of 90,146 at mid-2023. It has a lower proportion of elderly people compared to the national average and Hertfordshire as a whole.

	Stevenage	Hertfordshire	England
Aged under 16	18,413 (20.5%)	20%	18.5%
Aged 16 to 64	57,731 (64%)	62.6%	62.9%
Aged 65 and over	14,002 (15.5%)	17.4%	18.7%

CTS data as at December 2024 and 2023

	2024		2023	
	Numbers	Percentage	Numbers	Percentage
Working Age	4,141	54.1%	4,663	56.9%
Elderly	3,517	45.9%	3,537	43.1%
Total	7,658	100%	8,200	100%

What opportunities are there to promote equality and inclusion?

What do you still need to find out? Include in actions (last page)

<b>Disability e.g., physical impairment, mental ill health, learning difficulties, long-standing illness</b>					
Positive impact		Negative impact		Unequal impact	The increase is applied to all properties; it is not possible to exempt any particular groups.
Please evidence the data and information you used to support this assessment	<p>In terms of Council Tax Support, disabled households are those where a disability related welfare benefit is in payment. We recognise that people with disabilities are historically disadvantaged and face greater barriers when accessing information about services and therefore consider disabled households to be more vulnerable than other households.</p> <p>Within the 2021 Census data, 15,468 (or 17.3%) residents assessed themselves as disabled under the Equalities Act 2010.</p> <p>The Council are continuing to provide the current CTS scheme therefore, there are no additional adverse impacts on this protected group resulting from these proposals.</p>				
What opportunities are there to promote equality and inclusion?			What do you still need to find out? Include in actions (last page)		

<b>Gender Reassignment</b>					
Positive impact		Negative impact		Unequal impact	✓
Please evidence the data and information you used to support this assessment	<p>There is no evidence to suggest any specific impacts on residents within any of these protected characteristic groups.</p> <p>The increase is applied to all properties; it is not possible to exempt any particular groups.</p>				



What opportunities are there to promote equality and inclusion?		What do you still need to find out? Include in actions (last page)	
---	--	--	--

**Marriage or Civil Partnership**

Positive impact		Negative impact		Unequal impact	✓
Please evidence the data and information you used to support this assessment	<p>There is no evidence to suggest any specific impacts on residents within any of these protected characteristic groups.</p> <p>The increase is applied to all properties; it is not possible to exempt any particular groups.</p>				
What opportunities are there to promote equality and inclusion?			What do you still need to find out? Include in actions (last page)		

Page 73

**Pregnancy & Maternity**

Positive impact		Negative impact		Unequal impact	✓
Please evidence the data and information you used to support this assessment	<p>There is no evidence to suggest any specific impacts on residents within any of these protected characteristic groups.</p> <p>The increase is applied to all properties; it is not possible to exempt any particular groups.</p>				
What opportunities are there to promote equality and inclusion?			What do you still need to find out? Include in actions (last page)		

### Race

Positive impact		Negative impact		Unequal impact	✓
Please evidence the data and information you used to support this assessment	<p>There is no evidence to suggest any specific impacts on residents within any of these protected characteristic groups.</p> <p>The increase is applied to all properties; it is not possible to exempt any particular groups.</p>				
What opportunities are there to promote equality and inclusion?			What do you still need to find out? Include in actions (last page)		

### Religion or Belief

Positive impact		Negative impact		Unequal impact	✓
Please evidence the data and information you used to support this assessment	<p>There is no evidence to suggest any specific impacts on residents within any of these protected characteristic groups.</p> <p>The increase is applied to all properties; it is not possible to exempt any particular groups.</p>				
What opportunities are there to promote equality and inclusion?			What do you still need to find out? Include in actions (last page)		

### Sex

Positive impact		Negative impact		Unequal impact	✓
Please evidence the data and information	<p>There is no evidence to suggest any specific impacts on residents within any of these protected characteristic groups.</p>				

you used to support this assessment	The increase is applied to all properties; it is not possible to exempt any particular groups.		
What opportunities are there to promote equality and inclusion?		What do you still need to find out? Include in actions (last page)	

<b>Sexual Orientation e.g., straight, lesbian / gay, bisexual</b>					
Positive impact		Negative impact		Unequal impact	✓
Please evidence the data and information you used to support this assessment	<p>There is no evidence to suggest any specific impacts on residents within any of these protected characteristic groups.</p> <p>The increase is applied to all properties; it is not possible to exempt any particular groups.</p>				
What opportunities are there to promote equality and inclusion?		What do you still need to find out? Include in actions (last page)			

**Socio-economic<sup>1</sup>**

**e.g., low income, unemployed, homelessness, caring responsibilities, access to internet, public transport users, social value in procurement**

Positive impact		Negative impact	Council Tax increase could negatively affect residents in a lower socio-economic standing as they will have a financial challenge.	Unequal impact	
-----------------	--	-----------------	--	----------------	--

Please evidence the data and information you used to support this assessment

Using the Herts Insight data, it shows Stevenage is ranked 117 most deprived lower tier authorities out of 317 from the 2019 data, the previous data from 2015, had Stevenage at 137. There is limited data held to break this down further.

What opportunities are there to promote equality and inclusion?	Identify and support those who are struggling utilising various support streams, the main one being Council Tax Support (CTS) where currently there are 4,141 working age and 3,517 elderly claimants receiving CTS. CTS scheme is a variable scheme based on each person's individual circumstances which is then used to assess their level of entitlement. On top of this, the Council operates an	What do you still need to find out? Include in actions (last page)	
---	---	--	--

<sup>1</sup>Although non-statutory, the council has chosen to implement the Socio-Economic Duty and so decision-makers should use their discretion to consider the impact on people with a socio-economic disadvantage.

	Exceptional Hardship Scheme for short time emergency fund.		
--	--	--	--

<b>Additional Considerations</b>					
<b>Please outline any other potential impact on people in any other contexts</b>					
Positive impact		Negative impact		Unequal impact	
Please evidence the data and information you used to support this assessment					
What opportunities are there to promote equality and inclusion?			What do you still need to find out? Include in actions (last page)		

Page 77

## Consultation Findings

Document any feedback gained from the following groups of people:

Staff?			
Voluntary & community sector?			
Other stakeholders?			

## Overall Conclusion & Future Activity

Explain the <b>overall findings</b> of the assessment and <b>reasons for outcome (please choose one)</b> :	
1. No inequality, inclusion issues or opportunities to further improve have been identified	
Negative / unequal impact, barriers to inclusion or improvement opportunities identified	2a. Adjustments made
	2b. Continue as planned
	2c. Stop and remove

Page 78

Detail the <b>actions that are needed</b> as a result of this assessment and how they will help to <b>remove discrimination &amp; harassment, promote equal opportunities</b> and / or <b>encourage good relations</b> :				
Action	Will this help to remove, promote and / or encourage?	Responsible officer	Deadline	How will this be embedded as business as usual?
Monitor through the monthly reports to establish the impact of the council tax increase and the challenges relating to affordability and provide residents with support accordingly.	Promote the support that the Council offers through the Council Tax Support Scheme and Exceptional Hardship Scheme.	Revenues and Benefits staff	Ongoing	Current practice is to ensure staff continue to support residents who are struggling to make payment either through considering the schemes available or through providing payment plans

**Approved by Assistant Director:** Brian Moldon

**Date:** 14.01.25

Please send this EqIA to [equalities@stevenage.gov.uk](mailto:equalities@stevenage.gov.uk) for critical friend feedback and for final submittance with the associated project.

**STEVENAGE BOROUGH COUNCIL**

**Wednesday 12 February 2025**

**COUNCIL TAX RESOLUTION**

**SETTING THE AMOUNT OF COUNCIL TAX FOR THE COUNCIL'S AREA**

1. That the following be approved:
  - a. the revised working revenue estimates for the year 2024/25 amounting to £12,251,910 and the revenue estimates for 2025/26 amounting to £10,753,540;
  - b. the contribution to balances totalling £596,801 in 2024/25;
  - c. the contribution to balances totalling £6,053 in 2025/26.
2. That it be noted that at its meeting on 11 December 2024 the Cabinet calculated the amount of 28,571.8 Band D equivalent properties as its council tax base for the year 2025/26 in accordance with Regulation 3 of the Local Authorities (Calculation of Council Tax Base) Regulations 1992 made under Section 31B of the Local Government Finance Act 1992 as amended by Section 74 of the Localism Act 2011.
3. That the following amounts be calculated by the Council for the year 2025/26 in accordance with Sections 31 to 36 of the Local Government Finance Act 1992 as amended by Section 74 of the Localism Act 2011:
  - a. £90,151,990 Being the aggregate of the amounts which the Council estimates for the items set out in Section 31A(2)(a) to (f) of the Act, less the aggregate of the amounts which the Council estimates for the items set out in Section 31A(3)(a) to (d)
  - b. £83,111,480 Being the aggregate of the amounts which the Council estimates for the items set out in Section 31A(3)(a) to (d) of the Act.
  - c. £7,040,510 Being the amount by which the aggregate at 3a above exceeds the aggregate at 3b above, calculated by the Council in accordance with Section 31A(4) of the Act as its Council Tax requirement for the year.
  - d. £246.41 Being the amount at 3c divided by the amount at 2 above, calculated by the Council, in accordance with Section 31B (1) of the Act, as the basic amount of its council tax for the year
  - e. Valuation Bands

A	£ 164.27
B	£ 191.65

C	£ 219.03
D	£ 246.41
E	£ 301.17
F	£ 355.93
G	£ 410.68
H	£ 492.82

Being the amounts given by multiplying the amount at 3d. above by the number which, in the proportion set out in Section 5(1) of the Act, is applicable to dwellings listed in a particular valuation band divided by the number which in that proportion is applicable to dwellings listed in valuation D, calculated by the Council, in accordance with Section 36(1) of the Act, as the amounts to be taken into account for the year in respect of categories of dwellings listed in different valuation bands.

4. a. That it be noted that for the year 2025/26 Hertfordshire County Council have stated the following amounts in precepts issued to the Council, in accordance with Section 40 of the Local Government Finance Act 1992, for each of the categories of the dwellings shown below:

Valuation Bands

	Basic Amount of Council Tax	Adult Social Care Charge	2025/26 Council Tax
A	£995.18	£184.73	£1,179.91
B	£1,161.04	£215.52	£1,376.56
C	£1,326.91	£246.31	£1,573.22
D	£1,492.77	£277.10	£1,769.87
E	£1,824.50	£338.68	£2,163.18
F	£2,156.22	£400.26	£2,556.48
G	£2,487.95	£461.83	£2,949.78
H	£2,985.54	£554.20	£3,539.74

- b. That it be noted that for the year 2025/26 Hertfordshire Police Authority have stated the following amounts in precepts issued to the Council, in accordance with Section 40 of the Local Government Finance Act 1992 and amended by Section 27 of the Police and Magistrates' Court Act 1994, for each of the categories of the dwellings shown below:



Valuation Bands

A	£ 176.67
B	£ 206.11
C	£ 235.56
D	£ 265.00
E	£ 323.89
F	£ 382.78
G	£ 441.67
H	£ 530.00

5. That, having calculated the aggregate in each case of the amounts at 3e. and 4a. and b. above, the Council in accordance with Section 30(2) of the Local Government Finance Act 1992, hereby sets the following amounts as the amounts for council tax for the year 2025/26 for each of the categories of dwellings shown below:

Valuation Bands

A	£1,520.85
B	£1,774.32
C	£2,027.81
D	£2,281.28
E	£2,788.24
F	£3,295.19
G	£3,802.13
H	£4,562.56

6. To determine in accordance with Section 52ZB Local Government Finance Act 1992 that the Council's basic amount of Council Tax for 2025/26 is not excessive in accordance with principles approved by the Secretary of State under Section 52ZC having calculated the aggregate in each case of the amounts at 3e.

This page is intentionally left blank

**Meeting** CABINET / COUNCIL  
**Portfolio Area** Resources and Transformation  
**Date** 12 February 2025/26 February 2025



## FINAL CAPITAL STRATEGY 2024/25-2028/29

### KEY DECISION

**Authors** Rhona Bellis  
**Contributors** Gavin Allen / Reenu Keogh / Senior Leadership Team  
**Lead Officers** Brian Moldon  
**Contact Officer** Clare Fletcher

### 1. PURPOSE

- 1.1 To approve revisions to the 2024/25 General Fund (GF) and Housing Revenue Account (HRA) Capital Programme and Strategy and approve the Capital Programme for 2025/26.
- 1.2. To provide Members with an update on the Council's draft Five-Year Capital Strategy and the resources available to fund the Capital Strategy.
- 1.3. To provide Members with an update on the Council's investment strategy as required by the updated prudential code.
- 1.4. To set out the Council's approach to funding its key priorities.
- 1.5. To update Members on the work of the Council's Financial Security Group (CFSG) in reviewing all General Fund capital bids prior to inclusion in the final 2025/26 Capital Strategy to the February 2025 Cabinet.

### 2. RECOMMENDATIONS

That the following proposals be recommended to Council on 26 February 2025:

- 2.1. Final General Fund Capital Budget for 2025/26 of £52Million, as set out in Appendix C to the report, be approved.
- 2.2. Revisions to the 2024/25 General Fund Capital Budget for 2024/25 of £244k, as set out in Appendix C to the report, be approved.

- 2.3. Final HRA Capital Budget for 2025/26 of £51.4Million, as set out in Appendix B to the report, be approved.
- 2.4. Forecast of resources and approach to resourcing the capital programme as outlined in the report (General fund Paragraph 4.4 and HRA paragraph 4.10) be approved.
- 2.5. Final General Fund growth bids identified for inclusion in the Capital Strategy (paragraph **Error! Reference source not found.**, and Appendix A to the report) be approved.
- 2.6. To enable the use of Community infrastructure levy of up to £5Million, to fund future infrastructure projects as outlined in paragraph 4.6.3. be approved.
- 2.7. The approved capital de-minimis expenditure limit of £10,000 be noted.
- 2.8. The approved revenue surplus in any year of up to £500K that can be allocated to the capital reserve to support capital expenditure be noted.
- 2.9. That the comments from Council Financial Security Group set out in section 4.14 are noted.

### **3. BACKGROUND**

#### **3.1. Introduction**

- 3.1.1. This report is an update on the Council's Draft Capital Strategy 2024/25-2028/29 presented to the January 2025 Cabinet meeting. Changes since that meeting can be found in section 4.2.4.
- 3.1.2. The purpose of the Capital Strategy is to outline how the Council determines its priorities for capital investment and how much it can afford to borrow as well as setting out any associated risks. The Council's Financial Security Group (CFSG) and the Senior Leadership Team reviewed the capital bids for 2024/25 contained within the Capital Strategy in November /December 2024 and the results of that review are included in this report.
- 3.1.3. The framework the government uses to control how much councils can afford to spend on capital investment is known as the Prudential Framework. The objectives of the Prudential Code, which sets out how this framework is to be applied, are to ensure that local authorities' capital investment plans are:
  - affordable, prudent, and sustainable and that:
  - treasury management decisions are taken in accordance with good professional practice;
  - local strategic planning, asset management planning and proper option appraisal are supported.
- 3.1.4. The Government issued guidance on the disclosures required in the Capital Strategy from 1 April 2018 onwards which includes:
  - an Investment Strategy;
  - disclosure of other investments and their contribution to service delivery objectives and/or place making role;
  - indicators that allow Members and the public to assess a local authority's total risk exposure as a result of investment decisions, including how these

investments have been funded, rate of return and additional debt servicing costs taken on;

- the approach to assessing the risk of losses being made before entering and whilst holding an investment; and
- the steps taken to ensure that elected Members and Statutory officers have the appropriate skills and governance.

3.1.5. Some of these disclosures may be outlined in the Treasury Management Strategy instead of the Capital Strategy.

## **3.2 General Fund Investment Strategy**

3.2.1 For a number of years capital spend has been prioritised due to the limited availability of capital receipts and the Council's ability to afford borrowing costs. Accordingly, the council applied a 'fix on fail' approach to assets with no significant asset improvements being funded, with the exception of those supported through external funding or partially through external funding (for example Garage Improvement Programme). This approach cannot be sustained in the medium to long term as it will lead to a gradual degradation of the Council's assets with reactive works only being undertaken to keep sites wind and water tight. Sustaining such an approach in the medium term will inevitably lead to close of buildings even before consideration is given to the legal requirements in terms of Energy Performance Certificate (EPC's) and other legal and climate change requirements.

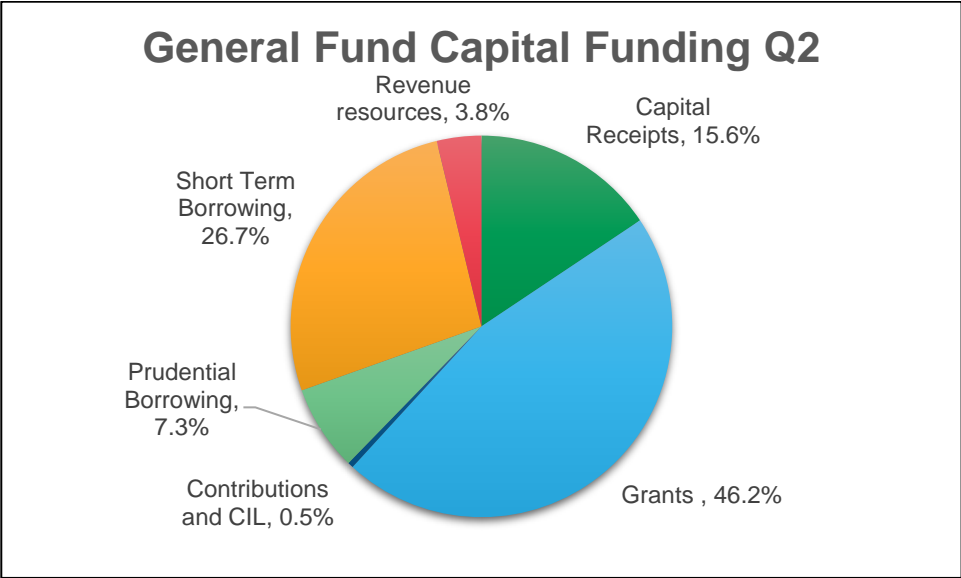
3.2.2 To address the issues above, The General Fund Capital Strategy Overview - Priorities versus Funding Requirement 2023/24-2029/30 report to Executive 15 November 2023 set out the Councils key capital regeneration and community asset ambitions and key land and asset disposals, to determine a funding strategy to meet corporate objectives and address the issues outlined above.

3.2.3 The following priority schemes / activities require a funding strategy:

- Regeneration SG1- Public Sector Hub, Leisure Centre and Theatre
- Climate Change - green fleet, buildings (operational, community and commercial)
- Towns fund programme where match funding is required
- Operational need investment in Community Assets
- Response to Legislative changes e.g. waste and recycling
- Protection of key income streams to ensure the financial resilience of the General Fund

3.2.4 The high level assessment in the report of potential value of capital receipts that could be realised by SBC is £44Million which is significantly less than the need identified of £127Million. This means that even if all approved receipts were delivered there will still be a requirement to find alternative funding strategies or third-party funding to meet the gap. The total high level investment requirement and total receipt realisation are currently excluded from the Capital Strategy but will come forward in future reiterations of the programme.

- 3.2.5 The limited funding available compared to the identified current need means that in the main priority schemes will need to provide a significant element of self-funding through providing land development opportunities.
- 3.2.6 The current years capital programme (approved February 2024 and as subsequently amended through the quarterly monitoring and supplementary reports), is fully funded, and shown in the chart below which reflects the quarter two monitoring report to the November 2024 Cabinet.



- 3.2.7 Grants includes £27.5Million Towns Fund Grant from an overall allocation of £37.5Million which is fully allocated to specific regeneration projects. Funding is received in stages as relevant projects proceed.
- 3.2.8 Short term borrowing is used to bridge funding gaps and is generally “repaid” from capital receipts in the following years.
- 3.2.9 Prudential Borrowing remains an option to fund capital schemes. Due to the on-going net cost to the General Fund, any such proposal requires a business case to be completed to determine affordability and benefit to the Council. This approach may be used to fund income generating schemes which support the Councils Priorities.

**3.3 Housing Revenue Account (HRA) Investment Strategy**

- 3.3.1 The HRA is a legally ring-fenced account and the HRA Medium Term Financial Strategy (MTFS), approved by Cabinet on 13 November 2024, covers both revenue and capital expenditure as they are intrinsically linked – capital investment supporting the provision of services over the course of the plan. Further details can be found in the Housing Revenue Account (HRA) – Final Budget and Rent Setting 2025/26 (Cabinet 15 January 2025 / Council 22 January 2025).
- 3.3.2 Funding for HRA capital projects comes from a variety of sources and preference is given to using restricted or third part funding ahead of more flexible funding, to ensure that funding conditions are met and optimised. These include right to buy receipts, S20 receipts, grants and developer contributions.

### 3.4 Budget and Policy Framework

3.4.1 The process for approving capital budgets is set out in the Budget and Policy Framework in the Constitution. This includes a consultation period and the timescale required to implement this is outlined below:

Table 1		
Date	Meeting	Report
Jan-25	Cabinet	Draft 2024/25 - 2028/29 Capital Strategy (GF and HRA)
	Overview and Scrutiny	Draft 2024/25 - 2028/29 Capital Strategy (GF and HRA)
Feb-25	Cabinet	Final 2024/25 – 2028/29 Capital Strategy (GF and HRA)
	Overview and Scrutiny	Final 2024/25 – 2028/29 Capital Strategy (GF and HRA)
Feb-25	Special Council	Final 2024/25 – 2028/29 Capital Strategy (GF and HRA)

3.4.2 This is the second time the Capital Strategy 2024/25-2028/29 has been considered by Cabinet and Scrutiny.

## 4. REASONS FOR RECOMMENDED COURSE OF ACTION AND OTHER OPTIONS

### 4.1 Capital Programme – General Fund

4.1.1. The ongoing financial pressures as set out section 3 of this report resulted in only the most urgent bids or those supporting the delivery of a top priority being included in the list of capital growth for consideration by members.

4.1.2. Budgets in the Capital Strategy are reviewed quarterly to ensure that they remain relevant and deliverable. There have been no significant changes to the phasing of the existing Capital Strategy presented to members at Q2 (November 2024).

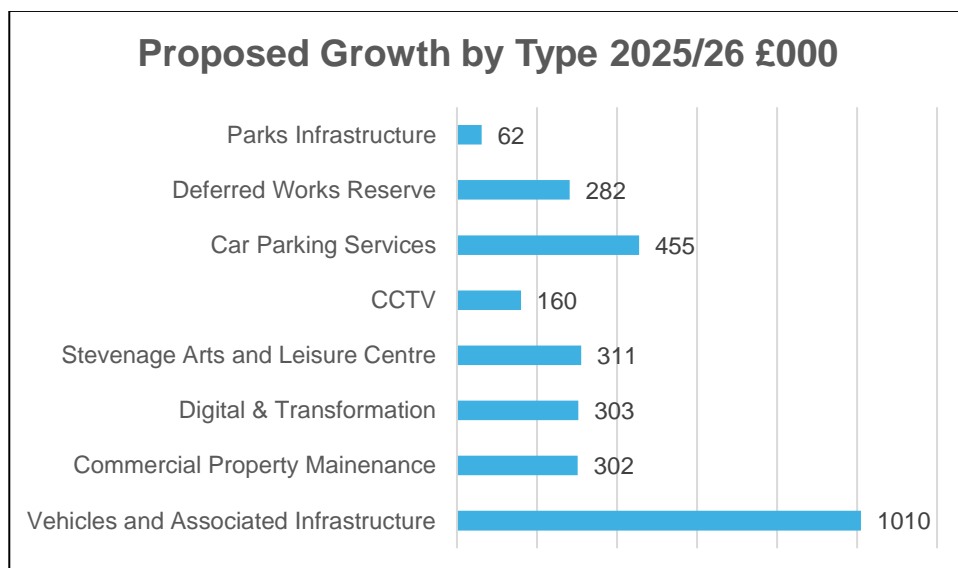
### 4.2. Proposed Capital Bids 2025/26

4.2.1. The capital growth bids received and recommended for inclusion in the Capital Strategy by Council’s Financial Security Group (CFSG) and the Council’s Senior Leadership (SLT) have been prioritised, as set out in the table below (details in Appendix A). These bids total £2.6Million for 2025/26. Additional bids for future years will be considered as part of the 2026/27 budget setting process.

Table 2 Proposed General Fund Growth 2025/26		
		£000
Priority 2	Income generating	10
Priority 3	Mandatory requirements (including Health & Safety)	449

<b>Table 2 Proposed General Fund Growth 2025/26</b>		
		<b>£000</b>
Priority 4	Schemes to maintain operational efficiency	2,131
Priority 8	Schemes that further the Council's Corporate Plans	12
	Deferred Works reserve	282
<b>Total General Fund Capital Growth Bids</b>		<b>2,884</b>
<b>Funding Proposal</b>		
General Capital Receipts		1,406
Locality Review Receipts		854
Forum Receipts to Fund Proposed Growth Items		455
Capital Reserve		169
<b>Total Funding Proposed</b>		<b>2,884</b>

- 4.2.2. Total funding identified for future years capital growth amounted to £2.884Million. The proposed bids for consideration above amount to £2.602Million. Members are asked to approve an increase in the deferred works reserve budget in 2025/26 of £282K reflecting this excess funding, to add capacity to the capital program in case any deferred bids become urgent.
- 4.2.3. The proposed growth can be split into service areas as illustrated in the graph below.



#### 4.2.4. Changes since the Draft Capital Strategy Report

- 4.2.4.1. Since the Draft Capital Strategy Report went to Cabinet 15 January 2025, the following budgets have been added to the Final Capital Strategy. These have previously been to members to agree in principal.



- 4.2.4.2. There are a number of significant growth projects that directly contribute to the headline priorities of the Making Stevenage Even Better Corporate Plan. They represent the council's strategic ambitions across key delivery areas and are tied into the strategic milestones of the 2024/25 Corporate Performance Suite. The below projects represent significant capital expenditure, across several key areas including: Balancing the Budget and Building New & Sustainable Homes:
- 4.2.4.3. Garages improvements budget £7Million – this budget is to enable to the delivery of the Garages Asset Management Strategy and is linked into the council's ambitious Commercialisation programme which is a key component of the Balancing the Budget pillar of the Corporate Plan. This includes ongoing (£250K per annum for 10 years) and one-off garages capital works (£4.5Million) to be delivered over seven to ten years from 2025/26. Funding will come from existing budgets £150K, freeholder contributions £150K, garage sales £2.25Million, revenue contributions £617K and the balance from prudential borrowing. Full details can be found in the Garages Asset Management Report (Cabinet 15 January 2025).
- 4.2.4.4. Indoor Market space reconfiguration £4.1Million - the Council has consulted on moving the indoor market to Park Place and the re-letting the existing space. The works are estimated to cost a total of £4.1Million, funded by £2Million of town fund grant, agreed by Stevenage Development Board and a further £2.1Million of prudential borrowing to be funded from rental income once a tenant is secured, expenditure will be incurred once the tenant is contracted (Cabinet June 2024).
- 4.2.4.5. Park Place fit out £1.7Million - capital costs relating to the fitting out of accommodation at Park Place in Stevenage where the indoor market will be relocated are currently being negotiated. The most recent estimate is between £1.6Million and £1.7Million including costs relating to the safe management of food within the space. Spend is expected to fall into 2024/25 and 2025/26. Funding will come from Towns Fund - £600K, Capital Receipts £378K, deferred works reserve £450k and ring fenced capital receipts ~ £250k (Cabinet June 2024). The capital programme will be updated to reflect this once approved.
- 4.2.4.6. Ongoing discussions have been taking place with Homes England regarding grant funding for the new community infrastructure at The Oval redevelopment. . The Oval scheme is a key delivery element of the Building New & Sustainable Homes priority area, with the grant funding also contributing to the council's Thriving Neighbourhoods ambitions.
- 4.2.4.7. In January 2025, Homes England confirmed that this was being recommended for approval. A final decision on funding is expected in February 2025, with the current proposal being that the £9Million provision made within the GF capital budget to complete these works being fully funded by Homes England grant. A subsequent report will be taken to Cabinet following the outcome of the grant request to appoint contractors to make any required amendments to the budget and any appointments to deliver the works at the site. Any funding allocation would be time limited with spend needing to be completed by March 2026. Members are asked to approve the addition of £9Million to the capital programme in 2024/25 for this fully funded grant funded project.
- 4.2.4.8. The Oval redevelopment will see significant change at the largest retail setting outside of the main town centre facilities. Following extensive consultation with over 7,000 responses to surveys, Planning permission for the new scheme was

granted in July 2024. The new development will see the delivery of a new community centre and church, as well as the introduction of new play facilities which will better meet the needs of the existing community. There will also be the construction of new retail including the provision of an anchor retail store which will further encourage footfall at the site. Alongside this, the proposals will see the construction of 300 new homes, including the delivery of 91 new independent living accommodation in the first phase of delivery which will be located on the former Hobbs Court site.

4.2.4.9. Revised drawdown forecasts received from MACE have been applied to re-phase the SG1 joint venture costs across 2024/25 to 2026/27 resulting in re-phase of £1.2Million of budget from 2024/25 into 2025/26.

4.2.4.10. Re-phasing of £2.5Million from 2025/26 to 2026/27 in relation to housing investment delivered through the wholly owned housing development company as options are reviewed by officers. These will come forward at a future date.

4.2.4.11. These items add an additional £17.1Million to the Capital programme - in 2024/25 £(244)K, 2025/26 £14.7Million and 2026/27 £2.6Million.

### **4.3. Revised Summary Capital Programme including Proposed Growth**

4.3.1. The revised Capital Strategy for 2024/25 - 2026/27 totals £82.6Million which includes the proposed growth bids of £2.9Million and those projects identified in section 4.2.4. This is summarised by service in the table below, and in detail in Appendix C.

**Table 3: Revised Capital Programme including proposed growth by Service**

	24/25 £000	25/26 £000	26/27 £000	Total £000
Stevenage Direct Services	4,917	6,354	250	11,521
Housing Development	1,939	16,203	2,874	21,016
Finance and Estates	2,737	557	0	3,294
Digital & Transformation	379	303	0	682
Regeneration	13,869	27,077	1,336	42,282
Communities and Neighbourhoods	1,095	492	0	1,587
Planning and Regulatory	953	553	0	1,506
Deferred Works Reserve	387	282	0	669
<b>Total GF Schemes</b>	<b>26,276</b>	<b>51,821</b>	<b>4,460</b>	<b>82,557</b>
<b>Garage Improvement Plan (GIP) £250,000 budget annually from 2027/28-2034/35 – Total £2Million</b>				

- 4.3.2. Excluding the GIP, there are no other current capital projects phased for delivery after March 2027. Capital investment will be required over the medium to long term to support service delivery and a review of the high level investment need, will be refreshed in a future capital update. These bids come forward annually for consideration (e.g., Fleet replacement). The funding of the medium to long term capital strategy is considered in the section 3.2.
- 4.3.3. The Deferred Works Reserve, after the inclusion of growth above, will have a budget of £387K in 2024/25 and a further £282K in 2025/26 giving a total of £669K. This budget is for any health & safety emergency works that may arise after the budgets are agreed at Council in February.
- 4.4. Capital Resources for the Revised General Fund Capital Strategy, including proposed Growth**
- 4.4.1. The projected resources used to fund the Capital Strategy are summarised in the table below.

**Table 4: Revised Capital Programme Resourcing including Proposed Growth**

	24/25 £'000	25/26 £'000	26/27 £'000	Total £'000	Total %
Capital Receipts including Locality Review Receipts	8,037	3,676	674	12,387	15%
Grants and other contributions	9,138	27,957	1,336	38,431	47%
Revenue Reserves	550	617	0	1,167	1%
Capital Reserve	496	569	0	1,065	1%

**Table 4: Revised Capital Programme Resourcing including Proposed Growth**

	24/25 £'000	25/26 £'000	26/27 £'000	Total £'000	Total %
CIL	208	98	0	306	<1%
Forum Receipts	378	455	0	833	1%
New Homes Bonus CNM	243	0	0	243	<1%
Borrowing	7,226	18,449	2,450	28,125	34%
<b>TOTAL</b>	<b>26,276</b>	<b>51,821</b>	<b>4,460</b>	<b>82,557</b>	<b>100%</b>
<b>Garage Improvement Plan (GIP) £250,000 budget annually from 2027/28-2034/2035 – Total £2Million to be funded from future Garage Sales.</b>					

4.4.2. The total borrowing recommended of £28Million includes £19.8Million of short term borrowing for SG1 Joint Venture and Housing Development schemes which is scheduled to be repaid in 2026/27 and 2027/28, using capital receipts profiled to be received in that year. The remaining balance is prudential borrowing for Garage Improvements and Housing Development schemes including through the Wholly Owned Company (WOC). The borrowing is repaid through a minimum revenue contribution (MRP) from the General Fund (see also section 4.7).

4.4.3. The use of capital receipts is dependent on delivery of the disposal sites to the market. The forecast below includes both General Capital Receipts and Locality Review Receipts as they are available for use in the Capital Programme. Ring-fenced Town Centre Transformation and SG1 receipts are restricted.

#### 4.5. Capital Receipts Review Update

4.5.1. The current position is detailed below and shows an overall reduction in forecast receipts up to 2026/27 of £216K. This is a site previously due to be sold, now being held for strategic review. The current and future economic climate impacts on asset sales. Forecasts are based on best information available at the time the report is written.

Table 5: Capital Receipts	Previous Forecast, £000	Revised Forecast/Actual, £000	Variance, £000
<b>Capital Receipts (exclude Locality)</b>			
Year 2024/25 Forecast	6,976	7,060	84
Year 2025/26 Forecast	1,450	1,450	0
Year 2026/27 Forecast	12,240	12,240	0
<b>Total Capital Receipts (exclude Locality)</b>	<b>20,666</b>	<b>20,750</b>	<b>84</b>
<b>Locality Receipts</b>			
Year 2024/25 Forecast	1,215	915	(300)
Year 2025/26 Forecast	245	245	0
<b>Total Locality Receipts total</b>	<b>1,460</b>	<b>1,160</b>	<b>(300)</b>

<b>Table 5: Capital Receipts</b>	<b>Previous Forecast, £000</b>	<b>Revised Forecast/Actual, £000</b>	<b>Variance, £000</b>
<b>Grant Total Capital Receipts</b>	<b>22,126</b>	<b>21,910</b>	<b>(216)</b>
Sales Costs 4%	(624)	(612)	12
Contingency adjustment	(725)	(745)	0
<b>Total Net Receipts</b>	<b>20,777</b>	<b>20,553</b>	<b>(224)</b>

#### **4.6. Community Infrastructure and S106 Update**

- 4.6.1. The Community Infrastructure Levy (CIL) is a planning charge introduced by the Planning Act 2008. The Council started charging CIL in April 2020 and the current unallocated balance is £2.955Million including £0.89Million for local projects and £2.065Million for strategic council priorities. Local CIL of £97.5K per annum for three years from 2023/24 to 2025/26 has been allocated to fund the Community Climate Change budget. This is a member led strategy and wards can use £7.5K per ward per annum to fund relevant projects.
- 4.6.2. Public consultation on changes to the charging mechanism for CIL was reported to Cabinet January 2025.
- 4.6.3. Strategic CIL can be used to fund town centre infrastructure projects including those identified above. Members are asked to approve the allocation of up to £5Million of CIL to the Council's top priorities as set out in the The General Fund Capital Strategy Overview - Priorities versus Funding Requirement 2023/24-2029/30 report to Executive 15 November 2023. For: firstly, the sports and leisure hub and secondly, (if applicable) the public sector hub.
- 4.6.4. Others allocation of funds to relevant capital projects may be brought forward for approval later in the year- and require Cabinet approval above £75K.
- 4.6.5. Section 106 (S106) monies that have yet to be allocated to any current or future capital schemes are shown in the table below along with the categories they can be used for:

<b>Table 6: S106 contribution Available</b>	<b>Amount £000</b>
Biodiversity	94
Environmental	131
Engineering and Stevenage Works	68
<b>Total</b>	<b>293</b>

#### **4.7. Minimum Revenue Provision (MRP)**

- 4.7.1. MRP is applied where the council has to set aside a revenue allocation for provision of debt repayments (borrowing in the capital programme). MRP replaces other capital charges (e.g., depreciation) in the statement of accounts and has an impact on the council's bottom line. MRP will increase and decrease throughout the programme and is sensitive to both expenditure and funding changes. The council will continue to balance the use of capital receipts, internal borrowing and

external borrowing to ensure the most efficient use of resources, including the need to fund MRP.

4.7.2. The other main risks to the capital programme are:

- Potential for scheme overspends.
- Potential for delay in realising capital receipts noting that £9.7Million of land/asset sales are forecast to be achieved in 2024/25 and 2025/26.
- The deferred works budget may not be sufficient to fund any schemes not currently funded in the Strategy due to the ongoing and aforementioned fix-on-fail policy approach.
- Potential for money spent as capital on Towns Fund projects to revert to a future revenue liability if projects do not progress to physical completion, e.g., only feasibility and early design are completed.
- Cost volatility and increased client risk in construction projects due to the impact of cost of living, which has resulted in supply chain pressures and significant price increases across the construction sector.

#### **4.8. Other capital investment and Finance Lease**

4.8.1. The Council purchased several properties in the town centre to enable it to meet its SG1 regeneration aims. These properties were purchased in part using LEP funding. These properties have been purchased for regeneration purposes and therefore do not fall under the Property Investment Strategy. Prior to making these strategic acquisitions full risk assessments were undertaken to ensure the cost of carrying these assets in the short to medium term could be met by the Council. The Regeneration Asset allocated reserve has been setup specifically to cover these costs.

4.8.2. The Council undertook a long-term finance lease for a circa £50Million mixed development scheme on Queensway in the town centre. This is a finance lease arrangement and falls outside the scope of capital investment. Prior to the decision to proceed being made a risk assessment was undertaken and presented to Members. Key Officers were given training on their roles and responsibilities for the new governance arrangements associated with the Limited Liability Partnership.

4.8.3. External legal, financial, and commercial advice is procured to ensure the validity and viability of business cases presented to Members.

#### **4.9. Capital Programme - Housing Revenue Account**

4.9.1. The 2024/25 HRA Medium Term Financial Strategy (including capital programme) was approved by Cabinet on 13 November 2024.

4.9.2. The new plan allows for total investment of £249Million (down from £262Million) from 2023/24 to 2028/29, with the majority of this invested in existing (54%) and new housing stock (46%). It is important that the Council continues to balance ongoing investment with the need to replace RTB sales, in order meet housing demand and ensure the financial stability of the HRA in the longer term.

4.9.3. Building on the MTFs, the Housing Revenue Account (HRA) – Final Budget and Rent Setting 2025/26 was approved by Council 22 January 2025. The values below are taken from that report.

- 4.9.4. The summary final capital strategy budget for 2024/25 – 2028/29 totals £212Million and is set out in full in Appendix B (HRA Capital Strategy).

<b>Table 7: Summary HRA Capital Strategy</b>						
	<b>24/25</b>	<b>25/26</b>	<b>26/27</b>	<b>27/28</b>	<b>28/29</b>	<b>Total</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>
Housing Investment	24,431	23,424	19,993	21,519	21,543	110,911
Special Projects & Equipment	36	0	0	0	0	36
New Build (Housing Development)	6,906	27,781	37,057	18,771	8,400	98,915
Digital & Transformation	289	194	199	740	764	2,186
<b>Total HRA Schemes</b>	<b>31,662</b>	<b>51,399</b>	<b>57,249</b>	<b>41,030</b>	<b>30,707</b>	<b>212,048</b>

#### 4.10. Capital Programme – HRA Resources

- 4.10.1. Capital works on the housing stock is projected to be in line with the current year budget and the projected spend on new schemes is in line with the development programme included in the Medium-Term Financial Strategy.
- 4.10.2. Significant revenue pressures in the HRA may result in changes to the HRA business plan being brought to Cabinet for approval in 2025/26. Changes relating to capital funding will be reflecting in the strategy once approved.
- 4.10.3. The table below shows the funding sources for the programme. Most of the work to existing homes continues to be financed from the Major Repairs Reserve (MRR) (funded from depreciation charges to the HRA) and the new build costs from loans and receipts.

<b>Table 8: Revised HRA Capital Programme</b>						
	<b>24/25</b>	<b>25/26</b>	<b>26/27</b>	<b>27/28</b>	<b>28/29</b>	<b>Total</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>
MRR (Self Financing Depreciation)	18,671	13,138	13,532	13,938	14,356	73,636
(RTB) new Build provision	5,760	9,678	3,854	3,983	4,115	27,389
Debt Provision Receipts	429	1,464	1,051	1,077	1,104	5,125
Section 20 Contribution	1,226	2,963	3,262	1,173	805	9,429
Other Receipts	0	1,375	0	0	0	1,375
Grant	1,410	8,446	1,200	4,140	1,000	16,196
Revenue Contribution to Capital	4,167	0	3,390	4,439	0	11,996
Borrowing	0	14,335	30,960	12,280	9,327	66,902
<b>TOTAL</b>	<b>31,662</b>	<b>51,399</b>	<b>57,249</b>	<b>41,030</b>	<b>30,707</b>	<b>212,048</b>

#### 4.11. Changes to Right to Buy Capital Receipts

- 4.11.1. On the 30 October, the Chancellor of the Exchequer delivered an Autumn Budget Statement containing changes and measures that will impact the HRA and the

forecasts made in this MTFS report. The Government stated before the budget announcement that they intended to reduce the council homes sold under the scheme and they would be looking at discount levels to help achieve this reduction. They also confirmed that councils will no longer be required to return a proportion of the capital receipt generated by a RTB sale to HM Treasury. Nationally this totalled £183Million a year and will increase capital receipts over the MTFS by £3.5Million.

- 4.11.2. The impact on General Fund capital receipts relating to Right to Buy retained receipts is yet to be fully determined.
- 4.11.3. In 2023/24, 20 properties were sold through Right to Buy and so far this year 16 properties have been sold from 180 applications received of which 123 were received after the November 2024 budget. Historically between 30% and 50% of applications do not proceed to sale.
- 4.11.4. More detail on this and further impacts relating to the Autumn budget can be found in the Housing Revenue Account (HRA) – Final Budget and Rent Setting 2025/26 report (Council January 2025)

#### **4.12. De Minimis Level for Capital Expenditure 2025/26**

- 4.12.1. Accounting best practice recommends that the Council approves a de minimis level for capital expenditure, or a value below which the expenditure would not be treated as capital. This would mean that the expenditure would not be recorded on the asset register nor be funded from capital resources.
- 4.12.2. No change to the de-minimis expenditure limit of £10,000 per scheme is being proposed this year.

#### **4.13. Contingency Allowance for 2024/25**

- 4.13.1. The contingency allowance for 2024/25 is £250,000. The contingency proposed for 2025/26 remains at £250,000, for schemes requiring funding from existing capital resources. A limit of £250,000 is also set for schemes for each Fund that have new resources or match funded resources identified in addition to those contained within this report. This limit applies individually to both the General Fund and the HRA. This contingency sum constitutes an upper limit on both funds within which the Cabinet can approve supplementary estimates, rather than forming part of the Council's Budget Requirement for the year.
- 4.13.2. The contingency allowance for 2024/25 is £500,000 in relation to spend of restricted use or 1.4.1 receipts for registered providers to ensure that the Council achieves nominal rights and does not have to return 1.4.1 receipts to the government. This contingency allowance is a recommended to remain at £500,000 for 2025/26.
- 4.13.3. Separate to the contingency allowance, is the delegation to Cabinet or Portfolio Lead/Leader of the Council to approve increases to the capital programme for grant funded projects, when external funding sources have been secured. Officers propose that this contingency allowance remains at £5Million where a scheme is fully funded from third party contribution/grant.

#### **4.14. Consultation**

**Council Financial Security Group (CFSG) 19 November 2024**



- 4.14.1. Following a review of all growth bids by Senior Leadership Team (SLT), a priority list was presented to CFSG with 24 new Growth Bids for 2025/26 (these are shown in Appendix A). The scoring rationale applied to these budgets was “do not support” 0 point, “support but low priority” 1 point and support with high priority” 3 points.
- 4.14.2. There were six members who were asked to score, with schemes receiving a mixed score between 7 and (the maximum) 18. The table below shows the summary of scores received.

<b>Table 9: Scheme receiving:</b>	<b>Number of schemes</b>
18 points (or 100%)	9
16 points (or 89%)	9
15 points (or 83%)	1
14 points (or 78%)	1
12 points (or 67%)	2
11 points (or 61%)	1
7 points (or 39%)	1

- 4.14.3. As can be seen from the table above, all but one scheme was supported by a majority of members scoring. The lowest scoring scheme, receiving 7 points was £140,000 for Car Parks Resurfacing (39% reflects the scoring aggregate, 4 out of 6 voted in favour but at low priority).
- 4.14.4. Car Parks resurfacing is being recommended as a bid to members for approval as it is part of an ongoing requirement to ensure the public remains safe when using the car parks.
- 4.14.5. Cabinet is requested to consider the views of CFSG and agree to approve all 24 schemes (which SLT had supported). These have all been included within the proposed capital programme for 2025/26 (in Appendix B) and are fully funded.

## **5. IMPLICATIONS**

### **5.1. Financial Implications**

- 5.1.1. This report is financial in nature and consequently financial implications are included in the above.

### **5.2. Legal Implications**

- 5.2.1. The legal implications for each individual scheme within the capital programme will be considered when approval is sought for that scheme. Each scheme within the capital programme will be approved in accordance with the council’s constitution.

### **5.3. Equality and Diversity Implications**

- 5.3.1. None specifically in relation to this report.

## **5.4. Risk Implications**

- 5.4.1. The significant risks associated with the capital strategy are inherent within this report.
- 5.4.2. There is a risk that the value of land sales is not realised due to the impact of the cost-of-living crisis reducing demand and prices lower than anticipated as a result. In order to mitigate the impact of this, revenue underspends of up to £500k may be made available to support capital resource in the short term.
- 5.4.3. The Council manages this risk by reviewing and updating the Strategy quarterly, including resources where a sale is likely to complete. This will enable action to be taken where a receipt looks doubtful.
- 5.4.4. A significant risk exists that delivery of projects is works deferred due to lack of resources (including officers) and materials. A reasonable assessment has been made in the prioritisation process to try to keep this risk to a minimum. This relates in particular to property and regeneration projects where re-phasing of budgets is not uncommon and expenditure may fall into years after the current forecasts in this report.
- 5.4.5. The impact on the Council's medium - long term capital strategy as a result of the governments English Devolution White Paper (16 December 2024) is currently unknown. Measures include plans for new powers for mayors across strategic planning – giving them the ability to guide infrastructure and development projects across areas, housing, transport and skills. Impacts if any, will be included in future years capital strategy documents.

## **5.5. Climate Change Implications**

- 5.5.1. In their current form the Council's buildings do not currently support the climate change ambitions in terms of energy efficiency or divestment of use of fossil fuels.
- 5.5.2. However, there is an opportunity through the local asset review programme to build in design principles to improved / future assets in terms of energy efficiency and sustainable energy sources. This should be a core principle of any future designs arising from the local asset reviews. There would be a further benefit of reduced energy costs.
- 5.5.3. The climate change agenda is far wider than the buildings the Council uses. For example, the Council is also examining the vehicle fleet and consideration will be given to reducing its carbon impact and the HRA strategy includes significant investment in decarbonisation for the period to 2028/29 – ensuring all homes meet the minimum EPC rating of C.
- 5.5.4. In addition to existing assts, new buildings being planned as part of the regeneration of Stevenage – e.g., the Hub and new Leisure Centre will be designed and equipped to meet modern standards.

## **BACKGROUND DOCUMENTS**

BD1 Quarter 2 monitoring report (Cabinet, December 2024)

BD2 HRA MTFS (2024/25-2028/29) (November 2024 Cabinet)

BD3 Housing Revenue Account (HRA) – Final Budget and Rent Setting 2025/26 (Cabinet 15 January 2025 / Council 22 January 2025)

BD4 General Fund Capital Strategy Overview – Priorities Versus Funding Requirement 2023/24-2029/30 (November 2023 Executive)

**Appendices**

- A - General Fund Capital Growth Bids
- B - HRA Capital Strategy
- C - General Fund Capital Strategy

This page is intentionally left blank

STEVENAGE BOROUGH COUNCIL  
GF CAPITAL - PRIORITY BASED BUDGETING 2025/26 CAPITAL GROWTH BIDS

Ref No	Service	Priority	Description of Growth Proposal	Capital in 2025/26	Description
1	Estates	3	Daneshill House boilers	197,000	3 x boiler replacement. 1 boiler out of service, 1 works but temperamental. All manufactured 2002 - 2005 with multiple obsolete parts.
2	Estates	4	Fry Road Nursery	80,000	Current building has suffered from subsidence. EPC upgrade works to meet legislation.
3	Estates	3	All buildings across corporate estate	25,000	Fire door survey and remedial works carried out across the corporate estate, to meet fire door standards
	<b>Total Estates</b>			<b>302,000</b>	
4	Planning & Regulatory	4	MSCP Lift Reinstatement	200,000	Additional lift in north east corner of St Georges to facilitate use by Autolus and accommodate increasing future demand
5	Planning & Regulatory	4	Car Parks Resurfacing	140,000	Replace running surfaces on MSCPs and bitmac resurfacing of surface car parks to maintain safety
6	Planning & Regulatory	4	Car Parks - Lighting Phased Replacement (2 years)	40,000	To provide for replacement of old lighting units with more efficient LED units
7	Planning & Regulatory	4	MSCP Painting	40,000	Painting of walls and ceilings to provide a brighter fresher experience for customers.
8	Planning & Regulatory	3	MSCP Fire Alarm Upgrade	25,000	Update St Georges Fire alarm and extend sensors to EV bays in line with insurance recommendations
9	Planning & Regulatory	2	Parking Restrictions	10,000	To allow for introduction of potential parking permit areas in Ingleside Drive and Bedwell
	<b>Total Planning &amp; Regulatory</b>			<b>455,000</b>	
10	ICT	4	Stevenage Only - Idox Re-Tender	100,000	Stevenage Only - Idox Re-Tender
11	ICT	4	Telephony Hardware Refresh	75,638	New Telephony system as current one is end of life
12	ICT	4	Laptop Replacement Program	61,950	Laptop Replacement Program will replace laptops older than five years old and have reached their end-of-life.
13	ICT	4	Dell Memory (RAM) for Virtual desktop environment	31,860	End of life upgrading
14	ICT	4	Infrastructure & Hardware upgrades	20,650	Monitor replacement program, Azure cloud, Modern.gov migration.
15	ICT	4	Tablets Replacement Program	13,275	Tablet Replacement Program will replace tablets older than five years old and have reached their end-of-life.
	<b>Total ICT</b>			<b>303,373</b>	
16	SDS and Leisure	4	Operational Vehicles	962,704	Scheduled replacement programme to ensure the fleet is operational.
17	SDS and Leisure	4	CCTV Upgrade (Partnership)	159,900	Veracity Viewscope Command operating system used by the CCTV control room. Necessary for continued operation.
18	SDS and Leisure	3	Lighting Rig and Infrastructure	135,000	Theatre lighting system. Current lighting system over 15 years old and currently failing on a regular basis and causing a potential risk to shows. Replacement system is needed to allow the theatre to continue to attract productions
19	SDS and Leisure	4	Operational Plant	105,000	Scheduled replacement programme to ensure the plant is operational.
20	SDS and Leisure	4	House lights GCT	70,510	Current house lights. Significant energy consumption associated. Also, spare bulbs used up and we will no longer be able to replace blown bulbs.
21	SDS and Leisure	3	Parks Infrastructure (roads, footpaths etc.)	50,000	Keep access routes in a sound and safe condition, in order to avoid insurance claims, and measures to protect green spaces from unauthorised vehicular access.
22	SDS and Leisure	4	Fuel pumps at Cavendish Road fuel station.	30,000	3 x Fuel pumps nearing end of their service lives. Maximum service life of 15-20 years. Fuel pumps are 18 years old.
23	SDS and Leisure	3	Replacement work Cavendish Road fuel station - manhole covers	17,000	3 x manhole covers leading to the fuel tanks at end of their lives - supporting frames are cracking and require replacement.
24	SDS and Leisure	8	New pumps/aerators to FVP lakes	12,000	Current pumps/aerators are at the end of their economic life and require replacement in order to help maintain a healthy, attractive water system
	<b>Total SDS and Leisure</b>			<b>1,542,114</b>	
	<b>Total New Capital Projects Consulted (CFSG)</b>		<b>Capital Growth considered by CFSG</b>	<b>2,602,487</b>	
	Finance		DeferredWorks Reserve	282,000	Balance of funding identified for growth allocated to increase risk capacity in 2025/26
			<b>Total New Capital Growth Bids</b>	<b>2,884,487</b>	

This page is intentionally left blank

## APPENDIX B - HOUSING CAPITAL STRATEGY



		2024/25	2025/26	2026/27	2027/2028	2028/2029
Cost Centre	Scheme	Final Capital Strategy	Final Capital Strategy	Final Capital Strategy	Final Capital Strategy	Final Capital Strategy
		£	£	£	£	£
	<b>SUMMARY</b>					
	Capital Programme Excl New Build (Housing Investment)	24,431,083	23,424,077	19,993,134	21,519,212	21,543,326
	Special Projects & Equipment	36,073				
	New Build (Housing Development)	6,906,344	27,781,117	37,057,000	18,770,580	8,400,000
	Digital & Transformation	288,936	194,000	199,000	740,000	764,000
	<b>TOTAL HRA CAPITAL PROGRAMME</b>	<b>31,662,436</b>	<b>51,399,194</b>	<b>57,249,134</b>	<b>41,029,792</b>	<b>30,707,326</b>
	<b>HRA USE OF RESOURCES</b>					
BH930	MRR (Self Financing Depreciation)	18,670,830	13,138,173	13,532,319	13,938,288	14,356,438
BH902	Other Capital Receipts	-	1,375,000	-	-	-
BH906	Section 20 Contribution (leaseholders income)	1,226,056	2,962,878	3,261,738	1,173,177	805,409
BH901	(RTB) new Build provision	5,759,869	9,677,658	3,854,421	3,982,876	4,114,542
BH903	RTB - Debt Provision Receipts	428,523	1,464,120	1,050,506	1,076,769	1,103,688
	Borrowing Prudential	-	14,335,365	30,959,784	12,280,024	9,327,249
	Direct Revenue Financing (was RCCO)	4,167,218	-	3,390,366	4,438,658	-
BH905	Grant	1,409,940	8,446,000	1,200,000	4,140,000	1,000,000
	<b>TOTAL HRA RESOURCES FOR CAPITAL</b>	<b>31,662,436</b>	<b>51,399,194</b>	<b>57,249,134</b>	<b>41,029,792</b>	<b>30,707,326</b>
	Major Repair Reserve Bought Forward (BH930)	(5,915,321)	1	(0)	(1)	(1)
	Depreciation (increasing MRR)	(12,755,509)	(13,138,174)	(13,532,319)	(13,938,289)	(14,356,438)
	MRR Used (decreasing MRR)	18,670,830	13,138,173	13,532,319	13,938,288	14,356,438
	Major Repair Reserve Carried Forward	<b>1</b>	<b>(0)</b>	<b>(1)</b>	<b>(1)</b>	<b>(1)</b>
BH901	Total RTB Receipts Bought Forward	(7,878,356)	(3,819,684)	(1)	(1)	(0)
	Total RTB Receipts Received	(1,701,197)	(5,857,975)	(3,854,421)	(3,982,876)	(4,114,542)
	Total RTB Receipts Used HRA	5,759,869	9,677,658	3,854,421	3,982,876	4,114,542
	Total RTB Receipts Carried Forward	<b>(3,819,684)</b>	<b>(1)</b>	<b>(1)</b>	<b>(0)</b>	<b>(0)</b>

## APPENDIX B - HOUSING CAPITAL STRATEGY



		2024/25	2025/26	2026/27	2027/2028	2028/2029
Cost Centre	Scheme	Final Capital Strategy	Final Capital Strategy	Final Capital Strategy	Final Capital Strategy	Final Capital Strategy
		£	£	£	£	£
	<b>CAPITAL PROGRAMME EXCL. NEW BUILD</b>					
	<b>Planned Investment including Decent Homes</b>					
Various	<b>Decent Homes - Internal/External Works</b>	<b>3,795,020</b>	<b>8,650,000</b>	<b>9,800,000</b>	<b>10,700,000</b>	<b>10,700,000</b>
Various	<b>Decent Homes External Works</b>		<b>500,000</b>	<b>550,000</b>	<b>550,000</b>	<b>550,000</b>
KH299	Insulation Measures		50,000	50,000	50,000	50,000
Various	Decent Homes - Roofing					
Various	<b>Decent Homes - Flat Blocks</b>	<b>10,890,790</b>	<b>5,400,000</b>	<b>250,000</b>	<b>250,000</b>	<b>250,000</b>
KH205	Communal Heating		100,000	100,000	100,000	100,000
KH321	High Rises - Improvement Works	1,271,530	1,750,000	1,750,000		
	<b>Health &amp; Safety</b>					
KH085	Fire Safety	300,000				
KH112	Asbestos Management	230,100	300,000	300,000	300,000	300,000
KH114	Subsidence	137,630	120,000	120,000	120,000	120,000
KH144	Contingent Major Repairs	552,090	500,000	500,000	500,000	500,000
KH327	Building safety		1,000,000	1,000,000	1,000,000	1,000,000
	<b>Estate &amp; Communal Area</b>					
KH223	Asset Review - Challenging Assets	601,891	600,000	600,000	600,000	600,000
Various	<b>Other HRA Schemes</b>	6,652,032				
	<b>TOTAL CAPITAL PROGRAMME EXCL. NEW BUILD</b>	<b>24,431,083</b>	<b>23,424,077</b>	<b>19,993,134</b>	<b>21,519,212</b>	<b>21,543,326</b>
	<b>SPECIAL PROJECTS &amp; EQUIPMENT</b>					
	<b>HRA Equipment</b>					
KH015	Capital Equipment (including Supported Housing Equip)	36,073				
	<b>Sub Total Special Projects &amp; Equipment</b>	<b>36,073</b>				



## APPENDIX B - HOUSING CAPITAL STRATEGY



		2024/25	2025/26	2026/27	2027/2028	2028/2029
Cost Centre	Scheme	Final Capital Strategy	Final Capital Strategy	Final Capital Strategy	Final Capital Strategy	Final Capital Strategy
		£	£	£	£	£
	<b><u>CAPITAL PROGRAMME NEW BUILD</u></b>					
	New Build Programme - eligible for 1-4-1	5,759,859	20,214,117	14,612,000	12,783,580	8,400,000
	New Build Programme - ineligible	1,146,485	7,567,000	22,445,000	5,987,000	
KH233	Open Market Acquisitions (Social Rent)	767,463			891,790	
KH244	Twin Foxes					
KH245	March Hare in Burwell Road (15 Units)	1,107,240	1,637,239		(1,800,000)	
KH247	Kenilworth Close (105 units) (Ineligible 141)	846,485				
	Kenilworth Close 1 for 1 Expenditure (61.8%)	469,190				
KH303	Dunn Close (27 units, 21 main block SA)	1,715,967				
KH333	Brent Court Social Rent	300,000	7,567,000	22,445,000	5,987,000	
	<b>Schemes Under Development</b>	<b>1,700,000</b>	<b>18,576,878</b>	<b>14,612,000</b>	<b>12,800,000</b>	<b>8,400,000</b>
KH072	L.S.S.O. Buy Back					
	<b>TOTAL CAPITAL PROGRAMME NEW BUILD</b>	<b>6,906,344</b>	<b>27,781,117</b>	<b>37,057,000</b>	<b>18,770,580</b>	<b>8,400,000</b>
	<b><u>INFORMATION TECHNOLOGY</u></b>					
	<b><u>IT General (IT)</u></b>					
KH268	Infrastructure Investment	97,299	194,000	199,000	740,000	764,000
KH336	2024/25	20,000				
	<b>Total General IT</b>	<b>117,299</b>	<b>194,000</b>	<b>199,000</b>	<b>740,000</b>	<b>764,000</b>
	<b><u>Connected To Our Customers (CTOC)</u></b>					
KH288	New CRM Technology (Digital Platform)	52,967				
	<b>Total CTOC</b>	<b>52,967</b>				
	<b><u>Housing All Under One Roof programme (HAUOR)</u></b>					
KH283	Housing Improvements - Northgate online	118,670				
	<b>Total HAUOR</b>	<b>118,670</b>				
	<b>TOTAL ICT INCLUDING DIGITAL AGENDA</b>	<b>288,936</b>	<b>194,000</b>	<b>199,000</b>	<b>740,000</b>	<b>764,000</b>

This page is intentionally left blank

## APPENDIX C - GENERAL FUND CAPITAL STRATEGY

Cost Centre	Scheme	2024/25			2025/26			2026/27		
		Draft Capital Strategy £	Final Capital Strategy £	Variance Draft vs Final Capital Strategy £	Draft Capital Strategy £	Final Capital Strategy £	Variance Draft vs Final Capital Strategy £	Draft Capital Strategy £	Final Capital Strategy £	Variance Draft vs Final Capital Strategy £
	<b>General Fund - Schemes</b>									
	Stevenage Direct Services	5,066,713	4,916,713	(150,000)	1,603,704	6,353,704	4,750,000	0	250,000	250,000
	Housing Development	1,938,907	1,938,907	0	9,652,830	16,202,580	6,549,750	424,498	2,874,748	2,450,250
	Finance and Estates	2,737,244	2,737,244	0	557,000	557,000	0	0	0	0
	Digital & Transformation	378,822	378,822	0	303,373	303,373	0	0	0	0
	Regeneration	13,962,272	13,868,728	(93,544)	23,640,113	27,077,066	3,436,953	1,479,079	1,335,670	(143,409)
	Communities and Neighbourhoods	1,094,629	1,094,629	0	492,410	492,410	0	0	0	0
	Planning and Regulatory	953,273	953,273	0	552,500	552,500	0	0	0	0
	Deferred Works Reserve	387,222	387,222	0	282,000	282,000	0	0	0	0
	<b>Total Schemes</b>	<b>26,519,081</b>	<b>26,275,537</b>	<b>(243,544)</b>	<b>37,083,930</b>	<b>51,820,633</b>	<b>14,736,703</b>	<b>1,903,577</b>	<b>4,460,418</b>	<b>2,556,841</b>
	<b>General Fund -Resources</b>									
BG902	Capital Receipts	5,931,395	6,375,852	444,457	2,161,281	2,461,783	300,502	424,498	674,498	250,000
	SG1 Receipts	0	378,000	378,000	455,000	455,000	0	0	0	0
	Locality Review receipts	15,000	15,000	0	1,514,568	1,214,568	(300,000)	0	0	0
BG905	Ringfenced receipts	2,090,875	1,646,418	(444,457)	0	0	0	0	0	0
BG904	Towns Fund	7,342,497	7,342,497	0	18,807,174	18,807,174	0	1,335,670	1,335,670	0
BG904	Other Grants and other contributions (Towns Fund / Homes England)	1,701,380	1,701,380	0	0	9,150,000	9,150,000	0	0	0
BG904	Contractors Deposits	94,553	94,553	0	0	0	0	0	0	0
BG937	Local – Neighbourhood CIL	207,578	207,578	0	97,500	97,500	0	0	0	0
BG903	Capital Reserve (Housing Receipts)	496,190	496,190	0	569,437	568,935	(502)	0	0	0
-	RCCO	95,000	95,000	0	0	0	0	0	0	0
VAR	Revenue Reserves	697,445	697,445	0	0	617,000	617,000	0	0	0
BG928	Insurance Reserve	10,000	10,000	0	0	0	0	0	0	0
BG934	Leisure RCCO cfwd	65,970	65,970	0	0	0	0	0	0	0
BG929	NDR Reserve	0	0	0	0	0	0	0	0	0
BG934	Leisure Provision - now reserve	200,000	200,000	0	0	0	0	0	0	0
BG920	New Homes Bonus CNM	242,541	242,541	0	0	0	0	0	0	0
BG934	Leisure Reserve - now reserve	140,000	140,000	0	0	0	0	0	0	0
tbc	Unspecified revenue contribution	38,934	38,934	0	0	617,000	617,000	0	0	0
BG916	Capital Reserve (Revenue Savings)	0	0	0	0	0	0	0	0	0
-	Prudential Borrowing Approved	2,145,610	1,995,610	(150,000)	2,450,250	3,833,000	1,382,750	0	2,450,250	2,450,250
-	Short Term borrowing and funded from private sale	5,701,558	5,230,014	(471,544)	11,028,720	14,615,673	3,586,953	143,409	0	(143,409)
-	Funding Gap	0	0	0	0	0	0	0	0	0
	<b>Total Resources (General Fund)</b>	<b>26,519,081</b>	<b>26,275,537</b>	<b>(243,544)</b>	<b>37,083,930</b>	<b>51,820,633</b>	<b>14,736,703</b>	<b>1,903,577</b>	<b>4,460,418</b>	<b>2,556,841</b>

## APPENDIX C - GENERAL FUND CAPITAL STRATEGY

Cost Centre	Scheme	2024/25			2025/26			2026/27		
		Draft Capital Strategy	Final Capital Strategy	Variance Draft vs Final Capital Strategy	Draft Capital Strategy	Final Capital Strategy	Variance Draft vs Final Capital Strategy	Draft Capital Strategy	Final Capital Strategy	Variance Draft vs Final Capital Strategy
		£	£	£	£	£	£	£	£	£
		0	0	0	0	0	0	0	0	0
BG902	<b>General Funds Receipts</b>									
	Unallocated B/fwd	(2,191,306)	(2,191,306)	(0)	(1,436,282)	(1,045,467)	390,815	(1)	(33,684)	(33,683)
	In Year Receipts	(5,676,370)	(5,730,013)	(53,642)	(725,000)	(1,450,000)	(725,000)	(12,240,000)	(12,240,000)	0
	New Garage Sales (£2250k predicted from 26/27 to 31/32 - for GIP)				0	0		(700,000)	(700,000)	0
	Used in Year for capital financing	5,931,395	6,375,852	444,457	2,161,281	2,461,783	300,502	674,498	674,498	0
	Receipts Used to Repay ST Borrowing	0	0	0			0	11,529,140	11,529,140	(0)
	Used to fund sg1 receipts deficit							117,943	117,943	0
	Used to repay LEP loan	500,000	500,000	0			0			0
	<b>General Fund Receipts Unallocated C/fwd</b>	<b>(1,436,281)</b>	<b>(1,045,467)</b>	<b>390,815</b>	<b>(1)</b>	<b>(33,684)</b>	<b>(33,683)</b>	<b>(618,420)</b>	<b>(652,103)</b>	<b>(33,683)</b>
BG911	<b>Locality Review receipts</b>									
	Unallocated B/fwd	(70,000)	(70,000)	0	(1,269,568)	(1,008,568)	261,000	0	(39,000)	(39,000)
	In Year Receipts	(1,214,568)	(953,568)	261,000	(245,000)	(245,000)	0	0	0	0
	Used in Year	15,000	15,000	0	1,514,568	1,214,568	(300,000)	0	0	0
	<b>Receipts Unallocated C/fwd</b>	<b>(1,269,568)</b>	<b>(1,008,568)</b>	<b>261,000</b>	<b>(0)</b>	<b>(39,000)</b>	<b>(39,000)</b>	<b>0</b>	<b>(39,000)</b>	<b>(39,000)</b>
BG905	<b>Ringfenced regeneration receipts</b>									
	Unallocated B/fwd	(2,582,908)	(2,582,908)	0	(1,292,033)	(1,786,490)	(494,457)	(1,408,490)	(1,408,490)	0
	In Year Receipts	(1,300,000)	(1,350,000)	(50,000)	0	0	0	0	0	0
	Used in Year	2,590,875	2,146,418	(444,457)	378,000	378,000	0	0	0	0
	<b>Reserve Unallocated C/fwd</b>	<b>(1,292,033)</b>	<b>(1,786,490)</b>	<b>(494,457)</b>	<b>(914,033)</b>	<b>(1,408,490)</b>	<b>(494,457)</b>	<b>(1,408,490)</b>	<b>(1,408,490)</b>	<b>0</b>
	<b>SG1 Receipts</b>									
	Unallocated B/fwd	451,504	451,504	(0)	451,504	829,504	378,000	829,504	829,504	0
	In Year Receipts			0	(378,000)	(378,000)	0	(333,561)	(333,561)	0
	Costs funded by general receipts							(117,943)	(117,943)	0
	Used in Year	0	378,000	378,000	378,000	378,000	0			0
	<b>Reserve Unallocated C/fwd</b>	<b>451,504</b>	<b>829,504</b>	<b>378,000</b>	<b>451,504</b>	<b>829,504</b>	<b>378,000</b>	<b>378,000</b>	<b>378,000</b>	<b>0</b>
BG904	<b>Grant Contributions Unapplied</b>									
	Unallocated B/fwd	(13,702,267)	(13,702,267)	0	(12,061,161)	(12,061,161)	0	0	0	0
	In Year Receipts	(7,497,324)	(7,497,324)	0	(6,746,013)	(15,896,013)	(9,150,000)	(1,335,670)	(1,335,670)	0
	Used in Year	9,138,430	9,138,430	0	18,807,174	27,957,174	9,150,000	1,335,670	1,335,670	0
	<b>Receipts Unallocated C/fwd</b>	<b>(12,061,161)</b>	<b>(12,061,161)</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
BG936 & BG937	<b>CIL</b>									
	Unallocated B/fwd	(1,302,667)	(1,302,667)	0	(1,645,089)	(1,645,089)	0	(2,195,089)	(2,195,089)	0
	In Year Resource	(550,000)	(550,000)	0	(550,000)	(550,000)	0	(550,000)	(550,000)	0
	Used in Year	207,578	207,578	0	0	0	0	0	0	0
	<b>CIL C/fwd</b>	<b>(1,645,089)</b>	<b>(1,645,089)</b>	<b>0</b>	<b>(2,195,089)</b>	<b>(2,195,089)</b>	<b>0</b>	<b>(2,745,089)</b>	<b>(2,745,089)</b>	<b>0</b>
BG903 & BG916	<b>Capital Reserve and Debt Provision Reserve</b>									
	Unallocated B/fwd	(314,597)	(314,597)	0	(193,687)	(193,687)	0	(168,967)	(32)	168,935
	In Year Resource	(375,280)	(375,280)	0	(375,280)	(375,280)	0	(375,280)	(375,280)	0

## APPENDIX C - GENERAL FUND CAPITAL STRATEGY

Cost Centre	Scheme	2024/25			2025/26			2026/27		
		Draft Capital Strategy £	Final Capital Strategy £	Variance Draft vs Final Capital Strategy £	Draft Capital Strategy £	Final Capital Strategy £	Variance Draft vs Final Capital Strategy £	Draft Capital Strategy £	Final Capital Strategy £	Variance Draft vs Final Capital Strategy £
	Used in Year	496,190	496,190	0	400,000	568,935	168,935	0	0	0
	Capital Reserve Unallocated C/fwd	(193,687)	(193,687)	0	(168,967)	(32)	168,935	(544,247)	(375,312)	168,935
	<b>Stevenage Direct Services</b>									
	<b>Parks &amp; Open Spaces</b>									
KC218	Hertford Road Play Area (S106 Funded)	0	0	0	25,000	25,000	0	0	0	0
KE494	Green Space Access Infrastructure	53,018	53,018	0	0	0	0	0	0	0
KE542	Flat block waste management infrastructure	18,730	18,730	0	0	0	0	0	0	0
KE911	Play Area Improvement Programme	480,330	480,330	0	75,000	75,000	0	0	0	0
KE916	Peartree skate park	0	0	0	90,000	90,000	0	0	0	0
KE520	Welfare improvements at out based hubs	10,000	10,000	0	0	0	0	0	0	0
KE543	Shrub bed programme	47,109	47,109	0	44,000	44,000	0	0	0	0
KG002	Garages (GIP)	1,609,610	1,459,610	(150,000)	0	0	0	0	0	0
Growth	Garages (GIP) 10 year plan (£250k/annum)	0	0	0	0	250,000	250,000	0	250,000	250,000
Growth	Garages asbestos roof capital works	0	0	0	0	4,500,000	4,500,000	0	0	0
Growth	Parks Infrastructure	0	0	0	50,000	50,000	0	0	0	0
	<b>Vehicles, Plant, Equipment</b>									
KE497	Trade Waste Containers	20,000	20,000	0	0	0	0	0	0	0
Various	Vehicle/Plant replacement Programme - see Appendix 'A1 Vehicles'	1,240,174	1,240,174	0	160,000	160,000	0	0	0	0
KE423	Vehicle replacement for KE008ACU (Fiesta)	0	0	0	0	0	0	0	0	0
KE512	Vehicle replacement for LK08PVT Roll On/Off FAD CF85 410	0	0	0	0	0	0	0	0	0
KE951	Domestic Recycling Collection Vehicles (x3)	907,544	907,544	0	0	0	0	0	0	0
KE918	Cleaning machine for the town centre	0	0	0	0	0	0	0	0	0
KE934	Receptacles for new rounds etc	0	0	0	160,000	160,000	0	0	0	0
KE935	Westin Road ABS Pump	5,500	5,500	0	0	0	0	0	0	0
KE936	Vehicles	107,980	107,980	0	0	0	0	0	0	0
KE937	Trailer vehicle solar panels	16,300	16,300	0	0	0	0	0	0	0
KE938	Purchase of new MEWP (Mobile Elevated Work Platform)	73,850	73,850	0	0	0	0	0	0	0
KE942	Replace Water Bowers - TRK 16 and TRK25	15,000	15,000	0	0	0	0	0	0	0
KE943	Maxi Truck EL 4WD 48V 4WD articulated truck with a 1,000kg - 1,500kg	0	0	0	0	0	0	0	0	0
KE945	Tomcat Industrial Scrubber Dryer - 3 vehicles: MaxVac Urban (57.9), Kec	114,000	114,000	0	0	0	0	0	0	0
KE925	Repair closed church wall St Nicholas church	30,000	30,000	0	0	0	0	0	0	0
KE926	roof residual waste bay Cavendish Transfer Station	0	0	0	150,000	150,000	0	0	0	0
Growth	Fuel pumps at Cavendish Road fuel station.	0	0	0	30,000	30,000	0	0	0	0
Growth	Replacement work Cavendish Road fuel station - manhole covers	0	0	0	17,000	17,000	0	0	0	0
KE929	Digital system fleet and workshop operation	38,546	38,546	0	0	0	0	0	0	0
KE930	Digital system streets and grounds services	56,000	56,000	0	0	0	0	0	0	0
KE931	Digital system play area inspections/managment	16,500	16,500	0	0	0	0	0	0	0
KE932	Digital book of remembrance	1,696	1,696	0	0	0	0	0	0	0
KE933	Asset Management system	10,000	10,000	0	0	0	0	0	0	0
	<b>Vehicles, Plant, Equipment - cont.</b>									
KE598	Food collection vehicles (x5) and associated costs	850,000	850,000	0	0	0	0	0	0	0
KE599	Replace four refuse vehicles - VU66 NPY, VU66 NPZ, VU66 NRE, VX17	305,000	305,000	0	0	0	0	0	0	0

## APPENDIX C - GENERAL FUND CAPITAL STRATEGY



Cost Centre	Scheme	2024/25			2025/26			2026/27		
		Draft Capital Strategy £	Final Capital Strategy £	Variance Draft vs Final Capital Strategy £	Draft Capital Strategy £	Final Capital Strategy £	Variance Draft vs Final Capital Strategy £	Draft Capital Strategy £	Final Capital Strategy £	Variance Draft vs Final Capital Strategy £
KE600	Replace Sweeper - LK20 EJO	65,000	65,000	0	0	0	0	0	0	0
KE601	Shovel Loader to replace - FN69 XSU	200,000	200,000	0	0	0	0	0	0	0
Growth	Operational Vehicles	0	0	0	962,704	962,704	0	0	0	0
KE602	Stand on Mowers to replace AN100520 & AN100559	15,000	15,000	0	0	0	0	0	0	0
	<b>Total Stevenage Direct Services</b>	<b>5,066,713</b>	<b>4,916,713</b>	<b>(150,000)</b>	<b>1,603,704</b>	<b>6,353,704</b>	<b>4,750,000</b>	<b>250,000</b>	<b>250,000</b>	<b>250,000</b>
	<b>Housing Development Scheme (Joint GF/HRA)</b>									
KG035	Kenilworth - Community Centre	0	0	0	1,223,580	1,223,580	0	0	0	0
Growth	The Oval	0	0	0	0	9,000,000	9,000,000	0	0	0
KG036	Kenilworth - private sale (Malvern Close & Blocks A3&A6)	1,327,907	1,327,907	0	5,979,000	5,979,000	0	424,498	424,498	0
Various	<b>Housing Development Schemes (Joint GF/HRA)</b>	<b>1,327,907</b>	<b>1,327,907</b>	<b>0</b>	<b>7,202,580</b>	<b>16,202,580</b>	<b>9,000,000</b>	<b>424,498</b>	<b>424,498</b>	<b>0</b>
KG038	Marshgate Wholly Owned Housing Development Company (WOC)	611,000	611,000	0	2,450,250	0	(2,450,250)	0	2,450,250	2,450,250
	<b>Total Housing Development (including grants to Registered Providers)</b>	<b>1,938,907</b>	<b>1,938,907</b>	<b>0</b>	<b>9,652,830</b>	<b>16,202,580</b>	<b>6,549,750</b>	<b>424,498</b>	<b>2,874,748</b>	<b>2,450,250</b>

## APPENDIX C - GENERAL FUND CAPITAL STRATEGY

Cost Centre	Scheme	2024/25			2025/26			2026/27		
		Draft Capital Strategy	Final Capital Strategy	Variance Draft vs Final Capital Strategy	Draft Capital Strategy	Final Capital Strategy	Variance Draft vs Final Capital Strategy	Draft Capital Strategy	Final Capital Strategy	Variance Draft vs Final Capital Strategy
		£	£	£	£	£	£	£	£	£
	<b>Finance &amp; Estates</b>									
	<b>Estates</b>									
KE526	Cavendish Fire Protection : Urgent and H&S Works	4,563	4,563	0	0	0	0	0	0	0
KE527	Depots: Planned Preventative Works (reroof)	257,240	257,240	0	0	0	0	0	0	0
KE529	Community Centres Urgent and H&S Works	3,970	3,970	0	0	0	0	0	0	0
KE536	Multi Storey Car Park - Installation of emergency lighting	206,434	206,434	0	0	0	0	0	0	0
KE554	Bedwell Neighbourhood centre canopy repairs	7,555	7,555	0	0	0	0	0	0	0
KE555	8-10 The glebe roof replacement	1,111	1,111	0	0	0	0	0	0	0
KE558	MSCP resurface worn stairwell floor	79,856	79,856	0	0	0	0	0	0	0
KE927	Thermal Image Cameras	140,000	140,000	0	0	0	0	0	0	0
KE928	Ph2 fire protection works Cavendish	95,000	95,000	0	255,000	255,000	0	0	0	0
KE559	MSCP / Indoor Market guttering	1,000	1,000	0	0	0	0	0	0	0
KR150	Works to improve vacant premises prior to re-letting	19,476	19,476	0	0	0	0	0	0	0
KR151	Daneshill: Urgent and H&S Works	59,088	59,088	0	0	0	0	0	0	0
KR152	BTC 2019/20 Backlog H&S Works	27,930	27,930	0	0	0	0	0	0	0
KR153	BTC Urgent and H&S Works	65,780	65,780	0	0	0	0	0	0	0
KR154	BTC Planned Preventative Works	179,188	179,188	0	0	0	0	0	0	0
KR155	EPC Surveys	81,896	81,896	0	0	0	0	0	0	0
KR156	EPC remedials	209,710	209,710	0	0	0	0	0	0	0
KR157	Building condition and Insurance valuation Survey	18,800	18,800	0	0	0	0	0	0	0
KR162	Fairlands valley farmhouse roofing works	0	0	0	0	0	0	0	0	0
KR165	Cavendish Road reception access enhancement	189	189	0	0	0	0	0	0	0
KR166	Cavendish Road manhole covers	48,079	48,079	0	0	0	0	0	0	0
KR167	Cavendish Road penstock valve	49,886	49,886	0	0	0	0	0	0	0
KR169	MSCP replacement fuse boards	7,080	7,080	0	0	0	0	0	0	0
KR170	BTC Essential works - Replace / upgrade doors, Lighting and control	195,000	195,000	0	0	0	0	0	0	0
Growth	Daneshill House boilers	0	0	0	197,000	197,000	0	0	0	0
Growth	Fry Road Nursery	0	0	0	80,000	80,000	0	0	0	0
Growth	All buildings across corporate estate	0	0	0	25,000	25,000	0	0	0	0
KE921	Improvement works to Hampson Park depot	42,600	42,600	0	0	0	0	0	0	0
	<b>Estates Cont.</b>									
KR171	Burwell Road shops - Reroofing,	60,000	60,000	0	0	0	0	0	0	0
KR172	MSCP fire door replacement	35,000	35,000	0	0	0	0	0	0	0
KR173	Commercial - shop units roof works	125,000	125,000	0	0	0	0	0	0	0
KR174	Commercial properties - General repairs	100,000	100,000	0	0	0	0	0	0	0
KR175	cavendish - IT server room works	65,000	65,000	0	0	0	0	0	0	0
KR176	King George V Pavilion - Works to existing Fascia boards	20,000	20,000	0	0	0	0	0	0	0
KR177	Replace 1 FM Team vehicle	28,000	28,000	0	0	0	0	0	0	0
KR178	Cavendish - generator	90,000	90,000	0	0	0	0	0	0	0
KR916	Commercial Properties Refurbishment (MRC Programme)	359,671	359,671	0	0	0	0	0	0	0
KS278	New Management Software	53,143	53,143	0	0	0	0	0	0	0
	<b>Total Finance &amp; Estates</b>	<b>2,737,244</b>	<b>2,737,244</b>	<b>0</b>	<b>557,000</b>	<b>557,000</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

## APPENDIX C - GENERAL FUND CAPITAL STRATEGY



Cost Centre	Scheme	2024/25			2025/26			2026/27		
		Draft Capital Strategy £	Final Capital Strategy £	Variance Draft vs Final Capital Strategy £	Draft Capital Strategy £	Final Capital Strategy £	Variance Draft vs Final Capital Strategy £	Draft Capital Strategy £	Final Capital Strategy £	Variance Draft vs Final Capital Strategy £
	<b>Corporate Projects, Customer Services &amp; Technology</b>									
	<b>IT General</b>									
KS268	Infrastructure Investment	273,605	273,605	0	20,650	20,650	0	0	0	0
KS318	Core ICT Equipment	0	0	0	0	0	0	0	0	0
KS320	Telephony Hardware Refresh	22,500	22,500	0	75,638	75,638	0	0	0	0
KS321	VDI hosting Hardware Refresh	11,250	11,250	0	0	0	0	0	0	0
KS322	Hardware Replacment Program	78,660	78,660	0	75,225	75,225	0	0	0	0
KS323	Hardware Replacment Program (HRA Element)	(37,466)	(37,466)	0	0	0	0	0	0	0
Growth	SBC Idox Re-Tender, and Dell Memory (RAM) for Virtual desktop	0	0	0	131,860	131,860	0	0	0	0
	<b>Total IT General</b>	<b>348,549</b>	<b>348,549</b>	<b>0</b>	<b>303,373</b>	<b>303,373</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
	<b>Connected to Our Customer (CTOC)</b>									
KS274	New CRM Technology	30,273	30,273	0	0	0	0	0	0	0
	<b>Total CTOC</b>	<b>30,273</b>	<b>30,273</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
	<b>Total Corporate Projects, Customer Services &amp; Technology</b>	<b>378,822</b>	<b>378,822</b>	<b>0</b>	<b>303,373</b>	<b>303,373</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
	<b>Regeneration</b>									
KE506	Public Sector Hub	1,309,738	929,988	(379,750)	0	0	0	0	0	0
	Lease buy outs		379,750	379,750	0	0	0	0	0	0
KE585	Public Sector Hub Assembly	0	0	0	0	0	0	0	0	0
KE539	Repay LEP Loan	0	0	0	0	0	0	0	0	0
KE947	SG1 Joint Venture	4,373,652	3,180,108	(1,193,544)	4,832,939	6,169,892	1,336,953	143,409	0	(143,409)
	Spur Road (Grant funded)	599,705	599,705	0	0	0	0	0	0	0
	<b>Towns Fund:</b>									
KE538	Towns Fund	0	(600,000)	(600,000)	0	(2,000,000)	(2,000,000)	(88,390)	(88,390)	0
Growth	Old Indoor Market space - reconfiguration			0	0	4,100,000	4,100,000	0	0	0
Growth	Parkplace - works ahead of Inddor Market relocation	0	1,700,000	1,700,000	0	0	0	0	0	0
KE560	Stevenage Enterprise Centre	1,500,000	1,500,000	0	2,500,000	2,500,000	0	0	0	0
KE561	Gunnels Wood Road Infrastructure	979,177	979,177	0	0	0	0	0	0	0
KE562	Station Gateway	500,000	500,000	0	0	0	0	0	0	0
KE563	Marshgate Biotech	0	0	0	207,174	207,174	0	0	0	0
KE564	Stevenage Innovation & Technology Centre (SITEC)	100,000	100,000	0	4,900,000	4,900,000	0	0	0	0
KE565	New Towns Heritage Centre	100,000	100,000	0	1,400,000	1,400,000	0	479,820	479,820	0
KE566	Stevenage Sports & Leisure Club	2,000,000	2,000,000	0	7,450,000	7,450,000	0	326,930	326,930	0
KE469	Leisure Centre (GD1) BUILDINGS	0	0	0	0	0	0	0	0	0
KE567	Cycling & Pedestrian Connectivity	1,200,000	1,200,000	0	1,200,000	1,200,000	0	113,320	113,320	0
KE568	Diversification of Retail & Garden Square	1,300,000	1,300,000	0	1,150,000	1,150,000	0	503,990	503,990	0
Various	<b>Towns Fund</b>	<b>7,679,177</b>	<b>8,779,177</b>	<b>1,100,000</b>	<b>18,807,174</b>	<b>20,907,174</b>	<b>2,100,000</b>	<b>1,335,670</b>	<b>1,335,670</b>	<b>0</b>
	<b>Total Regeneration</b>	<b>13,962,272</b>	<b>13,868,728</b>	<b>(93,544)</b>	<b>23,640,113</b>	<b>27,077,066</b>	<b>3,436,953</b>	<b>1,479,079</b>	<b>1,335,670</b>	<b>(143,409)</b>
	<b>Community &amp; Neighbourhoods</b>									
KC202	Fairlands Valley Park - Aqua	3,571	3,571	0	0	0	0	0	0	0
KC232	SALC and the Swim Centre Urgent and H&S Works	57,992	57,992	0	0	0	0	0	0	0
KC231	SALC, Swim Centre, and Fairlands Valley Sailing Centre 2019/20 Backlog H&S Works	18,216	18,216	0	0	0	0	0	0	0



## APPENDIX C - GENERAL FUND CAPITAL STRATEGY

Cost Centre	Scheme	2024/25			2025/26			2026/27		
		Draft Capital Strategy	Final Capital Strategy	Variance Draft vs Final Capital Strategy	Draft Capital Strategy	Final Capital Strategy	Variance Draft vs Final Capital Strategy	Draft Capital Strategy	Final Capital Strategy	Variance Draft vs Final Capital Strategy
		£	£	£	£	£	£	£	£	£
	<b>Community &amp; Neighbourhoods (continued)</b>									
KC242	SLL Leisure management - end of contract capital provision	235,970	235,970	0	0	0	0	0	0	0
KC237	Fire stopping works at SALC	77,819	77,819	0	0	0	0	0	0	0
	Pool cover (to be grant funded)	36,000	36,000	0	0	0	0	0	0	0
KC238	Lift replacement at SALC	41,599	41,599	0	0	0	0	0	0	0
KC240	Replacement Camera programme	40,000	40,000	0	10,000	10,000	0	0	0	0
KC052	Shephalbury Park	5,600	5,600	0	0	0	0	0	0	0
KC236	Ridlins Athletics	56	56	0	0	0	0	0	0	0
KE917	Ridlins Athletics Facility	15,916	15,916	0	0	0	0	0	0	0
KC243	New Leisure Contract	4	4	0	0	0	0	0	0	0
KC245	Equipment replacement at Fairlands Valley Sailing Centre	31,887	31,887	0	0	0	0	0	0	0
KC246	Aqua Park - Rubber crumb surface replacement	35,000	35,000	0	0	0	0	0	0	0
KC247	Lighting of clock tower - permanent install	65,000	65,000	0	0	0	0	0	0	0
KC250	Fire stopping at SALC	220,000	220,000	0	0	0	0	0	0	0
KC252	Lift procurement at SALC	160,000	160,000	0	0	0	0	0	0	0
KC253	Sailing Centre	10,000	10,000	0	0	0	0	0	0	0
KE118	Lighting Desk SALC - Equipmt & Tools	0	0	0	205,510	205,510	0	0	0	0
Growth	Operational Plant	0	0	0	105,000	105,000	0	0	0	0
Growth	CCTV Upgrade	0	0	0	159,900	159,900	0	0	0	0
Growth	New pumps/aerators to FVP lakes	0	0	0	12,000	12,000	0	0	0	0
Growth	Riddlin - Bolier and Hot Water System	40,000	40,000	0	0	0	0	0	0	0
	<b>Total Community &amp; Neighbourhoods</b>	<b>1,094,629</b>	<b>1,094,629</b>	<b>0</b>	<b>492,410</b>	<b>492,410</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
	<b>Planning &amp; Regulatory</b>									
KC244	Community Climate Change Fund	117,578	117,578	0	97,500	97,500	0	0	0	0
KC916	Street Scene UKSPF	145,075	145,075	0	0	0	0	0	0	0
KC917	St Georges MSCP - conversion of store room and boiler room to office space	50,000	50,000	0	0	0	0	0	0	0
KE119	Off Street Car Parks (Multi Storey Car Parks)	444,457	444,457	0	0	0	0	0	0	0
KE120	Park Place Remedials	94,553	94,553	0	0	0	0	0	0	0
KE201	Hard standings	34,338	34,338	0	0	0	0	0	0	0
KE217	Parking Restrictions	15,000	15,000	0	0	0	0	0	0	0
KE470	Electric Car Charging Points	30,102	30,102	0	0	0	0	0	0	0
KE531	Workplace Travel Plan	16,172	16,172	0	0	0	0	0	0	0
Growth	MSCP Lift Reinstatement	0	0	0	200,000	200,000	0	0	0	0
Growth	Car Parks Resurfacing	0	0	0	140,000	140,000	0	0	0	0
Growth	Car Parks - Lighting Phased Replacement (2 years)	0	0	0	40,000	40,000	0	0	0	0
Growth	MSCP Painting	0	0	0	40,000	40,000	0	0	0	0
Growth	MSCP Fire Alarm Upgrade	0	0	0	25,000	25,000	0	0	0	0
Growth	Parking Restrictions	0	0	0	10,000	10,000	0	0	0	0
KE569	Cashless on street parking transition	5,998	5,998	0	0	0	0	0	0	0
	<b>Total Planning &amp; Regulatory</b>	<b>953,273</b>	<b>953,273</b>	<b>0</b>	<b>552,500</b>	<b>552,500</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
KR911	<b>Deferred Works Reserve</b>	<b>387,222</b>	<b>387,222</b>	<b>0</b>	<b>282,000</b>	<b>282,000</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

This page is intentionally left blank



## **AUDIT COMMITTEE/ CABINET / COUNCIL**

Portfolio Area: Resources

Date: 4 February 2025 / 12 February  
2025 / 26 February 2025



## **ANNUAL TREASURY MANAGEMENT STRATEGY INCLUDING PRUDENTIAL INDICATORS 2024/25**

### **NON-KEY DECISION**

Author – Rhona Bellis  
Contributor – Reenu Keogh  
Lead Officer – Brian Moldon  
Contact Officer – Brian Moldon

### **1 PURPOSE**

1.1 To recommend to Council the approval of the Treasury Management Strategy 2025/26, including its Annual Investment Strategy, Prudential Indicators and Minimum Revenue Provision (MRP) policy following considerations from Audit and Cabinet committees.

### **2 RECOMMENDATIONS**

#### **2.1 Audit Committee**

That post consideration by the Audit Committee to the Cabinet, the 2025/26 Treasury Management Strategy is recommended to Council for approval.

#### **2.2 Cabinet**

That post consideration by the Cabinet, in addition to those made by the Audit Committee, the 2025/26 Treasury Management Strategy is recommended to Council for approval.

**Part I**  
**Release to Press**

**2.3 Council**

That post consideration by the Audit Committee and the Cabinet, the 2025/26 Treasury Management Strategy be approved by Council.

**3 BACKGROUND**

3.1.1 CIPFA published the updated Treasury Management and Prudential Codes on 20 December 2021 for implementation from 2023/24. This Council therefore, has to have regard to these Codes of Practice when it prepares the Treasury Management Strategy Statement and Annual Investment Strategy, and also related reports during the financial year, which are taken to Full Council for approval.

3.1.2 The Council is required to operate a balanced budget, which broadly means that cash raised during the year will meet cash expenditure. Part of the treasury management operation is to ensure that this cash flow is adequately planned, with cash being available when it is needed. Surplus monies are invested in low-risk counterparties or instruments commensurate with the Council's low risk appetite, providing adequate liquidity initially before considering investment return.

3.1.3 The second main function of the treasury management service is the funding of the Council's capital plans. These capital plans provide a guide to the borrowing need of the Council, essentially the longer-term cash flow planning, to ensure that the Council can meet its capital spending obligations. This management of longer-term cash may involve arranging long or short-term loans or using longer-term cash flow surpluses. On occasion, when it is prudent and economic, any debt previously drawn may be restructured to meet Council risk or cost objectives.

3.1.4 The contribution the treasury management function makes to the authority is critical, as the balance of debt and investment operations ensure liquidity or the ability to meet spending commitments as they fall due, either on day-to-day revenue or for larger capital projects. The treasury operations will see a balance of the interest costs of debt and the investment income arising from cash deposits affecting the available budget. Since cash balances generally result from reserves and balances, it is paramount to ensure adequate security of the sums invested, as a loss of principal will in effect result in a loss to the General Fund Balance.

3.1.5 CIPFA defines treasury management as:

*“The management of the local authority's borrowing, investments and cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks.”*

3.1.6 Whilst any commercial initiatives or loans to third parties will impact on the treasury function, these activities are generally classed as non-treasury activities, (arising usually from capital expenditure), and are separate from the day-to-day treasury management activities.

## **3.2 Reporting Requirements**

### **3.2.1 Capital Strategy**

The Capital Strategy will be brought before members as a separate report. The aim of that strategy is to ensure that all Members of the Council fully understand the overall long-term policy objectives and resulting capital strategy requirements, governance procedures and risk appetite.

### **3.2.2 Treasury Management reporting**

The Council is required to receive and approve (as a minimum) three main treasury reports each year. The annual treasury management strategy including the Prudential Indicators (this report) is forward looking, it is the first and most important of the three and includes:

- a. **Prudential and treasury indicators and treasury strategy** (this report)
  - 
  - the capital plans, (including prudential indicators).
  - a minimum revenue provision (MRP) policy, (how residual capital expenditure is charged to revenue over time).
  - the Treasury Management Strategy, (how the investments and borrowings are to be organised), including treasury indicators; and
  - an Annual Investment Strategy, (the parameters on how investments are to be managed).
- b. **A mid-year treasury management report** – This is primarily a progress report and will update members on the capital position, amending prudential indicators as necessary, and whether any policies require revision.
- c. **An annual treasury report** – This is a backward-looking review document and provides details of a selection of actual prudential and treasury indicators and actual treasury operations compared to the estimates within the strategy.

3.2.3 These reports are required to be adequately scrutinised, and this is undertaken by the Audit Committee and Cabinet.

3.2.4 In addition to the three major reports detailed above from 2023/24 quarterly reporting is also required and form an appendix to the quarterly Capital monitoring reports, where not included in the main reports. However, these additional reports do not have to be reported to Full Council but do require to be adequately scrutinised. This role is undertaken by the Cabinet (The reports should comprise updated Treasury / Prudential Indicators only).

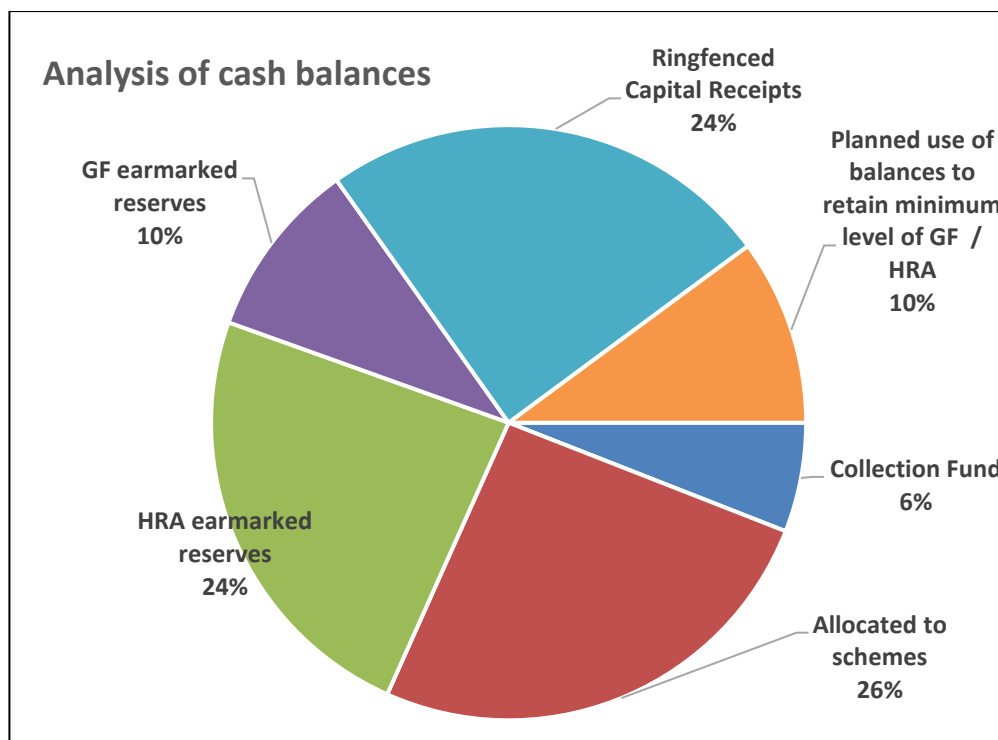
## **4 REASONS FOR RECOMMENDED COURSE OF ACTION AND OTHER OPTIONS**

### **4.1 Performance of Current Treasury Strategy**

**Part I**  
**Release to Press**

- 4.1.1 For the financial year to 31 December 2024 returns on investments have averaged 5.22% and total interest earned was £1.706Million contributing to General Fund and Housing Revenue Account income.
- 4.1.2 Cash balances as of 31 December 2024 were £57.8Million and are forecast to be £37Million as of 31 March 2025. The Council's balances are made up of cash reserves e.g., HRA and General Fund balances, restricted use receipts such as right to buy one for one receipts and balances held for provisions such as business rate appeals, reduced by internal borrowing.
- 4.1.3 In considering the Council's level of cash balances, Members should note that the General Fund MTFs and Capital Strategy have a planned use of resources over a minimum of five years and the HRA Business Plan (HRA BP) a planned use of resources over a 30-year period, which means, while not committed in the current year; they are required in future years.
- 4.1.4 The Council's current investment portfolio is held for Treasury management purposes only and consists of "conventional" cash investments: deposits with banks and building societies, Money Market Funds and loans to other Local Authorities. Currently no investments have been made with any of the other approved instruments within the Specified and Non-specified Investment Criteria (see Appendix D).
- 4.1.5 There have been **no breaches** of treasury **counter party limits**, with the investment activity during the year conforming to the approved strategy. Any breach would be notified to the Chief Finance Officer. The Council has had no liquidity difficulties and no funds have been placed with the Debt Management Office (DMO) during 2024/25 to date, demonstrating that counterparty limits and availability for placing funds approved in the TM Strategy were working effectively. It is possible that surplus funds borrowed during the year may be placed in the DMO temporarily if cash balances, due to the timing of taking out new loans would breach other counterparty limits.
- 4.1.6 The following chart shows the planned use of cash balances forecast to be held at 31 March 2025.

**Part I**  
**Release to Press**



**4.2 Treasury Management Strategy for 2025/26**

4.2.1 The strategy for 2025/26 covers two main areas:

**Capital issues**

- the capital expenditure plans and the associated prudential indicators.
- the minimum revenue provision (MRP) policy.

**Treasury management issues**

- the current treasury position.
- treasury indicators which limit the treasury risk and activities of the Council.
- prospects for interest rates.
- the borrowing strategy.
- policy on borrowing in advance of need.
- debt rescheduling.
- the investment strategy.
- creditworthiness policy; and
- the policy on use of external service providers.

4.2.2 These elements cover the requirements of the Local Government Act 2003, MHCLG Investment Guidance, MHCLG MRP Guidance, the CIPFA Prudential Code and the CIPFA Treasury Management Code.

4.2.3 The Council's Treasury Management Policy Statement can be found at **Appendix A**.

**Part I**  
**Release to Press**

4.2.4 The Council's Capital Strategy is reported separately from the Treasury Management Strategy. Non-treasury investments are reported through the former, ensuring the separation of the core treasury function under security, liquidity and yield principles, and the policy and commercialism investments usually driven by expenditure on an asset.

4.2.5 The revised Treasury Management Code requires all investments and investment income to be attributed to one of the following three purposes: -

- **Treasury management**

Arising from the organisation's cash flows or treasury risk management activity, this type of investment represents balances which are only held until the cash is required for use. Treasury investments may also arise from other treasury risk management activity which seeks to prudently manage the risks, costs or income relating to existing or forecast debt or treasury investments.

- **Service delivery**

Investments held primarily and directly for the delivery of public services including housing, regeneration and local infrastructure. Returns on this category of investment which are funded by borrowing are permitted only in cases where the income is "either related to the financial viability of the project in question or otherwise incidental to the primary purpose".

- **Commercial return**

Investments held primarily for financial return with no treasury management or direct service provision purpose. Risks on such investments should be proportionate to an authority's financial capacity – i.e., that 'plausible losses' could be absorbed in budgets or reserves without unmanageable detriment to local services. An authority must not borrow to invest primarily for financial return.

4.2.6 The Council's current investment portfolio is held for Treasury management purposes only.

4.2.7 **Environmental, social and governance (ESG)** investment considerations - investment considerations here means understanding the ESG "risks" that the council is exposed to and evaluating how well it manages these risks. It is NOT the same as Socially Responsible Investing.

4.2.8 Managing the ESG risk is already part of the current Treasury Investment Strategy, as the council uses mainstream rating agencies to assess counterparty creditworthiness – they now incorporate ESG risks alongside more traditional financial risk metrics when assessing counterparty ratings.

### **4.3 Training**

4.3.1 The CIPFA Code requires the responsible officer to ensure that members with responsibility for treasury management receive adequate training in treasury management. This especially applies to members responsible for scrutiny.



**Part I**  
**Release to Press**

4.3.2 The last training arranged for members took place in November 2024, further training will be arranged as required.

4.3.3 The training needs of treasury management officers are periodically reviewed.

4.3.4 A formal record of the training received by officers central to the Treasury function will be maintained by the Head of Technical Accounting. Similarly, a formal record of the treasury management training received by members will also be maintained by the Head of Technical Accounting.

**4.4 Treasury Management Consultants**

4.4.1 The Council uses MUFG Corporate Markets Treasury Limited (MUFG - formerly Link Asset Services) as its external treasury management advisors.

4.4.2 The Council recognises that responsibility for treasury management decisions always remains with the organisation and will ensure that undue reliance is not placed upon the services of our external service providers. All decisions will be undertaken with regards to all available information, including, but not solely, our treasury advisors.

4.4.3 It also recognises that there is value in employing external providers of treasury management services to acquire access to specialist skills and resources. The Authority will ensure that the terms of their appointment and the methods by which their value will be assessed are properly agreed and documented and subjected to regular review.

**4.5 THE CAPITAL PRUDENTIAL INDICATORS 2025/26-2027/28**

The Council's capital expenditure plans are the key driver of treasury management activity. The output of the capital expenditure plans is reflected in the prudential indicators, which are designed to assist members' overview and confirm capital expenditure plans.

4.5.1 **Capital Expenditure and Financing** – this prudential indicator is a summary of the Council's capital expenditure plans, both those agreed previously, and those forming part of the Capital Strategy 2025/26. Members are asked to approve the capital expenditure forecasts: -

<b>Capital Expenditure</b>	<b>2023/24</b>	<b>2024/25</b>	<b>2025/26</b>	<b>2026/27</b>	<b>2027/28</b>
<b>£000</b>	<b>Actual</b>	<b>Estimate</b>	<b>Estimate</b>	<b>Estimate</b>	<b>Estimate</b>
Non-HRA	8,880	26,276	51,821	4,460	0
HRA	37,568	31,662	51,399	57,249	41,030
<b>Total</b>	<b>46,448</b>	<b>57,938</b>	<b>103,220</b>	<b>61,710</b>	<b>41,030</b>

4.5.2 The table below summarises the above capital expenditure plans and how these plans are being financed by capital or revenue resources. Any shortfall of resources results in a funding borrowing need.

**Part I**  
**Release to Press**

<b>Financing of Capital Expenditure £000</b>	<b>2023/24 Actual</b>	<b>2024/25 Estimate</b>	<b>2025/26 Estimate</b>	<b>2026/27 Estimate</b>	<b>2027/28 Estimate</b>
Capital receipts	4,830	14,604	16,648	5,579	5,060
Capital grants and contributions	7,202	11,982	39,464	5,798	5,313
Capital reserves	132	496	569	0	0
Revenue	3,830	4,960	617	3,390	4,439
Major Repairs Reserve	18,429	18,671	13,138	13,532	13,938
<b>Net financing need for the year</b>	<b>34,422</b>	<b>50,713</b>	<b>70,436</b>	<b>28,299</b>	<b>28,750</b>
<b>Capital Expenditure requiring borrowing</b>	<b>12,026</b>	<b>7,225</b>	<b>32,784</b>	<b>33,411</b>	<b>12,280</b>

**4.6 The Council's Borrowing Need (the Capital Financing Requirement) -**

The second prudential indicator is the Council's Capital Financing Requirement (CFR). The CFR is simply the total historic outstanding capital expenditure which has not yet been paid for from either revenue or capital resources. It is essentially a measure of the Council's indebtedness and so its underlying borrowing need. Any capital expenditure above, which has not immediately been paid for through a revenue or capital resource, will increase the CFR.

4.6.1 The CFR does not increase indefinitely, as the minimum revenue provision (MRP) is a statutory annual revenue charge which broadly reduces the indebtedness in line with each asset's life, and so charges the economic consumption of capital assets as they are used.

4.6.2 The CFR includes any other long-term liabilities (e.g., finance leases). Whilst these increase the CFR, and therefore the Council's borrowing requirement, these types of schemes include a borrowing facility by the lease provider and so the Council is not required to separately borrow for these schemes.

4.6.3 The Council is asked to approve the CFR projections below:

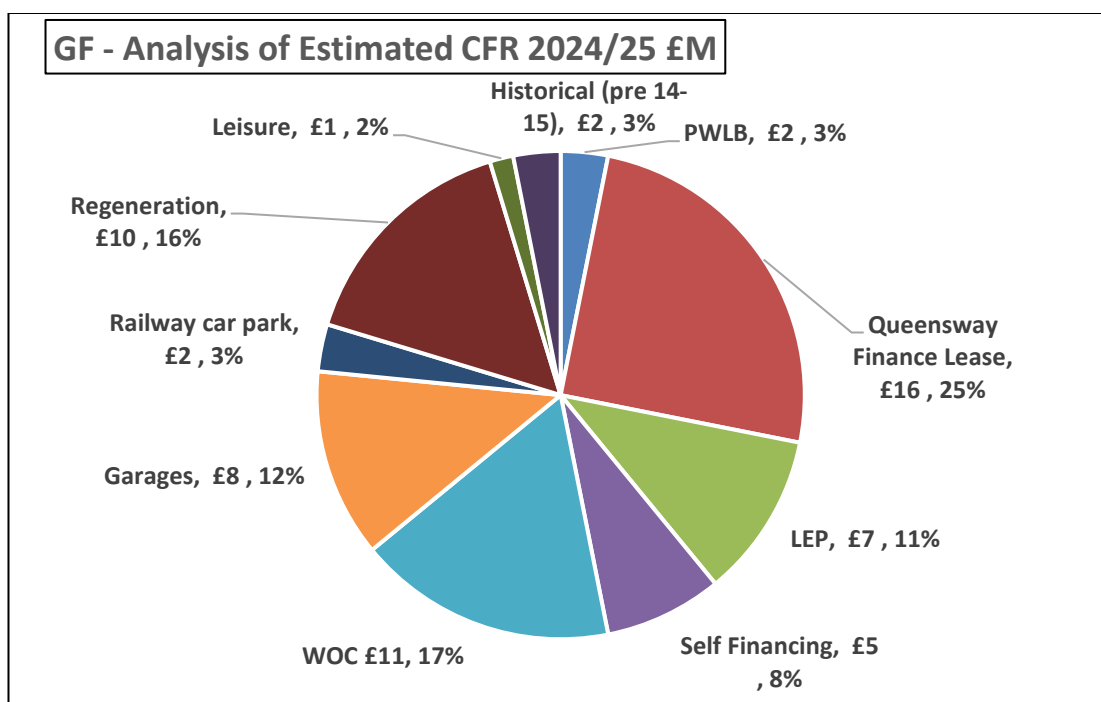
<b>£000</b>	<b>2023/24 Actual</b>	<b>2024/25 Estimate</b>	<b>2025/26 Estimate</b>	<b>2026/27 Estimate</b>	<b>2027/28 Estimate</b>
<b>Capital Financing Requirement</b>					
General Fund excluding Finance Lease	42,160	47,924	54,626	45,471	33,700
Finance Lease	16,475	16,208	15,935	15,654	15,357
Total General Fund	58,635	64,133	70,561	61,125	49,057
Housing	272,394	272,356	286,179	309,125	312,692
<b>Total CFR</b>	<b>331,029</b>	<b>336,489</b>	<b>356,740</b>	<b>370,250</b>	<b>361,749</b>
<b>Movement in CFR</b>		<b>5,470</b>	<b>20,251</b>	<b>13,511</b>	<b>(8,500)</b>

<b>Movement in CFR represented by</b>					
Net financing need for the year (above)		7,225	32,784	33,411	12,280
Internal and External debt repayments		(1,000)	(11,656)	(18,918)	(19,806)

**Part I**  
**Release to Press**

£000	2023/24 Actual	2024/25 Estimate	2025/26 Estimate	2026/27 Estimate	2027/28 Estimate
Less MRP/VRP <sup>1</sup> and other financing movements		(756)	(877)	(981)	(974)
<b>Movement in CFR</b>		<b>5,470</b>	<b>20,251</b>	<b>13,511</b>	<b>(8,500)</b>

4.6.4 The general fund CFR is made up mainly of internal borrowing as illustrated below for 2024/25.



**4.7 Liability Benchmark**

4.7.1 A third prudential indicator is the Liability Benchmark (LB). The Council is required to estimate and measure the LB for the forthcoming financial year and the following two financial years.

Financial Year End	2024 £'000	2025 £'000	2026 £'000
(Over)/Under Liability Benchmark	4,798	(1,919)	0

4.7.2 This benchmark compares actual loan debt outstanding and the liability benchmark (loans less investments, plus a liquidity buffer). Years where actual loans are less than the benchmark (negative value) indicate a future borrowing requirement; any years where actual loans outstanding exceed the benchmark (positive value) represent a technically overborrowed position.

4.7.3 The table above shows the current forecast overborrowed position remaining over the short term. This shows that in each year, there are theoretical investment balances that if unallocated, could be used to pay off debt.

<sup>1</sup> Voluntary Revenue Provision

**Part I**  
**Release to Press**

4.7.4 Investment balances held by the council are already allocated and are not available for repayment of debt or additional capital expenditure. As a result, the Council will need to externally borrow to replace internal borrowing in the medium term.

4.7.5 Cashflow is monitored on an ongoing basis to ensure that the timing of external borrowing to support the Capital Strategy and Treasury function is undertaken in a timely and prudent manner.

**4.8 Core Funds and Expected Investment Balances**

4.8.1 The application of resources (capital receipts, reserves etc.) to either finance capital expenditure or other budget decisions to support the revenue budget will have an ongoing impact on investments unless resources are supplemented each year from new sources (asset sales etc.). Detailed below are estimates of the year-end balances for each resource and anticipated day-to-day cash flow balances.

Year End Resources £000	2023/24 Actual	2024/25 Estimate	2025/26 Estimate	2026/27 Estimate	2027/28 Estimate
Fund balances / reserves	90,484	59,681	52,693	47,961	48,070
Provisions	4,361	3,361	2,361	2,361	2,361
<b>Total core funds</b>	<b>94,845</b>	<b>63,042</b>	<b>55,054</b>	<b>50,322</b>	<b>50,431</b>
Working capital*	2,854	33,105	25,000	10,324	3,155
(Under)/over borrowing	(72,497)	(64,228)	(50,054)	(30,646)	(20,617)
<b>Expected investments</b>	<b>25,202</b>	<b>31,919</b>	<b>30,000</b>	<b>30,000</b>	<b>32,969</b>

\*Working capital balances shown are estimated year-end; these may be higher mid-year

**4.9 Minimum Revenue Provision (MRP) Policy Statement**

4.9.1 Under Regulation 27 of the Local Authorities (Capital Finance and Accounting) (England) Regulations 2003, where the Council has financed capital expenditure by borrowing it is required to make a provision each year through a revenue charge (MRP). The 2003 Regulations have been further amended with full effect from April 2025 to expressly provide that in determining a prudent provision local authorities cannot exclude any amount of CFR from its calculation, unless by an exception set out in statute.

4.9.2 The Council is required to calculate a prudent provision of MRP which ensures that the outstanding debt liability is repaid over a period that is reasonably commensurate with that over which the capital expenditure provides benefits.

4.9.3 The MRP policy statement requires full council approval in advance of each financial year. The Council is recommended to approve the MRP Statement at **Appendix B** to this report.

**4.10 Borrowing**

4.10.1 The capital expenditure plans set out in paragraph 4.5.1 provide details of the service activity of the Council. The treasury management function ensures that the Council's cash is organised in accordance with the relevant professional codes, so that sufficient cash is available to meet this service activity and the Council's Capital Strategy. This will involve both the

**Part I**  
**Release to Press**

organisation of the cash flow and, where capital plans require, the organisation of appropriate borrowing facilities. The strategy covers the relevant treasury / prudential indicators, the current and projected debt positions, and the Annual Investment Strategy.

**4.10.2 Current Portfolio Position**

The overall treasury management portfolio as at 31 March 2024 and as at 31 December 2024 are shown below for both borrowing and investments.

<b>TREASURY PORTFOLIO</b>		
<b>£000</b>	actual	current
	<b>31.3.24</b>	<b>31.12.24</b>
Total treasury investments	25,202	57,815
<b>Treasury external borrowing:</b>		
PWLB	234,987	247,987
Finance Leases and other external borrowing	23,543	21,715
<b>Total external borrowing</b>	<b>258,530</b>	<b>269,702</b>
<b>Net treasury investments / (borrowing)</b>	<b>(233,328)</b>	<b>(211,887)</b>

4.10.3 The Council's forward projections for borrowing are summarised below. The table shows the actual external debt, against the underlying capital borrowing need, highlighting any over or under borrowing.

<b>£000</b>	<b>2023/24</b>	<b>2024/25</b>	<b>2025/26</b>	<b>2026/27</b>	<b>2027/28</b>
	<b>Actual</b>	<b>Estimate</b>	<b>Estimate</b>	<b>Estimate</b>	<b>Estimate</b>
<b>External Debt</b>					
Debt at 1 April	251,693	258,532	272,261	306,686	339,604
Expected change in Debt	7,500	13,996	23,530	33,199	1,824
Expected change in Other long-term liabilities (OLTL)	(259)	(266)	(273)	(281)	(296)
Actual gross external debt at 31 March	<b>258,532</b>	<b>272,261</b>	<b>306,686</b>	<b>339,604</b>	<b>341,132</b>
The Capital Financing Requirement	<b>(331,029)</b>	<b>(336,489)</b>	<b>(356,740)</b>	<b>(370,250)</b>	<b>(361,749)</b>
(Under) / over borrowing external debt	<b>(72,497)</b>	<b>(64,228)</b>	<b>(50,054)</b>	<b>(30,646)</b>	<b>(20,617)</b>

4.10.4 Within the range of prudential indicators there are several key indicators to ensure that the Council operates its activities within well-defined limits. One of these is that the Council needs to ensure that its gross debt does not, except in the short-term, exceed the total of the CFR in the preceding year plus the estimates of any additional CFR for 2025/26 and the following two financial years. This allows some flexibility for limited early borrowing for future years but ensures that borrowing is not undertaken for revenue or speculative purposes.

**Part I**  
**Release to Press**

4.10.5 Based on the capital programme 2025/26 (February 2025 Update) resourcing projections, the Council has the following borrowing requirements in 2025/26:

- General Fund £3.8Million in relation to the Garages Improvement Plan (£1.7Million) and other commercial property works (£2.1Million).
- HRA £31.4Million of which £17Million is to replace internal borrowing and £14.4Million for new capital expenditure.

4.10.6 The current PWLB borrowing rate is unusually high and costs of external borrowing as taken into account when the Council allocates funding to capital projects. The Borrowing strategy is considered later in the report.

4.10.7 The S151 officer reports that the Council complied with this prudential indicator in the current year and does not envisage difficulties for the future. This view takes account of current commitments, existing plans and the proposals in this budget report.

**4.11 Treasury Indicators: Limits to Borrowing Activity**

4.11.1 **The Operational Boundary.** This is the limit beyond which external debt is not normally expected to exceed. In most cases, this would be a similar figure to the CFR but may be lower or higher depending on the levels of actual debt and the ability to fund under-borrowing by other cash resources.

<b>Operational Boundary £000</b>	<b>2024/25 Estimate</b>	<b>2025/26 Estimate</b>	<b>2026/27 Estimate</b>	<b>2027/28 Estimate</b>
General Fund	49,133	55,561	46,125	34,057
General Fund additional borrowing facility available to the Housing (WOC) Wholly Owned Company	15,000	15,000	15,000	15,000
<b>Total - General Fund</b>	<b>64,133</b>	<b>70,561</b>	<b>61,125</b>	<b>49,057</b>
HRA	272,356	286,179	309,125	312,692
<b>Total</b>	<b>336,489</b>	<b>356,740</b>	<b>370,250</b>	<b>361,749</b>
Previous Operational Boundary	355,749	373,964	399,360	375,132

4.11.2 **The Authorised Limit for external debt.** This is a key prudential indicator and represents a control on the maximum level of borrowing. This represents a legal limit beyond which external debt is prohibited, and this limit needs to be set or revised by the Full Council. It reflects the level of external debt which, while not desired, could be afforded in the short-term, but is not sustainable in the longer-term.

- This is the statutory limit determined under section 3 (1) of the Local Government Act 2003. The Government retains an option to control either the total of all local authority plans, or those of a specific authority, although this power has not yet been exercised.
- The Council is asked to approve the following Authorised Limit:

**Part I**  
**Release to Press**

Authorised Limit £000	2024/25 Estimate	2025/26 Estimate	2026/27 Estimate	2027/28 Estimate
General Fund Finance lease	16,208	15,935	15,654	15,357
General Fund Borrowing for capital expenditure including WOC	54,924	61,626	52,471	40,700
<b>Total Borrowing - General Fund</b>	<b>71,132</b>	<b>77,561</b>	<b>68,125</b>	<b>56,057</b>
Borrowing - HRA	283,356	297,179	320,125	323,692
<b>Total</b>	<b>354,488</b>	<b>374,740</b>	<b>388,250</b>	<b>379,749</b>
<b>Previous Authorised Limit</b>	<b>373,549</b>	<b>391,764</b>	<b>416,360</b>	<b>392,132</b>

**4.12 Prospects for Interest Rates**

4.12.1 The Council retains MUFG as its treasury advisor and part of their service is to assist the Council to formulate a view on interest rates. MUFG provided the following forecasts on 20 January 2025. These PWLB rates exclude the Certainty Rate (the standard rate minus 20 bps) which has been accessible to most authorities since 1 November 2012. Please note, the lower Housing Revenue Account (HRA) PWLB rate started on 15 June 2023 (standard rate minus 60 bps).

Interest Rate Forecasts								
Bank Rate	Mar-25	Jun-25	Sep-25	Dec-25	Mar-26	Jun-26	Sep-26	Dec-26
MUFG CM	4.50%	4.25%	4.00%	4.00%	3.75%	3.75%	3.75%	3.50%
Cap Econ	4.50%	4.25%	4.00%	3.75%	3.50%	3.50%	3.50%	3.50%
<b>5Y PWLB RATE</b>								
MUFG CM	4.90%	4.80%	4.60%	4.50%	4.50%	4.40%	4.30%	4.20%
Cap Econ	5.10%	4.90%	4.80%	4.60%	4.60%	4.50%	4.50%	4.40%
<b>10Y PWLB RATE</b>								
MUFG CM	5.10%	5.00%	4.80%	4.80%	4.70%	4.50%	4.50%	4.40%
Cap Econ	5.30%	5.10%	5.00%	4.80%	4.80%	4.70%	4.60%	4.60%
<b>25Y PWLB RATE</b>								
MUFG CM	5.50%	5.40%	5.30%	5.20%	5.10%	5.00%	4.90%	4.80%
Cap Econ	5.70%	5.50%	5.30%	5.00%	4.90%	4.90%	4.80%	4.70%
<b>50Y PWLB RATE</b>								
MUFG CM	5.30%	5.20%	5.10%	5.00%	4.90%	4.80%	4.70%	4.60%
Cap Econ	5.30%	5.20%	5.20%	5.10%	5.00%	4.90%	4.80%	4.80%

4.12.2 The Bank of England (BOE) base rate stands at 4.75% currently and is expected to remain at this level for the first quarter of 2025, reducing gradually thereafter when both the CPI inflation and wage/employment data are supportive of such a move.

4.12.3 The CPI measure of inflation (a key bank of England KPI driving decisions on interest rates) is now 2.5%. The BOE expects inflation to rise to around 2.75% over the next year as household energy prices provide less of a drag on inflation than they have done in recent months. Inflation is expected to fall back to the 2% target after that.

4.12.4 Regarding the PWLB forecast, these have been materially lifted since the last update, to not only reflect our increased concerns around the future path of

**Part I**  
**Release to Press**

inflation, but also the increased level of Government borrowing over the term of the current Parliament.

4.12.5 The short to medium part of the curve is forecast to remain elevated over the course of the next year, and the degree to which rates moderate will be tied to the arguments for further Bank Rate loosening or otherwise. The longer part of the curve will also be impacted by inflation factors, but there is also the additional concern that with other major developed economies such as the US and France looking to run large budget deficits there could be a glut of government debt issuance that investors will only agree to digest if the interest rates paid provide sufficient reward for that scenario.

4.12.6 Invariably the direction of US Treasury yields in reaction to a new presidential term, and change in core policies will, in all probability, impact UK gilt yields. So, there are domestic and international factors that could impact PWLB rates whilst, as a general comment, geo-political risks abound in Europe, the Middle East and Asia.

**4.13 Current Borrowing Position**

4.13.1 The estimated Council's capital financing requirement (CFR) for 2024/25 is £336Million. The CFR denotes the Council's underlying need to borrow for capital purposes. If the CFR is positive the Council may borrow from the PWLB or the market (external borrowing), or from internal balances on a temporary basis (internal borrowing). The balance of external and internal borrowing is generally driven by market conditions. The Council had £272Million in external debt at 31 December 2024, of which PWLB debt and its purpose is detailed in the table below.

<b>Purpose of Loan</b>	<b>PWLB Loan £'000</b>
<b>General Fund Regeneration Assets</b>	<b>1,756</b>
<b>HRA</b>	
Decent Homes	38,320
Self-Financing	207,911
<b>Total HRA Loans</b>	<b>246,231</b>
<b>Total PWLB Debt at 31st December 2024</b>	<b>247,987</b>

4.13.2 The Council is forecast to utilise (short term) £59Million of cash flow funds in lieu of borrowing. This is a prudent and cost-effective approach in the current economic climate but will require ongoing monitoring if any upside risk to gilt yields prevails.

4.13.3 External borrowing for the HRA of £13Million has been taken in 2024/25. The capital programme is being kept under regular review because of inflationary pressures, shortages of materials and labour. Our borrowing strategy will, therefore, also be regularly reviewed and then revised, if necessary, to achieve optimum value and risk exposure in the long-term.



**Part I**  
**Release to Press**

4.13.4 The General Fund has PWLB external borrowing of £1.8Million and other external borrowing of £7.6Million (Local Enterprise Partnership - LEP) and finance lease of £16.5Million (Aviva). Discussions are continuing with the LEP regarding making these re-investible loans for further regeneration of the town, rather than needing to be repaid on the dates originally agreed. As indicated in the table, the current position is that the remaining balance is repayable - £6.57Million in 2030 and £1Million in 2025. The loans are at zero interest.

<b>Table 5: LEP Loans</b>					
<b>Loan Received</b>	<b>Site Assembly</b>	<b>Land Assembly</b>	<b>SG1</b>	<b>Repaid</b>	<b>Total</b>
2015/16	762,488			(208,795)	553,693
2018/19	416,306				416,306
2019/20		4,108,709			4,108,709
2020/21		1,491,291	500,000		1,991,291
2022/23			500,000		500,000
<b>Total</b>	<b>1,178,794</b>	<b>5,600,000</b>	<b>1,000,000</b>	<b>(208,795)</b>	<b>7,569,999</b>

4.13.5 The Aviva finance lease entered in 2018/19 for 37 years was immediately sublet to Queensway Properties (Stevenage) LLP for 37 years.

4.13.6 The HRA has external borrowing from PWLB of £246Million

- £7.763Million from pre-2012,
- £4.010Million taken out in 2019/20,
- £10.0 Million taken out in 2020/21,
- £9.047Million taken out in 2021/22,
- £7.5Million taken out in 2023/24 and
- £13Million taken out in 2024/25.

The remainder of £194.911 Million relates to HRA self-financing payment made to central government in 2012.

4.13.7 The target average borrowing rate in the latest HRA MTFS is 4.88% in 2024/25 and 4.4% in 2025/26.

4.13.8 The HRA BP includes a heightened reserves provision going forward to mitigate the risk associated with having a higher borrowed BP.

4.13.9 Finance leases entered between the HRA and Marshgate Ltd during 2021/22 and 2022/23, the Council's Wholly Owned Housing Company, relating to 10 residential dwellings, leased for 25 years amounted to £1.3Million.

**4.14 Borrowing Strategy**

**Part I**  
**Release to Press**

- 4.14.1 The Council is currently maintaining a non-fully funded position. This means that the capital borrowing need, (the Capital Financing Requirement), has not been fully funded with loan debt as cash supporting the Council's reserves, balances and cash flow has been used as a temporary measure. This strategy is prudent as medium and longer dated borrowing rates are expected to fall from their current levels once prevailing inflation concerns are addressed by tighter near-term monetary policy.
- 4.14.2 Against this background and the risks within the economic forecast, caution will be adopted with the 2025/26 treasury operations. The Assistant Director of Finance will monitor interest rates in financial markets and adopt a pragmatic approach to changing circumstances.
- 4.14.3 Borrowing may be taken to facilitate investment in regeneration and/or economic improvements for the town. This may include investment in special purpose vehicles owned by the Council to facilitate regeneration aspirations. Any such investments will be presented to Members.

**4.15 Policy on Borrowing in advance of Need**

- 4.15.1 It is the Council's intention not to borrow more than or in advance of its needs purely to profit from the investment of the extra sums borrowed. Any decision to borrow in advance will be within forward approved Capital Financing Requirement estimates and will be considered carefully to ensure that value for money can be demonstrated and that the Council can ensure the security of such funds.
- 4.15.2 In determining whether borrowing will be undertaken in advance of need the Council will.
- ensure that there is a clear link between the capital programme and maturity profile of the existing debt portfolio which supports the need to take funding in advance of need
  - ensure the ongoing revenue liabilities created, and the implications for the future and budgets have been considered
  - evaluate the economic and market factors that might influence the manner and timing of any decision to borrow
  - consider the merits and demerits of alternative forms of funding
  - consider the alternative interest rate bases available, the most appropriate periods to fund and repayment profiles to use.

**4.16 Rescheduling**

- 4.16.1 Rescheduling of current borrowing in the debt portfolio may be considered whilst premature redemption rates remain elevated but only if there is surplus cash available to facilitate any repayment, or rebalancing of the portfolio to provide more certainty is considered appropriate.

**4.17 New Financial Institutions as a Source of Borrowing and / or Types of Borrowing**

**Part I**  
**Release to Press**

- 4.17.1 Currently the PWLB Certainty Rate is set at gilts + 80 basis points. However, consideration may still need to be given to sourcing funding from the following sources for the following reasons:
- 4.17.2 Local authorities (primarily shorter dated maturities out to 3 years or so – generally still cheaper than the Certainty Rate).
- 4.17.3 Financial institutions (primarily insurance companies and pension funds but also some banks, out of forward dates where the objective is to avoid a “cost of carry” or to achieve refinancing certainty over the next few years).
- 4.17.4 Our advisors will keep us informed as to the relative merits of each of these alternative funding sources.
- 4.17.5 The latest list of approved borrowing sources is in Appendix F. These options allow flexibility if funds are required for the short or medium term in order to minimise costs where possible.

**4.18 ANNUAL INVESTMENT STRATEGY**

- 4.18.1 Ministry of Housing, Communities and Local Government (MHCLG) and CIPFA have extended the meaning of ‘investments’ to include both financial and non-financial investments. This report deals solely with treasury (financial) investments, (as managed by the treasury management team). Non-financial investments, essentially the purchase of income yielding assets and service investments, are covered in the Capital Strategy, (a separate report).
- 4.18.2 In managing the TM function other areas kept under review include:
- Training opportunities available to Members and officers (the most recent training for Members took place on 26 November 2024)
  - That those charged with governance are also personally responsible for ensuring they have the necessary skills and training
  - A full mid-year review of the TMS will be reported in 2025/26.
- 4.18.3 The 2025/26 Strategy uses the credit worthiness service provided by MUFG the Council’s treasury advisors. This service uses a sophisticated modelling approach which utilises credit ratings from the three main credit rating agencies and is compliant with CIPFA code of practice.
- 4.18.4 While MUFG may advise the Council, the responsibility for treasury management decisions always remains with the Council and officers do not place undue reliance on the external service advice.
- 4.18.5 The TM limits for 2025/26 (Appendix D) have been reviewed. No changes are considered necessary since that agreed as part of the Mid-Year Review of 2024/25.
- 4.18.6 The latest list of “Approved Countries for Investment” is detailed in Appendix E. This lists the countries that the Council may invest with providing they meet the minimum credit rating of AA- . The Council retains the discretion not to invest in countries that meet the minimum rating but where there are concerns over human rights issues.

**4.19 Non-Treasury Investments**

**Part I**  
**Release to Press**

4.19.1 The CIPFA Prudential and Treasury Codes recommend that authorities' capital strategies should include a policy and risk management framework for all investments. The Codes identify three types of local authority investment:

- Treasury management investments, which are taken to manage cashflows and as part of the Council's debt and financing activity
- Commercial investments (including investment properties), which are taken mainly to earn a positive net financial return (previously purchased commercial investments only as Council's are no longer permitted to access PWLB rates if they invest in commercial investments primarily for gain.
- Service investments, which are taken mainly to support service outcomes

4.19.2 Details of the Annual Investment Strategy can be found in Appendix A.

**4.20 Investment returns expectations**

4.20.1 The current BOE base rate of 4.75% is expected to reduce to 4.5% by March 2025. The suggested budgeted investment earnings rates for returns on investments placed for periods up to about three months during each financial year are as follows: -

Average earnings in each year	
2025/26	4.1%
2026/27	3.7%
2027/28	3.5%
2028/29	3.5%
Years 6+	3.5%

4.20.2 As there are so many variables at this time, caution must be exercised in respect of all interest rate forecasts.

4.20.3 Against this view the forecast of interest earned on Treasury investments in 2025/26 is £1.7Million based on average balances of £44Million.

4.20.4 For its cash flow generated balances, the Council will seek to utilise its business reserve instant access and notice accounts, Money Market Funds and short-dated deposits, to benefit from the compounding of interest.

**4.21 Changes of investment strategy**

4.21.1 There are no proposed changes to the Strategy for 2025/26.

**4.22 OTHER ISSUES**

**Part I**  
**Release to Press**

- 4.22.1 **UK Sovereign rating and investment criteria:** The UK sovereign rating is currently on the lowest acceptable level suggested for approved countries as set out in Appendix E. The Council's investment criteria only use countries with a rating of AA- or above. The UK rating will be exempt from the sovereign rating investment criteria so in this event if it were to result in the UK being downgraded below AA- it would not impact on the Council's ability to invest with UK institutions. Other investment criteria will be considered in this event to ensure security of funds for the Council.
- 4.22.2 **Queensway Properties (Stevenage) LLP:** In December 2018, the Council entered into a 37-year agreement with Aviva to facilitate the regeneration of Queensway in the town centre. A separate legal entity, Queensway Properties (Stevenage) LLP, was incorporated to manage the rental streams and costs associated with the scheme.

## **5 IMPLICATIONS**

### **5.1 Financial Implications**

- 5.1.1 This report is of a financial nature and reviews the treasury management function for 2024/25 to date. Any consequential financial impacts identified in the Capital strategy and Revenue budget monitoring reports have been incorporated into this report.
- 5.1.2 During the financial year Officers operated within the treasury and prudential indicators set out in the Council's Treasury Management Strategy Statement and in compliance with the Council's Treasury management practices.

### **5.2 Legal Implications**

- 5.2.1 Approval of the Prudential Code Indicators and the Treasury Management Strategy are intended to ensure that the Council complies with relevant legislation and best practice.
- 5.2.2 There have been no changes to PWLB borrowing arrangements or changes to the Prudential and Treasury Management codes since the last Treasury report.

### **5.3 Risk Implications**

- 5.3.1 The current policy of minimising external borrowing only remains financially viable while cash balances are high and the differentials between investment income and borrowing rates remain. As these conditions change the Council may need to take borrowing at higher rates which would increase revenue costs.
- 5.3.2 The Council's Treasury Management Strategy is based on limits for counterparties to reduce risk of investing with only a small number of institutions.

## **Part I**

### **Release to Press**

5.3.3 The thresholds and time limits set for investments in the Strategy are based on the relative ratings of investment vehicles and counter parties. These are designed to consider the relative risk of investments and to preclude certain grades of investments and counterparties to prevent loss of income to the Council.

5.3.4 There is a risk to the HRA BP's ability to fund the approved 30-year spending plans if interest rates rise above planned rates - this will be included in future revisions to the BP.

#### **5.4 Equalities and Diversity Implications**

5.4.1 This report is technical in nature and there are no implications associated with equalities and diversity within this report. In addition to remaining within agreed counterparty rules, the council retains the discretion not to invest in countries that meet the minimum rating but where there are concerns over human rights issues. Counterparty rules will also be overlaid by any other ethical considerations from time to time as appropriate.

5.4.2 The Treasury Management Policy does not have the potential to discriminate against people on grounds of age; disability; gender; ethnicity; sexual orientation; religion/belief; or by way of financial exclusion. As such a detailed Equality Impact Assessment has not been undertaken.

#### **5.5 Climate Change Implications**

5.5.1 The council's investment portfolio is invested in sterling investments and not directly in companies. These investments are short term and mainly used for working capital purposes. The council uses mainstream rating agencies to assess counterparty creditworthiness – they now incorporate ESG risks alongside more traditional financial risk metrics when assessing counterparty ratings. In this way the TM team aligns with the Councils ambition to attempt to be carbon neutral by 2030.

### **BACKGROUND PAPERS**

- BD1 Treasury Management Strategy including Prudential Code Indicators 2024/25 (Council February 2024)

### **APPENDICES**

- Appendix A Treasury Management Strategy (TMS)
- Appendix B Minimum Revenue Provision Policy
- Appendix C Prudential Indicators
- Appendix D Specified and Non-Specified Investment Criteria
- Appendix E Approved Countries for investment
- Appendix F Approved Sources of Long and Short-term Borrowing

## Appendix A Treasury Management Strategy 2025/26

### 1. Treasury Management Policy Statement

- 1.1. The Council defines its treasury management activities as: “*The management of the Council’s investments and cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks*”.
- 1.2. The Council regards the successful identification, monitoring and control of risk to be the prime criteria by which the effectiveness of its treasury management activities will be measured. Accordingly, the analysis and reporting of treasury management activities will focus on their risk implications for the organisation.
- 1.3. The Council acknowledges that effective treasury management will provide support towards the achievement of its business and service objectives. It is therefore committed to the principles of achieving value for money in treasury management, and to employing suitable comprehensive performance measurement techniques, within the context of effective risk management.
- 1.4. This Strategy has been prepared in accordance with the CIPFA Treasury Management Code 2021. The Code requires the Council to approve the Treasury Management Strategy annually and to produce a mid-year and annual report. In addition, Members in both Executive and Scrutiny functions receive monitoring reports and regular reviews. The aim of these reporting arrangements is to ensure that those with ultimate responsibility for the treasury management function appreciate fully the implications of treasury management policies and activities, and that those implementing policies and executing transactions have properly fulfilled their responsibilities regarding delegation and reporting.
- 1.5. The Act requires the Council to set out its Treasury Management Strategy for borrowing and to prepare an Annual Investment Strategy to set out the Council’s policies for managing its investments and for giving priority to the security and liquidity of those investments.

### 2. Annual Investment Strategy

#### 2.1. Investment Policy – Management of Risk

- 2.1.1. The Ministry of Housing, Communities and Local Government (MHCLG) and CIPFA have extended the meaning of ‘investments’ to include both financial and non-financial investments. This report deals solely with treasury (financial) investments, (as managed by the treasury management team). Non-financial investments, essentially the purchase of income yielding assets and service investments, are covered in the Capital Strategy, (a separate report).

The Council’s investment policy has regard to the following:

- MHCLG’s Guidance on Local Government Investments (“the Guidance”)
- CIPFA Treasury Management in Public Services Code of Practice and Cross Sectoral Guidance Notes 2021 (“the Code”)
- CIPFA Treasury Management Guidance Notes 2021

The Council’s investment priorities will be security first, portfolio liquidity second and then yield, (return). The Council will aim to achieve the optimum return (yield) on its investments commensurate with proper levels of security and liquidity and regarding the Council’s risk appetite.

In the current economic climate, it is considered appropriate to maintain a degree of liquidity to cover cash flow needs but to also consider “laddering” investments for periods up to 12 months with high credit rated financial institutions, whilst investment rates remain elevated, as well as wider range fund options.

2.1.2. The guidance from the MHCLG and CIPFA place a high priority on the management of risk. This Council has adopted a prudent approach to managing risk and defines its risk appetite by the following means: -

- a. Minimum acceptable **credit criteria** are applied in order to generate a list of highly creditworthy counterparties. This also enables diversification and thus avoidance of concentration risk. The key ratings used to monitor counterparties are the short term and long-term ratings.
- b. **Other information:** ratings will not be the sole determinant of the quality of an institution; it is important to continually assess and monitor the financial sector on both a micro and macro basis and in relation to the economic and political environments in which institutions operate. The assessment will also take account of information that reflects the opinion of the markets. To achieve this consideration the Council will engage with its advisors to maintain a monitor on market pricing such as “**credit default swaps**” and overlay that information on top of the credit ratings.
- c. **Other information sources** used will include the financial press, share price and other such information pertaining to the banking sector in order to establish the most robust scrutiny process on the suitability of potential investment counterparties.
- d. This Council has defined the list of **types of investment instruments** that the treasury management team are authorised to use. There are two lists in Appendix D under the categories of ‘specified’ and ‘non-specified’ investments.
  - **Specified investments** are those with a high level of credit quality and subject to a maturity limit of one year.
  - **Non-specified investments** are those with less high credit quality, may be for periods in excess of one year, and/or are more complex instruments which require greater consideration by members and officers before being authorised for use.

The Council has determined that it will limit the maximum total exposure to non-specified investments as detailed in Appendix D.

- e. **Lending limits and Transaction Limits**, (amounts and maturity), for each counterparty will be set through applying the matrix table in Appendix D and will consider investments longer than 365 days
- f. This Council has engaged **external consultants**, MUFG Corporate Markets Treasury Limited (MUFG – formerly Link Asset Services), to provide expert advice on how to optimise an appropriate balance of security, liquidity and yield, given the risk appetite of this Council in the context of the expected level of cash balances and need for liquidity throughout the year.
- g. All investments will be denominated in **sterling**.



- h. The Council only invests in counterparties with a high credit quality in the UK or other countries meeting minimum AA- sovereign rating. The Council understands that changes have taken place to the ratings agencies and that their new methodologies mean that sovereign ratings are now of lesser importance in the assessment process. However, the Council continues to specify a minimum sovereign rating as the underlying domestic and where appropriate, international, economic and wider political and social background will still have an influence on the ratings of a financial institution (see Appendix E).
- i. As a result of the change in accounting standards for 2023/24 under IFRS 9, this Council will consider the implications of investment instruments which could result in an adverse movement in the value of the amount invested and resultant charges at the end of the year to the General Fund. (In November 2018, the MHCLG, concluded a consultation for a temporary override to allow English local authorities time to adjust their portfolio of all pooled investments by announcing a statutory override to delay implementation of IFRS 9 for five years ending 31.3.23. More recently, a further extension to the over-ride to 31.3.25 has been agreed by Government.
- j. However, this Council will also pursue value for money in treasury management and will monitor the yield from investment income against appropriate benchmarks for investment performance. Regular monitoring of investment performance will be carried out during the year.

## 2.2. Creditworthiness policy

- 2.2.1. The primary principle governing the Council's investment criteria is the security of its investments, although the yield or return on the investment is also a key consideration. Based on this this main principle, the Council will ensure that:
  - It maintains a policy covering the categories of financial instruments it will invest in, maximum investment duration, criteria for choosing counterparties with adequate security, and monitoring their security.
  - It has sufficient liquidity in its investments. For this purpose, it will set out procedures for determining the maximum periods for which funds may prudently be committed. These procedures also apply to the Council's Prudential indicators of the maximum principal sums invested more than 364 days.
- 2.2.2. The Assistant Director (Finance) will maintain a counterparty list in compliance with the criteria in the Strategy for Specified and Non-Specified Investment and will revise the criteria and submit them to Council for approval as necessary.
- 2.2.3. In determining the credit quality, the Council uses the Fitch credit ratings, together with Moody and Standard & Poor's equivalent where rated. Not all counterparties are rated by all three agencies and the Council will use available ratings.
- 2.2.4. The Council also applies the creditworthiness service provided by MUFG Asset Services. This service employs a sophisticated modelling approach utilising credit ratings from the three main credit rating agencies - Fitch, Moody's and Standard & Poor's. The credit ratings of counterparties are supplemented with the following overlays:
  - Credit watches and credit outlooks from credit rating agencies.

- Credit Default Swap (CDS) spreads. A CDS is a contract used to insure the holder of a bond against default by the issuer. A CDS can act as an indicator of default risk and provide an early warning of likely changes in credit ratings.
- Sovereign ratings to select counterparties from only the most creditworthy countries.

MUFG Asset Services modelling approach combines credit ratings, credit watches and credit outlooks in a weighted scoring system which is then combined with an overlay of CDS spreads for which the product is a series of colour coded bands which indicate the relative creditworthiness of counterparties. These colour codes are used by the Council to determine the suggested duration for investments.

2.2.5. Credit ratings will be monitored whenever an investment is to be made, using the most recent information. The Council is alerted to changes to ratings of all three agencies through its use of the MUFG creditworthiness service.

- If a downgrade results in the counterparty / investment scheme no longer meeting the Council's minimum criteria, its further use as a new investment will be withdrawn immediately.
- In addition to the use of credit ratings the Council will be advised of information in movements in credit default swap spreads against the iTraxx benchmark and other market data daily via its Passport website, provided exclusively to it by MUFG Asset Services. Extreme market movements may result in downgrade of an institution or removal from the Council's lending list.

2.2.6. Sole reliance will not be placed on the use of this external service. In addition, the Council will also use market data including information on government support for banks and the credit ratings of that government support.

2.2.7. The Council receives updates from MUFG on future changes to Money Market Funds (MMF) that might affect the liquidity or risk of the fund. The Council is likely to change its approach to the use of MMF should liquidity or risk be adversely affected.

2.2.8. There are alternatives to the PWLB for borrowing, for both the General Fund and the HRA, including the UK Municipal Bonds Agency. The UKMBA provides funding through three lending programmes. Current UKMBA trading levels in the market, inclusive of all fees, are lower than the PWLB Certainty rate at like maturities.

- Proportionally guaranteed, pooled loans of £1 million or more for maturities greater than one year.
- Standalone loans to a single local Council for £250 million or more for maturities greater than one year. These loans are outside of the proportional guarantee and are guaranteed solely by the borrower, who must obtain an external credit rating from one or more of the major credit rating agencies.
- Short term, pooled loans, outside of the proportional guarantee for maturities of less than one year.

To date the borrowing rates available were lower than those offered for comparable loans available from the Public Works Loans Board (PWLB) at the time of issuance. The Council may make use of this alternative source of borrowing as and when appropriate.

## 2.3. Investment Strategy

2.3.1. **In-house funds.** Investments will be made with reference to the core balance and cash flow requirements, anticipated capital financing requirements and the outlook for short-term interest rates (i.e., rates for investments up to 12 months). Greater returns are usually obtainable by investing for longer periods. While most cash balances are required to manage the ups and downs of cash flow, where cash sums can be identified that could be invested for longer periods, the value to be obtained from longer term investments will be carefully assessed.

- If it is thought that Bank of England base rate (Bank Rate) is likely to rise significantly within the time horizon being considered, then consideration will be given to keeping most investments as being short term or variable.
- Conversely, if it is thought that Bank Rate is likely to fall within that time period, consideration will be given to locking in higher rates currently obtainable, for longer periods.

## 3. Country limits

3.1. The Council has determined that it will only use approved counterparties from UK or selected countries with a minimum sovereign credit rating of AA- from Fitch Ratings (or equivalent from other agencies if Fitch does not provide). This is part of the criteria used to produce the Council's Counterparty List.

## 4. Borrowing Strategy and Policy on Borrowing in Advance of Need

4.1. The Council is currently maintaining an under-borrowed position. This means that the capital borrowing need (the Capital Financing Requirement), has not been fully funded with loan debt as cash supporting the Council's reserves, balances and cash flow has been used as a temporary measure. The current strategy is prudent as medium and longer dated borrowing rates are expected to fall from their current levels as current high inflation rates are expected to continue to reduce throughout 2025/26.

4.2. Against this background and the risks within the economic forecast, caution will be adopted with the 2025/26 treasury operations. The Assistant Director of Finance will monitor interest rates in financial markets and adopt a pragmatic approach to changing circumstances. When prudent to do so "internal borrowing" will be replaced with external borrowing in order to reduce interest rate risk.

4.3. Borrowing may be taken to facilitate investment in regeneration and/or economic improvements for the town. This may include investment in special purpose vehicles owned by the Council to facilitate regeneration aspirations. Any such investments will be presented to Members.

4.4. The Council will not borrow more than or in advance of its needs purely to profit from the investment of the extra sums borrowed. Any decision to borrow in advance will be considered carefully to ensure value for money can be demonstrated and that the Council can ensure the security of such funds.

4.5. In determining whether borrowing will be undertaken in advance of need the Council will:

- ensure that there is a clear MUF<sub>G</sub> between the capital programme and maturity profile of the existing debt portfolio which supports the need to take funding in advance of need

- ensure the ongoing revenue liabilities created, and the implications for the future plans and budgets have been considered
  - evaluate the economic and market factors that might influence the manner and timing of any decision to borrow
  - consider the merits and demerits of alternative forms of funding
  - consider the alternative interest rate bases available, the most appropriate periods to fund and repayment profiles to use.
- 4.6. Borrowing may be taken to facilitate investment in regeneration and/or economic improvements for the town. This may include investment in special purpose vehicles owned by the Council to facilitate regeneration aspirations. Any such investments will be presented to Members.

**5. End of year investment report**

5.1. At the end of the financial year, the Council will report on its investment activity as part of its Annual Treasury Outturn Report.

**6. Policy on the use of external service providers**

6.1. In October 2023, the Council reappointed MUFG Asset Services (formerly Link) as its treasury management advisors on a three-year contract. The new contract commenced on 1 November 2023.

6.2. The Council recognises that responsibility for treasury management decisions always remains with the organisation and will ensure that undue reliance is not placed upon our external service providers.

6.3. It also recognises that there is value in employing external providers of treasury management services to acquire access to specialist skills and resources. The Council will ensure that the terms of their appointment and the methods by which their value will be assessed are properly agreed and documented and subjected to regular review.

**7. Scheme of Delegation and Role of Section 151 officer**

**7.1. The Council has the role of:**

- receiving and reviewing reports on treasury management policies, practices and activities
- approval of annual strategy.
- approval of/amendments to the organisation's adopted clauses, treasury management policy statement and treasury management practices
- budget consideration and approval
- approval of the division of responsibilities
- receiving and reviewing regular monitoring reports and acting on recommendations
- approving the selection of external service providers and agreeing terms of appointment

7.2. **The Audit Committee** has the role of reviewing the policy and procedures and making recommendations to Council.

**7.3. The Section 151 Officer** has the role of:

- recommending clauses, treasury management policy/practices for approval, reviewing the same regularly, and monitoring compliance
- submitting regular treasury management policy reports
- submitting budgets and budget variations

- receiving and reviewing management information reports
- reviewing the performance of the treasury management function
- ensuring the adequacy of treasury management resources and skills, and the effective division of responsibilities within the treasury management function
- ensuring the adequacy of internal audit, and liaising with external audit
- recommending the appointment of external service providers.
- preparation of a capital strategy to include capital expenditure, capital financing, non-financial investments and treasury management, with a long-term timeframe ensuring that the capital strategy is prudent, sustainable, affordable and prudent in the long term and provides value for money
- ensuring that due diligence has been carried out on all treasury and non-financial investments and is in accordance with the risk appetite of the Council
- ensure that the Council has appropriate legal powers to undertake expenditure on non-financial assets and their financing
- ensuring the proportionality of all investments so that the Council does not undertake a level of investing which exposes the Council to an excessive level of risk compared to its financial resources
- ensuring that an adequate governance process is in place for the approval, monitoring and ongoing risk management of all non-financial investments and long-term liabilities
- provision to Members of a schedule of all non-treasury investments including material investments in subsidiaries, joint ventures, loans and financial guarantees
- ensuring that members are adequately informed and understand the risk exposures taken on by a Council
- ensuring that the Council has adequate expertise, either in house or externally provided, to carry out the above
- creation of Treasury Management Practices which specifically deal with how non treasury investments will be carried out and managed, to include the following (covered in Annual Capital Strategy Report).

In addition, high value and/or urgent payments can be made by CHAPS by the Treasury Team, however as these can have a material impact on cash flows on the day, authorisation for this type of payment must be obtained from the S151 or deputy S151 Officer.

7.4. Reporting arrangement to the Council and the Audit Committee is as below:

Area of Responsibility	Council Committee	Frequency
Treasury Management Policy Statement (revised)	Council	Initial adoption in 2010

Area of Responsibility	Council Committee	Frequency
Treasury Management Strategy / Annual Investment Strategy / Prudential Indicators and Minimum Revenue Provision (MRP) policy	Council	Annually before the start of the year
Treasury Management Strategy / Annual Investment Strategy / Prudential Indicators and MRP policy – mid-year report	Council	Annually before the end of the year
Treasury Management Strategy / Annual Investment Strategy / Prudential Indicators and MRP policy – updates or revisions at other times	Council	As required.
Annual Treasury Outturn Report	Council	Annually by 30 <sup>th</sup> November
Scrutiny of Treasury Management Strategy	Audit Committee	Annually before the start of the year
Scrutiny of Treasury Management performance (mid year)	Audit Committee	Annually by 31 <sup>st</sup> December

## Appendix B (February 2025 Update)

### Minimum Revenue Provision Policy

#### Minimum Revenue Provision Policy Statement 2025/26

From 2013/14, the council has not had a fully funded capital programme, and although there has not been a need to borrow in full externally, due to the use of investment balances, it is necessary to make adequate provision for the repayment of debt in the form of Minimum Revenue Provision.

The **preferred method for existing underlying borrowing is Option 3 – the Asset Life Method** (out of 4 allowable options – the council can use a mixture of options), whereby the MRP will be spread over the useful life of the asset which range. Useful life is dependent on the type of asset and was reviewed in 2019/20. Following that review asset lives now ranges from 7 years (ICT equipment) to 50 years (Investment properties, regeneration sites and car parks for example).

In applying the new asset lives historic MRP had been overpaid and in accordance with current MHCLG MRP Guidance can be reclaimed in future years. The council has a policy to ring fence costs and income associated with regeneration assets and as such has shown these MRP changes separately, see table below. The overpayment of £1,057,660.39 results in no MRP needing to be charged to the accounts for the regeneration assets until 2025/26, when a partial charge will be required, utilising the remainder of the overpayment balance.

voluntary MRP made		Use of overpayment	
	Regeneration		Regeneration
2012/13	£46,929.65	2020/21	£193,703.12
2013/14	£140,788.95	2021/22	£193,703.12
2014/15	£163,165.30	2022/23	£193,703.12
2015/16	£141,355.30	2023/24	£193,703.12
2016/17	£141,355.30	2024/25	£193,703.12
2017/18	£141,355.30	2025/26	£89,144.79
2018/19	£141,355.30		
2019/20	£141,355.30		
<b>cumulative total</b>	<b>£1,057,660.39</b>	<b>cumulative total</b>	<b>£1,057,660.39</b>

Capital expenditure financed by borrowing in 2024/25 will not be subject to an MRP charge until 2025/26, or in the financial year following the one which the asset first becomes available for use.

The Council will apply the asset life method for any expenditure capitalised under a Capitalisation Direction.

**Leases** - the adoption of International Financial Reporting Standard 16 has introduced a single lessee accounting model and requires a lessee to recognise assets and liabilities for all leases with a term of more than 12 months unless the underlying asset is low value.

Regarding MRP in respect of assets acquired either under leases where a right-of-use asset is on the balance sheet or where on-balance sheet PFI contracts are in place, the prudent charge to revenue is measured as being equal to the element of the rent/charge that goes to write down the balance sheet liability.

**Investment property** - MRP is chargeable in respect of investment properties where acquisition results in an increase to the CFR.

**Capital Loans** - where the Council has issued capital loans that are categorised as non-commercial, the provision of MRP will not apply on the following basis:

- (a) the loan is treated as capital expenditure in accordance with regulation 25(1)(b),
- (b) the loan is not a commercial loan, and
- (c) the local council has not recognised, in accordance with proper practices(c), any expected or actual credit loss in respect of that loan.

A commercial loan is defined in regulation 27(5) as a loan from the council to another entity for a purpose which, if the council were to undertake itself, would be primarily for financial return; or, where the loan is itself capital expenditure undertaken primarily for financial return.

The Council has determined that MRP is not required for borrowing or credit arrangements used to finance capital expenditure on housing assets and accounted for within the Housing Revenue Account (HRA) as it has determined, through its duty to charge depreciation and hold a Major Repairs Reserve, that prudent provision has been made.

The council will make MRP provisions with respect to any debt used to finance a commercial capital loan.

**Capital Receipts** - for capital expenditure on loans to third parties where the principal element of the loan has been repaid in annual instalments, the capital receipts arising from the principal loan repayments will be used to reduce the CFR instead of MRP.

Where no principal repayment is made in a given year, MRP will be charged using the Asset Life Method.

**Share Capital** - where an Council incurs expenditure that is capitalised on or after April 2008, which is financed by borrowing for the acquisition of share capital, Regulation 25(1)(d) Acquisition of share capital sets out the maximum period for an council to provide MRP of 20 years.



## THE CAPITAL PRUDENTIAL AND TREASURY INDICATORS 2025/26 – 2027/28

The Authority's capital expenditure plans are the key driver of treasury management activity. The output of the capital expenditure plans is reflected in the prudential indicators, which are designed to assist members' overview and confirm capital expenditure plans.

### (a) Capital Expenditure

Capital expenditure is where the Council spends money on assets, such as property or vehicles that will be used for more than one year. This includes spending on assets owned by other bodies, loans and grants to other bodies enabling them to buy assets.

Capital Expenditure	2025/26 Final Capital Strategy £000	2026/27 Estimate £000	2027/28 Estimate £000
General Fund	26,276	51,821	4,460
HRA	31,662	51,399	57,249
<b>Total Capital Expenditure</b>	<b>57,938</b>	<b>103,220</b>	<b>61,710</b>

### (b) Affordability Prudential Indicator

The previous sections cover the overall capital and control of borrowing prudential indicators, but within this framework prudential indicators are required to assess the affordability of the capital investment plans. These provide an indication of the impact of the capital investment plans on the Authority's overall finances. The Authority is asked to approve the following indicators: -

#### Ratio of financing costs to net revenue stream

Ratio of financing costs to net revenue stream %	2024/25 Estimate %	2025/26 Final Capital Strategy %
General Fund	-5%	-2%
HRA	12%	15%

General Fund: Net revenue stream is the RSG, NNDR grant and Council Tax raised for the year.

HRA: The net revenue stream is the total HRA income shown in the Council's accounts from received rents, service charges and other incomes. The ratio of financing costs to net revenue stream reflects the high level of debt as a result of self financing.

The estimates of financing costs include current commitments and the proposals in this budget report.

This page is intentionally left blank

**Specified and Non-specified Investment Criteria  
(including Treasury Limits and Procedures)**

Table 1

**Specified Investments** are sterling denominated with maturities up to maximum of one year and must meet the following minimum high credit quality criteria:

Investment Counterparty	Investment Instrument	Minimum High Credit Quality Criteria	Investment Duration
Banks or Building Societies	Overnight Deposit	Fitch: Short Term F1 and Long Term A and Moody, Standard & Poor, equivalent where rated, the lowest rating used where different	Maximum duration as per Treasury Advisor's (MUFG's) colour coded Credit List, and less than one year
	Notice Account	Part-nationalised or Nationalised UK banking institutions (subject to regular reviews of government share percentage).	
	Short Term Deposit		
OR			
Debt Management Office or UK Local Authority	Any deposit	No limit.	
Money Market Funds	Instant Access or with Notice	AAA rated	Instant Access or notice period up to one year

Table 2

**Non-Specified Investment** are sterling denominated with a maturity longer than one year but no longer than five years, and must meet the following criteria:

Investment Counterparty	Investment Instrument	Minimum High Credit Quality Criteria	Investment Duration
Banks or Building Societies	Any deposits with maturity up to a maximum of five years	Fitch: Short Term F1+ and Long Term AA- and Moody, Standard & Poor, equivalent where rated, the lowest rating used where different	Maximum duration suggested by Treasury Advisor's (MUFG's) colour coded Credit List, and not in excess of five years
Debt Management Office or UK Local Authority		No Limit.	

Table 3

## Treasury Limits

Investment Instrument	Cash balances less than £30Million	Cash balances higher than £30Million
	Limits	Limits
Variable Rate Investments (Excluding Enhanced Cash Funds)	Maximum holding £30M	Maximum holding 100%
Counterparty limits (to encompass all forms of investment)	Maximum £5M	Maximum £10M
Instant Access Or Overnight Deposit	Maximum holding 100%	
Fixed Rate less than 12 month maturity	Maximum holding 100%	
Fixed Rate more than 12 months to maturity (includes all types of Fixed Rate Investments i.e. Certificates of Deposits )	Maximum £5M	Maximum £10M
Money Market Funds - Traditional Instant Assess (Counterparty Limit per Fund)	Maximum £5M per MMF	Maximum £10M per MMF
	No limit on total cash held	
Enhanced Cash Funds	Maximum £3M	
Certificates of Deposits	Maximum £5M	
Property Funds	Maximum of £3M - No durational limit. Use would be subject to consultation and approval	

### Procedures of Applying the Criteria and Limits

Before the Treasury Team makes an investment, the Team will follow the follow procedure to ensure full compliance with the Specified and Non-Specified Criteria and Treasury Limits:

**1** Check that the Counterparty is on the Counterparty List (also known as Current Counterparty Report for Stevenage) produced by MUFG Asset Services (LAS), specifically meeting the Council's Specified and Non-specified Minimum High Credit Quality Criteria in the above Table 1 & 2. If it is not on the list, the Treasury Team will not invest with them.

**2** If the Counterparty is on the list, then the Treasury Team refers to the Credit List produced by LAS in colour coding, to determine the maximum investment duration suggested for the deposit, as per the column of Suggested Duration (CDS Adjusted with manual override).

**3** Refer to the Treasury Limits in the above Table 3 to ensure the amount invested complies with the Treasury Limits.

### Approved Countries for Investments

This list is based on those countries which have sovereign ratings of AA- or higher, (shown - the lowest rating from Fitch, Moody's and S&P) and also, (except - at the time of writing - for Hong Kong and Luxembourg), have banks operating in sterling markets which have credit ratings of green or above in the Link creditworthiness service.

#### *Based on lowest available rating (as at 25.11.24)*

##### AAA

- Australia
- Denmark
- Germany
- Netherlands
- Norway
- Singapore
- Sweden
- Switzerland

##### AA+

- Canada
- Finland
- U.S.A.

##### AA

- Abu Dhabi (UAE)
- Qatar

##### AA-

- Belgium
- France
- **U.K.**

**The UK is exempt from the sovereign rating criteria as recommended by MUFG. The UK sovereign rating is currently AA-.**

**The above list includes the possible countries the Council may invest with. Not all of these countries are used or will be used in treasury management investments**

This page is intentionally left blank

## Approved Sources of Long and Short-term Borrowing 2025/26

On Balance Sheet	Fixed	Variable
PWLB	●	●
UK Municipal Bond Agency	●	●
Local Authorities	●	●
Banks	●	●
Pension Funds	●	●
Insurance Companies	●	●
UK National Wealth Fund	●	●
Market (long-term)	●	●
Market (temporary)	●	●
Market (LOBOs)	●	●
Stock Issues	●	●
Local Temporary	●	●
Local Bonds	●	
Local Authority Bills	●	●
Overdraft		●
Negotiable Bonds	●	●
Internal (capital receipts & revenue balances)	●	●
Commercial Paper	●	
Medium Term Notes	●	
Finance Leases	●	●

This page is intentionally left blank



**Meeting** COUNCIL  
**Portfolio Area** Resources and Transformation  
**Date** 26 February 2025



## PAY POLICY STATEMENT 2025/26

### 1 PURPOSE

- 1.1 To approve the pay policy statement for financial year 2025/26.

### 2 RECOMMENDATIONS

- 2.1 That the pay policy statement set out in accordance with the Localism Act 2011 and the Local Government Transparency Code 2015, as attached at Appendix A to the report, be approved.
- 2.2 That members note and approve the proposed changes to Senior Officer salary scales from 1 April 2025 in line with the Appointments Committees Recommendations.
- 2.3 A payment is made to the retiring Chief Executive of £9,140, the reasons for which are set out in paragraph 4.8 and 4.9.
- 2.4 That the pay policy statement be placed on the Council's website once approved.

### 3 BACKGROUND

- 3.1 The Localism Act requires local authorities to adopt annually a statutory pay policy statement which must then be published (including on the Council's website) 'to help local people understand how public money is being spent in their area and to hold the Town Hall to account'.
- 3.2 No remuneration may be made to officers which falls outside the Pay Policy Statement although it will be possible for a meeting of the Council to amend

the Statement at any time.

- 3.3 The Pay Policy Statement must include its policies on the following matters:-
- the remuneration of its chief officers
  - the level and elements of remuneration for each chief officer,
  - the remuneration of chief officers on recruitment
  - increases and additions to remuneration for each chief officer
  - the use of performance related pay
  - the use of bonuses for chief officers
  - the approach to the payment of chief officers on their ceasing to hold office
- 3.4 'Remuneration' of chief officers includes pay and terms and conditions which may apply in the future and to chief officer appointments which may be made in the future.
- 3.5 The Statement may also set out policies relating to other terms and conditions relating to Chief Officers.
- 3.6 The Statement must also set out:
- The relationship between the remuneration of its chief officers and that of its employees who are not chief officers.
  - The Authority's definition of its 'lowest paid employees' for these purposes and the reasons for this definition and
  - The remuneration of its 'lowest paid employees'
- 3.7 For clarity, 'Chief Officer' includes the Head of Paid Service (the Chief Executive), the Chief Finance Officer, the Monitoring Officer (Borough Solicitor), non-statutory chief officers (the Strategic Directors), and deputy chief officers (Assistant Directors).
- 3.8 In approving its pay policy statement the Council must have regard to any guidance issued or approved by the Secretary of State. In 2012 'Openness and accountability in local pay' ("the Guidance") was issued. The Council is not bound to follow the guidance but must take it into account in approving the Statement.
- 3.9 The Act itself does not require local authorities to publish specific salary details in the Pay Policy Statement. However, the Accounts and Audit (England) Regulations 2011 and the Local Government Transparency Code 2015 require the publication in the accounts of salary bands and the salaries of Chief Officers. Salary bands for these posts have therefore been included in the Pay Policy Statement as suggested in the Guidance.
- 3.10 The Guidance refers extensively to the 2011 Hutton Review of Fair Pay in the Public Sector. This Review commented on fairness in pay and highlighted that the salary gap between the highest and lowest paid officers had grown in the years leading up to its publication. Hutton suggested that the relationship between chief officers and other employees is explained and taken into account in remuneration decisions for all staff. The relationship he recommended can be illustrated by the

publication of pay multiples – the ratio between the highest paid employee and mean average earnings.

- 3.11 The Statement therefore includes pay multiples comparing the Chief Executive’s remuneration against the lowest paid employees and mean average earnings across the Council.
- 3.12 The Guidance also expressed concerns that senior staff moving posts within the public sector could be seen as driving up average pay levels particularly where the sector as a whole is paying twice through a salary and a pension. As a closely related issue ‘Authorities should use their Pay Policy Statement to explain their policies towards re-engaging chief officers who have received severance or redundancy payments from that authority’. Although it is not envisaged that any such appointments will be made the Council has adopted a policy which relates to all Council officers, including chief officers and states that “Any employee who takes voluntary redundancy will not be permitted to return to the employment of Stevenage Borough Council, either as a permanent or fixed term employee, for a minimum period of 12 months following the date of their redundancy. There is no restriction on returning to employment following compulsory redundancy”.
- There is no restriction on returning to the wider public sector, however, in line with the Redundancy Payment (Local Government) (Modification) Order 1999 (as amended) officers who are made redundant, receive an offer of employment from another public body before their employment terminates and then start work in the new job within 4 weeks of that termination will lose their entitlement to a redundancy payment.
- 3.13 The proposed pay policy takes account of the supplementary statutory guidance issued under the Localism Act 2011, in February 2013 by the Secretary of State, on pay policy statements and remuneration above £100,000.

#### **4. REASONS FOR RECOMMENDED COURSE OF ACTION AND OTHER OPTIONS**

- 4.1 The pay policy is set out in Appendix A and identifies the pay for the Council’s senior staff and the pay differentials between the Chief Executive and the mean average earnings and lowest paid worker. Since the 2024/25 pay policy a number of changes have been approved or are recommended in the 2025/26 pay policy report.
- Changes to Senior pay scales.**
- 4.1 Since the 2024/25 pay policy report the Appointments Committee has met to consider Chief Executive, Strategic Directors and Assistant Directors remuneration. The Committee considered a report in November 2024 which recommended an increase in the Chief Executive’s salary, which was duly ratified by Council on the 18 December 2024.

- 4.2 The November 2024 Appointments Committee report also identified that further benchmarking was being undertaken relating to Strategic Director and Assistant Director roles. Further to this it was noted that any proposals resulting from the assessment / benchmarking exercise would be presented to the Appointments Committee for consideration and, if approved, included as part of the Pay Policy report to Council in February 2025.
- 4.3 The Strategic Director and Assistant Director pay was subsequently reviewed by the Appointments Committee on the 12 February 2025. The associated report included the results of an independent (TBP2 Consultancy) report which considered the remuneration levels for associated roles in relation to upper and lower quartile pay for Hertfordshire, South East and Outer London.
- 4.4 The Appointments Committee unanimously agreed the revised pay scales in line with the Hertfordshire Districts pay as set out in Appendix A for Directors as summarised below.

Strategic Directors	Bottom of Scale	Top of Scale
Current Pay Scale	£90,176	£104,472
Recommendation based on Hertfordshire Lower & Upper Quartile	£107,000	£121,000
Increase	£16,824	£16,528

- 4.5 The comparators were more a bit difficult to compare for the Assistant Director roles because comparator Councils operate with different senior officer operating models. Accordingly, the recommendations for Assistant Director pay was based predominantly on the current remuneration packages noting that circa 50% of AD's being paid above the top of current grade via market forces payments because the Council has not been able to secure appointments within the existing pay scales. This was the case for the last two recruitments hence why the AD Finance role was advertised recently at up to £95,500. Essentially the proposed pay scale for AD's largely reflects what the Council is having to pay now i.e. top of the current pay scale with the addition of market forces supplements. The Appointments Committee unanimously agreed the increase below based on this information.

Assistant Directors	Bottom of Scale	Top of Scale
Current Pay Scales	£75,227	£87,099
Recommended based on market forces currently paid	£82,750	£96,000
Increase	£7,523	£8,901

- 4.6 Further rationale for the proposed Strategic and Assistant Director pay increases includes:
  - Senior Management remuneration has not been reviewed for nearly 20 years and a number of market forces supplementary payments are in place.

- Ensuring that Stevenage’s senior staff pay remains competitive and the Council is able to attract and retain staff, particularly noting the likely additional challenge posed going forwards concerning the implementation of Local Government Reform.
- The Council is already paying market forces for a number of Assistant Director roles and the latest round of recruitment necessitated advertising the role at circa £95,500.
- Strategic Director supplements as in included in the pay policy annually can be removed when these posts are next appointed too if the new pay scales are approved and the pay levels continue to be competitive.
- The Council now needs to recruit a new Director and has two Assistant Director posts are currently vacant.

4.7 Council is recommended to approve the changes to senior pay as set out above and included in the pay policy.

**Other Pay Adjustments:**

4.8 Since Council met in January 2025, the Leader of the Council in conjunction with his Cabinet Members have considered the pay of the current Chief Executive following the changes set out in paragraph 4.1 for the in-coming Chief Executive. A number of factors were considered when making the decision to recommend that the incumbent should also be paid at the higher rate from the date of the Council decision to do so including:

- The Council’s pay policy is that when a grade or market force supplement for any given role changes, it should be applied from the date the change is agreed.
- To ensure the Council is equitable in terms of pay and is a fair and reasonable employer.

4.9 Based on the factors above the Cabinet are recommending that from the date the new Chief Executive pay scales were approved, 18 December 2024, the existing Chief Executive should also be paid at the increased level. This equates to a payment of £9,140, to reflect the difference between the current Chief Executives pay and pay scale for the role which was approved by Council in December 2024.

**5. IMPLICATIONS**

**5.1 Financial Implications**

5.1.1 The 2025/26 impact of the proposed new pay levels for Strategic Director and Assistant Director roles is summarised below and will be included in the next budget monitoring update.

Pay increase impact on budgets	General Fund increase	Housing Revenue Account increase	Shared Service partner increase	Total Increase
2025/26	£12,690	£12,140	£1,240	£26,070

- 5.1.2 The payment to the incumbent Chief Executive will also result in a modest positive impact on his final salary pension payment.

## **5.2 Legal Implications**

- 5.2.1 Sections 38 to 43 of the Localism Act 2011 require Councils to prepare a Pay Policy Statement for each financial year and the Secretary of State, pursuant to section 40, has issued both the original Pay Accountability Guidance in February 2012 and a supplementary guidance in February 2013. The content of this report and the recommendations comply with the Council's responsibilities in this regard. Section 39(4) permits the Council to amend its policy by resolution, if required in-year.
- 5.2.2 The payment recommended to be made to the incumbent Chief Executive is in accordance with paragraph 3.2 above.

## **5.3 Equalities and Diversity Implication**

- 5.3.1 The Council has a legal obligation to comply with the Equality Act 2010, and to ensure equal pay for work of equal value, for men and women. The Council implemented single status with effect from 1 July 2014 to ensure compliance.
- 5.3.2 The Council publishes its Gender Pay Gap Report on an annual basis. A copy of this report can be found on the Council's website at the following link –

[www.stevenage.gov.uk/documents/about-the-council/access-to-information/data-transparency/gender-pay-gap-31-march-2023.pdf](http://www.stevenage.gov.uk/documents/about-the-council/access-to-information/data-transparency/gender-pay-gap-31-march-2023.pdf)

## **APPENDICES**

Appendix A- Stevenage Borough Council Pay Policy Statement 2025/26.

## APPENDIX A – PAY POLICY STATEMENT FOR STEVENAGE BOROUGH COUNCIL

This Pay Policy Statement is made in accordance with Chapter 8 of the Localism Act, 2011.

This policy shall apply from 1 April 2025 to 31 March 2026 subject to amendment by Council.

To date no Chief Officers' Pay Award has been agreed 2025/26 at a national level. Should an award be agreed this will be implemented in line with national guidance.

### Remuneration bands of senior officers are set out here:

Head of Paid Service/ Chief Executive	£145,000-£165,000
Deputy Chief Executive (Strategic Director pay band plus 10%)	£117,000- £133,100
Strategic Directors	£107,000-£121,000
Monitoring Officer/ Borough Solicitor	Employed by Hertfordshire County Council as part of a shared legal service.
Section 151 Officer	The section 151 officer receives a supplement of up to £7,744 per annum in addition to their Strategic Director pay
Assistant Directors	£82,750-£96,000

*Lowest Paid Employees with effect from 1 April 2025	£24,308
**Mean Average Basic Earnings	£42,016

\*Excludes apprentices. 'Lowest Paid Employee' means the employees on the lowest grade assuming that the posts are full time.

\*\* At the time of writing no pay award for NJC staff has been agreed for financial year 2025/26 has been agreed

1. Any employee, up to and including those on grade 6, is eligible for an overtime payment at an enhanced rate of +0.33 of their basic pay hourly rate for any overtime hours worked Monday to Saturday and +1.00 for any

overtime hours worked on a Sunday for any additional hours worked over 37 per week.

2. Employees at or below Grade 6 that are required to undertake non-standard working are entitled to non-standard working enhancements. In addition to their normal salary those employees at or below grade 6, who are required as part of their contracted hours to work on a Saturday, or for longer than 4 consecutive hours between 10pm and before 7am receive a shift enhancement of +0.33 of their basic salary for those hours, and employees at or below grade 6 who are required to work on a Sunday as part of their contracted hours receive a shift enhancement of +1.00 of their basic salary, this rate of enhancement also applies to any hours worked on a public holiday.
3. With effect from 1 January 2014 the Council commenced paying the Living Wage to all employees, excluding apprentices. SBC updates the Living Wage on 1 April each year. With effect from 1 April 2025 this will be £12.60 per hour which equates an annual salary of £24,308.
4. The pay of the Chief Executive (excluding payments for elections) is currently 5.97 times the pay of the lowest paid worker and this ratio is not expected to change significantly. The pay of the Chief Executive is currently 3.53 times the pay of mean average earnings. It should be noted at the time of writing no national pay award has been for any staff group for 2025/26.
5. Many of the Chief Officers, Deputy Chief Officers and other employees receive a payment for attending and performing certain duties at elections. These payments are set in line with guidance produced per election type.
6. Salary packages amounting to £100,000 or more for new appointments will be approved by Full Council.
7. Salary increments are paid annually by default for all employees of the Council up to the top of the pay grade.
8. The pay of Chief Officers and Deputy Chief Officers is based on job evaluations undertaken through the Inbucon scheme.
9. The terms and conditions of Chief Officers and Deputy Chief Officers are set in accordance with the JNC.
10. Chief Officers and Deputy Chief Officers including any new appointments at this level will be made in accordance with the pay scales set out above.



11. All employees including Chief Officers and Deputy Chief Officers are entitled to redundancy payments based on the same multiple of 2.5 times statutory provision and based on actual weekly pay.
12. Any redundancy or severance packages of £100,000 or more for Chief Officers must be approved by Full Council.
13. Any employee who takes voluntary redundancy will not be permitted to return to the employment of Stevenage Borough Council, either as a permanent or fixed term employee, for a minimum period of 12 months following the date of their redundancy. There is no restriction on returning to employment following compulsory redundancy but an employee who is re – employed following redundancy must have a break of at least four weeks between the termination of the first employment and the start of the second in order to retain a redundancy payment
14. All employees including Chief Officers and Deputy Chief Officers are entitled to retirement pensions calculated in the same way under the Local Government Pension Scheme (Administration) Regulations 2008, Regulations 2014 and the Council Pension Discretion Policy. These Regulations require the Council to publish its policy on increasing an employee's total pension and on awarding additional pension.
15. The Local Government (Early Termination of Employment) (Discretionary Compensation) (England and Wales) Regulations 2006 require the Council to formulate, review and publish its policy on making discretionary payments on early termination of employment.
16. The terms and payment of terminating the employment of any officer of the Council in any contentious circumstances which do not result from an award made by an Employment Tribunal or Court are settled by the Council on the basis of the legal merits of the case, the time and disruption which protracted litigation would involve, any limit of statutory entitlement on monetary claim available to an employee and what is considered prudent in all the circumstances.

This page is intentionally left blank

**Meeting** Council

**Portfolio Area** Communities, Community Safety and Equalities

**Date** 26<sup>th</sup> February 2025



## LICENSING ACT 2003 – REVIEW OF STATEMENT OF LICENSING POLICY

**Authors** Julie Dwan | 2493

**Lead Officers** Rory Cosgrove | 2888 & James Chettleburgh | 2266

**Contact Officer** Julie Dwan | 2493

### NON-KEY DECISION

#### 1 PURPOSE

- 1.1 To consider and adopt the Council's proposed Statement of Licensing Policy as required under the Licensing Act 2003 (the Act).
- 1.2 To note that the draft Statement of Licensing Policy was considered by the Council's General Purposes Committee at their meeting on 4<sup>th</sup> December 2024, by Cabinet on 15<sup>th</sup> January 2025 and Overview & Scrutiny on 21<sup>st</sup> January 2025.

#### 2 RECOMMENDATIONS

- 2.1 That the Council notes the report and agrees the proposed Stevenage Borough Council Licensing Act Statement of Licensing Policy 2025-2030 (attached at **appendix A**).
- 2.2 That the Council recommends the proposed Stevenage Borough Council Statement of Licensing Policy be adopted.
- 2.3 That the Council agrees that Licensing Officers, the Licensing Manager and the Head of Environmental Health and Licensing, in their capacity as 'The

Licensing Authority', are approved to act on behalf of the Council as a Responsible Authority as prescribed in the Licensing Act 2003 (13.4 & 69.4).

- 2.4 That the Council notes that sections 6.3.1 and 16.6.5 of the draft policy have been amended accordingly to remove any wording which conflicts with the above proposed recommendation.
- 2.5 That the Council note if the decision is made to agree for the Licensing Authority to act as a Responsible Authority, amendments to the Council's Constitution may be required, specifically Part 3 – Responsibility for Functions.

### **3 BACKGROUND**

- 3.1 The Council is the licensing authority for the purposes of the Act and consequently is under a duty to prepare a Statement of Licensing Policy that it proposes to apply in exercising its functions under the Act.
- 3.2 The Statement of Licensing Policy sets out the general approach the Council will take when carrying out its regulatory role under the Act and promoting the four licensing objectives:
- The prevention of crime and disorder
  - Public safety
  - The prevention of public nuisance
  - The protection of children from harm
- 3.3 Each objective is of equal importance. There are no other statutory licensing objectives, therefore the promotion of the four objectives is a paramount consideration at all times.
- 3.4 However, the legislation also supports a number of other key aims and purposes. These are vitally important and should be principal aims for everyone involved in licensing work. They include:
- protecting the public and local residents from crime, anti-social behaviour and noise nuisance caused by irresponsible licensed premises;
  - giving the police and licensing authorities the powers they need to effectively manage and police the night-time economy and take action against those premises that are causing problems;
  - recognising the important role which pubs and other licensed premises play in our local communities by minimising the regulatory burden on business, encouraging innovation and supporting responsible premises;

- providing a regulatory framework for alcohol which reflects the needs of local communities and empowers local authorities to make and enforce decisions about the most appropriate licensing strategies for their local area; and
  - encouraging greater community involvement in licensing decisions and giving local residents the opportunity to have their say regarding licensing decisions that may affect them.
- 3.5 Licensing authorities are responsible for administering the Act and this function is delegated to the council's General Purposes Committee. The Committee is responsible for considering and proposing the authority's licensing policy through developing a statement of licensing policy prior to its approval by the licensing authority (Full Council), and for taking decisions on specific licence applications or issues.
- 3.6 Statutory guidance for licensing authorities is issued by the Secretary of State under Section 182 of the Act, often referred to as 'Section 182 guidance'. Licensing authorities have a duty to have regard to this guidance and it should be adhered to unless there is good reason to depart from it. The Section 182 guidance is a comprehensive and useful tool describing the discharge of functions under the Act, including processes for hearings, and is updated periodically.
- 3.7 In shaping a policy, the licensing authority must have regard to the Section 182 guidance as well as giving appropriate weight to the views of the local community. Whilst there is a certain amount of flexibility in setting an approach to making licensing decisions, this cannot be inconsistent with the provisions in the Act. The statement cannot create new requirements for applicants outside of the Act, or override the right of anyone to make an application under the Act, make representations or seek a review of a licence.
- 3.8 The policy takes on additional significance in the event that an applicant challenges or appeals the Council's decision on a specific application. At this point the Magistrates court will adopt the licensing authority's policy as if it were its own.
- 3.9 The Policy seeks to strike a balance between the interests of licence holders, applicants and residents in the promotion of the licensing objectives defined by the Act. Additionally, it outlines the licensing authority's expectations of licence holders in promoting the licensing objectives, whilst advising on the licensing authority's obligations under the Act, including its interpretation of the Act and/or Statutory Guidance where necessary. The Statement is designed to offer appropriate protection for residents and a streamlined approach to regulation that eases unnecessary burdens on businesses.

- 3.10 The current Statement was adopted by full Council in February 2020 and must now be reviewed and, where necessary, revised.

### **Proposed changes**

- 3.11 A limited number of additions and amendments to the extant Statement of Licensing Policy were consulted upon, to reflect the most recent Section 182 Guidance. In all respects however the format of the new policy reflects that of its predecessor and is in line with Local Government Association guidance.
- 3.12 The draft policy can be found at Appendix A; all significant additions or variations from the 2020—2025 policy have been listed in the version history on page 47 of the draft policy document. There are no changes to the intent or direction in the proposed 2025-2030 policy, which sets out how the Council seeks to regulate alcohol and entertainment activities under its control and provide a framework for consistent decision making.
- 3.13 . In summary the principal proposed changes are as follows:
- The format of the policy has been amended in line with the corporate structure as recommended by the Council’s Cooperate Policy & Performance Manager
  - All typographical errors in the previous 2020-2025 Policy have been addressed and any changes to the names of projects and services referenced in this policy have also been amended
  - Contact details for the Council’s Licensing team have been updated throughout the 2020-2025 policy document. References made to ‘Challenge 21’ have been amended to ‘Challenge 25’
  - The pool of model premises licence conditions mentioned in section 6.11.13 of the draft policy document have been revised and updated. See **Appendix E**.
  - Amendments made in regard to audience size in section 6.2.2 of the draft policy document following Legislative changes to the Live Music Act 2012 which deregulates amplified live and recorded music.

### **Consultation**

- 3.14 Before determining its policy, the licensing authority must consult the persons listed in section 5(3) of the 2003 Act. These are:
- the chief officer of police for the area;
  - the fire and rescue authority for the area;

- each local authority’s Director of Public Health in England (DPH)14 or Local Health Board in Wales for an area any part of which is in the licensing authority’s area,
  - persons/bodies representative of local premises licence holders;
  - persons/bodies representative of local club premises certificate holders;
  - persons/bodies representative of local personal licence holders; and persons/bodies representative of businesses and residents in its area
- 3.15 The views of all these persons or bodies should be given appropriate weight when the policy is determined. It is recognised that in some areas, it may be difficult to identify persons or bodies that represent all parts of the industry affected by the provisions of the Act, but licensing authorities must make reasonable efforts to do so.
- 3.16 To comply with this requirement, the licensing authority published the draft Policy on a dedicated webpage on the Council’s website and social media pages including Facebook, Twitter and Instagram with a link to the draft policy document, details of the consultation period and an explanation of how to make a representation. The web page was available between 23<sup>rd</sup> October and 20<sup>th</sup> November 2024 and the social media posts went out on 19<sup>th</sup> November for the remainder of the consultation period. A public Notice was also displayed on the outside window at Daneshill House and in the Comet newspaper dated 31st October 2024. A consolidated list of persons/bodies who were consulted on the draft policy document are at **Appendix B.**
- 3.17 As a result of the consultation exercise, two responses were received from the Portman Group and the Local Planning Authority and are attached at **Appendix C.**
- 3.18 **The Portman Group** – They operate on behalf of the alcohol industry and have a code of Practice on the naming, packaging and Promotion of Alcoholic Drinks which seeks to ensure that drinks sold on licensed premises are packaged and promoted in a socially responsible manner. Complaints about a product’s packaging or point of sale advertising which fail the code are considered by an independent complaints panel and the panel’s decision published online. Retailer alert bulletins are sent out to notify retailers of decisions made, to ask retailers to remove/not replenish stock of such a product. In their response they ask that the Council consider following other local authorities by adding some text into the policy concerning their regulatory work regarding the Code of Practice for licence holders and encourage retailers in the area to abide by retailer Alert Bulletins to remove irresponsible products and promotions. They would also like the Council to consider imposing conditions on premises licences, where evidence of

irresponsible alcohol promotion is found, requesting licence holders to comply with the Portman Group's Retailer Alert Bulletins.

- 3.19 **The Local Planning Authority** – Have proposed amendments to paragraph 3.5 of the draft policy so that it reads 'The Council's planning policies are set out in its local Plan. Central Government policy and guidance in the form of...' the statement also makes reference to 'Executive' which needs to be replaced with 'Cabinet' as the Executive Committee was replaced with Cabinet which took effect from June 2024.
- 3.20 All consultation responses and comments have been carefully reviewed. Recommendations from the Local Planning Authority to amend the wording in paragraph 3.5 has been addressed on version 2 of the draft policy statement attached at Appendix A, and all references made to the 'Executive' have been replaced with 'Cabinet'
- 3.21 The Portman Groups recommendation to add some text into the policy concerning their regulatory work and their code of practice has been included in section 6.14 of version 2 of the draft policy document and includes a sentence stating that the Council will encourage retailers in the area to sign up to and abide by Portman Groups Retailer Alert Bulletins to remove irresponsible products and promotions.
- 3.22 The proposal to impose conditions on premises licences, where evidence of irresponsible alcohol promotion is found, requesting licence holders to comply with the Portman Groups Retailer Alert Bulletins has not been included in version 2 of the draft policy statement. This condition is difficult to enforce, the Portman Group do not have any statutory powers and the packaging and promotion of such products is the responsibility of the companies which produce them. I have liaised with the Herts and Beds Licensing Group and none of its members which include our neighbouring Local Authorities impose such conditions.

#### **4 REASONS FOR RECOMMENDED COURSE OF ACTION AND OTHER OPTIONS**

- 4.1 Section 5 of the Licensing Act 2003 requires licensing authorities to publish a statement of licensing policy every five years in accordance with prescribed requirements. The adoption of the statement of licensing policy is a non-executive function by virtue of the Act and Statutory Guidance and is reserved for Full Council
- 4.2 The only alternative option would be to adopt a policy that differs in content and/or extent from the document proposed here. An alternative policy has not been considered as the one proposed achieves an effective balance between ensuring the promotion of the licensing objectives and avoiding being overly prescriptive or prohibitive to applicants and licence holders.



4.3 The draft Statement of Licensing policy was considered by the Council's General Purposes Committee at their meeting on 4<sup>th</sup> December 2024. The following comments and amendments to the proposed Statement of Licensing Policy were made by Members:

- That Licensing Officers, the Licensing Manager and the Head of Environmental Health and Licensing, in their capacity as 'The Licensing Authority', are approved to act on behalf of the Council as a Responsible Authority as prescribed in the Licensing Act 2003. (13.4 & 69.4)
- That sections 6.3.1 and 16.6.5 of the policy be amended accordingly and remove any wording which conflicts with the above proposed recommendation.

4.4 The wording in section 6.3.1 has been amended from: 'Licensing authorities themselves are included within the prescribed list of responsible authorities under the Act'.

To: 'Licensing authorities themselves are included within the prescribed list of responsible authorities under the Act. The Licensing Authority will determine when it considers it appropriate to act in its capacity as a responsible authority in the initiating of a licence review and to make representations with regards to licence applications. When acting as a Responsible Authority the Licensing Authority will, as far as is reasonably practicable, operate in accordance with the Home Office Guidance to Licensing Authorities, in that there will be clear and identifiable separation of responsibilities. The function of initiating a licence review or making representations regarding licence applications will primarily lie with the Licensing Manager, the Head of Environmental Health and Licensing or an appropriately authorised Licensing Officer within the Council's Licensing Team'.

4.5 The wording section 6.16.5 has been amended from: 'The Licensing Authority in its duties recognises that it cannot itself initiate any review application. The role of the Licensing Authority will be solely to administer the process, and to determine the application by way of a hearing, at which time evidence to support the review can be given'.

To: 'The Licensing Authority will determine when it considers it appropriate to act in its capacity as a responsible authority in the initiating of a licence review. When acting as a responsible authority the Licensing Authority will, as far as is reasonably practicable, operate in accordance with the Home Office Guidance to Licensing Authorities, in that there will be clear and identifiable separation of responsibilities. The function of initiating a licence review will primarily lie with the Licensing Manager, the Head of Environmental Health and Licensing or an appropriately authorised Licensing Officer within the Council's Licensing Team'.

- 4.6 The benefits of the Licensing Team to be granted the delegation to act on behalf of the Licensing Authority as a Responsible Authority will allow the team to make representations with regards to licensing applications which are received, or if they deem it appropriate, initiate or support another responsible authority, in a review of a premises licence. This will provide more enforcement powers in respect of premises which the Licensing Authority grant Licences to, specifically those that are in breach of their licence and fail to uphold the four licensing objectives.
- 4.7 The General Purposes Committee resolved:
- That the proposed Stevenage Borough Council draft Statement of Licensing Policy 2025-2030 including amendments, attached at Appendix A in the report, be supported.
  - That the Cabinet be requested to agree the Stevenage Borough Council draft Statement of Licensing Policy for onward recommendation to Council.
- 4.8 The draft Statement of Licensing policy including amendments was considered by Cabinet on 15<sup>th</sup> January 2025
- 4.9 Cabinet resolved:
- That the proposed Stevenage Borough Council draft Statement of Licensing Policy 2025-2030 including amendments proposed by the General Purposes Committee, attached at Appendix A in the report, be supported, and note that amendments to the Council's Constitution may be required.
  - That the Council agree and adopt the Stevenage Borough Council proposed Statement of Licensing Policy including amendments.

## **5 IMPLICATIONS**

### **Financial Implications**

Fees under the Licensing Act have been fixed in regulations since 2005. Premises and club premises licence fees are based on the rateable value of the premises. Whilst fees were intended to provide full cost-recovery, it is considered that this is not the case since operational costs have increased but the fees have remained unchanged since 2005.

### **Legal Implications**

- 5.1 The Licensing Authority has a statutory duty to produce a Statement of Policy under the Licensing Act 2003. Inadequate implementation of the Act would result in lack of clarity and direction for businesses and residents.

### **Equalities and Diversity Implications**

- 5.2 An Equalities Impact Assessment was carried out in November 2024 No significant impacts were identified to any individuals or businesses. A copy of

the Equalities Impact Assessment can be found at Appendix 11.4 of the draft policy document.

### **Community Safety Implications**

- 5.3 The Act has a community safety implication arising from the licensing objectives. There are currently no local concerns regarding the impact of Licensable activities on community safety, and it does not appear within the Council's community safety plan.

## **BACKGROUND DOCUMENTS**

- BD1 Licensing Act 2003
- BD2 Revised Guidance issued under section 182 of the Licensing Act 2003 (December 2023)
- BD3 Licensing Act 2003 Statement of Policy 2020-25

## **APPENDICES**

- A Licensing Act 2003 draft Statement of Policy V2
- B Consolidated list of consultees
- C1 Consultation response from the Portman Group
- C2 Consultation response from The Local Planning Authority
- D1 Consultation letter
- D2 Public Notice
- D3 Newspaper Notice
- D4 Social Media Post
- E Stevenage pool of model premises licence conditions

# Statement of Licensing Policy

Stevenage Borough Council

[2025-2030]

<b>Date created</b>	4 <sup>th</sup> October 2024
<b>Approved by</b>	
<b>Owner</b>	Rory Cosgrove (Head of Environmental Health & Licensing)
<b>Version</b>	Draft Version 3
<b>Author</b>	Julie Dwan (Acting Licensing Manager)
<b>Business Unit and Team</b>	Planning & Regulation (Environmental Health & Licensing)
<b>Policy Review Date</b>	February 2025
<b>Equality Impact Assessment Date</b>	November 2024

For translations, braille or large print versions of this document please email [equalities@stevenage.gov.uk](mailto:equalities@stevenage.gov.uk).

## Contents

---

1. Purpose.....	4
2. Scope .....	4
3. Legal Framework.....	65
4. Equalities .....	7
5. Data Protection .....	7
6. Policy.....	7
Licensable Activities.....	7
The Licensing Authority as a Responsible Authority.....	10
Culture, Live Music, Dancing & Theatre.....	11
Circuses.....	13
Cumulative Impact.....	13
Early Morning Restriction Order (EMRO).....	15
Late Night Levy.....	16
Licensing Hours.....	17
Conditions.....	18
Mandatory Conditions.....	21
Licensing Objectives.....	22
Naming Packing & Promotion in Retail Premises.....	28
Enforcement.....	29
Licence Reviews.....	30
Licence Suspensions.....	31
Temporary event notices.....	32
Sexual Entertainment.....	34
Administration, Exercise and Delegation of Functions.....	35
Applications for Personal Licences.....	36

Equal Opportunities.....	37
7. Consultation .....	4039
8. Monitoring and Review .....	4139
9. References and Resources .....	4139
10. Abbreviations and Definitions .....	4341
11. Appendices.....	4343
Appendix 11.1- Table of Delegations & Licensing functions.....	
Appendix 11.2 - Case-law & Guidance Sources.....	
Appendix 11.3 - Useful Contacts.....	
Appendix 11.4 - Equalities Impact Assessment- November 2024.....	
12. Version History .....	<b>Error! Bookmark not defined.</b> 43

DRAFT

## **1. Purpose**

1.1 The purpose of this policy is to set out the approach that the Licensing Authority intends to take when determining applications and carrying out its duties with regard to regulation and enforcement. The policy does not seek to fully explain the various application processes, however guidance and advice on making an application or requesting a review of a licence is available from the Licensing Authority on request. Applicants and members of the public are advised to contact the Licensing Authority in the event of any enquiry for appropriate advice.

1.2 The Act requires the Licensing Authority to carry out its licensing function to promote the four licensing objectives:

- The prevention of crime and disorder
- Public safety
- The prevention of public nuisance
- The protection of children from harm

1.3 This Policy will replace all previous versions. The Statement of Licensing Policy is revised every five years. The previous version of this policy was approved on 26<sup>th</sup> February 2020.

## **2. Scope**

2.1 The Licensing Authority recognises that as part of implementing its cultural strategy, proper account will have to be taken of the need to encourage and promote live music, dancing and theatre for the wider cultural benefit of the community. Any conditions that may be required for these activities between the hours of 11pm and 5am for audiences of any size will not, therefore, discourage the promotion of such entertainment but will relate solely to the promotion of the licensing objectives.

2.2 The specific activities which require a licence under the provisions of the Act, and which are covered in the policy statement include:

- The retail sale of alcohol (including via the internet or mail order).
- The supply of alcohol to members of a qualifying club.
- The provision of entertainment to the public or to members of a club or events with a view to making profit and to which the public are not



admitted, including raising money for charity where the entertainment involves:

- a theatrical performance
- a film exhibition
- any indoor sporting event including boxing or wrestling.
- the performance of live music
- the playing of recorded music
- a 'dance' performance
- the provision of facilities for dancing or for making music and/or entertainment of a similar nature such as karaoke; between the hours of 11pm and 8am the following morning (as amended by the Live Music Act 2012), or for audiences above 500 at any time.
- The supply of any hot food or drink between 11pm and 5am.

2.3 In determining a licence application, the principle adopted by Licensing Authority will be that each application will be determined on its merits. In considering every application, under the terms of this policy, regard will be given to Government guidance under Section 182 of the Act, to the Act generally and to any supporting regulations issued by Central Government.

2.4 Any individual preparing an operating schedule is at liberty to volunteer any measures as a step he or she intends to take to promote the licensing objectives. When incorporated into the licence or certificate as a condition, these measures become enforceable under the law and a breach of such a condition could result in prosecution.

2.5 The Police Reform and Social Responsibility Act 2011 introduced for the first-time provisions to enable the Licensing Authority itself to make representations in respect of an application to grant, or vary a premises licence, or club premises certificate. Stevenage Borough Council as the Licensing Authority will only make representations in situations where, for example, there have been a number of minor, unconnected complaints that in themselves, do not require another responsible authority to make a representation, but when considered together, may constitute a public nuisance or represent breaches of licensing conditions as observed by Licensing Officers, which have then undermined the licensing objectives.

### 3. Legal Framework

- 3.1 The Licensing Authority will avoid duplication with other statutory and regulatory regimes, and the control measures that they afford in any conditions derived from an application's operating schedule, for provisions contained in the following:
- (a) The Gambling Act 2005
  - (b) The Environmental Protection Act 1990
  - (c) The Noise Act 1996
  - (d) The Clean Neighbourhoods and Environment Act 2005
  - (e) The Regulatory Reform (Fire Safety) Order 2005
  - (f) The Health and Safety at Work etc. Act 1974.
  - (g) The Equality Act 2010
- 3.2 The Licensing Authority can only impose conditions on a licence that are necessary and in proportion to the promotion of the licensing objectives. Where other existing legislation already places certain statutory responsibilities on an employer or operator of a premises, it cannot be necessary to impose the same or similar duties.
- 3.4 The Licensing Authority will seek to avoid confusion and duplication by not imposing licence conditions that are required under other legislation, except where they can be exceptionally justified to promote the licensing objectives.
- 3.5 The Council's Planning Policies are set out in its Local Plan. Central Government policy and guidance in the form of Planning Policy Guidance (PPG) and National Planning Policy Framework (NPPF) are also relevant when applying for premises licences and reference to these will be made.
- 3.6 Licensing is separated from planning and licence applications will not, therefore, be a re-run of the planning application. In general, the Licensing Authority will expect that, prior to the submission of a licensing application; the appropriate planning permission will have been resolved before a licence application is made and that any change to operating hours sought does not exceed those authorised by the planning permission. It is recognised that in certain situations a provisional statement may be sought alongside planning permission.

## 4. Equalities

4.1 Under the Equality Act (2010) the Council has a legal duty to fulfil the requirements of the Public Sector Equality Duty (PSED). Through this duty and in the application of this policy, the council will carry out its functions in a way that:

- a) Removes discrimination, harassment, victimisation, and any other conduct that is unlawful under the Equality Act (2010)
- b) Promotes equal opportunities between people who have a protected characteristic(s) and those who don't
- c) Encourages good relations between people who have a protected characteristic(s) and those who don't.

Further information on the Council's fulfilment of the Equality Act (2010) is set out in the Equality, Diversity and Inclusion (EDI) Policy (2022) and Reasonable Adjustment Policy (2024).

## 5. Data Protection

The Council regards respect for the privacy of individuals and the lawful and careful treatment of personal information as very important to delivery of services.

5.1 The Council will ensure that it treats personal information lawfully and proportionately as set out in the General Data Protection Regulation (GDPR) and Data Protection Act (2018). For further information on the Council's approach to handling information please see [Data Protection Act \(stevenage.gov.uk\)](https://www.stevenage.gov.uk/data-protection-act)

## 6. Policy

6.1.1 The Licensing Authority will continue to promote and work in partnership with the nominated responsible authorities, the Police and Crime Commissioner, Directors of Public Health, and our partners within the Community Safety Partnership to discharge its responsibilities identified by other Government and local strategies and initiatives, where they impact on the objectives of the Licensing Act. National strategies and initiatives are:

- Stevenage Pubwatch Scheme
- Alcohol Harm Reduction Strategy
- Action plan to Tackle Alcohol Related Crime through local initiatives such as Family Intervention Project (FIP), 'No More' service as examples.
- National Licensing Week.

6.1.2 The Licensing Authority will consider each application on its own merits but may make reference to other adopted Council policies including.

- The Council's Corporate Plan 'Future Town, Future Council'
- SoSafe Stevenage Community Safety Partnership (CSP)
- Joint Advisory Group's Action Plan
- Crime and Disorder Strategies
- Regulators' Code

6.1.3 Stevenage Pubwatch has been developed to enhance the safety, security, comfort and wellbeing of customers and staff for all types of premises that form its membership. The Licensing Authority will take an active part in the scheme and will work with all licence holders to promote Stevenage as being a safe and vibrant place.

6.1.4 The Licensing Authority fully supports the use of proof of age schemes for patrons using venues within Stevenage Borough, namely Validate, Challenge 25 and other PASS schemes in conjunction with our partners at Trading Standards.

6.1.5 Orders made by the Council under the Criminal Justice and Police Act 2001 to control the drinking of alcohol in the streets will be regularly reviewed along with this policy.

## 6.2 Licensable activities

- This policy relates to the following activities that are required to be licensed under the Act:
  - Retail sale of alcohol
  - Supply of alcohol by or on behalf of a club, or to the order of a member of the club
  - Provision of 'regulated entertainment' to the public, club members or with a view to profit
  - Provision of late-night refreshment (Supply of hot food and/or drink from any premises between 11pm and 5am)

6.2.1 Regulated entertainment includes:

- Performance of a play
- Exhibition of a film
- Indoor sporting events
- Boxing/wrestling entertainment
- Performance of live music
- Playing of recorded music
- Performance of dance

6.2.2 In certain circumstances some of the above activities have been deregulated. The Live Music Act and Deregulation Act 2015 are designed to encourage more performances of 'live' music. The Act removes the licensing requirements for:

- Amplified 'live' music between 8am and 11pm before audiences of no more than 500 people on premises authorised to sell alcohol for consumption on the premises.
- Amplified 'live' music between 8am and 11pm before audiences of no more than 500 people in workplaces not otherwise licensed under the 2003 Act (or licensed only for the provision of late-night refreshment)
- Unamplified 'live' music between 8am and 11pm in all venues.
- The provision of entertainment facilities.

6.2.3 The Legislative Reform (Entertainment Licensing) Order 2014 and Deregulation Act 2015 deregulated some of the licensable activities under the 2003 Act in addition to the deregulation created by the Live Music Act 2012. As a result, the following activities are no longer licensable between the hours of 8am and 11pm on any day:-

- Performances of plays up to an audience of 500 people.
- Exhibitions of dance up to an audience of 500 people.
- Indoor sport up to an audience of 1000 people.
- 'Not for profit' film exhibitions up to an audience of 500.
- Playing of recorded music up to an audience of 500 on premises authorised to sell alcohol.
- Playing of recorded music in a church hall, community hall, or other similar community premises, that is not licensed to sell alcohol, up to an audience of 500 people and the organiser obtains consent from the person responsible for the premises.
- Playing of recorded music at a non-residential premises of a local authority, a school or a hospital up to an audience of 500 people and the organiser obtains consent from the local authority or the school or the health care provider for the hospital.

## 6.3 The Licensing Authority as a Responsible Authority

6.3.1 Licensing authorities themselves are included within the prescribed list of responsible authorities under the Act. The Licensing Authority will determine when it considers it appropriate to act in its capacity as a responsible authority in the initiating of a licence review and to make representations with regards to licence applications. When acting as a Responsible Authority the Licensing Authority will, as far as is reasonably practicable, operate in accordance with the Home Office Guidance to Licensing Authorities, in that there will be clear and identifiable separation of responsibilities. The function of initiating a licence review or making representations regarding licence applications will primarily lie with the Licensing Manager, the Head of Environmental Health and Licensing or an appropriately authorised Licensing Officer within the Council's Licensing Team.

6.3.2 As a responsible authority, the Licensing Authority will not make representations on behalf of other parties such as residents, local councillors or local community groups, as they are already afforded the ability to make representations regarding licensing applications.

6.3.3 The only occasion when the Licensing Authority will depart from the above principle is in circumstances where any of the parties have not been afforded an opportunity to make representations, and it is aware that there are relevant grounds on which a representation should be submitted.

6.3.4 In this instance, the representation will be submitted by an officer who has the approved delegation and has not been a part of the administrative process of the application under consideration.

## 6.4 Responsible Authorities

6.4.1 Responsible authorities are public bodies that must be fully notified of applications and that are entitled to make representations to the Licensing Authority in relation to the application for the grant, variation or review of a premises licence. For all premises, responsible authorities include:

- the relevant licensing authority and any other licensing authority in whose area the premises is situated.
- the chief officer of police; • the local fire and rescue authority.
- the relevant enforcing authority under the Health and Safety at Work etc. Act 1974;
- the local authority with responsibility for environmental health;
- the local planning authority;
- a body that represents those who are responsible for, or interested in, matters relating to the protection of children from harm;
- each local authority's Director of Public Health (DPH)
- the local weights and measures authority (trading standards); and
- Home Office Immigration Enforcement (on behalf of the Secretary of State).

6.4.2 Full details of all of the responsible authorities, as prescribed under the Act are available from the Licensing team and will also be available on the Council's website.

## 6.5 Culture, Live Music, Dancing and Theatre

6.5.1 The Licensing Authority wishes to encourage and promote live music, dance and theatre for the wider cultural benefit of the community. It will seek to achieve a balance between the potential for limited neighbourhood

disturbance and the benefits of cultural activities, particularly for children, and will not allow the views of vocal minorities to predominate over the general interests of the community.

- 6.5.2 The Licensing Authority will only attach licence conditions that are reasonable, proportionate, and strictly necessary for the promotion of the licensing objectives. The Authority is aware of the need to avoid measures as far as possible that deter live music, dancing and theatre for example by imposing indirect costs of a disproportionate nature.
- 6.5.3 The Licensing Authority will monitor the impact of licensing on regulated entertainment in the Borough, particularly on live music and dancing between the hours of 11pm and 8am and for indoor sporting events, as outlined in supporting regulations to the Act. If there is evidence that licensing requirements deter such activities, the Authority will consider how to prevent this, and if necessary, will revise this, Policy.
- 6.5.4 The Licensing Authority is aware of the value to the community of a broad range of cultural entertainments, particularly live music, dancing and theatre. We wish to encourage these activities for the benefit of all.
- 6.5.5 Informed through community stakeholder consultation and commissioned by Stevenage Borough Council and Arts Council England, 'Stevenage Reimagined', A Ten-Year Arts and Heritage Strategy' was launched in June 2019 and is working to make Stevenage a creative destination town. The strategy brings together a number of ambitions to build on Stevenage's unique arts and heritage legacy in recognition of both the economic and social benefits that a strong cultural offer can bring.
- 6.5.6 The Council on its own behalf has sought premises licences for appropriate public spaces within the Borough, specifically Fairlands Valley Park and King George V Playing Fields. Further licences may be sought in the Council's name going forward. Licensing of these spaces will make it easier for people to organise suitable cultural events. We will consider any request for permission to use such public spaces for cultural activities with our colleagues in Parks and Landscapes, and all such events will be notified to the Council's Safety Advisory Team.



- 6.5.7 Consideration will be given to the particular characteristics of any event, including the type, scale and duration of the proposed entertainment, especially where limited disturbance only may be caused.
- 6.5.8 Incidental performance of live music or the playing of recorded music may not be regarded as regulated entertainment under the Act in certain circumstances. This is where they are incidental to another activity which is not entertainment or the provision of entertainment facilities. Whether or not music is incidental to other activities will be judged on a case-by-case basis but:
- The playing of live or recorded music at volumes which predominate other activities at a premises would not normally be regarded as incidental.
  - A juke box played at moderate levels would normally be regarded as incidental to the other activities.
- 6.5.9 Spontaneous performance of music, singing or dancing does not amount to the provision of regulated entertainment, unless facilities are provided and made available for the purpose or purposes of enabling the entertainment to take place.
- 6.6 **Circuses**
- 6.6.1 The Licensing Authority has taken note of the guidance provided by Central Government regarding licensing provisions for circuses.
- 6.6.2 Should a circus operator wish to sell alcohol, or provide late night refreshment, it would be necessary for the event organiser to apply for the relevant permissions in accordance with the Licensing Act 2003, and also to seek permission before making such an application from the landowner or managing agent, Sports & Leisure Management Ltd)
- 6.6.3 The Licensing Authority has a premises licence in place for the area known as Fairlands Valley, where historically, circuses have held performances. Any person wishing to hold a circus in this area will need to obtain permission from the premises licence holder (ed Stevenage

Borough Council) and would be required to comply with the conditions of the licence for this area.

## 6.7 Cumulative Impact

6.7.1 Cumulative Impact' means the potential impact on the promotion of the licensing objectives of a significant number of licensed premises concentrated in one area. An example of this impact would be the increase in crime and disorder or public nuisance in a town centre resulting from a large concentration of licensed premises in one area over and above the impact of the individual premises themselves. At the present time a saturation policy has not been adopted.

6.7.2 The Licensing Authority recognises that there is a difference between the commercial need and the cumulative impact of premises in an area. Commercial need is the commercial demand for other licensed premises and is a matter for planning consideration and market forces. It does not form part of this Licensing Policy Statement.

6.7.3 The Licensing Authority will not operate a quota of any kind, nor will it ordinarily seek to impose general limitations on trading hours in particular areas.

6.7.4 In considering issues of cumulative impact the Licensing Authority will be mindful that, in addition to the licensing functions, there are a number of other mechanisms, both within and outside the licensing regime, for addressing nuisance and disorder. These include, but are not limited to:

(i) planning controls

(ii) positive measures to create a safe and clean town centre environment in partnership with local businesses, transport operators and other departments of the local authority.

(iii) the provision of CCTV surveillance in town centres, ample taxi ranks, provision of public conveniences open late at night, street cleaning and litter patrols.

(iv) powers of local authorities to designate parts of the local authority area as places where alcohol may not be consumed publicly.

(v) police enforcement of the general law concerning disorder and antisocial behaviour, including the issuing of fixed penalty notices and new powers introduced by the Anti-social Behaviour, Crime and Policing Act 2014.

(vi) the prosecution of any personal licence holder or member of staff at such premises who is selling alcohol to people who are drunk.

(vii) the confiscation of alcohol from children.

(ix) police and local authority powers to close down instantly for up to twenty-four hours any licensed premises or temporary event on grounds of disorder, the likelihood of disorder or noise emanating from the premises causing a nuisance; and

(x) the power of the police, other responsible authorities or a local resident or business to seek a review of the licence or certificate in question.

6.7.5 The Council will also address the issue of crime and disorder through the SoSafe Community Safety Partnership in line with strategic objectives for crime and disorder reduction within the district. The success of these measures in reducing nuisance and disorder will be subject to ongoing review.

6.7.6 Any decision to carry out a cumulative impact assessment would require a public consultation. The Licensing Authority has no plans to carry out such an assessment at the time of writing this policy.

## 6.8 Early Morning Restriction Orders (EMRO)

6.8.1 The ability to implement an EMRO is a power conferred on licensing authorities by the Police Reform and Social Responsibility Act 2011. An EMRO would enable the Licensing Authority to restrict the sale of alcohol in the whole, or in part, of the district between midnight and 06:00hrs on all or some days.

- 6.8.2 The Licensing Authority could consider making an EMRO in relation to problem areas if it had evidence that the order is appropriate for the promotion of the licensing objectives.
- 6.8.3 It is important to be aware that the restriction would only relate to the sale or supply of alcohol and would have no effect on regulated entertainment.
- 6.8.4 The Licensing Authority is of the view that an EMRO is a power that should be used sparingly due to the potential impact on the night-time economy. There are many other powers available under the Act to address specific problem premises and the police have a number of powers for dealing with disorder under other legislation.
- 6.8.5 An EMRO is most appropriate for situations where the use of other powers has been unsuccessful or where the problem is so significant that only an EMRO would offer a viable solution.
- 6.8.6 Any decision to implement an EMRO would require a public consultation. The Licensing Authority has no plans to implement any EMROs at the time of writing this policy.
- 6.9 Late Night Levy
- 6.9.1 The ability to implement a levy is a power conferred on licensing authorities by the Police Reform and Social Responsibility Act 2011. This would enable the Council to charge a levy to all persons who are licensed to sell alcohol within a specified time period between midnight and 06:00hrs as a means of raising a contribution towards the costs of policing the late-night economy.
- 6.9.2 The levy would apply to all premises where the licence allowed alcohol sales within the specified period irrespective of whether or not they were trading during those hours. Additionally, the levy would apply to the district as a

whole, including premises such as village pubs that are often the centre of a community with little or no impact on the licensing objectives.

- 6.9.3 A minimum of seventy percent of the levy must be given to the police however there is no statutory requirement for it to be spent on policing the late-night economy or even on the district in which it was levied.
- 6.9.4 The Licensing Authority would consider making a levy if it had evidence that the order is appropriate for the promotion of the licensing objectives.
- 6.9.5 The Licensing Authority is strongly of the view that a levy is a power that should be used sparingly due to the potential impact on the night-time economy. There are many other powers available under the Act to address specific problem premises and the police have a number of powers for dealing with disorder under other legislation.
- 6.9.6 As a levy would impact on all businesses within the specified timings it would be an unreasonable charge for well-managed premises that were not impacting on the licensing objectives.
- 6.9.7 A levy is most appropriate for situations where the use of other powers has been unsuccessful or where the problem is so widespread within the district that only a levy would offer a viable solution.
- 6.9.8 Any decision to implement a levy would require a public consultation. The Licensing Authority has no plans to implement a levy at the time of writing this policy.

## 6.10 Licensing Hours

- 6.10.1 The Government's view is that longer licensing hours should be encouraged in the interests of avoiding a concentration of disturbance while ensuring that nuisance is minimised to local residents. Furthermore, it is held by the Government that shops and public houses generally should be permitted to sell alcohol during hours they intend to operate. Entertainment providers should be encouraged to provide a range of entertainment during their operating hours and to promote live music, dancing and theatre for the wider cultural benefit of the community.

- 6.10.2 The Licensing Authority acknowledges the view of Government and accepts the principle of 24 hour opening for licensed premises but considers that it is self-evident that a risk of disturbance to residents is greater when licensable activities continue late into the night and the early hours of the morning. It is also acknowledged that the majority of licensed premises will not wish to remain open for 24 hours even if their licence permits it. Where an applicant applies to extend their current opening hours, the Licensing Authority will expect their operating schedule to detail the measures to be taken to ensure the licensing objectives have been addressed, and where necessary for small businesses to comply with the licensing objectives.
- 6.10.3 The Licensing Authority recognises that longer licensing hours for the sale of alcohol would avoid large numbers of people leaving premises at the same time, which in turn could reduce the friction at late-night fast-food outlets, taxi ranks, minicab offices and other sources of transport that can lead to disorder and disturbance.
- 6.10.4 Fixed trading hours within designated areas will not be set as this could lead to significant movements of people across boundaries at particular times seeking premises opening later, with the attendant concentration of disturbance and noise. Such an approach could unfairly disadvantage residents in one area with respect to another, as well as potentially lead to peaks of disorder and disturbance, a situation that the Act seeks to avoid.
- 6.10.5 The Licensing Authority will deal with the issue of licensing hours having due regard to the individual merits of each application. However, consideration will be given to imposing stricter conditions in respect of noise control where premises are situated in mainly residential areas and representations have been made to the Licensing Authority.
- 6.10.6 This policy will not attempt to artificially introduce staggered closing times and the principle of a 'lock-in' period after which no further customers are to be admitted to the premises, will not be applied.
- 6.10.7 The Licensing Authority will generally consider granting licences to shops, stores and supermarkets to sell alcohol for consumption off the premises at any times they are open for shopping. However, it may consider there are very good reasons for restricting those hours, for example, where police

representations are made in respect of isolated shops known to be the focus of disorder and disturbance.

## 6.11 Conditions

- 6.11.1 Licensing is about the control of licensed premises, qualifying clubs and temporary events within the terms of the Act. Where representations are made and if considered necessary, conditions will be attached to licences, certificates and permissions that will address matters which are within the control of individual licensees and any mandatory conditions prescribed in the Act itself.
- 6.11.2 The Licensing Authority may not impose any condition unless it has been satisfied at a hearing of the necessity to impose conditions on the basis of the representations raised. It will then only impose conditions necessary to promote the licensing objectives.
- 6.11.3 When considering conditions, the Licensing Authority will primarily focus on the impact of the activities taking place at licensed premises on members of the public living, working or engaged in normal activity in the vicinity of the premises. The vicinity means those locations where the licensed premises can be identified as the source or cause of concern.
- 6.11.4 The Licensing Authority acknowledges that the licensing function is not to be used for the general control of anti-social behaviour by individuals when they are beyond the direct control of the licensee and the vicinity of any premises concerned. However, as a matter of policy, the council expects every holder of a licence, certificate or permission to be responsible for minimising the impact of their activities and any anti-social behaviour by their patrons in the vicinity of their premises.
- 6.11.5 In this respect, the Licensing Authority recognises that, apart from the licensing function, there are a number of other mechanisms available for addressing issues of unruly behaviour that can occur away from licensed premises, including:
- planning controls.
  - ongoing measures to create a safe and clean environment in these areas in partnership with local businesses, transport operators and other Council Departments.

- designation of parts of the Borough as places where alcohol may not be consumed publicly.
  - regular liaison with the Police on law enforcement issues regarding disorder and anti-social behaviour, including the issue of fixed penalty notices, prosecution of those selling alcohol to people who are drunk; confiscation of alcohol from adults and children in designated areas and instantly closing down licensed premises or temporary events on the grounds of disorder, or likelihood of disorder or excessive noise from the premises;
  - the power of the police, other responsible authority or a local resident or business to seek a review of the licence or certificate.
- 6.11.6 The Licensing Authority seeks to address many of these issues through the SoSafe Community Safety Partnership to create a safe and secure Stevenage, in line with the strategic objectives for crime and disorder reduction within the Borough, through initiatives such as the 'No More' Project and Family Intervention Project, Box Cleve as local examples.
- 6.11.7 The Licensing Authority will also endeavour to work with other local authorities and other enforcement agencies, particularly in Hertfordshire and Bedfordshire, to ensure a consistent approach is taken to licensing matters whilst respecting the differing needs of the individual communities throughout the area.
- 6.11.8 Operating Schedules for licensed premises and club premises are the key to ensuring compliance with the four licensing objectives. In the vast majority of cases, the terms of the Operating Schedule should translate into the licence conditions that set out how the business will be run. The Licensing Authority will endeavour to work in full co-operation with licensees and applicants to minimise the number of disputes that might otherwise arise in this area.
- 6.11.9 Prospective holders of new premises licences, and those seeking variations to existing premises licences, are advised to consult with the Council's licensing officers and the various responsible authorities at the earliest possible planning stages in order to reduce the risk of confusion and dispute arising.
- 6.11.10 The Licensing Authority will seek to impose the minimum conditions necessary on events and premises that present the lowest risk to public safety, particularly where such events are charitable in nature.



6.11.11 Conditions attached to licences or certificates will be tailored to the individual style and characteristics of the particular premises and events concerned. In general, conditions attached to either a premises licence or a club premises certificate will be:

- clear
- enforceable
- evidenced
- proportionate
- relevant
- be expressed in plain language capable of being understood by those expected to comply with them.

6.11.12 Conditions can only be attached to a premises licence or a club premises certificate if they are so applied at a licensing hearing, unless the authority, the premises user and the relevant responsible authority all agree that a hearing is not necessary.

6.11.13 However, where considered appropriate, and necessary for the promotion of the Licensing Objectives, the Licensing Authority may consider attaching conditions drawn from its Pool of Conditions. This is available on the Council website using the following link: [www.stevenage.gov.uk/licensing-and-registration/beer-and-entertainment/premises-licence](http://www.stevenage.gov.uk/licensing-and-registration/beer-and-entertainment/premises-licence) but should not be regarded as an exhaustive or exclusive list and will be applied by the Licensing Authority at its discretion.

## 6.12 Mandatory conditions

6.12.1 The Licensing Authority acknowledges that there are mandatory conditions that apply to all premises licences and separate mandatory conditions that apply to all club premises certificates.

- 6.12.2 Section 19 of the Act contains a mandatory condition for premises licences whereby there can be no sale of alcohol without a designated premises supervisor named on the licence or where the designated premises supervisor does not hold a valid personal licence, and where every sale of alcohol must be made or authorised by a personal licence holder.
- 6.12.3 The Council does not expect the designated premises supervisor to be available at the premises at all times, however he/she is expected to exercise control over day-to-day management of the premises. In the absence of the designated premises supervisor, a senior member of staff should be authorised, preferably in writing, to deputise for the designated premises supervisor and the deputy's role should be made known to all staff.
- 6.12.4 At a review of a premises where relevant representations are received in relation to ineffective management of the premises when alcohol is available to the public, the Council will consider imposing a condition requiring a personal licence holder to be present at all times whilst alcohol is being supplied.
- 6.12.5 When the Licensing Act 2003 (Mandatory Licensing Conditions) Order 2010 SI 2010/860 introduced new mandatory conditions as part of section 19 of the Act with effect from 6th April 2010 and 1st October 2010, the Council chose not to re-issue all existing licences to include these conditions. When the Council processes an application to vary an existing licence the full range of mandatory conditions will be included on the licence. The absence of mandatory conditions on a licence does not invalidate those conditions; it is the licence / certificate holders' responsibility to be aware of, and comply with, all mandatory conditions.
- 6.12.6 The Licensing Authority strongly believes that irresponsible drinks promotions, specifically those that encourage patrons to drink more than they otherwise would or within a shorter time period, should be discouraged and will fully implement the respective paragraphs in the Guidance.
- 6.12.7 In the case of a review of an existing licence or certificate where there is evidence that an irresponsible alcohol promotion is contributing to an adverse effect on the licensing objectives, the Council will consider this as evidence of the ineffectiveness of the management of the premises.

## 6.13 Licensing Objectives

6.13.1 The following paragraphs set out Stevenage Borough Council Licensing Policy relating specifically to each of the four licensing objectives.

6.13.2 All applicants will need to provide evidence to the licensing authority in respect of each of the four licensing objectives information which is relevant to the individual style and characteristics of their premises and events. Existing licensed premises will only be required to supply such information to when a variation is being applied for.

6.13.3 Special measures may be required occasionally or for specific types of events such as when a popular live band or promotions are planned, which are intended, or likely to attract larger audiences or audiences of a different nature. These can often have a significant impact on the achievement of the licensing objectives. Reference should be made in the applicants operating schedule where applicable, to such occasions and the additional measures, which are planned to achieve the licensing objectives.

### **Prevention of crime and disorder**

6.13.4 The proximity of entertainment venues to residential and other premises is an issue requiring detailed assessment in order to minimise the potential for crime and disorder problems arising from patrons.

6.13.5 In addition to the requirements for the Licensing Authority to promote the licensing objectives, it also has a duty under Section 17 of the Crime and Disorder Act 1998 to do all it reasonably can to prevent crime and disorder in the Borough.

6.13.6 The Licensing Authority will consider attaching conditions to licences when representations are made, to deter and prevent crime and disorder both inside and within the immediate vicinity of the premises, these may include Conditions drawn from the Pool of Conditions relating to Crime and Disorder or from the premises operating schedule.

6.13.7 In considering all licence applications, the Licensing Authority will consider the adequacy of measures proposed to deal with the potential for crime and disorder having regard to all the circumstances of the application and

when representations have been received. The Licensing Authority will particularly consider:

- Control over any areas other than the public highways.
- The steps taken or proposed to be taken, by the applicant to prevent crime and disorder.
- The use of special promotions.
- Any known association with drug taking or dealing.
- Any criminal record, including formal cautions, of the licensee or any person with a significant interest in the business.
- The giving of false or misleading information by the applicant in the operating schedule or verbally to Licensing Authority or other enforcement officers.
- The supply of alcohol for which the requisite excise duty has not been paid.

6.13.8 When addressing crime and disorder the applicant should identify any particular issues (particular to the type of premises and /or activities) which are likely to adversely affect the promotion of the crime and disorder objective. Any steps proposed to address identified issues should be included with the applicant's operating schedule.

### **Public Safety**

6.13.9 The Act covers a wide range of premises that require licensing, including, cinemas, concert halls, theatres, nightclubs, public houses, cafes/restaurants and fast-food outlets and takeaways.

6.13.10 Each of these types of premises present a mixture of risks, with many common to most premises and others unique to specific operations. It is essential that premises are constructed or adapted and operated so as to acknowledge and safeguard occupants against these risks. The Licensing Authority will expect Operating Schedules to satisfactorily address these issues.

6.13.11 It should be noted that conditions relating to public safety should be those that are necessary, in the particular circumstances of any individual premises or club premises and should not duplicate other requirements of the law. Equally, the attachment of conditions to a premises licence or club premises certificate will not in any way relieve the duty holder of the

statutory duty to comply with the requirements of other legislation. These include the Health and Safety at Work etc. Act 1974, associated regulations, the requirements under the Management of Health and Safety at Work Regulations 1999 and the Regulatory Reform (Fire Safety) Order 2005 to undertake risk assessments. However, these regulations will not always cover the unique circumstances that arise in connection with licensing and entertainments at specific premises. It is in these cases that licence conditions will be used as appropriate.

- 6.13.12 The Licensing Authority will consider attaching Conditions to licences and permissions where representations have been made, in order to promote safety. In considering all licence applications, the Licensing Authority will consider the adequacy of measures proposed to ensure public safety having regard to all the circumstances of the application.
- 6.13.13 Where an applicant identifies an issue in regard to public safety which is not covered by existing legislation, the applicant should identify in their operating schedule the steps to be taken to ensure public safety. Depending on the individual style and characteristics of the premises and/or events, the Licensing Authority will particularly consider:
- the arrangements for ensuring safety and absence of risks to health in connection with the use, handling, storage and transport of articles and substances.
  - the provision of such information, instruction, training and supervision as is necessary to ensure health and safety.
  - the maintenance of premises in a condition that is safe and without risks to health and the provision and maintenance of means of access to and egress from it that are safe and without such risks.
  - the provision and maintenance of an environment that is safe and without risks to health.
  - the provision and maintenance of plant and systems of work that are safe and without risks to health.
  - controlling the keeping and use of explosive or highly flammable or otherwise dangerous substances,
  - measures to prevent overcrowding.
  - prior notification of special events.

## **Prevention of Public Nuisance**

- 6.13.14 The proximity of entertainment venues to residential and other premises is an issue requiring detailed assessment in order to minimise the potential for nuisances to people living, working or sleeping the vicinity of the premises.
- 6.13.15 The concerns mainly relate to noise nuisance, light pollution and noxious smells and due regard will be taken on the impact these may have and the Licensing Authority will expect Operating Schedules to satisfactorily address these issues. The Licensing Authority will also take into account previous history of the premises.
- 6.13.16 The Licensing Authority may consider attaching conditions to licences and permissions when relevant representations have been made, to prevent public nuisance. When the licensable activities include the supply of alcohol, the council will consider the adequacy of measures proposed to deal with the potential for nuisance and/or anti-social behaviour having regard to all the circumstances of each application. The Licensing Authority will particularly consider:
- The steps taken or proposed to be taken by the applicant to prevent noise and vibration escaping from the premises, including music, noise from ventilation equipment, and human voices. Such measures may include the installation of soundproofing, air conditioning, acoustic lobbies, noise limiting devices and other noise amelioration measures.
  - The steps taken or proposed to be taken by the applicant to prevent disturbance by customers arriving at or leaving the premises. Such measures may include CCTV and the use of door supervisors in the immediate vicinity of the premises. This will be of greater importance between 22.00 hrs and 07.00 hrs, than at other times of the day.
  - The steps taken or proposed to be taken by the applicant to prevent queuing (either by pedestrian or vehicular traffic). If some queuing is inevitable then queues should be diverted away from neighbouring premises or be otherwise managed to prevent disturbance or obstruction.
  - The steps taken or proposed to be taken by the applicant to ensure staff and patrons leave the premises quietly and orderly manner.
  - The arrangements made or proposed for parking by patrons, and the effect of parking by patrons on local residents and other businesses.
  - Whether there is sufficient provision for public transport for patrons, including taxis and private hire vehicles.
  - Whether licensed taxis or private hire vehicles are likely to disturb local residents.

- The installation of any special measures where licensed premises are or are proposed to be located near sensitive premises such as dwellings, residential homes, nursing homes, hospitals, hospices or places of worship.
- The use of gardens, patios, forecourts and other open-air areas.
- Delivery and collection arrangements, including proximity to noise sensitive premises and the time of such activities.
- The siting of external lighting, including security lighting that is installed inappropriately.
- The siting of any other equipment or facilities used in conjunction with the premises.
- Whether activities on the premises would lead to increased refuse storage or disposal problems.
- Whether activities on the premises would lead to additional litter, including fly posting and illegal placards in the vicinity of the premises.
- The history of previous nuisance complaints proved against the premises; particularly where statutory notices have been served on the present licensees.
- The contribution the applicant makes or proposes to make towards the cost of CCTV surveillance, litter collection or associated street furniture.

### **Protection of Children from Harm**

- 6.13.17 The wide range of premises that require licensing means that children can be expected to visit many of these, often on their own, for food and/or entertainment.
- 6.13.18 The Act does not prohibit children under 16 from having access to any licensed premises, save for when the premises are being used exclusively or primarily for the supply of alcohol for consumption on the premises under the authorisation of either a premises licence, a club premises certificate or a temporary events notice, unless accompanied by an adult, or between the hours of midnight and 5:00am unaccompanied. However, the Licensing Authority recognises that limitations may have to be considered where it appears necessary to protect and prevent children from experiencing physical, moral, or psychological harm.
- 6.13.19 The Licensing Authority will consult with the appropriate Hertfordshire Safeguarding Children Board on any application that indicates there may be concerns over access for children.

- 6.13.20 The Licensing Authority will judge the merits of each individual application before deciding whether to impose conditions limiting the access of children to individual premises when representations have been made. The Licensing Authority will in particular consider:
- where there have been convictions for supply of alcohol to minors or premises with a reputation for underage drinking
  - where there is a known association with drug taking or dealing
  - where there is a strong element of gambling on the premises
  - where entertainment of an adult or sexual nature is commonly provided
- 6.13.21 The Licensing Authority will consider any of the following options when dealing with a licence application following representations, limiting the access of children is considered necessary to prevent harm to children:
- Limitations on the hours when children may be present.
  - Limitations on ages below 16 and/or 18.
  - Limitations or exclusion when certain activities are taking place.
  - Requirements for an accompanying adult.
  - Full exclusion of people under 18 from the premises when any licensable activities are taking place.
- 6.13.22 No conditions will be imposed requiring that children be admitted to any premises and, where no limitation is imposed, this will be left to the discretion of the individual licensee.
- 6.13.23 The Act contains a number of sections designed to protect children in licensed premises and the Licensing Authority will work closely with the police to ensure the appropriate enforcement of the law, especially relating to the sale and supply of alcohol to children.
- 6.13.24 Films cover a vast range of subjects, some of which deal with adult themes and/or contain, for example, scenes of horror, violence or sexual nature that may be considered unsuitable for children within certain age groups.
- 6.13.25 In order to prevent children from seeing such films, the Licensing Authority will impose conditions requiring licensees to restrict children from viewing age-restricted films classified according to the recommendations of the BBFC, or by the Licensing Authority.



- 6.13.26 Many children go to see and/or take part in an entertainment arranged especially for them, for example dance or drama school productions, and additional arrangements are required to safeguard them while at the premises.
- 6.13.26 Where regulated entertainment is specially presented for children, the Licensing Authority will, following representations, require the following arrangements in order to control their access and egress and to assure their safety:
- An adult member of staff to be stationed in the vicinity of each of the exits from any level, subject to there being a minimum of one member of staff per 50 children or part thereof.
  - No child, unless accompanied by an adult to be permitted in the front row of any balcony.
  - No standing to be permitted in any part of the auditorium during the performance unless an approved area has been agreed by the council.
  - Such other measures as may be specified by the area child protection committee.
- 6.13.27 The Licensing Authority will expect Operating Schedules to satisfactorily address these issues. Following relevant representations, it will consider attaching conditions to licences and permissions to prevent harm to children.
- 6.13.28 Child sexual exploitation is a form of child abuse which is complex and can be manifested in different ways. Essentially it involves children and young people receiving something – for example, accommodation, alcohol, drugs, gifts or affection in exchange for sexual activity or having others perform sexual activities on them. The Council recognises that this form of exploitation could potentially be linked to licensed premises and as such will seek to promote knowledge and understanding of the issue amongst those in the licensed trade. Where potential instances of child sexual exploitation are identified to the Licensing Authority these will be referred to the appropriate bodies
- 6.14 Naming, Packing and promotion in retail premises.
- 6.14.1 The Licensing Authority acknowledges that irresponsible naming, packing or promotion of alcoholic drinks may contribute to alcohol related harms and will encourage retailers to sign up to and abide by Portman Groups Retailer Alert Bulletins, to remove irresponsible products and promotions.

6.14.2 The Portman Group operates on behalf of the alcohol industry, a code of practice on the Naming, Packaging and Promotion of Alcoholic Drinks. The Code seeks to ensure that drinks are packaged and promoted in a socially responsible manner and only to those who are 18 years old or older. Complaints about products under the Code are considered by an independent complaints Panel and the Panel's decisions are published on the Portman Group's website, in the trade press and in an annual report. If a products packaging or point-of-sale advertising is found to be in breach of the code, The Portman Group may issue a Retailer Alert Bulletin to notify retailers of the decision and ask them not to replenish stocks of any such product or to display such point-of-sale material, until there has been compliance with the decision.

## 6.15 Enforcement

6.15.1 Stevenage Borough Council delivers a wide range of enforcement services aimed at safeguarding the environment and the community on which business can fairly trade. The administration and enforcement is one part of this service.

6.15.2 The Council will have regard to the Regulators' Code which can be found here: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/300126/14-705-regulators-code.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/300126/14-705-regulators-code.pdf)

6.15.3 The Code provides a clear, flexible and principles-based framework for how regulators should engage with those they regulate. Nearly all regulators, including local authorities, must have regard to it when developing policies and procedures that guide their regulatory activities.

6.15.4 The Council is committed to accord with the principles of good enforcement and practice by carrying out its regulatory functions in a fair, open and consistent manner and will abide also by its own Enforcement Policy which is freely available from the Council, as is this Policy and details of the Council's Complaints Procedure.

6.15.5 Inspections of all licensed premises will be undertaken by the Licensing Authority on the basis of risk ensuring that enforcement is proportionate and targeted at higher risk premises which require greater attention and allowing a lighter touch in relation to lower risk premises.

6.15.6 The Licensing Authority will seek to work proactively with other responsible authorities in enforcing licensing legislation. It expects the responsible authorities to share information about licence holders and licensed premises

and to consult closely with the Licensing Authority when any enforcement action may be required. The Licensing Authority has signed the Hertfordshire Licensing Enforcement Protocol in conjunction with the other responsible authorities within the county. Inspections will take place at the discretion of the Licensing Authority and its partner agencies and resources will be concentrated on areas of need.

- 6.15.7 The Council expects responsible authorities to lead on enforcement action that falls within their normal working remit. In respect of non-compliance with an authorisation, the Licensing Authority would ordinarily take the lead assisted, where applicable, by witness statements from responsible authorities.
- 6.15.8 The Licensing Authority may carry additional inspections where complaints have been received from any of the responsible authorities, other agencies, members of the public or where information that a breach of licence may occur.
- 6.15.9 The Council will consider the use of Closure Notices under section 19 of the Criminal Justice and Police Act 2001 as a method of enforcing licence conditions. This procedure clearly identifies the actions a licence holder needs to take to rectify the situation within a set period of time and the consequences of not doing so. In the event of non-compliance with a Closure Notice, the Council will apply to the courts for a Closure Order.

## 6.16 Licence Reviews

- 6.16.1 An interested party, a body representative or a local Councillor as defined in the Act, and/or responsible authority have the power to seek a review of either a premises licence or club premises certificate, using the prescribed application form, if they are of the opinion that one or more of the licensing objectives are not being met by the licence holder.
- 6.16.2 The Licensing Authority, in determining if the application for a review is relevant, will have regard to the current guidance issued by the Secretary of State under section 182 of the Act in so far as to whether an application is frivolous, vexatious or repetitious. Representations made by a responsible authority cannot be deemed as being frivolous, vexatious, or repetitious.
- 6.16.3 Once the licence is before the Licensing Committee (see Section 21 below) at a review hearing, there are several options available to the committee. They include:

- Modification to the current conditions of the licence.
- Exclusion of a licensable activity currently permitted on a licence, or certificate.
- Removal of the designated premises supervisor.
- Suspension of the licence, or certificate, for a period not exceeding three months; or
- Revocation of the licence, or certificate.

6.16.4 In instances where the crime prevention objective is being undermined, revocation, even in the instance of this being a first review of the premises licence, or club premises certificate, will be given serious consideration. See also here R on the application of *Bassetlaw DC v Worksop Magistrates Court*.

6.16.5 The Licensing Authority will determine when it considers it appropriate to act in its capacity as a responsible authority in the initiating of a licence review. When acting as a responsible authority the Licensing Authority will, as far as is reasonably practicable, operate in accordance with the Home Office Guidance to Licensing Authorities, in that there will be clear and identifiable separation of responsibilities. The function of initiating a licence review will primarily lie with the Licensing Manager, the Head of Environmental Health and Licensing or an appropriately authorised Licensing Officer within the Council's Licensing Team.

6.16.6 The Licensing Authority recognises the importance of partnership working and will pro-actively support working with interested parties and/or businesses in the vicinity of a licensed premise or club, and responsible authorities, to allow the holders of a licence or club premises certificate the opportunity to address concerns raised at the earliest opportunity, with a view to resolve matters informally where possible.

## 6.17 Licence Suspensions

6.17.1 The payment of an annual fee for a premises licence or club premises certificate is a statutory requirement by virtue of the Act. The responsibility for ensuring prompt payment rests entirely with the licence or certificate holder. While the Local Authority will issue an invoice for the due fee and one subsequent reminder, it will not accept the alleged absence or loss of a reminder letter or an invoice as a reason for non-payment as there is no statutory requirement for such documents to be issued.

- 6.17.2 The suspension of either a premises licence or club premises certificate is not immediate if the payment was not made before, or at the time that it was due, either as a result of there being an administrative error, or where the holder raised a dispute as to their liability to pay the fee on or before the due date. In these instances, there is a grace period of 21 days to allow for resolution of a dispute, or to correct an error. Should the disputed error not be resolved following the end of the 21-day period, the licence will then be suspended.
- 6.17.2 In all instances of suspension, the Licensing Authority will write to the licence holder to advise of the suspension, the correspondence of which will include the date on which the suspension is to take effect, which in all instances will be 2 days after the day the notice is given.
- 6.17.3 In all instances of suspension, the Licensing Authority will notify Hertfordshire Constabulary and the relevant responsible authorities as defined under the Act. The procedures for suspension are described in the regulations, and the section 182 guidance; the Licensing Authority will follow these principles.
- 6.17.4 The lifting of a suspension will only take place from the day on which the Licensing Authority receives the payment of the outstanding fee. In all instances, confirmation that the suspension has been lifted in writing will be made the following working day after the payment has been received. Notification will also be provided to Hertfordshire Constabulary, and the relevant responsible authorities as notified at the time the suspension notice was given.

## 6.18 Temporary Event Notices

- 6.18.1 The process of issuing a Temporary Event Notice (TEN) is designed to be a light-touch process, and as such, the carrying on of any of the licensable activities does not have to be authorised by the Licensing Authority on an application, instead, the applicant serves notice to the required agencies.
- 6.18.2 Certain temporary events do not require a licence and can be notified to the Licensing Authority by a TEN giving a minimum of 10 working days' notice. This period begins the day after receipt of the notice and does not include the day of the event itself.

- 6.18.3 Premises users are now permitted under the Act a limited number of late TENs. A late TEN is a notice given no earlier than nine and no later than five working days before the event date. Late TENs are designed to assist premises users who require, for reasons beyond their control, to still serve a notice of intent for their event to the required authorities.
- 6.18.4 Applicants in the instance of a late TEN need to be aware that, should an objection be raised by either the Police or Environmental Health with regard to any of the four licensing objectives, the event cannot go ahead. Event size, location or timing may not allow sufficient time for organisers to carry out full and proper discussions on the possible crime and disorder, public nuisance and health and safety issues with the Licensing Authority, Police and other interested parties or body representatives.
- 6.18.5 A number of limitations are imposed on the use of TENs by the 2003 Act:
- the number of times a premises user may give a TEN is 50 times in a calendar year for a personal licence holder and five times in a calendar year for other people.
  - the number of times a premises user may give a late TEN is limited to 10 times in a calendar year for a personal licence holder and twice for other people. Late TENs count towards the total number of permitted TENs (i.e. the limit of five TENs a year for non-personal licence holders and 50 TENs for personal licence holders). A notice that is given less than ten working days before the event to which it relates, when the premises user has already given the permitted number of late TENs in that calendar year, will be returned as void and the activities described in it will not be authorised.
  - the number of times a TEN may be given for any particular premises is 15 times in a calendar year.
  - the maximum duration of an event authorised by a TEN is 168 hours (seven days);
  - the maximum total duration of the events authorised by TENs in relation to individual premises is 21 days in a calendar year;
  - the maximum number of people attending at any one time is 499; and
  - the minimum period between events authorised under separate TENs in relation to the same premises (not including withdrawn TENs) by the same premises user is 24 hours
- 6.18.6 The Licensing Authority recommends that to ensure events occur with the minimum of risk, at least 28 days' notice is given. Some events may be more

difficult to assess in advance it recommends that not more than 90 days' notice is given.

- 6.18.7 The Licensing Authority and relevant authorities including representatives from the Police, Fire and Ambulance have agreed to a Safety Advisory Team (SAT) for the Borough. The purpose of the team is to provide advice on the organisation and safety, and to assist with meeting with the requirements of other legislation that protects local residents and businesses, to persons planning to hold temporary event. Applicants giving notification to the licensing authority of a temporary event should have regard to the SAT advice. For further information please contact the Licensing Team at [licensing@stevenage.gov.uk](mailto:licensing@stevenage.gov.uk)

## 6.19 Sexual Entertainment

- 6.19.1 Stevenage Borough Council has adopted the provisions under the Local Government (Miscellaneous Provisions) Act 1982, schedule 3 for the licensing of sex shops, cinemas and sexual entertainment venues, as amended.
- 6.19.2 Premises seeking to provide regulated entertainment at their premises that will commonly be of an adult nature should consult with the Licensing Authority in the first instance as to whether separate permission will be required.
- 6.19.3 Should an application for a sexual entertainment venue be required under the Local Government (Miscellaneous Provisions) Act 1982, and relevant representations received as to this, consideration will be given as to the grant of any additional licence where the premises in question are in the vicinity of:
- Residential Housing;
  - Schools;
  - Play areas;
  - Children's nurseries or pre-school facilities;
  - Places of religious worship or education;
  - Historic buildings;
  - Tourist attractions;
  - Predominantly family shopping areas;
  - Community facilities or public buildings e.g. youth clubs, libraries, sports centres.

- 6.19.4 In so far as it relates to the licensing objectives, and taking into account location, the Licensing Authority may determine the nature of any external signage for the premises seeking to provide the adult entertainment.
- 6.19.5 The Licensing Authority will also expect that the entertainment occurring on the premises should only be visible to those who have chosen to visit and enter the premises, irrespective of its location in the Borough.
- 6.19.6 The Licensing Authority is keen to ensure that any premises seeking to provide any such entertainment of an adult nature is proactive in its operations to promote the licensing objective “Protection of Children from Harm”, and will expect operating schedules to address this matter by giving consideration to conditions as to entrance policy, security measures for staff and customers alike, staff training and management policies so as to ensure that this, as well as the other three licensing objectives are fully promoted.
- 6.20 Administration, Exercise and Delegation of Functions**
- 6.20.1 A major principle underlying the Act is that the licensing functions contained within the Act should be delegated to an appropriate level so as to ensure speedy, efficient and cost-effective service delivery.
- 6.20.2 The Licensing Authority is committed to the principle of delegating its powers to ensure that the objectives are met and has arranged for its licensing functions to be discharged in accordance with the guidance issued by the Secretary of State. These arrangements are set out in the table at the Appendix 1.
- 6.20.3 The power of the Licensing Authority under the Act may be carried out by the Council’s Licensing Committee, or one or more officers acting under delegated authority.
- 6.20.4 The Licensing Committee will be made up of 13 members with a quorum of four who will hear any relevant representations from authorised persons, responsible authorities and interested parties in the form of a hearing.
- 6.20.5 Many of the decisions and functions are administrative in nature, including the grant of non-contentious applications, such as those licences and certificates where no representations have been made. All such matters will be delegated to Licensing Officers and reported to the members of the Licensing Committee.



- 6.20.6 In support of the table of delegation as at Appendix 1, delegation to officers for the following has also been provided in respect of:
- Power to suspend a premises licence or club premises certificate for non-payment of annual fee
  - Power to specify the date on which suspension takes effect. This will be a minimum of 2 working days.
  - Power to impose existing conditions on a premises licence, club premises certificate and Temporary Event Notice where all parties agree that a hearing is unnecessary.
  - Power to make representations as a responsible authority.
- 6.20.7 This form of delegations is without prejudice to officers being able to refer an application to the committee, if considered appropriate in the circumstances of any particular case.
- 6.20.8 Whilst the hearing of a contested licence application is quasi-judicial in nature, the Committee will aim to keep proceedings as informal as possible. However, a degree of formality is needed to ensure that all parties receive a fair hearing. The procedures adopted by Stevenage Borough Council as the Licensing Authority are designed to ensure that all parties are able to express their view openly and fairly. The Committee procedure is inquisitorial rather than adversarial and whilst applicants, interested parties, and responsible authorities are entitled to bring legal representation with them if they wish, this is by no means a requirement.
- 6.20.9 Whilst the Committee usually meets in public, it does have the power to hear certain applications in private. The Committee will, however, always reach its decision in private. A public announcement of the decision will be made at the end of the hearing. The decision determined by the Committee will be accompanied with clear, cogent reasons for the decision, having due regard to the Human Rights Act 1998, the four licensing objectives and all other relevant legislation.
- 6.20.10 The Committee will determine each case before it on its merits. However, in determining the application the Licensing Committee will consider:
- The case and evidence presented by all parties.
  - The promotion of the four licensing objectives.

- Guidance by central Government.
- This Licensing Policy.

6.20.11 Where the Committee determines that it is appropriate to attach conditions to a licence/certificate it will ensure those conditions are focused on the activities taking place at the premises, on members of the public, living working or engaged in normal activity in the area concerned. Such conditions will be proportionate to the activity to be controlled and will only be imposed in the interests of the licensing objectives.

## 6.21 Applications for Personal Licences

6.21.1 Any individual may apply for a personal licence whether or not he or she is currently employed or has business interests associated with the licence use. An applicant has to demonstrate that they have an appropriate licensing qualification, are aged over 18 years, do not have a relevant or foreign criminal conviction or have been required to pay an immigration penalty. In addition, they must also demonstrate that they have the right to work within the United Kingdom. Any Personal Licence issued in respect of an application made on or after 6 April 2017 will become invalid if the holder ceases to be entitled to work in the United Kingdom.

6.21.2 Applicants with unspent criminal convictions for relevant offences set out in the Licensing Act are encouraged to first discuss their intended application with the police and local authority licensing officers before making an application. The Licensing Authority and police will arrange to hold interview(s) with prospective personal licence holders to discuss the circumstances surrounding the conviction. Applicants may bring with them supporting evidence, character references or representations to the meeting(s).

6.21.3 The holder of a Personal Licence is required by the Act to report (as soon as reasonably practicable) to the Licensing Authority any change to their name or address. Similarly, should they receive a conviction for any relevant criminal offence or foreign offence or have been required to pay an immigration penalty they must report this in writing (again as soon as reasonably practicable) on receipt of which the Licensing Authority has the discretion to suspend, for up to 6 months, or to revoke the Licence.

6.21.4 A personal licence is required by individuals who may be engaged in making and authorising the sale or supply of alcohol. Not every person retailing alcohol

at a premises licensed for that purpose needs to hold a personal licence although the Licensing Authority expects that every person authorised to make a sale of alcohol is clearly identified, for example by way of a written statement.

- 6.21.5 A joint interview will always be arranged where the police are minded to object to the transfer of a designated premises supervisor on the grounds that such a transfer may undermine the crime prevention objective.

## 6.22 Equalities and human rights

### Human Rights

- 6.22.1 The Human Rights Act 1998 incorporated the European Convention on Human Rights and makes it unlawful for a local authority to act in a way which is incompatible with a Convention right. The Licensing Authority will have particular regard to the following relevant provisions in determining licence applications:

- **Article 1**

That every person is entitled to the peaceful enjoyment of his or her possessions

- **Article 6**

In the determination of civil rights and obligations everyone is entitled to a fair public hearing within a reasonable time by an independent and impartial tribunal established by law.

- **Article 8**

That everyone has the right to respect for private and family life, home and correspondence.

### Equality

- 6.22.2 The Equality Act 2010 places a legal obligation on public authorities to have due regard to the need to eliminate unlawful discrimination, harassment and victimisation; to advance equality of opportunity; and to foster good relations,

between persons with different protected characteristics, and to promote equality of opportunity and good relations between persons of different racial groups. The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

- 6.22.3 The Licensing Authority will therefore have due regard to this responsibility when imposing conditions on licences to ensure that they could not directly or indirectly lead to discrimination against any racial group.
- 6.22.4 Further guidance as to this matter is available from the Government Equalities Office and the Equality and Human Rights Commission.

### **Modern slavery**

- 6.22.5 Stevenage Borough Council is committed to ending all forms of modern slavery. Through working in partnership with local residents, Hertfordshire Police, organisations such as the Salvation Army and the Modern Slavery Helpline the council aims to make the borough of Stevenage an even safer, place to live, work and visit. As a signatory of the Charter for Modern Slavery the Council is also aware of its wider social responsibility and is committed to having a positive impact on the working conditions of all those involved in supplying its goods and services.

## **7 Consultation**

- 7.1 Before the Licensing Authority determines its policy for any five-year period, it must consult with those persons listed in section 5(3) of the Act. These are:
- a) The chief officer of police for the borough.
  - b) Hertfordshire Fire and Rescue Service.
  - c) Hertfordshire Trading Standards.
  - d) Hertfordshire Local Safeguarding Children's Board.
  - e) Stevenage SoSafe Community Safety Partnership.
  - f) Persons/bodies representative of local holders of premises licences.
  - g) Persons/bodies representative of local holders of club premises certificates;
  - h) Persons/bodies representative of local holders of personal licences.
  - i) Persons/bodies representative of business and residents in the Borough

## 8 Monitoring and Review

- 8.1 This policy will be reviewed by the relevant Business Unit's Head of Service or Service Manager every 5 years (see page 1 for details of Business Unit) or earlier if there is a change in legislation. Where more than 10% of the policy content is changed the Assistant Director and appropriate Portfolio Holder will be required to decide if the policy needs to be formally reconsidered by Cabinet or appropriate decision-making body.
- 8.2 Where there is a request for the content of the policy to be reviewed in response to a complaint, the relevant Business Unit's Assistant Director will be notified. If the Assistant Director agrees that a review of policy is required, this will be discussed with the appropriate Portfolio Holder. The Head of Service or Service Manager will be responsible for implementing a subsequent policy review.

## 9 References and Resources

[Licensing Act 2003 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

[Revised Guidance issued under section 182 of the Licensing Act 2003 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk)

[Environmental Protection Act 1990 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

[Noise Act 1996 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

[Clean Neighbourhoods and Environment Act 2005 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

[The Regulatory Reform \(Fire Safety\) Order 2005 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

[Safety, Health and Welfare at Work Act 2005 \(irishstatutebook.ie\)](https://www.irishstatutebook.ie)

[Health and Safety at Work etc Act 1974 – legislation explained \(hse.gov.uk\)](https://www.hse.gov.uk)

[Equality Act 2010 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

[Planning practice guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

[National Planning Policy Framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

[Equality, Diversity and Inclusion Strategy 2022-2026 \(stevenage.gov.uk\)](https://www.stevenage.gov.uk)

[The No More Service \(stevenage.gov.uk\)](https://www.stevenage.gov.uk)

[SoSafe Community Safety Strategy 2021 - 2024 \(stevenage.gov.uk\)](https://www.stevenage.gov.uk)

[The Legislative Reform \(Entertainment Licensing\) Order 2014 \(legislation.gov.uk\)](#)

[Deregulation Act 2015 \(legislation.gov.uk\)](#)

[Live Music Act 2012 \(legislation.gov.uk\)](#)

[Homepage \(artscouncil.org.uk\)](#)

[20170123-Cultural Strategy-Appendix.pdf \(stevenage.gov.uk\)](#)

[Human Rights Act 1998 \(legislation.gov.uk\)](#)

[Local Government \(Miscellaneous Provisions\) Act 1982 \(legislation.gov.uk\)](#)

[Policing and Crime Act 2009 \(legislation.gov.uk\)](#)

[Anti-social Behaviour Act 2003 \(legislation.gov.uk\)](#)

[Crime and Disorder Act 1998 \(legislation.gov.uk\)](#)

[Crime and Security Act 2010 \(legislation.gov.uk\)](#)

[Criminal Justice and Police Act 2001 \(legislation.gov.uk\)](#)

[Private Security Industry Act 2001 \(legislation.gov.uk\)](#)

[Race Relations \(Amendment\) Act 2000 \(legislation.gov.uk\)](#)

[Health Act Violent Crime Reduction Act 2006 \(legislation.gov.uk\)2006 \(legislation.gov.uk\)](#)

[The Provision of Services Regulations 2009 \(legislation.gov.uk\)](#)

[The Legislative Reform \(Minor Variations to Premises Licences and Club Premises Certificates\) Order 2009 \(legislation.gov.uk\)](#)

[The Legislative Reform \(Supervision of Alcohol Sales in Church and Village Halls &c.\) Order 2009 \(legislation.gov.uk\)](#)

[Crime and Security Act 2010 \(legislation.gov.uk\)](#)

[The Legislative Reform \(Licensing\) \(Interim Authority Notices etc\) Order 2010 \(legislation.gov.uk\)](#)

[Police Reform and Social Responsibility Act 2011 \(legislation.gov.uk\)](#)

[The Licensing Act 2003 \(Mandatory Licensing Conditions\) Order 2010 \(legislation.gov.uk\)](#)

[The Licensing Act 2003 \(Descriptions of Entertainment\) \(Amendment\) Order 2013 \(legislation.gov.uk\)](#)

## 10 Abbreviations and Definitions

EDI	Equality, Diversity and Inclusion
GDPR	General Data Protection Regulation
PSED	Public Sector Equality Duty
SBC	Stevenage Brough Council
PPG	Planning Policy Guidance
NPPF	National Planning Policy Framework
FIP	Family Intervention Project
CSP	Community Safety Partnership
PASS	Proof of Age Standards Scheme
EMRO	Early Morning Restriction Order

## 11 Appendices

11.1	Table of Delegations of Licensing Functions
11.2	Case-law & Guidance Sources
11.3	Useful contacts
11.4	Equalities Impact Assessment (EqIA) November 2024

## 12 Version History

Date	Outlined Amendments	Author
4 <sup>th</sup> October 2024	Format of Policy has been amended	Julie Dwan
	Date of Policy amended from 2020-2025 to 2025-2030	

	Scope- Section 2.2. Replace the word 'registered' with 'Qualifying'. 'The supply of alcohol to members of a qualifying club'.	
	Legal Framework-Section 3.1 c) has a typo. The Noise Act 1986 has been amended to The Noise Act 1996.	
	Policy- Section 6.1.1. 'No More' project has been amended to the 'No More' service.	
	Policy-section 6.1.2. So Stevenage (Safer Communities) has been amended to SOSafe Stevenage, Community Safety Partnership (CSP)	
	Policy-Section 6.1.4. 'Challenge 21' has been replaced with 'Challenge 25'	
	Policy-Section 6.1.5 has a typo. Police & Criminal Justice Act 2001 has been replaced with Criminal Justice & Police Act 2001.	
	Policy-section 6.2.2. Slight change to the legislation. Amplified 'live' music between 8am and 11pm before audiences of no more than 200 people on premises authorised to sell alcohol for consumption on the premises. & Amplified 'live' music between 8am and 11pm before audiences of no more than 200 people in workplaces not otherwise licensed under the 2003 Act (or licensed only for the provision of late-night refreshment) Audience size has been amended to 500.	
	Circuses-Section 6.6.2, Name of management company has been added, 'Sports & Leisure Management Ltd'.	
	Policy-Section 6.6.3. Premises licence holder amended from Stevenage Leisure Ltd to Stevenage Borough Council.	
	Temporary Event Notices-6.18.7. contact details for the licensing team amended. Telephone number has been removed and replaced with an email address.	
	Conditions – Section 6.11.13. 'The pool of conditions is available on request from the licensing team'. Has been amended to: 'The pool of conditions, this is available on the Council website using the following link'. Link has been added.	



21 <sup>st</sup> November 2024	Draft policy V2 -Amendments following consultation	Julie Dwan
	Policy – Paragraph 3.5. sentence amended as per consultation response from the Planning Authority and now reads: ‘ The Council’s planning policies are set out in its local Plan. Central Government policy and guidance in the form of...’ references to ‘Executive’ in the policy have also been replaced with ‘cabinet’.	
	Policy- Section added at 6.14. It refers to the Naming, Packing & Promotion in retail premises. 6.14.1, sentence added stating that the Council will encourage retailers in the area to sign up to and abide by Portman Groups Retailer Alert bulletins. 6.14.2, Text added relating to the Portman Groups regulatory work.	
4 <sup>th</sup> December 2024	Draft Policy V3-Amendments following GP Committee	Julie Dwan
	That Licensing Officers, the Licensing Manager and the Head of Environmental Health and Licensing, in their capacity as ‘The Licensing Authority’, are approved to act on behalf of the Council as a Responsible Authority as prescribed in the Licensing Act 2003. (13.4 & 69.4)	
	That sections 6.3.1 and 16.6.5 of the draft policy be amended accordingly and remove any wording which conflicts with the above proposed recommendation.	
	The wording in section 6.3.1 has been amended from: ‘Licensing authorities themselves are included within the prescribed list of responsible authorities under the Act’. To: Licensing authorities themselves are included within the prescribed list of responsible authorities under the Act. The Licensing Authority will determine when it considers it appropriate to act in its capacity as a responsible authority in the initiating of a licence review and to make	

	<p>representations with regards to licence applications. When acting as a Responsible Authority the Licensing Authority will, as far as is reasonably practicable, operate in accordance with the Home Office Guidance to Licensing Authorities, in that there will be clear and identifiable separation of responsibilities. The function of initiating a licence review or making representations regarding licence applications will primarily lie with the Licensing Manager, the Head of Environmental Health and Licensing or an appropriately authorised Licensing Officer within the Council's Licensing Team.</p>	
	<p>The wording in section 6.16.5 has been amended from: 'The Licensing Authority in its duties recognises that it cannot itself initiate any review application. The role of the Licensing Authority will be solely to administer the process, and to determine the application by way of a hearing, at which time evidence to support the review can be given'. To: 'The Licensing Authority will determine when it considers it appropriate to act in its capacity as a responsible authority in the initiating of a licence review. When acting as a responsible authority the Licensing Authority will, as far as is reasonably practicable, operate in accordance with the Home Office Guidance to Licensing Authorities, in that there will be clear and identifiable separation of responsibilities. The function of initiating a licence review will primarily lie with the Licensing Manager, the Head of Environmental Health and Licensing or an appropriately authorised Licensing Officer within the Council's Licensing Team'.</p>	
	<p>A section added to the table of delegations at Appendix 11.1 for making representations on behalf of the Licensing Authority acting</p>	

	as a responsible authority or applying for a review as a responsible authority. That this be delegated to Officers in all cases.	
15 <sup>th</sup> January 2025	Cabinet resolved that the proposed draft statement of principles 2025-2030 be supported and recommended that the draft statement including amendments proposed at GP committee be agreed and adopted by the Council.	

DRAFT

DRAFT

## Licensing Act SOLP - consolidated list of consultees

- Hertfordshire Constabulary [LicensingEasternArea@herts.pnn.police.uk](mailto:LicensingEasternArea@herts.pnn.police.uk)
- Hertfordshire Fire & Rescue Service [administration.cfs@hertfordshire.gov.uk](mailto:administration.cfs@hertfordshire.gov.uk)
- Trading Standards [tradingstandards@hertfordshire.gov.uk](mailto:tradingstandards@hertfordshire.gov.uk)
- Home Office Immigration Enforcement [alcohol@homeoffice.gov.uk](mailto:alcohol@homeoffice.gov.uk)
- Licensing (internal)
- Environmental Health (internal)
- Planning Department (internal)
- Community Safety (internal)
- Legal Services [simon.pugh@stevenage.gov.uk](mailto:simon.pugh@stevenage.gov.uk)
- Hertfordshire County Council Safeguarding Children Board [admin.hscb@hertfordshire.gov.uk](mailto:admin.hscb@hertfordshire.gov.uk)
- Public Health [publichealth@hertfordshire.gov.uk](mailto:publichealth@hertfordshire.gov.uk)
- Hertfordshire Director of Public Health [sarah.perman@hertfordshire.gov.uk](mailto:sarah.perman@hertfordshire.gov.uk)
- All existing local premises licence holders (by email)
- All existing Club Premises Certificate holders (by post)
- Association of Convenience Stores (ACS) [acs@acs.org.uk](mailto:acs@acs.org.uk)
- Association of Town and City Management (ACTM) [info@atcm.org](mailto:info@atcm.org)
- British Beer and Pub Association (BBPA) [contact@beerandpub.com](mailto:contact@beerandpub.com)
- British Board of Film Classification (BBFC) [feedback@bbfc.co.uk](mailto:feedback@bbfc.co.uk)
- British Institute of Inn Keeping (BII) [enquiries@bii.org](mailto:enquiries@bii.org)
- British Retail Consortium (BRC) [info@brc.org.uk](mailto:info@brc.org.uk)
- Circus Arts Forum [info@circusarts.org.uk](mailto:info@circusarts.org.uk)
- Department for Culture, Media and Sport (DCMS) [enquiries@culture.gov.uk](mailto:enquiries@culture.gov.uk)
- Equity [info@equity.org.uk](mailto:info@equity.org.uk)
- Federation of Licensed Victuallers Associations (FLVA) [admin@flva.co.uk](mailto:admin@flva.co.uk)
- Local Government Association (LGA) [info@local.gov.uk](mailto:info@local.gov.uk)

- National Association of Licensing and Enforcement Officers (NALEO) [info@naleo.org.uk](mailto:info@naleo.org.uk)
  - Stevenage Pub Watch [suewayman@hotmail.com](mailto:suewayman@hotmail.com)
  - Night Time Industries Association (NTIA) [info@ntia.co.uk](mailto:info@ntia.co.uk)
  - Office for Product Safety and Standards (OPSS) [info@outdoorartsuk.org](mailto:info@outdoorartsuk.org)
  - Portman Group [info@portmangroup.org.uk](mailto:info@portmangroup.org.uk)
  - UK Hospitality (UKH) [info@ukhospitality.org.uk](mailto:info@ukhospitality.org.uk)
- 
- Neighbouring local authorities EHDC [Oliver.Rawlings@eastherts.gov.uk](mailto:Oliver.Rawlings@eastherts.gov.uk) ; NHDC [Steven.Cobb@north-herts.gov.uk](mailto:Steven.Cobb@north-herts.gov.uk) ; WHDC [james.vaughan@welhat.gov.uk](mailto:james.vaughan@welhat.gov.uk)
  - Institute of Licensing [info@instituteoflicensing.org](mailto:info@instituteoflicensing.org)
  - Stevenage Town Centre Manager (internal)
  - Stevenage Community Trust [enquiries@stevenagecommunitytrust.org](mailto:enquiries@stevenagecommunitytrust.org)
  - Stevenage Community Safety Partnership (internal)
  - North Herts Council for Voluntary Services [oonaghsherlock@nhcvs.org.uk](mailto:oonaghsherlock@nhcvs.org.uk)
  - North Hertfordshire College [enquiries@nhc.ac.uk](mailto:enquiries@nhc.ac.uk)
  - Hertfordshire Chamber of Commerce [enquiries@hertschamber.com](mailto:enquiries@hertschamber.com)
  - Stevenage Citizens Advice, Daneshill House, Danestrete, Stevenage SG1 1AF [emailadvice@castevenage.org.uk](mailto:emailadvice@castevenage.org.uk)

## Health

East and North Herts NHS Trust [jude.archer@nhs.net](mailto:jude.archer@nhs.net)

East and North Herts CCG (by post)

Healthwatch Hertfordshire [info@healthwatchhertfordshire.co.uk](mailto:info@healthwatchhertfordshire.co.uk)

GPs and Health Centres

- King George & Manor House Surgeries
- Bedwell MC
- Canterbury Way
- Chells surgery
- Knebworth
- Manor House surgery
- Marymeads
- Poplars
- Roebucks

- Shephall Surgery
- St Nicholas HC
- Stanmore Medical group
- Symonds Green HC

## Community Centres

Bedwell Community Centre [bedwellct@yahoo.co.uk](mailto:bedwellct@yahoo.co.uk)  
 Chells Manor community Association [chellsmanorcommunitycentre@gmail.com](mailto:chellsmanorcommunitycentre@gmail.com)  
 Timebridge Community Centre [timebridgeCCA@hotmail.com](mailto:timebridgeCCA@hotmail.com)  
 Douglas Drive Centre [admin@douglasdrive.co.uk](mailto:admin@douglasdrive.co.uk)  
 Hampson Park Community Centre [hampsonparkcc@gmail.com](mailto:hampsonparkcc@gmail.com)  
 Symonds Green Community Association [symondsgreen@symondsgreenc.co.uk](mailto:symondsgreen@symondsgreenc.co.uk)  
 Shephall Community Centre [paula@shephallcentre.co.uk](mailto:paula@shephallcentre.co.uk)  
 Springfield House Community Centre [heather.springfieldhouse@hotmail.co.uk](mailto:heather.springfieldhouse@hotmail.co.uk)  
 St Nicholas Community Centre [terrie.snca@gmail.com](mailto:terrie.snca@gmail.com); [shauneen.taylor@btconnect.com](mailto:shauneen.taylor@btconnect.com)  
 The Oval Community Centre [enquiries@ovalcommunity.com](mailto:enquiries@ovalcommunity.com)

## Community safety

Stevenage Community Trust [enquiries@stevenagecommunitytrust.org](mailto:enquiries@stevenagecommunitytrust.org)  
 Stevenage Credit Union [mail@stevenagecreditunion.com](mailto:mail@stevenagecreditunion.com)  
 Stevenage Education Trust [set@educationtrust.org.uk](mailto:set@educationtrust.org.uk)  
 Stevenage Haven [frankie.packard@stevenagehaven.co.uk](mailto:frankie.packard@stevenagehaven.co.uk)  
 The Living Room [enquiries@livingroomherts.org](mailto:enquiries@livingroomherts.org)  
 Mind in Mid Herts [sharn@mindinmidherts.org.uk](mailto:sharn@mindinmidherts.org.uk)

## Faith and inclusion

Mormon Church [andy@garnham.org.uk](mailto:andy@garnham.org.uk)  
 Mountain Of Fire and Miracles Ministries [mfmstevenage@mountainoffire.org.uk](mailto:mfmstevenage@mountainoffire.org.uk)  
 Oak Church Stevenage [info@oakchurchstevenage.org](mailto:info@oakchurchstevenage.org)  
 Redeemed Christian Church of God [info@rccgstevenage.org.uk](mailto:info@rccgstevenage.org.uk)  
 Stevenage Bangladeshi and Mosque & Muslim Cultural Centre [info@smcc786.co.uk](mailto:info@smcc786.co.uk)  
 Stevenage Liberal Synagogue [info@stevenageliberalsynagogue.org.uk](mailto:info@stevenageliberalsynagogue.org.uk)  
 Stevenage Muslim Community Centre [mohamed.salamkhan@gmail.com](mailto:mohamed.salamkhan@gmail.com)  
 Stevenage United Reformed Church [info@stevenageurc.org.uk](mailto:info@stevenageurc.org.uk)  
 Stevenage Vineyard Church [foodshed@stevenage-vineyard.co.uk](mailto:foodshed@stevenage-vineyard.co.uk)  
 Stevenage World Forum for Ethnic Communities [kate.belinis@cdaherts.org.uk](mailto:kate.belinis@cdaherts.org.uk)  
 Shalom Ministries [shalom-ministries@hotmail.co.uk](mailto:shalom-ministries@hotmail.co.uk)  
 Destiny International Christian Assembly [blessingjoseph77@gmail.com](mailto:blessingjoseph77@gmail.com)  
 Fountain of Life Church [fountainoflifechurchlondon@gmail.com](mailto:fountainoflifechurchlondon@gmail.com)  
 Heaven our Home Ministry International  
 Bridge Builder Christian Trust [amanda.bryant@bridgebuilderstrust.org.uk](mailto:amanda.bryant@bridgebuilderstrust.org.uk)





Appendix B  
Consultation Responses:

- Portman Group
- Local Planning Authority



**Julie Dwan**

---

**From:** Licensing  
**Sent:** 29 October 2024 09:08  
**To:** Julie Dwan  
**Subject:** FW: Portman Group response to Stevenage Borough Council's Revised Licensing Policy Statement for 2025-2030

Hi Julie

Looks like a response to the revised licensing Policies

Kind regards.

**Paul Edney | Technical Support Officer | Environmental Health & Licensing |**  
Stevenage Borough Council, Daneshill House, Danestrete, Stevenage, Herts, SG1 1HN |

 01438 242242 | [www.stevenage.gov.uk](http://www.stevenage.gov.uk) | [env.health@stevenage.gov.uk](mailto:env.health@stevenage.gov.uk) | [licensing@stevenage.gov.uk](mailto:licensing@stevenage.gov.uk)

**From:** David Saer <DSaer@portmangroup.org.uk>  
**Sent:** Monday, October 28, 2024 9:52 AM  
**To:** Licensing <licensing@stevenage.gov.uk>  
**Cc:** Jacob Coad <JCoat@portmangroup.org.uk>  
**Subject:** [External] Portman Group response to Stevenage Borough Council's Revised Licensing Policy Statement for 2025-2030

Dear Licensing Team,

Thank you for the opportunity to respond to the consultation on Stevenage Borough Council's Revised Licensing Policy Statement for 2025-2030.

We appreciated you signposting to us in the 'Useful contacts' section, though our address needs to be updated to 'Fora, 201 Borough High Street, London, SE1 1JA' and the telephone number needs to be removed.

We note that this is the only mention of the Portman Group in the document. In terms of extra builds to the draft, we would ask that you perhaps consider following other local authorities in adding in a little extra context in the text concerning our regulatory work regarding the Code of Practice for license holders and encouraging retailers in your area to abide by Retailer Alert Bulletins to remove irresponsible products and promotions.

We would suggest including something along the following lines:

#### The Portman Group Code of Practice

*The Portman Group operates, on behalf of the alcohol industry, a Code of Practice on the Naming, Packaging and Promotion of Alcoholic Drinks. The Code seeks to ensure that drinks sold in licensed premises are packaged and promoted in a socially responsible manner and only to those who are 18 years old or over. Complaints about products under the Code are considered by an Independent Complaints Panel and the Panel's decisions are published online. If a product's packaging or point-of-sale advertising is found to be in breach of the Code, the Portman Group may issue a Retailer Alert Bulletin to notify retailers of the decision and ask them not to replenish stocks of any such product or to display such point-of-sale material, until the decision has been complied with. We would encourage retailers to sign up to and abide by Retailer Alert Bulletins. The Secretary of State's Statutory Guidance under the Licensing Act 2003 states that licensing authorities should, in the exercise of their licensing functions consider whether it is appropriate to impose conditions on licences that require the licence holder to comply with the Portman Group's Retailer Alert Bulletins.*

We would also ask that you consider the [comments](#) from former UK Public Health Minister Andrea Leadsom in February 2024, who suggested that "licensing authorities should consider whether it is appropriate to impose conditions on licences that require the licence holder to comply with the Portman Group's Retailer Alert Bulletins" if there is evidence of irresponsible alcohol promotion undermining licensing objectives.

Finally, could I check if we have the most up to date contacts for your team in terms of our Retail Alert Bulletin distribution list which we hope will aid your work? If you have any questions or any of the above or how we can be of further assistance in your work, please just let me know.

Best wishes,

David

David Saer  
Director of External Affairs



Fora, 201 Borough High Street, London, [SE1 1JA](#) | Twitter: [@portmangroup](#)



...the majority of the population... and... the moderate majority... have low risk drinking behaviour... or do not drink at all.

...UK alcohol consumption... down 14% in 15 years.

...Near universal coverage... of pregnancy, unit, and CMO guideline messages on UK alcohol products.

**From:** Julie Dwan <Julie.Dwan@stevenage.gov.uk>  
**Sent:** 23 October 2024 15:30  
**Subject:** Consultation on the revised Licensing Policy Statement

Dear Sir or Madam

**Consultation on the revised Licensing Policy Statement**



**Julie Dwan**

---

**From:** Paul Edney  
**Sent:** 13 November 2024 15:47  
**To:** Paul Edney  
**Subject:** Consultation on the revised Licensing Policy Statement

Dear Acting Licensing Manager,

**Consultation on the revised Licensing Policy Statement**

I refer to your recent consultation dated 23<sup>rd</sup> October 2024 with respect to the Council's Statement of Licensing Policy 2025 – 2030. Thank you for giving the Council as Local Planning Authority the opportunity to provide comments on this statement. Please see our comments on the statement below:

We recommend Paragraph 3.5 is amended. The proposed amendment to this paragraph is set out in bold and underlined for reference:- "The Council's planning policies are set out in its **Local Plan. Central Government policy and guidance** in the form of..."

The statement makes reference to "Executive", this need to be replaced with "Cabinet". This is because the Executive Committee was replaced with Cabinet which took effect from June 2024.

We have no further comments to make on the statement.

Yours sincerely,

James Chettleburgh MRTPI | Head of Planning and Enforcement | Development Management | Planning and Regulation | Stevenage Borough Council | Daneshill House | Danestrete | Stevenage | SG1 1HN  
Mob: 07593 528253 | Email: [james.chettleburgh@stevenage.gov.uk](mailto:james.chettleburgh@stevenage.gov.uk)





Our Privacy Policy has been updated to reflect changes to data protection legislation and can be viewed at the following link <http://www.stevenage.gov.uk/privacy-policy>

*Warning: all information provided on your planning application is now publicly available. Individuals and organisations offering their services may contact you. The Council does not endorse or approve any builders, surveyors, trades persons or other supplier, and advises householders to obtain quotes/references, and check the legitimacy of any contractor who contacts them before making payment.*



Our Ref:  
Contact:  
Direct Line: 01438 242493  
Email: [licensing@stevenage.gov.uk](mailto:licensing@stevenage.gov.uk)  
Date: 23 October 2024

Dear Sir or Madam

### **Consultation on the revised Licensing Policy Statement**

Under the Licensing Act 2003, Stevenage Borough Council is the Licensing Authority and has responsibility for granting premises licences, club premises certificates, temporary event notices and personal licences in the Borough in respect of the sale and/or supply of alcohol and the provision of regulated entertainment and late-night refreshment.


At least every five years, the Council must review and adopt a Licensing Policy Statement that details how the Council will undertake its licensing functions. The current Licensing Policy Statement has been in effect since 26<sup>th</sup> February 2020 and therefore the Council is undertaking a full review. The proposed policy statement will form the basis of the Council's decision-making for licensing alcohol and entertainment premises. This consultation is your opportunity to raise any issues that you think should be taken into account when considering applications and taking enforcement action.

The draft Licensing Policy Statement, with proposed revisions highlighted, is open to public consultation between 23<sup>rd</sup> October and 20<sup>th</sup> November 2024; a copy of the document is available via the following page on the Council's website: <https://www.stevenage.gov.uk/licensing-policy-statement>

All consultation responses must be in writing and submitted by midnight on **20<sup>th</sup> November 2024**. Comments can be made by email to [licensing@stevenage.gov.uk](mailto:licensing@stevenage.gov.uk) or by post to:

Acting Licensing Manager  
Stevenage Borough Council  
Daneshill House  
Danestrete  
Stevenage  
SG1 1HN

All consultation responses may be published within a public report.

Yours sincerely  


Julie Dwan  
Acting Licensing Manager





This page is intentionally left blank

# STEVENAGE BOROUGH COUNCIL

## PUBLIC NOTICE

### Revised Statement of Licensing Policy Statement

#### LICENSING ACT 2003, Section 5

Under the Licensing Act 2003, Stevenage Borough Council is the Licensing Authority and has responsibility for granting premises licences, club premises certificates, temporary event notices and personal licences in the Borough in respect of the sale and/or supply of alcohol and the provision of regulated entertainment and late-night refreshment.

At least every five years, the Council must review and adopt a Licensing Policy Statement that details how the Council will undertake its licensing functions. The current Licensing Policy Statement has been in effect since 2020 and therefore the Council is undertaking a full review. The proposed policy statement will form the basis of the Council's decision-making for licensing alcohol and entertainment premises.

This consultation is your opportunity to raise any issues that you think should be taken into account when considering applications and taking enforcement action.

The draft Licensing Policy Statement, with proposed revisions highlighted, is open to public consultation between 23<sup>rd</sup> October 2024 and 20<sup>th</sup> November 2024; a copy of the document is available via the following page on the Council's website:  
<https://www.stevenage.gov.uk/licensing-policy-statement>

All consultation responses must be in writing and submitted by midnight on **20<sup>th</sup> November 2024**. Comments can be made by email to [licensing@stevenage.gov.uk](mailto:licensing@stevenage.gov.uk) or by post to:

Acting Licensing Manager  
Stevenage Borough Council  
Daneshill House  
Danestrete  
Stevenage  
SG1 1HN

All consultation responses may be published within a public report.



# Public Notices

In Association with



Planning Notices | Traffic Notices | Legal Notices  
 Probate Notices | Other Notices | Church and Religious Notices  
 Tenders and Contracts | Goods Vehicle Operator Licences

To advertise: **020 8478 4444** | email: [sehub@localiq.co.uk](mailto:sehub@localiq.co.uk)

## OTHER

### NOTICE OF APPLICATION FOR A PREMISES LICENCE UNDER SECTION 17 OF THE LICENSING ACT 2003

Notice is hereby given that **MANNINGS FAIRVIEW COMPANY LIMITED** has applied for a premises licence to Stevenage Borough Council in relation to **STEVENAGE WINTER WONDERLAND, STEVENAGE LEISURE PARK CAR PARK, STEVENAGE, SG1 2UA** to permit the provision of the following licensable activities: Retail Sale of alcohol for consumption on the premises Monday to Sunday 10:00-22:00hrs. The licensing register and details of this application may be inspected during normal office hours at the below address. Any interested party or responsible authority may make representations in writing to, Licensing Authority at Daneshill House, Danestrete, Stevenage, Herts, SG1 1HN or by email: [licensing@stevenage.gov.uk](mailto:licensing@stevenage.gov.uk) Such written representation must be received by 21/11/2024 clearly stating the grounds upon which the representation is made in relation to the four objectives of the Licensing Act 2003. It is an offence to knowingly or recklessly make a false statement in connection with an application. The maximum fine for which a person is liable on summary conviction for the offence is unlimited.

## PLANNING



**NORTH HERTFORDSHIRE DISTRICT COUNCIL**  
 Council Offices,  
 Gernon Road,  
 Letchworth Garden City,  
 Herts, SG6 3JF

The following **PROPOSALS** are the subject of an application submitted to the Council.

### PROPOSAL AFFECTING A CONSERVATION AREA

24/02214/FP

**Land On The North West Side Of Green Lane Ashwell Hertfordshire SG7 5LW**

Erection of two 2 bed dwellings, three 3 bed dwelling and two four bed dwellings, with associated access, landscaping and parking.

24/02215/FP **St Marys Church Hall Church Street Baldock Hertfordshire SG7 5AE**

Removal and replacement of windows and dormer structures to front elevation (south), removal and replacement of double opening emergency exit door set to side elevation (east) and creation of concrete pad to form level threshold access point forward of emergency exit.

24/02236/FP **20 Sollershott East Letchworth Garden City Hertfordshire SG6 3JN**

Two storey rear extension, alterations to existing fenestration and erection of detached garage following demolition of existing garage.

### PROPOSAL AFFECTING A LISTED BUILDING OR A BUILDING OF SPECIAL ARCHITECTURAL OR HISTORIC INTEREST

24/02181/LBC **4 Church Lane Kimpton Hertfordshire SG4 8RP**

Replace existing PVC rainwater goods with cast iron rainwater goods

24/02292/LBC **2 Eastholm Letchworth Garden City Hertfordshire SG6 4TN**

Two storey rear extension with solar roof panels, following demolition of existing conservatory, existing single storey rear extension and two rear dormer windows, and internal alterations.

### PROPOSAL AFFECTING THE SETTING OF A LISTED BUILDING AND AFFECTING A CONSERVATION AREA

24/02291/FP **2 Eastholm Letchworth Garden City Hertfordshire SG6 4TN**

Two storey rear extension with solar roof panels, following demolition of existing conservatory, existing single storey rear extension and two rear dormer windows.

The application details can be viewed on the Council's web site at [www.north-herts.gov.uk/home/planning](http://www.north-herts.gov.uk/home/planning). Any person who wishes to make representations about the **PROPOSAL** should submit them in writing to this office by no later than 23 days from the date of this notice. For householder applications, in the event of an appeal against refusal of planning permission, which is to be dealt with on the basis of representations in writing, any representations made about this application will be sent to the Secretary of State, and there will be no further opportunity to comment at appeal stage.

Shaun Greaves Development and Conservation Manager

Correspondence address:  
 North Herts Council, PO Box 10613,  
 Nottingham, NG6 6DW  
 Date: 31/10/2024

**To view more Public Notices in your area**

Visit our dedicated website:  
[publicnoticeportal.uk/stevenage-comet](http://publicnoticeportal.uk/stevenage-comet)

## PLANNING



### STEVENAGE BOROUGH COUNCIL

#### TOWN AND COUNTRY PLANNING ACT 1990

#### NOTICE OF APPLICATION FOR PLANNING PERMISSION

#### THE FOLLOWING APPLICATION(S) AFFECTING THE CHARACTER OR APPEARANCE OF A CONSERVATION AREA HAVE BEEN RECEIVED

24/00613/FPH Erection of single storey front and rear extension.  
 14 Burydale  
 Stevenage

24/00736/FP New cladding and windows to northern elevation, insertion of roof lights to the flat roof and alterations to existing window openings to southern elevation.  
 31A Queensway  
 Town Centre  
 Stevenage

Members of the public may inspect copies of the applications, plans and other submitted documents online at [www.stevenage.gov.uk](http://www.stevenage.gov.uk) or can be viewed on the Council's computers at the Customer Service Centre, Danestrete between 9.00am and 5.00pm Monday to Friday. Assistance is available if required.

Anyone who wishes to make representations about any of these applications should write to the Council at Council Offices Daneshill House Danestrete Stevenage by **17 November 2024** under the Local Government (Access to Information) Act 1985, any comments can only be taken into account if they are available for public inspection before the applications are determined and therefore they cannot be treated confidentially.

For applications relating to householder developments, in the event of an appeal against the refusal of planning permission, which is to be dealt with on the basis of representations in writing, any representations made about the application will be sent to the Secretary of State, and there will be no further opportunity to comment at appeal stage.

**DATED : 31 October 2024**

**SIGNED : Zayd Al-Jawad**  
 Assistant Director,  
 Planning & Regulation

## PROBATE & Trustee

### IRENEWEDGE Deceased

Pursuant to the Trustee Act 1925 anyone having a claim against or an interest in the Estate of the deceased, late of 1 Church Close, Codicote, Hitchin, Hertfordshire, SG4 8YT, who died on 15/09/2023, must send written particulars to the address below by 02/01/2025, after which date the Estate will be distributed having regard only to claims and interests notified.

Jenna Harrington  
 c/o Attwaters Jameson Hill,  
 72-74 Fore Street, Hertford,  
 SG14 1BY.  
 Ref: JDH/3004125-0001/Wed

## What are Public Notices?

Public notices are adverts placed by councils and other local authorities to inform people of developments in their areas.

They can cover a wide variety of topics that may impact your life

## STATUTORY

### STEVENAGE BOROUGH COUNCIL

#### PUBLIC NOTICE

#### Revised Gambling Statement of Principles

#### The Gambling Act 2005 (Licensing Authority Policy Statement) (England and Wales) Regulations 2006, Section 349

Under the Gambling Act 2005, the Council regulates the provision of premises for gambling (including betting shops, bingo halls and amusement arcades), the provision of gaming machines in clubs and alcohol licensed premises and small society lottery registration.

At least every three years, the Council must review and adopt a Statement of Licensing Principles that details how the Council will undertake its licensing functions. The current Statement of Licensing Principles has been in effect since 2022 and therefore the Council has undertaken a full review. The proposed statement of principles will form the basis of the Council's decision-making for licensing gambling premises.

This consultation is your opportunity to raise any issues that you think should be taken into account when considering applications and taking enforcement action.

The draft Statement of Principles, with proposed revisions highlighted, is open to public consultation between 23<sup>rd</sup> October and 20<sup>th</sup> November 2024; a copy of the document is available on the Council's website: <https://www.stevenage.gov.uk/gambling-principles-consultation>

All consultation responses must be in writing and submitted by midnight on **20th November 2024**. Comments can be made by email to [licensing@stevenage.gov.uk](mailto:licensing@stevenage.gov.uk) or by post to:

Acting Licensing Manager  
 Stevenage Borough Council  
 Daneshill House  
 Danestrete  
 Stevenage  
 SG1 1HN

All consultation responses may be published within a public report.

### STEVENAGE BOROUGH COUNCIL

#### PUBLIC NOTICE

#### Revised Statement of Licensing Policy Statement LICENSING ACT 2003, Section 5

Under the Licensing Act 2003, Stevenage Borough Council is the Licensing Authority and has responsibility for granting premises licences, club premises certificates, temporary event notices and personal licences in the Borough in respect of the sale and/or supply of alcohol and the provision of regulated entertainment and late-night refreshment.

At least every five years, the Council must review and adopt a Licensing Policy Statement that details how the Council will undertake its licensing functions. The current Licensing Policy Statement has been in effect since 2020 and therefore the Council is undertaking a full review. The proposed policy statement will form the basis of the Council's decision-making for licensing alcohol and entertainment premises.

This consultation is your opportunity to raise any issues that you think should be taken into account when considering applications and taking enforcement action.

The draft Licensing Policy Statement, with proposed revisions highlighted, is open to public consultation between 23<sup>rd</sup> October 2024 and 20<sup>th</sup> November 2024; a copy of the document is available via the following page on the Council's website:

<https://www.stevenage.gov.uk/licensing-policy-statement>

All consultation responses must be in writing and submitted by midnight on **20th November 2024**. Comments can be made by email to [licensing@stevenage.gov.uk](mailto:licensing@stevenage.gov.uk) or by post to:

Acting Licensing Manager  
 Stevenage Borough Council  
 Daneshill House  
 Danestrete  
 Stevenage  
 SG1 1HN

All consultation responses may be published within a public report.

**You'd want to know if someone was planning to dig up the road next to your house, right?**

## Don't be caught out

Every day hundreds of applications are made for permission to close roads.

The **Public Notice Portal** is a free to use, online service that will tell you who is applying for what and for where. It's free to use and if you register and tell us the area you are interested in, we'll keep checking the updates and will email to tell you about any plans for your community before they become a reality.

Find, save and share **Public Notices** that affect you in your local area.



Telling you their plans before they become your problems

## Notice Definitions: Statutory



Legally required notices of varying purpose that don't typically fit within one of the aforementioned notice categories, for example council tax, local elections or bankruptcy.

You can learn more about the wide range of legislation pertaining to public notices at **[legislation.gov.uk](http://legislation.gov.uk)**

This page is intentionally left blank





**Your Input Matters!** We're reviewing our Licensing Policy for 2025-2030 to support safe, well-regulated venues across Stevenage. Take a look at the draft policy and let us know your thoughts—your feedback helps shape our community! You have until 20 November to submit your comments.  

 View the draft and share your feedback: <https://www.stevenage.gov.uk/licensing-and-registration/revised-licensing-policy-statement-consultation>

This page is intentionally left blank

## Appendix 11.1 – Table of Delegations of Licensing Functions

<b>MATTER TO BE DEALT WITH</b>	<b>LICENSING COMMITTEE</b>	<b>OFFICERS</b>
Initial and five yearly review of licensing policy	Recommend policy to Full council	
Application for personal licence	If a police objection made	All other cases
Application for personal licence, with unspent convictions	All cases	All other cases
Application for premises licence/club premises certificate	If a relevant representation made	All other cases
Application for provisional statement	If a relevant representation made	All other cases
Application to vary premises licence/club premises Certificate	If a relevant representation made	All other cases
Application to vary designated premises supervisor	If a police objection	All other cases
Request to be removed as designated premises supervisor		All cases
Determination of a Police or Environmental Health Representation to a temporary events notice (except a late TENS)	All cases	
Application for transfer of premises licence	If a police objection made	All other cases
Application for Interim Authorities	If a police objection made	All other cases
Application to review premises licence/club premises certificate	All cases	
Decision on whether a complaint is irrelevant, frivolous, vexatious, etc		All cases
Decision to object when local authority is a consultee and not the lead authority	All cases	
Determination of an application to vary a premises licence at a community premises to include alternative licence conditions	If a police objection is made	All other cases
Decision whether to consult other responsible authorities on minor variation applications		All cases
Determination of minor variation application		All cases
Making representations on behalf of the Licensing Authority acting as a responsible authority, or applying for a review as a responsible authority.		All cases

This page is intentionally left blank

## Appendix 11.2 Case-law & Guidance Sources

### Relevant case law regarding policy statements

Limits of licensing policy:

*BBPA & Others v Canterbury City Council [2005] EWHC 1318 (Admin)*

“Strict” licensing policies and exceptions to policy:

*R (Westminster City Council) v Middlesex crown Court and Chorion plc [2002] LLR 538*

Cumulative impact policies and hours:

*R (JD Weatherspoon plc) v Guildford Borough Council [2006] EWHC 815 (Admin)*

Duplication and conditions:

*R (on the application of Bristol Council) v Bristol Magistrates’ Court [2009] EWHC 625 (Admin)*

Extra-statutory notification by the licensing authority:

*R (on the application of Albert Court Residents Association and Others) v Westminster City Council [2010] EWHC 393 (Admin)*

The prevention of crime and disorder: ambit of the objective

*Blackpool Council, R (on the application of) v Howitt [2008]*

### Guidance Documents

Home Office ‘Practical Guide for Preventing and Dealing with Alcohol Related Problems

Home Office Safer Clubbing Guide

Home Office Alcohol Disorder Zone Guidance

Home Office Designated Public Place Order (DPPO) guidance

Home Office s182 Guidance

Test Purchasing Guidance

Protecting young people from alcohol related harm

Licensing large scale events (music festivals, etc)

Licensing Village Halls

Councillor Handbook: Licensing Act 2003

Councillor Handbook: Community Events

Managing Crowds Safely

5 Steps to Risk Assessment

The Guide to Safety at Sports Grounds

Safety Guidance for Street Arts, Carnivals, Processions and Large-Scale Performances

UK BIDS: Business Improvement Districts (national BIDS advisory service)

### Appendix 11.3 Useful Contacts

#### **Association of Convenience Stores (ACS)**

<https://www.acs.org.uk/>

Federation House, 17 Farnborough Street, Farnborough, Hampshire, GU14 8AG

E-mail: [acs@acs.org.uk](mailto:acs@acs.org.uk)

#### **Association of Town and City Management (ACTM)**

<http://www.atcm.org/>

PO Box 242 Westerham TN16 9EU

E-mail: [info@atcm.org](mailto:info@atcm.org)

#### **British Beer and Pub Association (BBPA)**

<http://www.beerandpub.com>

Brewers Hall, Aldermanbury Square, London, EC2V 7HR

Tel: 020 7627 9191

E-mail: [contact@beerandpub.com](mailto:contact@beerandpub.com)

#### **British Board of Film Classification (BBFC)**

<https://bbfc.co.uk/>

3 Soho Square, London, W1D 3HD

E-mail: [feedback@bbfc.co.uk](mailto:feedback@bbfc.co.uk)

#### **British Institute of Inn Keeping (BII)**

<https://www.bii.org/>

Infor House, 1 Lakeside Road, Farnborough, GU14 6XP

Email: [enquiries@bii.org](mailto:enquiries@bii.org)

#### **British Retail Consortium (BRC)**

<https://www.brc.org.uk/>

2 London Bridge, London SE1 9RA

Email: [info@brc.org.uk](mailto:info@brc.org.uk)

#### **Circus Arts Forum**

[www.circusarts.org.uk](http://www.circusarts.org.uk)

E-mail: [info@circusarts.org.uk](mailto:info@circusarts.org.uk)

#### **Department for Culture, Media and Sport (DCMS)**

[www.culture.gov.uk](http://www.culture.gov.uk)

100 Parliament Street, London, SW1A 2BQ

E-mail: [enquiries@culture.gov.uk](mailto:enquiries@culture.gov.uk)

## **Equity**

<http://www.equity.org.uk/>

Guild House, Upper St Martins Lane, London, WC2H 9EG

Tel: 020 7379 6000

E-mail: [info@equity.org.uk](mailto:info@equity.org.uk)

## **Federation of Licensed Victuallers Associations (FLVA)**

<http://www.flva.co.uk>

The Raylor Centre, James Street, York, YO10 3DW

Email: [admin@flva.co.uk](mailto:admin@flva.co.uk)

## **Home Office**

[www.homeoffice.gov.uk](http://www.homeoffice.gov.uk)

2 Marsham Street, London, SW1P 4DF

Email: [public.enquiries@homeoffice.gov.uk](mailto:public.enquiries@homeoffice.gov.uk)

## **Institute of Licensing (IoL)**

<http://www.instituteoflicensing.org/>

Ridgeway, Upper Milton Wells, Somerset, BA5 3AH

Email: [info@instituteoflicensing.org](mailto:info@instituteoflicensing.org)

## **Local Government Association (LGA)**

<https://www.local.gov.uk/topics/licences-regulations-and-trading-standards>

17 Smith Square, Westminster, London SW1P 3HZ

E-mail: [info@local.gov.uk](mailto:info@local.gov.uk)

## **National Association of Licensing and Enforcement Officers (NALEO)**

<https://www.naleo.org.uk/>

37 Little Paddocks, Ferring, West Sussex, BN12 5NJ

Email: [info@naleo.org.uk](mailto:info@naleo.org.uk)

## **National Pub Watch**

<http://www.nationalpubwatch.org.uk/index.php>

PO Box 3523, Barnet, EN5 9LQ

## **Night Time Industries Association (NTIA)**

<https://www.ntia.co.uk/>

Email: [info@ntia.co.uk](mailto:info@ntia.co.uk)

## **Office for Product Safety and Standards (OPSS)**



<https://www.gov.uk/government/organisations/office-for-product-safety-and-standards>

4th Floor Cannon House, 18 The Priory Queensway, Birmingham, B4 6BS

Email: [OPSS.enquiries@beis.gov.uk](mailto:OPSS.enquiries@beis.gov.uk)

### **Outdoor Arts UK**

[outdoorartsuk.org.uk](http://outdoorartsuk.org.uk)

54 Charlton Street, London, NW1 1HS

Email: [info@outdoorartsuk.org](mailto:info@outdoorartsuk.org)

### **Portman Group**

<https://www.portmangroup.org.uk>

Fora, 201 Borough High Street, London, SE1 1JA

E-mail [info@portmangroup.org.uk](mailto:info@portmangroup.org.uk)

### **UK Cinema Association (UKCA)**

<https://www.cinemauk.org.uk/>

3 Soho Square, London, W1D 3HD

### **UK Hospitality (UKH)**

<https://www.ukhospitality.org.uk/>

6th Floor, 10 Bloomsbury Way, London, WC1A 2SL

Email: [info@ukhospitality.org.uk](mailto:info@ukhospitality.org.uk)

This page is intentionally left blank

Estimated time taken to complete: 2 hours\*

\*Please note that this should be a working document and should be actively reviewed throughout the lifetime of the project/policy/service change



# Revised Licensing Statement of Principles Equality Impact Assessment (EqIA) Form

February 2025 – February 2030

<b>Date created</b>	November 2024
<b>Approved by</b>	Assistant Director – Planning & Regulation
<b>Owner</b>	Head of Environmental Health & Licensing
<b>Version</b>	V1.1
<b>Author</b>	Julie Dwan Acting Licensing Manager
<b>Business Unit and Team</b>	Environmental Health & Licensing

Please [click this link](#) to find the EqIA guidance toolkit for support in completing the following form.

For translations, braille or large print versions of this document please email [equalities@stevenage.gov.uk](mailto:equalities@stevenage.gov.uk).

**First things first:**

**Does this policy, project, service, or other decision need an EqlA?**

<b>Title:</b>	Revised Licensing Statement of Principles	
<b>Please answer Yes or No to the following questions:</b>		
Does it affect staff, service users or the wider community?		<b>Yes/No</b>
Has it been identified as being important to particular groups of people?		<b>Yes/No</b>
Does it or could it potentially affect different groups of people differently (unequal)?		<b>Yes/No</b>
Does it relate to an area where there are known inequalities or exclusion issues?		<b>Yes/No</b>
Will it have an impact on how other organisations operate?		<b>Yes/No</b>
Is there potential for it to cause controversy or affect the council's reputation as a public service provider?		<b>Yes/No</b>

<b>Where a positive impact is likely, will this help to:</b>	
Remove discrimination and harassment?	N/A
Promote equal opportunities?	N/A
Encourage good relations?	<b>Yes/No</b>

**If you answered 'Yes' to one or more of the above questions you should carry out an EqlA.**

Or if you answered 'No' to all of the questions and decide that your activity doesn't need an EqlA you must explain below why it has no relevance to equality and diversity.

You should reference the information you used to support your decision below and seek approval from your Assistant Director before confirming this by sending this page to [equalities@stevenage.gov.uk](mailto:equalities@stevenage.gov.uk).

I determine that no EqlA is needed to inform the decision on the .

Name of assessor:

Decision approved by:

Role:

Role: Assistant Director

Date:

Date:

# Equality Impact Assessment Form

For a policy, project, strategy, staff or service change, or other decision that is new, changing or under review

Page 253

<b>What is being assessed?</b>		<b>Revised Licensing Statement of Principles</b>			
Lead Assessor	Julie Dwan			Assessment team	
Start date	February 2025	End date	February 2030		
When will the EqIA be reviewed? (Typically every 2 years)		November 2029, unless there are significant changes to the legislation which would require the Council to review the Licensing Statement of Principles sooner.			

Who may be affected by the proposed project?	All residents and businesses within Stevenage, Licensed premises in particular.
What are the key aims of the proposed project?	To provide information and guidance on the general approach that the Council will take to licensing. The Statement does not prevent anyone from making an application, and each application will be considered on its individual merits.

What <b>positive measures</b> are in place (if any) to help <b>fulfil our legislative duties</b> to:					
Remove discrimination & harassment	N/A	Promote equal opportunities	N/A	Encourage good relations	Promotion of better understanding between those

					providing Licensable Activities and those potentially affected by them.
--	--	--	--	--	---

What sources of data / information are you using to inform your assessment?	The legislation, namely the Licensing Act 2003 and related guidance and feedback received from the local consultation on the revised statement.
---	---

In assessing the potential impact on people, are there any overall comments that you would like to make?	The purpose of the Council's Licensing Statement of Principles is to provide information and guidance on the general approach that the Council will take to licensing. The Statement does not prevent anyone from making an application, and each application will be considered on its individual merits.
--	--

## Evidence and Impact Assessment

Explain the potential impact and opportunities it could have for people in terms of the following characteristics, where applicable:

Age					
Positive impact	X	Negative impact		Unequal impact	
Please evidence the data and information you used to support this assessment	The Licensing Act has as an objective 'Protection of children from Harm'. The policy embraces the promotion of this licensing objective and thus ensures that this age demographic is protected from certain licensable activities that may cause them harm. Each licence application is assessed on its merits and takes into account the views of all concerned, including those of the listed Responsible Authorities. However, we seek to minimise restrictions through the use of appropriate conditions, where possible, and only in extreme cases is there a refusal of an application.				

What opportunities are there to promote equality and inclusion?	N/A	What do you still need to find out? Include in actions (last page)	N/A
---	-----	--	-----

**Disability e.g., physical impairment, mental ill health, learning difficulties, long-standing illness**

Positive impact	Negative impact	Unequal impact
Please evidence the data and information you used to support this assessment		
No differential impact.		
What opportunities are there to promote equality and inclusion?	N/A	What do you still need to find out? Include in actions (last page)

**Gender Reassignment**

Positive impact	Negative impact	Unequal impact
Please evidence the data and information you used to support this assessment		
No differential impact.		
What opportunities are there to promote equality and inclusion?	N/A	What do you still need to find out? Include in actions (last page)

Marriage or Civil Partnership					
Positive impact		Negative impact		Unequal impact	
Please evidence the data and information you used to support this assessment	No differential impact.				
What opportunities are there to promote equality and inclusion?	N/A		What do you still need to find out? Include in actions (last page)	N/A	

Pregnancy & Maternity					
Positive impact		Negative impact		Unequal impact	
Please evidence the data and information you used to support this assessment	No differential impact.				
What opportunities are there to promote equality and inclusion?	N/A		What do you still need to find out? Include in actions (last page)	N/A	

Race					
Positive impact		Negative impact		Unequal impact	
Please evidence the data and information	No differential impact.				



you used to support this assessment			
What opportunities are there to promote equality and inclusion?	N/A	What do you still need to find out? Include in actions (last page)	N/A

Religion or Belief					
Positive impact		Negative impact		Unequal impact	
Please evidence the data and information you used to support this assessment	No differential impact.				
What opportunities are there to promote equality and inclusion?	N/A	What do you still need to find out? Include in actions (last page)	N/A		

Sex					
Positive impact		Negative impact		Unequal impact	
Please evidence the data and information you used to support this assessment	No differential impact.				
What opportunities are there to promote equality and inclusion?	N/A	What do you still need to find out? Include in actions (last page)	N/A		

<b>Sexual Orientation e.g., straight, lesbian / gay, bisexual</b>					
Positive impact		Negative impact		Unequal impact	
Please evidence the data and information you used to support this assessment	No differential impact.				
What opportunities are there to promote equality and inclusion?	N/A		What do you still need to find out? Include in actions (last page)	N/A	

<b>Socio-economic<sup>1</sup></b>					
<b>e.g., low income, unemployed, homelessness, caring responsibilities, access to internet, public transport users, social value in procurement</b>					
Positive impact		Negative impact		Unequal impact	
Please evidence the data and information you used to support this assessment	No differential impact.				
What opportunities are there to promote equality and inclusion?	N/A		What do you still need to find out? Include in actions (last page)	N/A	

<sup>1</sup>Although non-statutory, the council has chosen to implement the Socio-Economic Duty and so decision-makers should use their discretion to consider the impact on people with a socio-economic disadvantage.

Additional Considerations					
Please outline any other potential impact on people in any other contexts					
Positive impact		Negative impact		Unequal impact	
Please evidence the data and information you used to support this assessment	N/A				
What opportunities are there to promote equality and inclusion?			What do you still need to find out? Include in actions (last page)		

## Consultation Findings

Document any feedback gained from the following groups of people:

Staff?	None	Residents?	None
Voluntary & community sector?	None	Partners?	One consultation response from the <b>Local Planning Authority</b> who proposed amendments to be made to paragraph 3.5 of the draft policy so that it reads 'The Council's planning policies are set out in its local Plan. Central Government policy and guidance in the form of...' the statement also makes reference to 'Executive' which needs to be replaced with 'Cabinet' as the Executive Committee was replaced with Cabinet which took effect from June 2024.

Other stakeholders?	<p>One consultation response received from <b>Portman Group</b> who is a Social responsibility body and regulator for alcohol labelling, packaging and promotion in the UK. They operate a code of practice on the naming, packaging and promotion of alcoholic drinks, this has been provided with their response. They would like the Council to consider comments which are also outlined in their response, of former UK Public Health Minister Andrea Leadsom in February 2024, suggesting that 'Licensing Authorities should consider whether it is appropriate to impose conditions on licences that require the licence holder to comply with the Portman Group's Retailer Alert Bulletins'.</p>		

## Overall Conclusion & Future Activity

Page 260

Explain the <b>overall findings</b> of the assessment and <b>reasons for outcome (please choose one)</b> :	
<p>1. No inequality, inclusion issues or opportunities to further improve have been identified</p>	<p>The statement is intended to aid with local decision making in conjunction with the Licensing Act 2003 and associated guidance.</p> <p>The Statement supports a culture of openness where appropriate information can be accessed by all parties. Licensing Committee hearings, when required, will generally be held in public and any enforcement will be in line with the principles promoted within the Regulators' Code. Partnership working and exchange of information (within legal constraints) is also supported with a view to promoting better understanding between those providing licensable activities and those potentially affected by them.</p> <p>The Licensing Act has as an objective 'Protection of children from Harm'. The policy embraces the promotion of this licensing objective and thus ensures that this age demographic is protected from certain licensable activities that may cause them harm. The Council will seek to mediate between applicants and objectors and reach negotiated settlements wherever possible.</p>
	2a. Adjustments made

Negative / unequal impact, barriers to inclusion or improvement opportunities identified	2b. Continue as planned	
	2c. Stop and remove	

Detail the <b>actions that are needed</b> as a result of this assessment and how they will help to <b>remove discrimination &amp; harassment, promote equal opportunities</b> and / or <b>encourage good relations</b> :				
Action	Will this help to remove, promote and / or encourage?	Responsible officer	Deadline	How will this be embedded as business as usual?
N/A				

Approved by Assistant Director / Strategic Director: 

Date: 11<sup>th</sup> November 2024

Please send this EqIA to [equalities@stevenage.gov.uk](mailto:equalities@stevenage.gov.uk) for critical friend feedback and for final submittance with the associated project.

This page is intentionally left blank

**Meeting** Council

**Portfolio Area** Communities, Community Safety and Equalities

**Date** 26<sup>th</sup> February 2025



## **GAMBLING ACT 2005 – REVIEW OF STATEMENT OF PRINCIPLES**

**Authors** Julie Dwan | 2493

**Lead Officers** Rory Cosgrove | 2888 & James Chettleburgh | 2266

**Contact Officer** Julie Dwan | 2493

### **NON-KEY DECISION**

#### **1 PURPOSE**

- 1.1 To consider and adopt the Council's draft Statement of Principles as required under the Gambling Act 2005.
- 1.2 To note that the draft Statement of Principles was considered by the Council's General Purposes Committee at their meeting on 4<sup>th</sup> December 2024, by Cabinet on 15<sup>th</sup> January 2025 and Overview & Scrutiny on 21<sup>st</sup> January 2025.

#### **2 RECOMMENDATIONS**

- 2.1 That the Council note the report and agrees the proposed Stevenage Borough Council Gambling Act Statement of Principles 2025-2028 (attached at appendix A).
- 2.2 That the Council recommends the Stevenage Borough Council draft Statement of Principles be adopted.

### **3 BACKGROUND**

- 3.1 The Council is the licensing authority for the purposes of the Gambling Act and consequently is under a duty to prepare a Statement of Gambling Principles that it proposes to apply in exercising its functions under the Act.
- 3.2 The Statement of Principles sets out the general approach the Council will take when carrying out its regulatory role under the Act and promoting the three licensing objectives:
- preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime
  - ensuring that gambling is conducted in a fair and open way
  - protecting children and other vulnerable persons from being harmed or exploited by gambling.
- 3.3 The Act was conceived as ‘light touch’ legislation, covering a wide range of licensable activities such as adult gaming centres and betting premises.
- 3.4 The Act specifies that Local Authorities should “aim to permit” gambling, provided it is in accordance with the Code of Practice and guidance issued by the Gambling Commission, reasonably consistent with the licensing objectives and in accordance with the Statement of Principles. The effect of this duty is that Licensing Authorities must approach their functions in a way that seeks to regulate gambling by using their powers to promote the licensing objectives rather than by setting out to prevent it altogether.
- 3.5 The Statement seeks to strike a balance between the interests of licence holders, applicants and residents in the promotion of the licensing objectives defined by the Act. Additionally, it outlines the licensing authority’s expectations of licence holders in promoting the licensing objectives, whilst advising on the licensing authority’s obligations under the Act, including its interpretation of the Act and/or Statutory Guidance where necessary. The Statement is designed to offer appropriate protection for residents and a streamlined approach to regulation that eases unnecessary burdens on businesses.
- 3.6 The current Statement was adopted by full Council in March 2022 and must now be reviewed and, where necessary, revised.



## Proposed changes

- 3.8 A limited number of additions and amendments to the extant Statement of Principles were consulted upon.
- 3.9 The draft statement can be found at Appendix A; all significant additions or variations from the 2022-2025 policy can be found in the draft statement under the title 'version history' on page 72. There are no changes to the intent or direction in the proposed 2025-2028 policy, which sets out how the Council seeks to regulate gambling activities under its control and provide a framework for consistent decision making.
- 3.10 It should be noted that the Council have no jurisdiction over online Gambling, those providing gambling facilities online are required to obtain a licence directly from the Gambling Commission.
- 3.11 Looking at the Local Area Profile, the provision of licensed gambling premises in Stevenage Borough is concentrated around the Town Centre, Leisure Park and on the High Street, this is to be expected as a natural part of the leisure facilities offered by the town. There are a smaller amount of betting facilities offered in the neighbourhood areas within Stevenage and consist of betting shops, licensed clubs and premises with gaming machines.
- 3.12 The Town Centre and Leisure Park are situated in the Bedwell ward, identified as the largest area of deprivation within Stevenage. The main inequalities leading to deprivation are income and crime.
- 3.13 The Local Area profile has been constructive to outline where gambling harms can be realised. As a Licensing Authority, Stevenage Borough Council are not aware that harms from gambling are significant in Stevenage and there is no evidence to suggest that the objectives of the Gambling Commission are not being upheld.
- 3.14 The Licensing Authority intends to continue monitoring all licenced gambling premises, prioritising those premises located in the Town Centre, to ensure we are content that the premises are meeting the Gambling Commission operating licence conditions and social responsibility code. The Local Area Profile is located at **Appendix B**
- 3.15 In summary the principal proposed changes are as follows:

- The format of the policy has been amended in line with the corporate structure as recommended by the Council's Cooperate Policy & Performance Manager and all sections re-numbered.
- Contact details for the Council's Licensing team have been reviewed and updated throughout the 2025-2030 policy document
- Contact details of all the Responsible Authorities have been reviewed and updated throughout the 2025-2030 policy document.
- Section 6.10.18 of the draft policy document – The Council will now engage with the Gambling Harms Alliance in addition to the local Public Health team in the further development of this statement of principles and the Local Area Profile.
- Section 3.3 of the draft policy document - Amendment made to the declaration, removing the reference to a specific edition of the guidance issued by the Gambling commission so that the policy refers to all guidance issued by the Gambling commission.

## **Consultation**

- 3.16 In preparing the Statement, the licensing authority must publish any proposed document before giving it effect and must consult with:
- the chief officer of police for the licensing authority's area;
  - one or more persons who appear to the authority to represent the interests of persons carrying on gambling businesses in the authority's area;
  - one or more persons who appear to the authority to represent the interests of persons who are likely to be affected by the exercise of the authority's functions under this Act.
- 3.17 To comply with this requirement, the licensing authority published the draft Policy on a dedicated webpage on the Council's website and social media pages, including Facebook, Twitter and Instagram with a link to the draft policy document, details of the consultation period and an explanation of how to make a representation. The web page was available between 23rd October and 20th November 2024 and the social media posts went out on 19th November for the remainder of the consultation period. A Public Notice was also displayed on the outside window at Daneshill house and in the Comet, newspaper dated 31st October 2024. A consolidated list of persons/bodies who were consulted on the draft policy document by email or letter directing them to the consultation page, can be found at **Appendix C**.

- 3.18 As a result of the consultation exercise, five responses were received from Gamcare, Gambleaware, The Hertfordshire Safeguarding Adults Board, the Stevenage Planning Authority and Hertfordshire Public Health. These can be found at **Appendix D**
- 3.19 **Gamcare** – An independent charity and the leading provider of information, advice and support for anyone affected by gambling harms and operate the National Gambling Helpline. They welcome the position the Council are taking to go beyond the mandatory and default conditions of the Gambling Act 2005 in it's statement of principles and emphasises the importance of developing a local picture of the level of gambling harms so as to best target resources and that the Council should continue to pursue a Local Area Profile approach and use this data as a basis to scrutinise and possibly oppose a licensing application. It is also suggested that any changes to the Council's statement of principles should be viewed in the context of the Gambling Act review and subsequent process of white paper consultations to take account of the fast-changing regulatory environment.
- 3.20 **Gambleaware** – An independent charity and strategic commissioner of gambling harm education, prevention, early intervention and treatment in the UK. They have signposted the Council to an interactive map designed for Local Authorities, it shows the prevalence of problem gambling severity in each local authority area and ward as well as usage of and reported demand for treatment and support for gambling harms. They also attached two links of publications by the Local Government Association which set out the range of options available to local authorities to deal with gambling-related harms using existing powers. They are also fully supportive of local authorities which conduct an analysis to identify areas with increased levels of risk and support the use of additional licence requirements to mitigate the increased level of risk, where there are higher than average resident or visiting populations from groups known to be vulnerable to gambling harms.
- 3.21 **Hertfordshire Safeguarding Adults Board** – Nominated by the Council under section 157 of the Gambling Act 2005 as being the appropriate body to advise Councils of any risks posed by the operation of premises providing gambling facilities to children and young people. They have made no comments to the revised statement of principles but have provided a copy of the Hertfordshire Safeguarding Children Partnership Gambling Policy Statement.
- 3.22 **The Local Planning Authority** – Have proposed that the list of responsible authorities on page 61 be amended in respect of the details for the Local Planning Authority. That communications be addressed to the Head of Planning and Enforcement as opposed to Development Control Manager, so that communications relating to licensing matters are not missed going forward.
- 3.23 **Hertfordshire Public Health** – Are pleased that the Council's statement of principles includes a section on 'Public Health and gambling' and have provided sources of evidence which they recommend including as references evidence of the harms caused by problem gambling. They refer to the Hertfordshire Gambling Harms Strategy, which is to be launched in early 2025, one of the strategic priorities included in the strategy is 'Influencing the

licensing and regulatory environment' to protect vulnerable residents from the harm caused by gambling and be clear on the individual roles of the County Council and district and borough Councils. Public Health have recommended that 6.12 of the draft policy (Location) includes that applications will be considered against the cumulative impact of applications locally to protect children and vulnerable persons from being harmed or exploited by gambling.

- 3.24 All consultation responses and comments have been carefully reviewed. Feedback indicates that respondents are generally satisfied with the draft statement of gambling principles and the Councils approach. Notably, the Council's use of the local area profile and the data contained within the document to scrutinise and, where necessary oppose licensing applications in areas with higher populations of groups vulnerable to gambling related harms has been positively received.
- 3.25 Recommendations from the Local Planning Authority to update and amend their contact details on page 61, on the list of responsible authority's has been addressed on version 2 of the draft policy statement attached at **Appendix A.**
- 3.26 Hertfordshire Public Health's recommendation to amend section 6.12 of the draft policy statement with regards to location has not been included in version 2 of the draft statement. Cumulative impact assessments are not currently authorised under the Gambling Act 2005. This may be subject to future review and potential inclusion as part of the Governments White Paper on gambling reform. Additionally, it should be noted that licensing officers in Stevenage do not hold delegated authority under the Gambling Act. Consequently, decisions to oppose gambling related applications rest solely with the committee. This process is triggered if a representation or objection against an application is received. The Committee's role remains pivotal in ensuring robust scrutiny of applications. Section 6.12 is reflective of this.

#### **4 REASONS FOR RECOMMENDED COURSE OF ACTION AND OTHER OPTIONS**

- 4.1 Section 349 of the Gambling Act 2005 requires licensing authorities to publish a statement of licensing principles every three years in accordance with prescribed requirements. The adoption of the statement of licensing principles is a non-executive function by virtue of the Act and Statutory Guidance and is reserved for Full Council.
- 4.2 The only alternative option would be to adopt a policy that differs in content and/or extent from the document proposed here. An alternative policy has not been considered as the one proposed achieves an effective balance between ensuring the promotion of the licensing objectives and avoiding being overly prescriptive or prohibitive to applicants and licence holders. Any wholly revised Statement would be subject to a further full consultation process.

4.3 The draft Statement of Principles was considered by the Council's General Purposes Committee at their meeting on 4<sup>th</sup> December 2024 and then by Cabinet at their meeting on 15<sup>th</sup> January 2025. Members did not propose any further amendments to the proposed draft statement of principles.

4.4 The General Purposes Committee resolved:

- That the proposed Stevenage Borough Council Gambling Act proposed Statement of Principles 2025-2028, attached at Appendix A to the report, be supported.
- That the Cabinet be requested to agree the Stevenage Borough Council Gambling Act proposed Statement of Principles for onward recommendation to Council.

4.5 Cabinet resolved:

- That the proposed Stevenage Borough Council Gambling Act proposed Statement of Principles 2025-2028, attached at Appendix A in the report, be supported.
- That the Council agree and adopt the Stevenage Borough Council Gambling Act proposed Statement of Principles.

## **5 IMPLICATIONS**

### **Financial Implications**

5.1 Local authorities have the ability to set their own local fees in connection with the Act on a cost recovery only basis, subject to centrally prescribed maximum amounts. The administration and enforcement of the Act, including the adoption of a Statement, places no additional financial burden on the Council as all costs are recovered through fees.

### **Legal Implications**

The Licensing Authority has a statutory duty to produce a Statement of Principles under the Gambling Act 2005. Inadequate implementation of the Act would cause considerable difficulty to businesses and residents.

### **Equalities and Diversity Implications**

5.2 An Equalities Impact Assessment was carried out in November 2024. No significant impacts were identified to any individuals or businesses. A copy of the Equalities Impact Assessment can be found at Appendix 11.6 of the draft policy document.

### **Community Safety Implications**

5.3 The Act has a community safety implication arising from the licensing objectives. There are currently no local concerns regarding the impact of

gambling on community safety, and it does not appear within the Council's community safety plan.

## **BACKGROUND DOCUMENTS**

- BD1 Gambling Act 2005
- BD2 Gambling Act 2005 (Licensing Authorities Policy Statement) (England and Wales) Regulations 2006
- BD3 Guidance for Local Authorities, 5th Edition (Gambling Commission, March 2015)
- BD4 Gambling Act 2005; Stevenage Borough Council Statement of Policy 2016-2019

## **APPENDICES**

- A Gambling Act 2005 draft Statement of Principles
- B Local Area Profile
- C Consolidated list of consultees
- D1 Consultation response from Gamcare
- D2 Consultation response from GambleAware
- D3 Consultation response from Hertfordshire Safeguarding Adults Board
- D4 Consultation response from Local Planning Authority
- E1 Consultation letter
- E2 Public Notice
- E3 Newspaper Notice
- E4 Social Media Post

This page is intentionally left blank



# Gambling Act 2005 Statement of Principles

---

Stevenage Borough Council

[2025-2028]

<b>Date created</b>	October 2024
<b>Approved by</b>	
<b>Owner</b>	Rory Cosgrove (Head of Environmental Health & Licensing)
<b>Version</b>	Draft Version 2
<b>Author</b>	Julie Dwan (Acting Licensing Manager)
<b>Business Unit and Team</b>	Planning & Regulation (Environmental Health & Licensing)
<b>Policy Review Date</b>	March 2025
<b>Equality Impact Assessment Date</b>	November 2024

For translations, braille or large print versions of this document please email [equalities@stevenage.gov.uk](mailto:equalities@stevenage.gov.uk).

## Contents

---

1. Purpose .....	5
2. Scope .....	5
- The Licensing Objectives.....	5
3. Legal Framework.....	6
- Declaration.....	6
- Each application determined on its own merits.....	6
- Authorisations Under this Act.....	6
- The Gambling Commission.....	7
4. Equalities.....	8
5. Data Protection.....	8
6. Policy.....	9
- Stevenage Borough.....	9
- Responsible Authorities.....	10
- Interested Parties.....	11
- Exchange of Information.....	12
- Enforcement.....	13
- Licensing Authority Functions.....	15
- Meeting the Licensing Objectives.....	16
- Preventing gambling from being a source of crime and disorder, being associated with crime or disorder or being used to support crime.....	16
- Ensuring Gambling is conducted in a fair and open way.....	16
- Protecting Children & other vulnerable persons from being Harmed/exploited by Gambling.....	17.

- Premises Licence-consideration of Applications.....22
- General Principles.....22
- Decision Making.....22
- Environmental Considerations.....23
- Public health & Gambling.....24
- Definition of a 'premises'..... 25
- Family entertainment Centres.....28
- Premises 'ready for gambling'.....28
- Location.....29
- Planning.....33
- Duplication with other regulatory regimes..... 34
- Licensing Objectives.....34
- Conditions.....34
- Door supervisors.....37
- Adult Gaming Centres.....27
- Licensed family Entertainment Centres.....38.
- Casinos.....39
- Bingo premises.....40
- Betting premises.....40
- Gaming machines in gambling premises.....41
- Tracks.....42
- Travelling Fairs.....44
- Provisional Statements.....44
- Reviews.....46
- Permits, Temporary and Occasional Use Notices.....47

- Unlicensed Family Entertainment Centre gaming gaming machine permits (statement of Principles on Permits- Schedule 10 Para. 7) .....	48
-Statement of Principles Permits on unlicensed FECs.....	50
- Alcohol Licensed Premises gaming machine permits; (Schedule 13 Para.4(1) .....	50
- Prize Gaming Permits (Statement of Principles on Permits. (Schedule 14 Para. 8(3) .....	50
- Club Gaming and Club Machine Permits.....	52
- Temporary Use Notices.....	53
- Occasional Use Notices.....	54
- Small Society Lotteries.....	55
7. Consultation .....	55
8. Monitoring and Review .....	57
9. References and Resources.....	57
10. Abbreviations and Definitions .....	58
11. Appendices.....	59
Appendix 11.1- Map of Stevenage.....	
Appendix 11.2 - Responsible Authorities.....	
Appendix 11.3 - Summary of gaming machine categories and entitlements.....	
Appendix 11.4 - Table of Delegations.....	
Appendix 11.5 - Glossary of Terms.....	
Appendix 11.6 - Equality impact assessment (EqIA) November 2024.....	
12. Version History .....	59

## 1. Purpose

- 1.1 Licensing authorities are required by the Gambling Act 2005 (the Act) to publish a statement of the principles that they propose to apply when exercising their functions. This statement must be published at least every three years. The statement must also be reviewed from “time to time” and any amended parts re-consulted upon. The statement must be then re-published.
- 1.2 This Policy will replace all previous versions. The Gambling Act Statement of Principles is revised every three years. The previous version of this policy was approved on 9<sup>th</sup> March 2022.

## 2. Scope

- 2.1 In exercising most of their functions under the Act, licensing authorities must have regard to the licensing objectives as set out in section 1 of the Act which are:
- a) Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime;
  - b) Ensuring that gambling is conducted in a fair and open way;
  - c) Protecting children and other vulnerable persons from being harmed or exploited by gambling
- 2.2 It should be noted that the Gambling Commission (“the Commission”) has stated: “The requirement in relation to children is explicitly to protect them from being harmed or exploited by gambling”.

### 3 Legal Framework

3.1 This licensing authority is aware that, as per Section 153 of the Gambling Act 2005, in making decisions about premises licences and temporary use notices it should aim to permit the use of premises for gambling in so far as it thinks it is:

- In accordance with any relevant code of practice issued by the Commission;
- In accordance with any relevant guidance issued by the Commission.
- Reasonably consistent with the licensing objectives; and
- In accordance with the authority's statement of principles

3.2 Paragraph 6.7 of this Policy sets out in more detail how this authority will support the attainment of the licensing objectives.

#### **Declaration**

3.3 In producing the final statement, this licensing authority declares that it has had regard to the licensing objectives of the Act, the guidance issued by the Commission , and any responses from those consulted upon the statement.

#### **Each application is determined on its own merits.**

3.4 It should be noted that this policy statement will not override the right of any person to make an application, make representations about an application, or apply for a review of a licence, as each will be considered on its own merits and according to the statutory requirements of the Act.

#### **3.5 Authorisations under the Act**

3.5.1 The Act provides for three categories of licence: operating licences, personal licences and premises licences. The Council will be responsible for the determination and issuing of premises licences. The responsibility for operating and personal licences rests with the Gambling Commission.

3.5.2 Premises licences issued by the Council cover the following types of premises:

- casinos
- bingo premises

- betting premises
- track betting
- adult gaming centres (AGC)
- family entertainment centres (FEC)

3.5.3 The Council will be responsible for the determination and issuing of five categories of permit:

- unlicensed family entertainment centre (uFEC) gaming machine permits
- (alcohol) licensed premises gaming machine permits
- prize gaming permits
- club gaming permits
- club gaming machine permits

3.5.4 The Council will be responsible for the determination and issuing of two categories of temporary authorisations:

- temporary use notices (TUN)
- occasional use notices (OUN)

3.5.5 The Council will be responsible for the determination and registration of applications for small society lotteries.

## **3.6 The Gambling Commission**

3.6.1 The Commission regulates gambling in the public interest. It does so by keeping crime out of gambling, by ensuring that gambling is conducted in a fair and open way and by protecting children and vulnerable people.

3.6.2 The commission:

provides independent advice to the Government about the way gambling is carried out, the effects of gambling, and the regulation of gambling generally.

- issues guidance pursuant to section 25 of the Act about the way licensing authorities exercise their licensing functions under the Act and, in particular, the principles to be applied.

- issues Codes of Practice pursuant to section 24 of the Act about the way in which facilities for gambling are provided, which may also include provisions about the advertising of gambling facilities.

## 4 Equalities

- 4.1 Under the Equality Act (2010) the Council has a legal duty to fulfil the requirements of the Public Sector Equality Duty (PSED). Through this duty and in the application of this policy, the Council will carry out its functions in a way that:
- a. Removes discrimination, harassment, victimisation and any other conduct that is unlawful under the Equality Act (2010)
  - b. Promotes equal opportunities between people who have a protected characteristic(s) and those who don't
  - c. Encourages good relations between people who have a protected characteristic(s) and those who don't

Further information on the Council's fulfilment of the Equality Act (2010) is set out in the Equality, Diversity and Inclusion (EDI) Policy (2022) and Reasonable Adjustment Policy (2024).

## 5. Data Protection

- 5.1 The Council regards respect for the privacy of individuals and the lawful and careful treatment of personal information as very important to delivery of services.
- 5.2 The Council will ensure that it treats personal information lawfully and proportionately as set out in the General Data Protection Regulation (GDPR) and Data Protection Act (2018). For further information on the Council's approach to handling information please see [Data Protection Act \(stevenage.gov.uk\)](https://www.stevenage.gov.uk)



## 6. Policy

### 6.1 Stevenage Borough

- 6.1.1 Stevenage Borough Council is situated in the County of Hertfordshire, which contains ten District Councils in total. Stevenage was designated as Britain's first new town in 1946 and the Council area has a population estimated at 88104 (2018), making it the smallest in the County by population. In terms of area, it is also the smallest, covering approximately 20 square miles and is surrounded by the districts of North Hertfordshire and East Hertfordshire. A map of the Council area is attached as an appendices at 11.1.
- 6.1.2 Set in the attractive countryside of north Hertfordshire, Stevenage is an urban authority, enjoying the amenities of a well-planned new town, together with a history dating back to Roman times. The town is divided into distinct land use areas, the town centre, Old Town and railway station are the core of the town. They are surrounded by individual residential neighbourhoods containing around 38,000 homes. Local neighbourhood centres provide shops and community facilities for residents. There are two main employment areas, one to the west of the town centre at Gunnels Wood and one to the north-east at Pin Green.
- 6.1.3 There are a range of leisure facilities, retail parks and supermarkets. Open spaces and play areas are well spread throughout the town. Wide roads and a cycle and pedestrian network link all parts of the town. Stevenage's railway station is on the East Coast Main Line. There are long distance rail links between London and the north. Commuter services connect the town to Kings Cross, Cambridge and Peterborough as well as nearby towns including Hitchin, Letchworth and Welwyn Garden City. The town is connected to Junctions 7 and 8 of the A1(M) which links London, the midlands and the north. The A602 connects Stevenage to Hitchin and Ware while the nearby A505 provides connections between Luton Airport and Cambridgeshire. The urban road network of Stevenage comprises three main north-south routes and four main east-west routes.

## **6.2 Responsible Authorities**

6.2.1 The licensing authority is required by regulations to state the principles it will apply in exercising its powers under Section 157(h) of the Act to designate, in writing, a body which is competent to advise the authority about the protection of children from harm. The principles are:

- The need for the body to be responsible for an area covering the whole of the licensing authority's area; and
- The need for the body to be answerable to democratically elected persons, rather than any particular vested interest group.

6.2.2 In accordance with the Commission's Guidance for local authorities, this authority designates the Hertfordshire Safeguarding Children Board for this purpose.

6.2.3 Any concerns expressed by a responsible authority in relation to their own functions cannot be taken into account unless they are relevant to the application itself and the licensing objectives. In this regard the Council will not generally take into account representations that are deemed to be irrelevant, such as:

- There are too many gambling premises in the locality (because need for gambling facilities cannot be taken into account)
- The premises are likely to be a fire risk (because public safety is not a licensing objective)
- The location of the premises is likely to lead to traffic congestion (because this does not relate to the licensing objectives)
- The premises will cause crowds to congregate in one area causing noise and nuisance (because other powers are generally available to deal with these issues. It should be noted that, unlike the Licensing Act 2003, the Gambling Act does not include as a specific licensing objective the prevention of public nuisance. Any nuisance associated with gambling premises should be tackled under other relevant laws).

6.2.4 The contact details of all the Responsible Authorities under the Act for applications in respect of premises within the Borough of Stevenage are

included as an appendices at 11.2 . This information is also available via the Council's website at: [www.stevenage.gov.uk](http://www.stevenage.gov.uk)

### 6.3 Interested Parties

6.3.1 Interested parties can make representations about licence applications or apply for a review of an existing licence. These parties are defined in the Act as follows:

“For the purposes of this Part a person is an interested party in relation to an application for or in respect of a premises licence if, in the opinion of the licensing authority which issues the licence or to which the applications is made, the person:

- a) Lives sufficiently close to the premises to be likely to be affected by the authorised activities,
- b) Has business interests that might be affected by the authorised activities, or
- c) Represents persons who satisfy paragraph (a) or (b)”

6.3.2 The licensing authority is required by regulations to state the principles it will apply in exercising its powers under the Act to determine whether a person is an interested party. The principles are: Each case will be decided upon its own merits. This authority will not apply a rigid rule to its decision-making. It will consider the examples of considerations provided in the Commission's Guidance for local authorities at 8.9 to 8.17. It will also consider the Commission's Guidance that "has business interests" should be given the widest possible interpretation and include partnerships, charities, faith groups and medical practices.

6.3.3 Interested parties can be persons who are democratically elected such as Councillors and MPs. No specific evidence of being asked to represent an interested person will be required as long as the Councillor or MP represent the ward likely to be affected. Likewise, parish councils likely to be affected will be considered to be interested parties. Other than these however, this authority will generally require written evidence that a person/body (e.g. an advocate / relative) 'represents' someone who either lives sufficiently close to the premises to be likely to be affected by the authorised activities and/or has business interests that might be affected by the authorised activities. A letter from one of these persons, requesting the representation is sufficient.

6.3.4 If individuals wish to approach Councillors to ask them to represent their views, then care should be taken that the Councillors are not part of the

Licensing Committee dealing with the licence application. If there are any doubts, then please contact the Licensing team by e-mail at [licensing@stevenage.gov.uk](mailto:licensing@stevenage.gov.uk)

6.3.5 In the absence of any regulations to the contrary, representations should ideally:

- be made in writing (letter, or e-mail);
- be in black ink on single sides of A4 paper;
- indicate the name and address of the person or organisation making the representation;
- indicate the premises to which the representation relates;
- Indicate the proximity of the premises to the person making the representation. A sketch map or plan may be helpful to show this;
- Clearly set out the reasons for making the representation, and which objective it refers to.

## **6.4 Exchange of Information**

6.4.1 Licensing authorities are required to include in their statements the principles to be applied by the authority in exercising the functions under sections 29 and 30 of the Act with respect to the exchange of information between it and the Commission, and the functions under section 350 of the Act with respect to the exchange of information between it and the other persons listed in Schedule 6 to the Act. Those persons or bodies are listed in Schedule 6(1) as:

- a constable or police force
- an enforcement officer
- a licensing authority
- HMRC
- the First Tier Tribunal
- the Secretary of State.

6.4.2 The principle that this licensing authority applies is that it will act in accordance with the provisions of the Act in its exchange of information which includes the provision that the Data Protection Act 1998 or General Data Protection Regulation will not be contravened. The licensing authority will also have regard to any Guidance issued by the Commission to local authorities on this matter when it is published, as well as any relevant

regulations issued by the Secretary of State under the powers provided in the Gambling Act 2005.

- 6.4.3 Details of applications and representations which are referred to a Licensing Committee for determination will be published in reports that are made publicly available. Personal details of people making representations will be disclosed to applicants and only be withheld from publication on the grounds of personal safety where the licensing authority is asked to do so and is satisfied that it is appropriate to do so.
- 6.4.4 The authority will ensure that the information on the returns is accurate and sent to the Commission within agreed timescales.
- 6.4.5 We recognise the need to share information with other agencies about our inspections and compliance activities. The Council has various policies relating to information governance, which will be considered when deciding what information to share and the process for doing so.
- 6.4.6 Information can be accessed by data subjects via a number of routes including a Freedom of Information Request or Subject Access Request.

## **6.5 Enforcement**

- 6.5.1 Licensing authorities are required by regulation under the Act to state the principles to be applied by the authority in exercising the functions under Part 15 of the Act with respect to the inspection of premises; and the powers under section 346 of the Act to institute criminal proceedings in respect of the offences specified.
- 6.5.2 This licensing authority's principles are that it will be guided by the Commission's Guidance for local authorities, and will endeavour to be;
- Proportionate: regulators should only intervene when necessary; remedies should be appropriate to the risk posed, and costs identified and minimised;
  - Accountable: regulators must be able to justify decisions, and be subject to public scrutiny;
  - Consistent: rules and standards must be joined up and implemented fairly;
  - Transparent: regulators should be open, and keep regulations simple and user friendly; and

- Targeted: regulation should be focused on the problem and minimise side effects.
- 6.5.3 In accordance with the Commission's Guidance for local authorities this licensing authority will endeavour to avoid duplication with other regulatory regimes so far as possible.
- 6.5.4 This licensing authority has adopted and implemented a risk-based inspection programme, based on;
- The licensing objectives
  - Relevant codes of practice
  - Guidance issued by the Commission, in particular at Part 36
  - The council's local area profile
  - The principles set out in this statement of licensing policy.
- 6.5.5 This may include test purchasing activities to measure the compliance of licensed operators with aspects of the Act. When undertaking test purchasing activities, the licensing authority will undertake to liaise with the Gambling Commission and the operator to determine what other, if any, test purchasing schemes may already be in place. Irrespective of the actions of an operator on their broader estate, test purchasing may be deemed to be an appropriate course of action.
- 6.5.6 The main enforcement and compliance role for this licensing authority in terms of the Gambling Act 2005 will be to ensure compliance with the premises licences and other permissions that it authorises. The Commission is the enforcement body for operating and personal licences. It is also worth noting that concerns about manufacture, supply or repair of gaming machines or concerns about online or remote gambling will not be dealt with by the licensing authority but will be notified to the Commission.
- 6.5.7 This licensing authority will also keep itself informed of developments as regards the work of the Office for Product Safety and Standards in its consideration of the regulatory functions of local authorities, in particular, with regard to the Regulators' Code (April 2014) which provides a regulatory framework that supports compliance and growth while enabling resources to be focused where they are most needed. We will make available our enforcement and compliance protocols and written agreements upon request.

6.5.8 Bearing in mind the principle of transparency, the Council has adopted an Enforcement Policy which sets out the Council's approach to securing compliance with regulatory requirements and applies to all our regulatory functions, including gambling. The Policy is available on the Council's website.

## **6.6 Licensing Authority Functions**

6.6.1 The Licensing Authority has delegated some of its functions to the Licensing Committee and to officers. An explanation of these arrangements is shown in Appendix 5.

6.6.2 Licensing Authorities are required under the Act to:

- Be responsible for the licensing of premises where gambling activities are to take place by issuing Premises Licences
- Issue Provisional Statements
- Regulate members' clubs and miners' welfare institutes who wish to undertake certain gaming activities via issuing Club Gaming Permits and/or Club Machine Permits
- Issue Club Machine Permits to Commercial Clubs
- Grant permits for the use of certain lower stake gaming machines at unlicensed Family Entertainment Centres
- Receive notifications from alcohol licensed premises (under the Licensing Act 2003) for the use of two or fewer gaming machines
- Issue Licensed Premises Gaming Machine Permits for premises licensed to sell/supply alcohol for consumption on the licensed premises, under the Licensing Act 2003, where there are more than two machines
- Register small society lotteries below prescribed thresholds
- Issue Prize Gaming Permits
- Receive and Endorse Temporary Use Notices
- Receive Occasional Use Notices
- Provide information to the Gambling Commission regarding details of licences issued (see section above on 'information exchange')
- Maintain registers of the permits and licences that are issued under these functions

It should be noted that local licensing authorities will not be involved in licensing remote gambling at all. This will fall to the Commission via operating licences.

## **6.7 Meeting The Licensing Objectives**

### **Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.**

6.7.1 The Commission will take the lead role in keeping gambling free from crime by vetting applicants for operator and personal licences. The licensing authority will have to be satisfied that the premises will not adversely affect the licensing objective and is compliant with the Commission's Guidance, codes of practice and this policy statement.

6.7.2 The licensing authority will expect the applicant to have a good understanding of the local area in which they either operate, or intend to operate, a gambling premises. As part of the application, the applicant will provide evidence to demonstrate that in operating the premises they will meet this licensing objective.

6.7.3 Examples of the specific steps the licensing authority may take to address this area can be found in the section covering specific premises in Part C and in relation to permits and notices in Part D of this policy.

## **6.8 Ensuring that gambling is conducted in a fair and open way**

6.8.1 The Commission is the body primarily concerned with ensuring that operators conduct gambling activities in a fair and open way, except in the case of tracks.

6.8.2 The licensing authority will notify the Commission of any concerns about misleading advertising, the absence of required game rules, or any other matters as set out in the Commission's Licence Conditions and Code of Practice.

6.8.3 Examples of the specific steps the licensing authority may take to address this area can be found in the section covering specific premises in paragraph



6.10, and in relation to permits and notices in paragraph 6.27 of this statement.

## **6.9 Protecting children and other vulnerable persons from being harmed or exploited by gambling.**

6.9.1 Protection of Children: Persons under 18 cannot be admitted to many types of gambling premises. This objective means preventing children from taking part in most types of gambling.

6.9.2 Section 45 of the Act provides the definition for child and young person:

Meaning of “child” and “young person”

- 1) In this Act “child” means an individual who is less than 16 years old.
- 2) In this Act “young person” means an individual who is not a child but who is less than 18 years old.

6.9.3 Children and young persons may take part in private and non-commercial betting and gaming, but the Act restricts the circumstances in which they may participate in gambling or be on premises where gambling is taking place as follows:

- casinos, betting shops and adult gaming centres are not permitted to admit anyone under 18;
- bingo clubs may admit those under 18 but must have policies to ensure that they do not play bingo, or play category B or C machines that are restricted to those over 18;
- family entertainment centres and premises licensed to sell alcohol for consumption on the premises can admit under 18s, but they are not permitted to play category C machines which are restricted to those over 18;
- clubs with a club premises certificate can admit under 18s, but they must have policies to ensure those under 18 do not play machines other than category D machines;
- All tracks can admit under 18s, but they may only have access to gambling areas on days where races or other sporting events are taking place or are expected to take place. Tracks will be required to have policies to ensure that under 18s do not participate in gambling other than on category D machines.

- 6.9.4 The licensing authority will have regard to any code of practice which the Commission issues as regards this licensing objective in relation to specific premises.
- 6.9.5 The licensing authority will consider whether specific measures are required at particular premises, with regard to this licensing objective. These measures may include supervision of entrances / machines, segregation of areas, etc. Examples of the specific steps the Council may take to address this area can be found in the section covering specific premises in paragraph 6.10 and in relation to permits and notices in paragraph 6.27 of this policy.
- 6.9.6 Where gambling premises are located in sensitive areas where young and/or vulnerable persons may be present, for example near schools, this licensing authority will consider imposing restrictions on advertising the gambling facilities on such premises where it is considered relevant and reasonably consistent with the Licensing Objectives.
- 6.9.7 Protection of vulnerable people: It is difficult to define the term “vulnerable person”. The Commission, in its Guidance to Local Authorities, does not seek to offer a definition, but will, for regulatory purposes assume that this group includes people:
- “Who gamble more than they want to, people who gamble beyond their means, elderly persons, and people who may not be able to make informed or balanced decisions about gambling due to a mental impairment, or because of the influence of alcohol or drugs. ”
- 6.9.8 The Commission’s Code of Practice clearly describes the policies and procedures that operators should put in place regarding:
- combating problem gambling
  - access to gambling by children and young persons
  - information on how to gamble responsibly and help for problem gamblers
  - customer interaction
  - self-exclusion

- employment of children and young persons

6.9.9 The licensing authority may consider any of the measures detailed below as suitable methods to protect persons (children or vulnerable persons) from harm or at risk of being exploited by gambling. The business' local risk assessment in accordance with SR code provision 10.1.2, will consider these controls and any subsequent controls that have equal or better effect:

- leaflets offering assistance to problem gamblers should be available on gambling premises in a location that is both prominent and discreet
- training for staff members which focuses on an employee's ability to detect a person who may be vulnerable and providing support to vulnerable persons
- self-exclusion schemes
- operators should demonstrate their understanding of best practice issued by organisations that represent the interests of vulnerable people
- posters and leaflets with GamCare Helpline and website displayed in prominent locations
- external advertising to be positioned or designed not to entice passers-by.

6.9.10 It is a requirement of the Commission's Licence Conditions and Codes of Practice (LCCP), under Section 3, that licensees must have and put into effect policies and procedures intended to promote socially responsible gambling.

6.9.11 The LCCP say that licensees must make an annual financial contribution to one or more organisation(s) which between them research into the prevention and treatment of gambling related harm, develop harm prevention approaches and identify and fund treatment to those harmed by gambling.

6.9.12 The Council strongly believes that all licensed premises have a responsibility to ensure that safeguarding is a key priority for all businesses in respect of staff, customers and any person in the vicinity of the premises.

6.9.13 All business owners and management should sufficiently understand safeguarding matters including, but not limited to:

- gangs and knife crime
- county lines
- modern day slavery
- child sexual exploitation
- supply, distribution or taking of illegal substances

to enable them to spot warning signs of any safeguarding matter and know who to report it to. Information and training materials can be found on the websites of Hertfordshire County Council and Hertfordshire Police.

6.9.14 Applicants and licence holders are encouraged to ensure that suitable management controls are in place to address potential safeguarding concerns. Measures could include, but would not be limited to:

- awareness training for staff, including indicators to look out for.
- regular patrols of the premises, including external areas and the immediate proximity, to identify any vulnerable persons;
- close monitoring of patrons as they leave the premises;
- recording and reporting concerns to the police;
- implementing suitable safeguarding policies and procedures

6.9.15 The Council acknowledges that child sexual exploitation awareness (CSE) should be applied more broadly than licensed premises, particularly as children are not permitted access to most gambling premises. Applicants should be equally aware of children in the proximity of the premises that may be waiting for, or seeking, older persons.

6.9.16 Applicants and Licence Holders of relevant premises (pubs and clubs with gaming machines, bingo premises and unlicensed family entertainment centres) are to ensure that suitable management controls are in place to safeguard children against the risk of CSE. Measures may include, but are not limited to:

- awareness training for staff;
- regular patrols of the premises, including external areas and the immediate proximity, to identify any vulnerable children;
- close monitoring of patrons as they leave the premises;
- recording and reporting concerns to the police.

6.9.17 The Council anticipates applicants to be aware of ‘risk indicators’ of CSE which include, but are not limited to:

- developing relationships between a child and an older person
- children in the company of a group of older persons
- children regularly attending premises and meeting with several different older persons, particularly where older persons may be facilitating gambling for children
- children outside of licensed premises developing relationships with an older person, particularly an older person facilitating gambling for children
- children leaving the locality of the premises with older persons, particularly with a group of older persons
- children looking uncomfortable in the company of, or leaving with, older persons, particularly groups of older persons.

6.9.18 Whilst the Council does not wish to create the impression that all contact between children and older persons is inappropriate, it is strongly of the view that licence holders should be aware of the risks of CSE and should proactively manage their premises to minimise those risks.

6.9.19 The Hertfordshire Safeguarding Children Board (HSCB) have a dual role in respect of preventing CSE within licensed premises. The HSCB is a responsible authority under the Act having been nominated by the Council to undertake this function. The HSCB also monitors compliance with the statutory requirements under section 11 of the Children Act 2004 to safeguard and promote the welfare of children. Applicants are encouraged to visit the HSCB website for advice [www.hertssafeguarding.org.uk](http://www.hertssafeguarding.org.uk).

## 6.10 Premises Licence: consideration of Applications

### General Principles

- 6.10.1 The Act contains three licensing objectives. In this revision of its Statement of Policy, the Licensing Authority seeks to assist applicants by setting out the considerations we will apply when determining applications under the Act.
- 6.10.2 The Council will issue premises licences to allow premises to be used for certain types of gambling. These are:
- a) casino premises,
  - b) bingo premises,
  - c) betting premises including tracks and premises used by betting intermediaries,
  - d) adult gaming centre premises, or
  - e) family entertainment centre premises.
- 6.10.3 Premises licences are subject to the requirements set out in the Act and regulations, as well as specific mandatory and default conditions, which the Secretary of State has detailed in regulations. The Council will exclude default conditions and attach others, where were considered appropriate due to evidence of a risk to the licensing objectives. Paragraph 6.16 below clarifies the position with respect to mandatory and default conditions.
- 6.10.4 The Commission has issued Codes of Practice for each interest area for which they must have regard. The Council will also have regard to these Codes of Practice.

### **Decision Making**

- 6.10.5 When making decisions about premises licences the Council is under a statutory duty by virtue of s.153 of the Act to aim to permit the use of premises for gambling in so far it is considered to be:
- in accordance with any relevant code of practice issued by the Commission;
  - in accordance with any relevant guidance issued by the Commission;
  - reasonably consistent with the licensing objectives; and
  - in accordance with our Statement.
- 6.10.6 The licensing authority will not accept moral objections to gambling as a valid reason to reject applications for premises licences (except with regard to any 'no casino resolution' - see section on Casinos). Issues of nuisance, planning

permission and building regulation are not issues that can be taken into account when considering an application for a premises licence.

- 6.10.7 The licensing authority will not consider whether there is demand for gambling as valid criteria when deciding whether to grant or reject applications for premises licences. Each application must be considered on its merits without regard for demand, reflecting the statutory 'aim to permit' principle outlined above.
- 6.10.8 However, the authority will consider the location of a premises so far as it relates to the licensing objectives and whether there is need for condition(s) to mitigate risks in respect of gambling in a particular location.
- 6.10.9 The Council's Scheme of Delegation is reproduced in 11.4 of the appendices.. The General Purposes Committee has been established to deal with licensing issues and the determination of applications in certain cases, i.e. those where representations have been made or where premises licences require review. Uncontentious applications (i.e. those where no representations have been made) will be delegated to officers.
- 6.10.10 Where representations are received the Council will consider whether they are vexatious, frivolous or if they would influence the Council's determination of the application.

### **Environment considerations**

- 6.10.11 Whilst the Council acknowledges that protection of the environment is not a licensing objective therefore not a relevant consideration in the decision-making process, it has declared a climate emergency and expects applicants to make every effort to protect the environment.
- 6.10.12 Matters that applicants/licence holders could promote to protect the environment include, but are not limited to:
- avoiding single use plastic cups if providing drinks to customers
  - avoiding the use of plastic pen for completing betting slips
  - consideration of the building's carbon footprint
  - company policies on environmental issues

### **Public health and gambling**

- 6.10.13 The Council agrees with the Gambling Commission's position that gambling-related harm should be considered a public health issue.
- 6.10.14 Gambling is a legitimate leisure activity enjoyed by many and the majority of those who gamble appear to do so without exhibiting any signs of problematic behaviour. There are however significant numbers of people who do experience significant harm as a result of their gambling and these people's problems are often undetected.
- 6.10.15 For these problem gamblers, harm can include higher levels of physical and mental illness, debt problems, relationship breakdown and, in some cases, criminality. It can also be associated with substance misuse.
- 6.10.16 There can also be considerable negative effects experienced by the wider group of people around a problem gambler. The health and wellbeing of partners, children, and friends can all be negatively affected.
- 6.10.17 The Council considers that public health teams, whilst not a statutory responsible authority under the Act, can still assist the Council to address problem gambling-related harms in its district.
- 6.10.18 The Council will therefore engage with the local public health team and the Hertfordshire Gambling Harms Alliance in the further development of this Statement of Principles and the Local Area Profile. The public health team and Hertfordshire Gambling harms Alliance should, where appropriate, be able to assist with matters including, but not limited to:
- identifying and interpreting health data and evidence to inform the review of the Statement and develop a locally tailored local area profile
  - making decisions that benefit and protect the health and wellbeing of the district
  - conducting a health impact assessment of gambling in the district or assessing any existing relevant data.

### **Definition of 'premises'**

- 6.10.19 Premises are defined in the Act as "any place". Section 152 therefore prevents more than one premises licence applying to any place. However, it is possible



for a single building to be subject to more than one premises licence, provided they are for different parts of the building and the different parts of the building can be reasonably regarded as being different premises. This approach has been taken to allow large, multiple unit premises such as a pleasure park, pier, track or shopping mall to obtain discrete premises licences, where appropriate safeguards are in place. However, the authority will pay particular attention if there are issues about sub-divisions of a single building or plot and should ensure that mandatory conditions relating to access between premises are observed.

- 6.10.20 The Commission states in its Guidance to Licensing Authorities that: “In most cases the expectation is that a single building / plot will be the subject of an application for a licence, for example, 32 High Street. But, that does not mean 32 High Street cannot be the subject of separate premises licences for the basement and ground floor, if they are configured acceptably. Whether different parts of a building can properly be regarded as being separate premises will depend on the circumstances. The location of the premises will clearly be an important consideration and the suitability of the division is likely to be a matter for discussion between the operator and the licensing officer. However, the Commission does not consider that areas of a building that are artificially or temporarily separated, for example by ropes or moveable partitions, can properly be regarded as different premises. If a premises is located within a wider venue, a licensing authority should request a plan of the venue on which the premises should be identified as a separate unit. The Commission recognises that different configurations may be appropriate under different circumstances, but the crux of the matter is whether the proposed premises are genuinely separate premises that merit their own licence - with the machine entitlements that brings – and are not an artificially created part of what is readily identifiable as a single premises.”
- 6.10.21 The licensing authority takes particular note of the Commission’s Guidance, which states that licensing authorities should pay attention in considering applications for multiple licences for a building, and those relating to a discrete part of a building used for other (non-gambling) purposes. In particular this Authority is aware that entrances and exits from parts of a building covered by one or more licences should be separate and identifiable so that the separation of different premises is not compromised, and that people do not ‘drift’ into a gambling area. The Authority will pay particular attention to applications where access to the licensed premises is through other premises (which themselves may be licensed or unlicensed). Additionally, the third licensing objective seeks

to protect children from being harmed by gambling. In practice, this means not only preventing children from taking part in gambling, but also preventing them from being in close proximity to gambling. Therefore, licence holders should configure premises so that they do not invite children to participate in, have accidental access to or closely observe gambling where they are prohibited from participating.

6.10.22 The Guidance also gives a list of factors which the licensing authority should be aware of, which may include:

- Does the premises have a separate registration for business rates?
- Is the neighbouring premises owned by the same person or someone else?
- Can each of the premises be accessed from the street or a public passageway?
- Can the premises only be accessed from any other gambling premises?

6.10.23 Clearly, there will be specific issues that the Authority will consider before granting such applications, for example, whether children can gain access; compatibility of the two establishments; and ability to comply with the requirements of the Act. But, in addition, an overriding consideration should be whether, taken as a whole, the co-location of the licensed premises with other facilities has the effect of creating an arrangement that otherwise would be prohibited under the Act.

6.10.24 This authority will consider these and other relevant factors in making its decision, depending on all the circumstances of the case.

6.10.25 The Commission's relevant access provisions for each premises type are reproduced below:

### **Casinos**

- The principal access entrance to the premises must be from a street (as defined at 7.23 of the Guidance)

- No entrance to a casino must be from premises that are used wholly or mainly by children and/or young persons
- No customer must be able to enter a casino directly from any other premises which holds a gambling premises licence.

### **Adult Gaming Centre**

- No customer must be able to access the premises directly from any other licensed gambling premises.

### **Betting Shops**

- Access must be from a street (as per Para 7.23 Guidance to Licensing Authorities) or from another premises with a betting premises licence
- No direct access from a betting shop to another premises used for the retail sale of merchandise or services. In effect there cannot be an entrance to a betting shop from a shop of any kind and you could not have a betting shop at the back of a café – the whole area would have to be licensed.

### **Tracks**

- No customer should be able to access the premises directly from: -
  - a casino
  - an adult gaming centre

### **Bingo Premises**

- No customer must be able to access the premises directly from:
  - a casino
  - an adult gaming centre
  - a betting premises, other than a track

### **Family entertainment Centre**

- No customer must be able to access the premises directly from:
  - a casino

- an adult gaming centre
- a betting premises, other than a track

6.10.26 Part 7 of the Commission's Guidance to Licensing Authorities contains further guidance on this issue, which this authority will also take into account in its decision-making.

## **6.11 Premises 'ready for gambling'**

6.11.1 The Guidance states that a licence to use premises for gambling should only be issued in relation to premises that the licensing authority can be satisfied are going to be ready to be used for gambling in the reasonably near future, consistent with the scale of building or alterations required before the premises are brought into use.

6.11.2 Premises licence applications will be considered upon application. Where applicants do not have the right to occupy and/or does not have an operating licence issued by the Gambling Commission, the applicant will be advised to submit a provisional statement instead.

6.11.3 In deciding whether a premises licence can be granted where there are outstanding construction or alteration works at a premises, this authority will determine applications on their merits, applying a two-stage consideration process:

- First, whether the premises ought to be permitted to be used for gambling
- Second, whether appropriate conditions can be put in place to cater for the situation that the premises are not yet in the state in which they ought to be before gambling takes place.

6.11.4 Applicants should note that this authority is entitled to decide that it is appropriate to grant a licence subject to conditions, but it is not obliged to grant such a licence.

6.11.5 More detailed examples of the circumstances in which such a licence may be granted can be found at paragraphs 7.58-7.65 of the Guidance.

## **6.12 Location**

- 6.12.1 The Council will not consider demand issues with regard to the location of premises but will consider the potential impact of the location on the licensing objectives in its decision making. In line with the Commission's Guidance to Licensing Authorities, the Council will pay particular attention to the protection of children and vulnerable persons from being harmed or exploited by gambling, as well as issues of crime and disorder.
- 6.12.2 With regards to these licensing objectives, it is the Council's policy, upon receipt of any relevant representation to look at specific location issues which include:
- the possible impact that a gambling premises may have on any sensitive premises that provide services to children, young people or vulnerable people; e.g. a school or vulnerable adult centre;
  - the possible impact a gambling premises may have on a residential area where there is a high concentration of families with children;
  - the nature and size of the gambling activities taking place;
  - any levels of crime in the area.
- 6.12.3 A local area profile will be produced by the authority and published on its website. This will highlight areas, if any, within the district which the licensing authority, in consultation with the responsible authorities and other partner agencies (in particular, the Public Health unit of Hertfordshire County Council), considers presenting higher than normal risks for the location of a gambling premises. This may be due to large levels of vulnerable persons living in a particular locality, the proximity of a school, youth centre or medical facility, a high level of deprivation, or other factors which the authority believes should be taken into consideration.
- 6.12.4 We expect operators, both when applying for new premises licences and when reviewing their existing premises, to take account of our local area profile within

their own local risk assessments (described below), and to implement suitable and sufficient measures to mitigate any risks identified which may arise as a result of the opening or continuation of trade at those premises.

- 6.12.5 We will use the local area profile in assessing premises licence applications and the risk assessments supplied by the applicant or existing licence holders.
- 6.12.6 The Council will need to be satisfied that there is sufficient evidence that the particular location of the premises would be harmful to the licensing objectives before the location can be considered as inappropriate for a licensed premises. It is a requirement of the LCCP, under Section 10, for licensees to assess the local risks to the licensing objectives posed by the provisions of gambling facilities at each of their premises, and have policies, procedures and control measures to mitigate those risks. In undertaking their risk assessments, they must take into account relevant matters identified in this policy statement.
- 6.12.7 The LCCP say that licensees must review (and update as necessary) their local risk assessments:
- to take account of significant changes in local circumstances, including those identified in this policy statement;
  - when there are significant changes at a licensee's premises that may affect their mitigation of local risks;
  - when applying for a variation of a premises licence; and
  - in any case, undertake a local risk assessment when applying for a new premises licence.
- 6.12.8 This authority will expect the local risk assessment to consider as a minimum:
- the location of services for children such as schools, playgrounds, leisure/community centres and other areas where children will gather;
  - the demographics of the area in relation to vulnerable groups;
  - whether the premises is in an area subject to high levels of crime and/or disorder.

- 6.12.9 Local risk assessments should show how all vulnerable people, including people with gambling dependencies are protected.
- 6.12.10 This authority would also strongly recommend that the following matters are considered by operators when making their risk assessment, and they have taken action, in the form of conditions, where the operators have not demonstrated that they are sufficiently mitigating the risks. This list is not exhaustive and other factors not in this list that are identified must be taken into consideration:
- Information held by the licensee regarding self-exclusions and incidences of underage gambling;
  - Gaming trends that may reflect benefit payments;
  - Arrangement for localised exchange of information regarding self-exclusions and gaming trends;
  - Urban setting such as proximity to schools, commercial environment, factors affecting footfall.
  - Assessing staffing levels when a local college or similar establishment closes for the day, and the students begin to vacate the grounds;
  - Proximity of machines to the entrance door.
  - Age verification policies including 'Think 21' and 'Think 25'.
  - Consideration of line of sight from the counter to gambling machines;
  - Larger operators (e.g. William Hill, Coral, Ladbrokes, Betfred, and Paddy Power) are responsible for conducting/taking part in underage testing, the results of which are shared with the Gambling Commission. However, operators are urged to also make the results available to licensing authorities. Where the licensing authority receives intelligence in relation to failed 'Think 21' or similar test purchases, the licensing authority would encourage the consideration of additional tasking over the standard once a year visits as a means of assessing risk.

- Providing the licensing authority with details when a child or young person repeatedly attempts to gamble on their premises. This may provide the Licensing Authority with an opportunity to consider safeguarding concerns.
  - Range of facilities in proximity to the licensed premises such as other gambling outlets, banks, post offices, refreshment and entertainment type facilities
  - Known problems in the area, street drinkers, youths participating in anti-social behaviour, drug dealing activities, etc.
- 6.12.11 The authority would expect a risk assessment to be tailored to each premises and not solely based on a 'standard' template. The Council would also expect that each assessment is completed by a suitably competent person.
- 6.12.12 It will be the responsibility of the gambling operator to assign the assessor for assessing the local risks for their premises. The person assigned as the assessor must be competent to undertake this role as failure properly to carry out this function could result in a breach of the provisions of the LCCP. The Commission has not produced any guidance on the competencies of assessors; however, the Council would expect the assessor to understand how the premises operate or will operate, its design, and where it is located. The assessor will need to understand the local area and can use staff or area managers to assist in gaining an understanding of that local area. The assessor should also be suitably experienced in assessing gambling related risk and identification of appropriate controls.
- 6.12.13 The authority expects that local risk assessments are kept on the individual premises and are available for inspection.
- 6.12.14 It should be noted that this policy does not preclude any application being made and each application will be decided on its merits, with the onus upon the applicant to show how potential concerns can be overcome.
- 6.12.15 This authority expects that local risk assessments and any supplementary information, such as plans, local statistical data, etc., would be presented to this authority as part of any application for a new or variation of a licence.



## 6.13 Planning

6.13.1 The Commission's Guidance to Licensing Authorities states:

(Para. 7.58) –

In determining applications, the licensing authority should not take into consideration matters that are not related to gambling and the licensing objectives. One example would be the likelihood of the applicant obtaining planning permission or building regulations approval for their proposal. Licensing authorities should bear in mind that a premises licence, once it comes into effect, authorises premises to be used for gambling. Accordingly, a licence to use premises for gambling should only be issued in relation to premises that the licensing authority can be satisfied are going to be ready to be used for gambling in the reasonably near future, consistent with the scale of building or alterations required before the premises are brought into use. Equally, licences should only be issued where they are expected to be used for the gambling activity named on the licence. This is why the Act allows a potential operator to apply for a provisional statement if construction of the premises is not yet complete, or they need alteration, or he does not yet have a right to occupy them.

6.13.2 This authority will not take into account irrelevant matters as per the above guidance. In addition, this authority notes the following excerpt from the Guidance:

(Para. 7.65) –

When dealing with a premises licence application for finished buildings, the licensing authority should not take into account whether those buildings have to comply with the necessary planning or building consents. Nor should fire or health and safety risks be taken into account. Those matters should be dealt with under relevant planning control, building and other regulations, and must not form part of the consideration for the premises licence. S.210 of the Act prevents licensing authorities taking into account the likelihood of the proposal

by the applicant obtaining planning or building consent when considering a premises licence application. Equally, the grant of a gambling premises licence does not prejudice or prevent any action that may be appropriate under the law relating to planning or building.

## **6.14 Duplication with other regulatory regimes**

- 6.14.1 This licensing authority seeks to avoid any duplication with other statutory or regulatory systems where possible, including planning. This authority will not consider whether a licence application is likely to be awarded planning permission or building regulations approval, in its consideration of it. It will though, listen to, and consider carefully, any concerns about conditions which are not able to be met by licensees due to planning restrictions, should such a situation arise.
- 6.14.2 When dealing with a premises licence application for finished buildings, this authority will not take into account whether those buildings have to comply with the necessary planning or buildings consents. Fire or health and safety risks will not be taken into account, as these matters are dealt with under relevant planning control, buildings and other regulations and must not form part of the consideration for the premises licence.

## **6.15 Licensing Objectives**

- 6.15.1 Premises licences granted must be reasonably consistent with the licensing objectives. With regard to these objectives, we have considered the Commission's Guidance and have set out our policy in Part B.

## **6.16 Conditions**

- 6.16.1 The Secretary of State has set mandatory and default conditions and the Commission has set Licence Conditions and Codes of Practice on Operator's Licences which are necessary for the general good conduct of gambling premises, therefore it is unlikely that the Council will need to impose individual conditions imposing a more restricted regime in relation to matters that have already been dealt with.

- 6.16.2 If the licensing authority is minded to impose conditions because there are regulatory concerns of an exceptional nature, then any additional licence conditions must relate to the licensing objectives.
- 6.16.3 Any conditions attached to licences will be proportionate and will be:
- Relevant to the need to make the proposed building suitable as a gambling facility;
  - Directly related to the premises and the type of licence applied for;
  - Fairly and reasonably related to the scale and type of premises; and
  - Reasonable in all other respects.
- 6.16.4 Decisions upon individual conditions will be made on a case-by-case basis, although there will be a number of measures this licensing authority will consider utilising should there be a perceived need, such as the use of supervisors, appropriate signage for adult only areas, etc. There are specific comments made in this regard under some of the licence types below. This licensing authority will also expect the licence applicant to offer his/her own suggestions as to way in which the licensing objectives can be met effectively.
- 6.16.5 This licensing authority will also consider specific measures that may be required for buildings that are subject to multiple premises licences. Such measures may include the supervision of entrances; segregation of gambling from non-gambling areas frequented by children; and the supervision of gaming machines in non-adult gambling specific premises in order to pursue the licensing objectives. These matters are in accordance with the Commission's Guidance.
- 6.16.6 This authority will also consider whether additional safeguards are necessary in premises where category C or above machines are on offer and children are

admitted. Each premise will be considered individually, and additional safeguards may include:

- All such machines are located in an area of the premises which is separated from the remainder of the premises by a physical barrier which is effective to prevent access other than through a designated entrance;
- Only adults are admitted to the area where these machines are located;
- Access to the area where the machines are located is supervised.
- The area where these machines are located is arranged so that it can be observed by the staff or the licence holder; and,
- At the entrance to and inside any such areas there are prominently displayed notices indicating that access to the area is prohibited to persons under 18.

These considerations will apply to premises including buildings where multiple premises licences are applicable.

6.16.7 This licensing authority is aware that tracks may be subject to one or more than one premises licence, provided each licence relates to a specified area of the track. As per the Commission's Guidance, this licensing authority will consider the impact upon the third licensing objective and the need to ensure that entrances to each type of premises are distinct and that children are excluded from gambling areas where they are not permitted to enter.

6.16.8 It is noted that there are conditions that the licensing authority cannot attach to premises licences, which are:

- Any condition on the premises licence which makes it impossible to comply with an operating licence condition.
- Conditions relating to gaming machine categories, numbers, or method of operation.
- Conditions which provide that membership of a club or body be required (the Act specifically removes the membership requirement for casino and bingo clubs and this provision prevents it being reinstated); and,

- Conditions in relation to stakes, fees, winning or prizes.

## **6.17 Door Supervisors**

- 6.17.1 The Commission advises in its Guidance for licensing authorities that if a licensing authority is concerned that a premises may attract disorder or be subject to attempts at unauthorised access (for example by children and young persons) then it may require entrances to the premises are controlled by door supervisors in order to protect of children and vulnerable persons from being harmed or exploited by gambling, and also in terms of preventing premises becoming a source of crime. The licensing authority is entitled, under those circumstances, to impose a premises licence condition to this effect.
- 6.17.2 Where operators and licensing authorities decide that supervision of entrances/machines is appropriate for particular cases it will need to be decided whether these supervisors need to be SIA licensed or not. It will not be automatically assumed that they need to be, as the statutory requirements for different types of premises vary (as per Guidance, Part 33)

## **6.18 Adult Gaming Centres**

- 6.18.1 An Adult Gaming Centre (AGC) is one of three types of amusement arcade. This type of arcade can provide higher pay-out gaming machines (Category B3 and B4) and access is restricted to persons who are aged 18 years or over.
- 6.18.2 This licensing authority will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the authority that there will be sufficient measures to, for example, ensure that under 18 year olds do not have access to the premises.
- 6.18.3 This licensing authority may consider measures to meet the licensing objectives such as:
- Proof of age schemes

- CCTV
- Supervision of entrances / machine areas
- Physical separation of areas
- Location of entry
- Notices / signage
- Specific opening hours
- Self-exclusion schemes
- Provision of information leaflets/helpline numbers for organisations such as GamCare.

This list is not mandatory, nor exhaustive, and is merely indicative of example measures.

## **6.19 Licensed Family entertainment Centres**

- 6.19.1 A Licensed family entertainment centre (LFEC) is the second type of amusement arcade. This type of arcade can provide the lowest two categories of gaming machine (category C and D). Children can enter an LFEC, but they can only gamble on category D machines. All category C machines must be located in a separate area, which can only be accessed by persons who are aged 18 years or over.
- 6.19.2 This licensing authority will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the authority, for example, that there will be sufficient measures to ensure that under 18 year olds do not have access to the adult only gaming machine areas.
- 6.19.3 This licensing authority may consider measures to meet the licensing objectives such as:
- CCTV
  - Supervision of entrances/machine areas
  - Physical separation of areas
  - Location of entry

- Notices / signage
- Specific opening hours
- Self-exclusion schemes
- Provision of information leaflets/helpline numbers for organisations such as GamCare
- Measures/training for staff on how to deal with suspected truant school children on the premises.

This list is not mandatory, nor exhaustive, and is merely indicative of example measures.

- 6.19.4 This licensing authority will, as per the Commission's guidance, refer to the Commission's website to see any conditions that apply to operating licences covering the way in which the area containing the category C machines should be delineated. This licensing authority will also make itself aware of any mandatory or default conditions on these premises' licences, when they have been published.

## 6.20 Casinos

The Act states that a casino is an arrangement whereby people are given the opportunity to participate in one or more casino games. Casino games are defined as a game of chance which is not equal chance gaming. This means that casino games offer the chance for multiple participants to take part in a game competing against the house or bank at different odds to their fellow players. Casinos can also provide equal chance gaming and gaming machines. Large and small casinos can also provide betting machines.

- 6.20.1 This licensing authority has not passed a 'no casino' resolution under Section 166 of the Gambling Act 2005 but is aware that it has the power to do so. Should this licensing authority decide in the future to pass such a resolution, it will update this policy statement with details of that resolution. Any such decision will be made by the Full Council.

## **6.21 Bingo Premises**

- 6.21.1 A Bingo Hall is a place in which Bingo is played. There is no legal definition of Bingo, but it is a game in which players mark off numbers on cards as the numbers are drawn randomly by the caller, the winner being the first person to mark off all the numbers on their card.
- 6.21.2 The Commission's Guidance states at paragraph 18.5: "Licensing authorities will need to satisfy themselves that bingo can be played in any bingo premises for which they issue a premises licence." This will be a relevant consideration where the operator of an existing bingo premises applies to vary their licence to exclude an area of the existing premises from its ambit and then applies for a new premises licence, or multiple licences, for that or those excluded areas.
- 6.21.3 This authority notes the Guidance at paragraph 18.9 regarding the unusual circumstances in which the splitting of a pre-existing premises into two adjacent premises might be permitted, and in particular that it is not permissible to locate sixteen category B3 gaming machines in one of the resulting premises, as the gaming machine entitlement for that premises would be exceeded.
- 6.21.4 The authority also notes the Guidance at paragraph 18.7 that children and young people are allowed into bingo premises; however, they are not permitted to participate in the bingo and if category B or C machines are made available for use these must be separated from areas where children and young people are allowed.

## **6.22 Betting Premises**

- 6.22.1 The Act contains a single class of licence for betting premises however within this single class there are different types of premises which require licensing such as high street bookmakers, bookmakers located in self-contained facilities



at racecourses as well as the general betting premises licences that track operators will require.

6.22.2 With regard to betting machines, Section 181 of the Act states:

“A condition of a betting premises licence may relate to –

- a) the number of machines used on the premises for the purpose of making or accepting bets;
- b) the nature of those machines;
- c) the circumstances in which those machines are made available for use.”

6.22.3 When considering whether to impose a condition on a licence the council will take into account the size of the premises, the number of counter positions available for person-to-person transactions, and the ability of staff to monitor the use of the machines.

6.22.4 Where certain measures are not already addressed by the mandatory and default conditions and the Commission’s Codes of Practice or by the applicant, the council may consider licence conditions to address such issues.

## **6.23 Gaming Machines in gambling premises**

6.23.1 The Social responsibility code provisions 9.1.1 and 9.1.2 deal with the provision of gaming machines in betting and bingo premises respectively.

Both provisions state that:

6.23.2 Gaming machines may be made available for use on licensed betting/bingo premises only where there are also substantive facilities for non-remote betting/bingo, provided in reliance on this licence, available at the premises.

6.23.3 In both cases the provisions require:

- facilities for gambling must only be offered in a manner which provides for appropriate supervision of those facilities by staff at all times; and
- the license must ensure that the function along with the internal and/or external presentation of the premises are such that a customer can reasonably

be expected to recognise that it is a premises licensed for the purpose of providing betting/bingo facilities.

## **6.24 Tracks**

6.24.1 There are no, or very few, opportunities for betting at tracks within the Borough. Only one premises licence can be issued for any particular premises at any time unless the premises is a 'track'. A track is a site where races or other sporting events take place.

6.24.2 This licensing authority is aware that tracks may be subject to one or more than one premises licence, provided each licence relates to a specified area of the track. As per the Commission's Guidance, this licensing authority will especially consider the impact upon the third licensing objective (i.e. the protection of children and vulnerable persons from being harmed or exploited by gambling) and the need to ensure that entrances to each type of premises are distinct and that children are excluded from gambling areas where they are not permitted to enter.

6.24.3 This authority will therefore expect the premises licence applicant to demonstrate suitable measures to ensure that children do not have access to adult only gaming facilities. It is noted that children and young persons will be permitted to enter track areas where facilities for betting are provided on days when dog-racing and/or horse racing takes place, but that they are still prevented from entering areas where gaming machines (other than category D machines) are provided.

6.24.4 This licensing authority may consider measures to meet the licensing objectives such as:

- Proof of age schemes
- CCTV
- Supervision of entrances / machine areas
- Physical separation of areas

- Location of entry
- Notices / signage
- Specific opening hours
- Self-exclusion schemes
- Provision of information leaflets / helpline numbers for organisations such as GamCare.

This list is not mandatory, nor exhaustive, and is merely indicative of example measures.

- 6.24.5 Gaming machines - Where the applicant holds a pool betting operating licence and is going to use his entitlement to four gaming machines, machines (other than category D machines) should be located in areas from which children are excluded. Children and young persons are not prohibited from playing category D gaming machines on a track.
- 6.24.6 Betting machines - This licensing authority will, as per Part 6 of the Commission's Guidance, take into account the size of the premises and the ability of staff to monitor the use of the machines by children and young persons (it is an offence for those under 18 to bet) or by vulnerable people, when considering the number/nature/circumstances of betting machines an operator wants to offer.
- 6.24.7 Applications and plans - The Act requires applicants to submit plans of the premises with their application, in order to ensure that the licensing authority has the necessary information to make an informed judgment about whether the premises are fit for gambling. The plan will also be used for the licensing authority to plan future premises inspection activity.
- 6.24.8 Plans for tracks do not need to be in a particular scale but should be drawn to scale and should be sufficiently detailed to include the information required by regulations.
- 6.24.9 Some tracks may be situated on agricultural land where the perimeter is not defined by virtue of an outer wall or fence, such as point-to-point racetracks. In such instances, where an entry fee is levied, track premises licence holders may erect temporary structures to restrict access to premises.

- 6.24.10 In the rare cases where the outer perimeter cannot be defined, it is likely that the track in question will not be specifically designed for the frequent holding of sporting events or races. In such cases betting facilities may be better provided through occasional use notices where the boundary premises do not need to be defined.
- 6.24.11 This authority appreciates that it is sometimes difficult to define the precise location of betting areas on tracks. The precise location of betting facilities is not required to be shown on track plans, both by virtue of the fact that betting is permitted anywhere on the premises and because of the difficulties associated with pinpointing exact locations for some types of track. Applicants should provide sufficient information that this authority can satisfy itself that the plan indicates the main areas where betting might take place. For racecourses in particular, any betting areas subject to the “five times rule” (commonly known as betting rings) must be indicated on the plan.

## **6.25 Travelling Fairs**

- 6.25.1 It will fall to this licensing authority to decide whether, where category D machines and/or equal chance prize gaming without a permit is to be made available for use at travelling fairs, the statutory requirement that the facilities for gambling amount to no more than an ancillary amusement at the fair is met.
- 6.25.2 The licensing authority will also consider whether the applicant falls within the statutory definition of a travelling fair.
- 6.25.3 It has been noted that the 27-day statutory maximum for the land being used as a fair, is per calendar year, and that it applies to the piece of land on which the fairs are held, regardless of whether it is the same or different travelling fairs occupying the land. This licensing authority will work with its neighbouring authorities to ensure that land which crosses our boundaries is monitored so that the statutory limits are not exceeded.

## **6.26 Provisional Statements**

- 6.26.1 Developers may wish to apply to this authority for provisional statements before entering into a contract to buy or lease property or land to judge whether a development is worth taking forward in light of the need to obtain a premises licence. There is no need for the applicant to hold an operating licence in order to apply for a provisional statement.

- 6.26.2 Section 204 of the Act provides for a person to make an application to the licensing authority for a provisional statement in respect of premises that he or she:
- expects to be constructed;
  - expects to be altered; or
  - expects to acquire a right to occupy.
- 6.26.3 The process for considering an application for a provisional statement is the same as that for a premises licence application. The applicant is obliged to give notice of the application in the same way as applying for a premises licence. Responsible authorities and interested parties may make representations and there are rights of appeal.
- 6.26.4 In contrast to the premises licence application, the applicant does not have to hold or have applied for an operating licence from the Gambling Commission (except in the case of a track) and they do not have to have a right to occupy the premises in respect of which their provisional application is made.
- 6.26.5 The holder of a provisional statement may then apply for a premises licence once the premises are constructed, altered or acquired. The licensing authority will be constrained in the matters it can consider when determining the premises licence application and in terms of representations about premises licence applications that follow the grant of a provisional statement, no further representations from relevant authorities or interested parties can be taken into account unless:
- they concern matters which could not have been addressed at the provisional statement stage, or
  - they reflect a change in the applicant's circumstances.
- 6.26.6 In addition, the authority may refuse the premises licence (or grant it on terms different to those attached to the provisional statement) only by reference to matters:
- which could not have been raised by objectors at the provisional licence stage; or
  - which in the authority's opinion reflect a change in the operator's circumstances; or

- where the premises have not been constructed in accordance with the plan submitted with the application. This must be a substantial change to the plan and this licensing authority notes that it can discuss any concerns it has with the applicant before making a decision.

## **6.27 Reviews**

6.26.1 Requests for a review of a premises licence can be made by interested parties or responsible authorities; however, it is for the licensing authority to decide whether the review is to be carried out. This will be on the basis of whether the request for the review is relevant to the matters listed below:

- In accordance with any relevant code of practice issued by the Commission;
- In accordance with any relevant guidance issued by the Commission;
- Reasonably consistent with the licensing objectives; and
- In accordance with the authority's statement of licensing policy

6.26.2 The licensing authority will consider whether the request is frivolous, vexatious, or whether it will cause it to wish to alter/revoke/suspend the licence, or whether it is substantially the same as previous representations or requests for review.

6.26.3 The licensing authority can also initiate a review of a particular premises licence, or a particular class of premises licence based on any reason, which is considered appropriate.

6.26.4 Once a valid application for a review has been received by the licensing authority, representations can be made by responsible authorities and interested parties during a 28-day period. This period begins 7 days after the application was received by the licensing authority, which will publish notice of the application within 7 days of receipt.

6.26.5 The licensing authority must carry out the review as soon as possible after the 28-day period for making representations has passed.

6.26.6 The purpose of the review will be to determine whether the licensing authority should take any action in relation to the licence. If action is justified, the options open to the licensing authority are: -

- add, remove or amend a licence condition imposed by the licensing authority;
- exclude a default condition imposed by the Secretary of State or Scottish Ministers (e.g., opening hours) or remove or amend such an exclusion.
- suspend the premises licence for a period not exceeding three months; and
- Revoke the premises licence.

6.26.7 In determining what action, if any, should be taken following a review, the licensing authority must have regard to the principles set out in section 153 of the Act, as well as any relevant representations.

6.26.8 In particular, the licensing authority may also initiate a review of a premises licence on the grounds that a premises licence holder has not provided facilities for gambling at the premises. This is to prevent people from applying for licences in a speculative manner without intending to use them.

6.26.9 Once the review has been completed, the licensing authority must, as soon as possible, notify its decision to:

- the licence holder
- the applicant for review (if any)
- the Commission
- any person who made representations
- the chief officer of police or chief constable; and
- Her Majesty's Commissioners for Revenue and Customs.

## 6.27 **Permits/Temporary an Occasional Use Notices**

### **Unlicensed Family Entertainment Centre gaming machine permits (Statement of Principles on Permits – Schedule 10 paragraph 7)**

6.27.1 An unlicensed family entertainment centre (FEC) is the third type of amusement arcade. The category of machine in this type of arcade is restricted to the lowest category D and children can enter and gamble.

6.27.2 Where a premises does not hold a premises licence but wishes to provide gaming machines, it may apply to the licensing authority for this permit. It should be noted that the applicant must show that the premises will be wholly or mainly used for making gaming machines available for use (Section 238).

6.27.3 The Act states that a licensing authority may prepare a statement of principles that they propose to consider in determining the suitability of an applicant for a permit and in preparing this statement, and/or considering applications, it need not (but may) have regard to the licensing objectives and shall have regard to any relevant guidance issued by the Commission under section 25. The Commission's Guidance for local authorities also states: "In their three-year licensing policy statement, licensing authorities may include a statement of principles that they propose to apply when exercising their functions in considering applications for permits...., licensing authorities will want to give weight to child protection issues." (24.8)

6.27.4 Guidance further states: "An application for a permit may be granted only if the licensing authority is satisfied that the premises will be used as an unlicensed FEC, and if the chief officer of police has been consulted on the application. Licensing authorities might wish to consider asking applicants to demonstrate:

- A full understanding of the maximum stakes and prizes of the gambling that is permissible in unlicensed FECs;
- That the applicant has no relevant convictions (those that are set out in Schedule 7 of the Act; and
- That staff are trained to have a full understanding of the maximum stakes and prizes. (24.9)

It should be noted that a licensing authority cannot attach conditions to this type of permit.

## 6.28 **Statement of Principles – Permits on unlicensed FECs**

6.28.1 This licensing authority will expect the applicant to show that there are policies and procedures in place to protect children from harm. Harm in this context is not limited to harm from gambling but includes wider child protection considerations. The efficiency of such policies and procedures will each be considered on their merits; however, they may include:

- Appropriate measures/training for staff as regards suspected truant school children on the premises



- Measures/training covering how staff would deal with unsupervised very young children being on the premises;
- Measures/training covering how staff would deal with children causing perceived problems on/around the premises
- Demonstrate an awareness of local school holiday times and how to contact the local education office should truants be identified.

6.28.2 This licensing authority will also expect, as per Commission Guidance, that applicants:

- Demonstrate a full understanding of the maximum stakes and prizes of the gambling that is permissible in unlicensed FECs;
- Have no relevant convictions (those that are set out in Schedule 7 of the Act), and in addition that any management and staff who will be working at the unlicensed FEC have no relevant convictions; and
- Have staff that are trained to have a full understanding of the maximum stakes and prizes.

6.28.3 Compliance with any relevant industry Code of Practice for FECs issued by BACTA or other trade associations may be taken by the licensing authority as evidence that (apart from the criteria relating to criminal convictions) the applicant has met the above.

6.28.4 Applicants must submit with their application two copies of plans of the premises, to a scale of 1:100, showing the exits/entrances to the premises, location of gaming machines.

6.28.5 The licensing authority may refuse an application for renewal of a permit only on the grounds that an authorised local authority officer has been refused access to the premises without reasonable excuse, or that renewal would not be reasonably consistent with pursuit of the licensing objectives.

**6.29 (Alcohol) Licensed premises gaming machine permits - (Schedule 13 paragraph 4(1))**

- 6.29.1 There is provision in the Act for premises licensed to sell alcohol for consumption on the premises to automatically have 2 gaming machines, of categories C and/or D. The premises merely need to notify the licensing authority.
- 6.29.2 The licensing authority can remove the automatic authorisation in respect of any particular premises if:
- Provision of the machines is not reasonably consistent with the pursuit of the licensing objectives;
  - Gaming has taken place on the premises that breaches a condition of section 282 of the Act (i.e. that written notice has been provided to the licensing authority, that a fee has been provided and that any relevant code of practice issued by the Commission about the location and operation of the machine has been complied with);
  - The premises are mainly used for gaming; or
  - An offence under the Act has been committed on the premises.
- 6.29.3 If a premises wishes to have more than 2 machines, then it needs to apply for a permit and the licensing authority must consider that application based upon: the licensing objectives; any guidance issued by the Commission issued under Section 25 of the Act, and any “such matters” considered relevant.
- 6.29.4 This licensing authority considers that “such matters” will be decided on a case-by-case basis, but generally there will be regard to the need to protect children and vulnerable persons from harmed or being exploited by gambling. Stevenage Borough Council will expect the applicant to satisfy the authority that there will be sufficient measures to ensure that under-18-year-olds do not have access to the adult only gaming machines. Measures which will satisfy the

authority that there will be no access may include the adult machines being in sight of the bar, or in the sight of staff who will monitor that the machines are not being used by those under 18. Notices and signage may also be help. As regards the protection of vulnerable persons, applicants may wish to consider the provision of information leaflets/helpline numbers for organisations such as GamCare.

- 6.29.5 It is recognised that some alcohol-licensed premises may apply for a premises licence for their non-alcohol licensed areas. Any such application would most likely need to be applied for and dealt with as an Adult Gaming Centre premises licence.
- 6.29.6 It should be noted that the licensing authority can decide to grant the application with a smaller number of machines and/or a different category of machines than that applied for. Conditions other than these cannot be attached.
- 6.29.7 Notifications and applications for any number of machines will be dealt with by licensing authority officers.
- 6.29.8 It should also be noted that the holder of a permit must comply with any Code of Practice issued by the Commission about the location and operation of the machine.
- 6.30 Prize Gaming Permits - (Statement of Principles on Permits - Schedule 14 paragraph 8 (3))**
- 6.30.1 The Act states that a licensing authority may “prepare a statement of principles that they propose to apply in exercising their functions under this Schedule” which “may, in particular, specify matters that the licensing authority proposes to consider in determining the suitability of the applicant for a permit”.
- 6.30.2 This authority has not prepared a statement of principles. Should it decide to do so, details will be included in a revised version of the Statement.
- 6.30.3 In making its decision on an application for this permit the licensing authority does not need to have regard to the licensing objectives but must have regard to any Commission guidance.

6.30.4 It should be noted that there are conditions in the Act by which the permit holder must comply, but that the licensing authority cannot attach conditions. The conditions in the Act are:

- The limits on participation fees, as set out in regulations, must be complied with.
- All chances to participate in the gaming must be allocated on the premises on which the gaming is taking place and on one day; the game must be played and completed on the day the chances are allocated; and the result of the game must be made public in the premises on the day that it is played;
- The prize for which the game is played must not exceed the amount set out in regulations (if a money prize), or the prescribed value (if non-monetary prize); and
- Participation in the gaming must not entitle the player to take part in any other gambling.

### **6.31 Club Gaming and Club Machine Permits**

6.31.1 Members Clubs and Miners' welfare institutes (but not Commercial Clubs) may apply for a Club Gaming Permit or a Club Machine Permit. The Club Gaming Permit will enable the premises to provide gaming machines (3 machines of categories B, C or D), equal chance gaming and games of chance as set-out in forthcoming regulations. A Club Machine permit will enable the premises to provide gaming machines (3 machines of categories B, C or D).

6.31.2 This licensing authority acknowledges the following guidance from the Commission:

"The Act states that members' clubs must have at least 25 members and be established and conducted "wholly or mainly" for purposes other than gaming, unless the gaming is restricted to that of a prescribed kind (currently bridge and whist). Members' club must be permanent in nature, but there is no need for a club to have an alcohol licence." Examples include working men's clubs, branches of Royal British Legion and clubs with political affiliations.

6.31.3 The Guidance goes on to state that "licensing authorities may only refuse an application on the grounds that:

a) the applicant does not fulfil the requirements for a members' or commercial club or miners' welfare institute and therefore is not entitled to receive the type of permit for which it has applied;

b) the applicant's premises are used wholly or mainly by children and/or young persons;

c) an offence under the Act or a breach of a permit has been committed by the applicant while providing gaming facilities;

d) a permit held by the applicant has been cancelled in the previous ten years; or

e) An objection has been lodged by the Commission or the police."

6.31.4 There is also a 'fast-track' procedure available under the Act for premises that hold a Club Premises Certificate under the Licensing Act 2003 (Schedule 12 paragraph 10). As the Commission's Guidance for local authorities' states: "Under the fast-track procedure there is no opportunity for objections to be made by the Commission or the police, and the ground upon which an authority can refuse a permit are reduced." and "The grounds on which an application under the process may be refused are:

a) that the club is established primarily for gaming, other than gaming prescribed under schedule 12;

b) that in addition to the prescribed gaming, the applicant provides facilities for other gaming; or

c) that a club gaming permit or club machine permit issued to the applicant in the last ten years has been cancelled."

6.31.5 There are statutory conditions on club gaming permits that no child uses a category B or C machine on the premises and that the holder complies with any relevant provision of a code of practice about the location and operation of gaming machines.

## 6.32 Temporary Use Notices

6.32.1 Temporary Use Notices allow the use of premises for gambling where there is no premises licence but where a gambling operator wishes to use the premises

temporarily for providing facilities for gambling. Premises that might be suitable for a Temporary Use Notice, according to the Commission, would include hotels, conference centres and sporting venues.

- 6.32.2 The licensing authority can only grant a Temporary Use Notice to a person or company holding a relevant operating licence, i.e., a non-remote casino operating licence.
- 6.32.3 The Secretary of State has the power to determine what form of gambling can be authorised by Temporary Use Notices, and at the time of writing this Statement the relevant regulations (SI no 3157: The Gambling Act 2005 (Temporary Use Notices) Regulations 2007) state that Temporary Use Notices can only be used to permit the provision of facilities or equal chance gaming, where the gaming is intended to produce a single winner, which in practice means poker tournaments.
- 6.32.4 There are a number of statutory limits as regards temporary use notices. Discussion of the meaning of "premises" can be found in Part 7 of the Commission's Guidance to Licensing Authorities. As with "premises", the definition of "a set of premises" will be a question of fact in the particular circumstances of each notice that is given. The Act defines "premises" as including "any place".
- 6.32.5 In considering whether a place falls within the definition of "a set of premises", the Council will look at, amongst other things, the ownership/occupation and control of the premises.
- 6.32.6 This licensing authority expects to object to notices where it appears that their effect would be to permit regular gambling in a place that could be described as one set of premises, as recommended in the Commission's Guidance to Licensing Authorities.

### **6.33 Occasional Use Notices**

- 6.33.1 The licensing authority has very little discretion as regards these notices aside from ensuring that the statutory limit of 8 days in a calendar year is not exceeded. This licensing authority will though consider the definition of a 'track' and whether the applicant is permitted to avail him/herself of the notice.

## **6.34 Small Society Lotteries**

6.34.1 This licensing authority will adopt a risk based approach towards its enforcement responsibilities for small society lotteries. This authority considers that the following list, although not exclusive, could affect the risk status of the operator:

- submission of late returns (returns must be submitted no later than three months after the date on which the lottery draw was held)
- submission of incomplete or incorrect returns
- breaches of the limits for small society lotteries

6.34.2 Non-commercial gaming is permitted if it takes place at a non-commercial event, either as an incidental or principal activity at the event. Events are non-commercial if no part of the proceeds is for private profit or gain. The proceeds of such events may benefit one or more individuals if the activity is organised:

- by, or on behalf of, a charity or for charitable purposes
- to enable participation in, or support of, sporting, athletic or cultural activities.

6.34.3 Charities and community groups should contact this licensing authority on 01438 [242242](tel:242242) or at [Licensing@stevenage.gov.uk](mailto:Licensing@stevenage.gov.uk) to seek further advice.

## 7 Consultation

7.1 Stevenage Borough Council will consult widely upon this statement before finalising and publishing it. This is carried out in accordance with the Cabinet Office guidance on consultation principles, (published March 2018) which is available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/691383/Consultation\\_Principles\\_1\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/691383/Consultation_Principles_1_.pdf)

7.2 The Gambling Act requires that the following parties are consulted by Licensing Authorities:

1) The Chief Officer of Police.

The authority has therefore consulted:

a) Hertfordshire Constabulary

2) One or more persons who appear to the authority to represent the interests of persons carrying on gambling businesses in the authority's area. The authority has therefore consulted:

- a) British Amusement Catering Trade Association
- b) British Casino Association
- c) British Association of Leisure Parks, Piers and Attractions Ltd
- d) Business in Sport and Leisure
- e) British Beer and Pub Association
- f) Association of British Bookmakers
- g) The Bingo Association
- h) National Casino Forum
- i) Ladbrokes Coral Group
- j) Mecca Bingo Ltd
- k) William Hill Organisation Ltd
- l) Paddy Power Betfair
- m) Betfred
- n) Admiral Casino
- o) Future Machines Ltd



3) One or more persons who appear to the authority to represent the interests of persons who are likely to be affected by the exercise of the authority's functions under the Gambling Act 2005. The authority has therefore consulted:

- a) Gambling Commission
- b) Licensing Authority
- c) Planning and Development, Stevenage Borough Council
- d) Hertfordshire Fire and Rescue Service
- e) Environmental Health
- f) HM Revenues and Customs
- g) Local Safeguarding Children Board
- h) Community Safety/Development Stevenage Borough Council
- i) Stevenage Town Centre Manager
- j) Stevenage Community Safety Partnership
- k) Clubs with club premises certificates under the Licensing Act 2003
- l) Premises with licences permitting the sale of alcohol on the premises under the Licensing Act 2003
- m) Stevenage PubWatch
- n) Existing Gambling Permit holders
- o) Residents and local media
- p) East and North Herts NHS Trust
- q) North Herts Council for Voluntary Services
- r) Stevenage Citizen's Advice Bureau
- s) Stevenage Community Trust
- t) North Hertfordshire College
- u) Hertfordshire Chamber of Commerce
- v) GamCare

## 8 Monitoring and Review

- 8.1 This policy will be reviewed by the relevant Business Unit's Head of Service or Service Manager every 3 years (see page 1 for details of Business Unit) or earlier if there is a change in legislation. Where more than 10% of the policy content is changed the Assistant Director and appropriate Portfolio Holder will be required to decide if the policy needs to be formally reconsidered by the Executive or appropriate decision-making body.
- 8.2 Where there is a request for the content of the policy to be reviewed in response to a complaint, the relevant Business Unit's Assistant Director will be notified. If the Assistant

Director agrees that a review of policy is required, this will be discussed with the appropriate Portfolio Holder. The Head of Service or Service Manager will be responsible for implementing a subsequent policy review.

## 9 References and Resources

[Gambling Act 2005 \(legislation.gov.uk\)](https://legislation.gov.uk)

[Hertfordshire Gambling Harms Strategy 2024 | Hertfordshire County Council](#)

[Guidance to licensing authorities \(gamblingcommission.gov.uk\)](https://gamblingcommission.gov.uk)

[Equality Act 2010 \(legislation.gov.uk\)](https://legislation.gov.uk)

[Hertfordshire Safeguarding Children Partnership | Hertfordshire County Council](#)

[Data Protection Act 2018 \(legislation.gov.uk\)](https://legislation.gov.uk)

[Regulator's code | ICO](#)

[Licensing Act 2003 \(legislation.gov.uk\)](https://legislation.gov.uk)

[Talk to us now - GamCare](#)

[LCCP Condition 3.1.1 - Combating problem gambling \(gamblingcommission.gov.uk\)](https://gamblingcommission.gov.uk)

## 10 Abbreviations and Definitions

EDI	Equality, Diversity and Inclusion
GDPR	General Data Protection Regulation
PSED	Public Sector Equality Duty
SBC	Stevenage Brough Council
FEC	Family Entertainment Centre
AGC	Adult Gaming Centres
TUN	Temporary Use Notices
OUN	Occasional Use Notices
uFEC	Unlicensed Family Entertainment Centre
PSED	Public Sector Equality Duty
CSE	Child Sexual Exploitation
LCCP	Licence conditions Codes of Practice

## 11 Appendices

- 11.1 Map of Stevenage Borough Council Area
- 11.2 Responsible Authorities
- 11.3 Summary of gaming machine categories and entitlements
- 11.4 Table of Delegations
- 11.5 Glossary of Terms
- 11.6 Equality impact Assessment (EqIA) November 2024

## 12 Version History

Date	Outlined Amendments	Author
18 October 2024	Format of Policy amended	Julie Dwan
	Date of Policy amended from 2022-2025 to 2025-2028	
	Legal Framework -Section 3.1: 'As per section 153 of the Act 2005 amended to 'As per section 153 of the Gambling Act 2005'.	
	Legal Framework – Section 3.2: 'Part B of this Policy'. Amended, part B removed and replaced with paragraph 6.7	
	Legal Framework – Section 3.3 – Declaration, amendment made: 'The guidance issued by the Commission (5 <sup>th</sup> edition March 2015) '. Removed (5 <sup>th</sup> edition March 2015)	
	Policy – Section 6.1.1: 'A map of the Council area is attached as Appendix 1'. Appendix 1 removed and replaced with 'As an appendices at 11.1'.	
	Policy – Section 6.2.4: 'Contact details of all responsible authorities under the Act are included as Appendix 3'. Appendix 3 removed and replaced with 'As an appendices at 11.2'. Contact details of all responsible authorities have also been updated.	
	Policy – Section 6.3.4: Contact details amended, telephone number removed and email address has been added.	

	Policy – Section 6.3.5, Point 1: ‘be made in writing (letter, fax or email)’. The word ‘fax’ has been removed. Sentence now worded: ‘be made in writing (letter or email)’.	
	Policy – Section 6.8.3: ‘Part C’ has been replaced with ‘paragraph 6.10’. ‘Part D’ has been replaced with ‘paragraph 6.27’.	
	Policy – Section 6.9.5: ‘Part C’ has been replaced with ‘paragraph 6.10’. ‘Part D’ has been replaced with ‘paragraph 6.27’.	
	Policy – General Principles, Section 6.10.3: ‘C9.1’ has been replaced with ‘paragraph 6.16’.	
	Policy- Decision Making, Section 6.10.9: the Council’s Scheme of Delegations is produced as Appendix 5’. Appendix 5 has been removed and replaced with ‘in 11.4 of the appendices’.	
	Policy – Public Health & Gambling, Section 6.10.18: ‘The Council will therefore engage with the local public health team in the further development of this Statement of Principles and the Local Area Profile. The public health team should’, is replaced with ‘The Council will therefore engage with the local public health team and the Hertfordshire Gambling Harms Alliance in the further development of this Statement of Principles and the Local Area Profile. The public health team and Hertfordshire Gambling harms Alliance should ‘.	
	Policy – Small Society Lotteries, Section 6.34.3. email address has been added.	
21 <sup>st</sup> November 2024	Draft Statement V2 -Amendments following consultation:	Julie Dwan
	List of Responsible Authorities on page 61 has been amended in respect of the Local Planning Authority. Communications are now to be addressed to the Head of Planning and Enforcement and not to Development control Manager as was before.	
4 <sup>th</sup> December 2024	The General Purposes Committee resolved that the proposed draft statement of principles 2025-2028 be supported and that	Julie Dwan

	the cabinet be requested to agree the draft statement for onward recommendation to council.	
15 <sup>th</sup> January 2025	Cabinet resolved that the proposed draft statement of principles 2025-2028 be supported and recommended that the draft statement be agreed and adopted by the Council.	

DRAFT

This page is intentionally left blank

Local Area Profile  
as part of the  
Gambling Statement of Principles  
2025-2028

## Contents

1. Introduction .....	3
1.1 Background .....	3
1.2 Aims and Limitations.....	3
2. The National Picture .....	4
3. The Local Picture - Stevenage .....	6
3.1 Gambling Premises .....	7
3.2 Problem Gambling and 'At Risk' Groups in Stevenage .....	10
3.2.1 Young People .....	12
3.2.2 Those who are unemployed .....	13
3.2.3 Those from certain ethnic backgrounds .....	13
3.2.4 Those living in deprived areas.....	14
3.2.5 Those with substance abuse/misuse issues and existing problem gamblers.....	16
3.2.6 Those with poor mental health.....	17
4. Conclusion.....	18
5. References & footnotes .....	20



## 1. Introduction

### 1.1 Background

The Gambling Act 2005 (the Act) is the primary legislation governing gambling activity in Great Britain. It consolidated and updated previous gambling legislation and, following its full implementation in 2007, brought together the vast majority of commercial gambling into a single regulatory framework. As well as establishing a dedicated national regulator (the Gambling Commission), the Act gave local regulators broad discretion to manage local gambling provision.

The Act has three licensing objectives;

- Preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime
- Ensuring that gambling is conducted in a fair and open way
- Protecting children and other vulnerable persons from being harmed or exploited by gambling

These objectives influence the way the Gambling Commission and licensing authorities perform their functions, and the way gambling businesses carry out their activities.

Under S.349 of the Act, licensing authorities are required to publish a statement of licensing principles, commonly known as a policy statement. This statement, typically valid for a three-year period, sets out the local approach to regulation and ensures operators have sufficient awareness and understanding of the licensing authorities requirements. The Gambling Commission encourages licensing authorities to produce a policy statement reflective of local issues, in order to identify and reduce risk to the licensing objectives. To assist this process, it is recommended that authorities produce a local area profile<sup>1</sup>.

### 1.2 Aims and Limitations

This profile report aims to summarise existing national research relating to gambling related harm and identify potential risks relating to vulnerable groups and/or geographical areas within Stevenage (see section 3.2 of this report for the list of groups). Data from various sources will be utilised to identify these risks, which should be considered throughout the application process. Findings should assist the local authority in meeting the licensing objectives and ensure specific needs of local communities are considered and vulnerable groups are protected.

Where groups have been identified as being 'at risk' of gambling related harm, datasets have been sought to explore their prevalence within Stevenage and/or

Hertfordshire. In several areas, data could not be identified, or the data was not available at a local level. As a result, potential risks have not been explored. Where data could be identified, its currency could be questioned (e.g. the Census), or the data was not available at ward level.

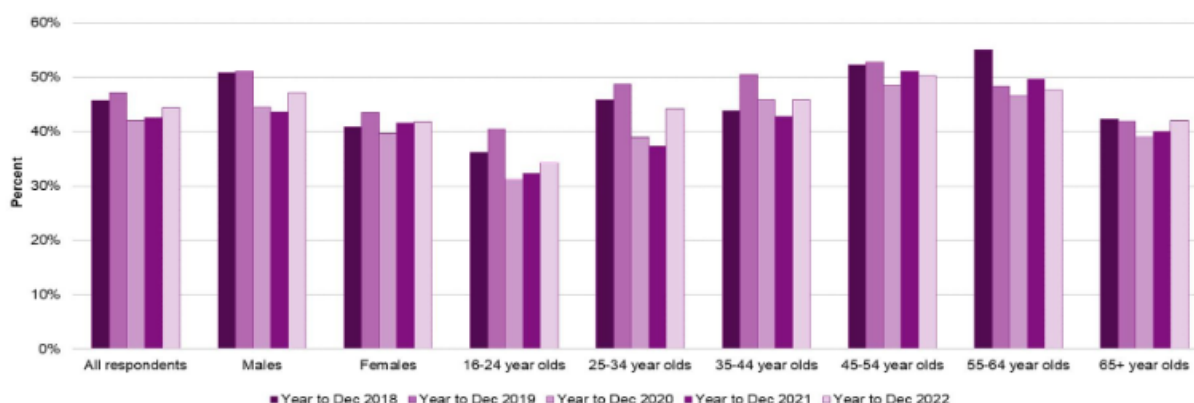
## 2. The National Picture

The Gambling Commission's annual report of the Gambling survey for Great Britain published in July 2024<sup>2</sup> provides an insight into attitudes and gambling behaviours following responses from, a nationally representative sample of 9,804 adults aged 18 and over during the period July 2023 and February 2024. The survey provided the following results:

- 48% of adults (18+) said they had participated in at least one form of gambling in the previous four weeks. This percentage dropped to 27% when those who only participated in lottery draws were excluded. 52% of Male participants were more likely to have participated in any gambling in the past 4 weeks compared to 44% of female participants.
- Overall gambling participation is highest for males aged 45 to 54 years old. However, removing lottery draw only players, shifts the age profile downwards, resulting in males aged 35 to 44 having the highest gambling participation rates.
- The online gambling participation rate (in the past four weeks) was 38%, this falls to 16% when lottery draw only players are removed. This highlights the large proportion of online players that only gamble on lottery draws
- The in-person gambling participation rate (in the past four weeks) was 29%. Excluding lottery draw only players, the participation rate was 18%.
- The most popular gambling activities (in the past four weeks) were lotteries, including National Lottery draws (32%) and other charity lottery draws (16%), Betting (9%) and online instant win games (8%)
- The most popular reason given as to why respondents gambled was 'for the chance to win big money' (86%) 'because it is fun' (70%) and because it was exciting (55%)

- Male participants were more likely to have higher Problem Gambling Severity Index (PGSI) scores than females and those aged between 18 and 34 had a higher PGSI scores than other age groups.
- The proportion of participants with a PGSI score of 8 or more, ( people gambling at risky levels) was more than 6 times higher for those who had gambled on online slots, when compared to all people who had gambled in the last 12 months.

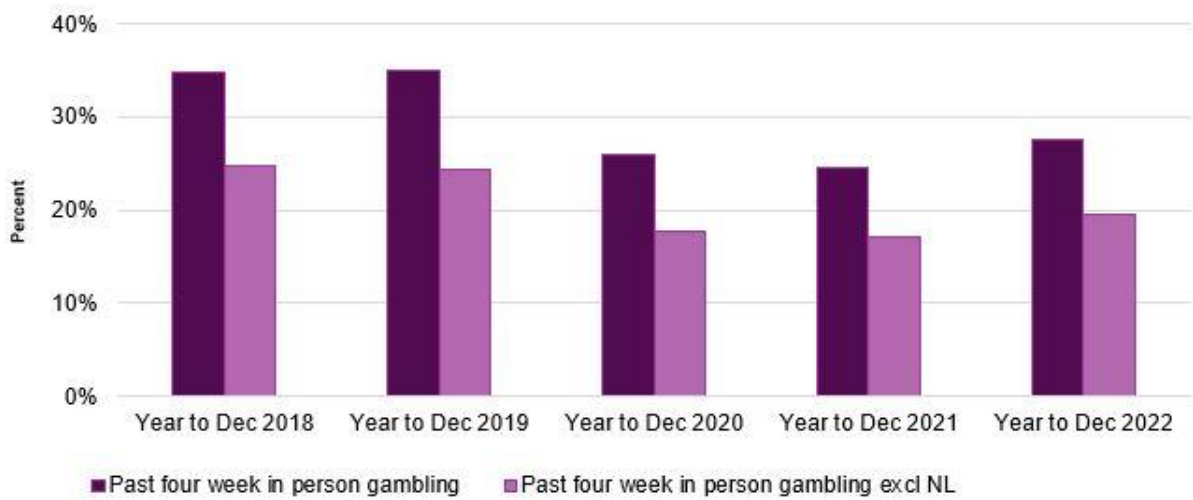
There is a significant increase in gambling participation in certain demographic groups, including males (a 47 percent gambling participation rate in 2022, compared to 44 percent in year ending December 2021) and 25 to 34-year-olds (a 44 percent participation rate in 2022, compared to 37 percent in the year ending December 2021).



**Fig. 1 – Gambling Behaviour 2018-2022 (Gambling Commission)**

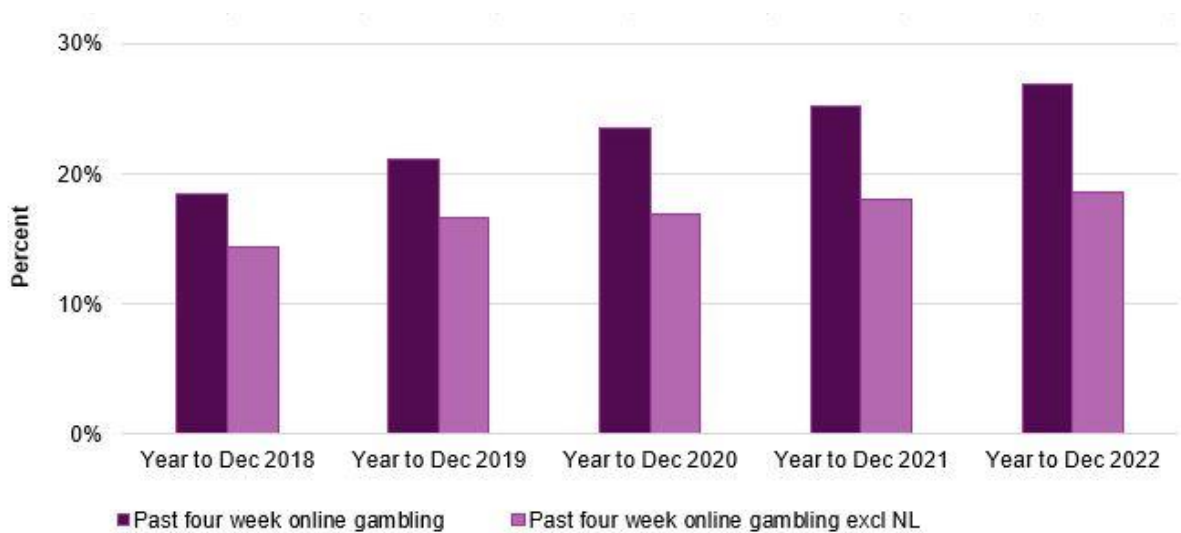
The Gambling commission reports that in year ending December 2022, 28 percent of adults had gambled in person in the previous four weeks, a significantly higher proportion to that seen in year ending December 2021 (25 percent). However, there is a significant decline from pre-pandemic participation rates (35 percent participation rate in the year ending December 2019).

In the year ending December 2022, participation in many gambling activities have remained stable, compared to the previous year. The most popular gambling activities remained National Lottery draws at 29% followed by other lotteries at 13% and scratch cards at 8%. In the year ending December 2022, National Lottery draws experienced a significant increase in participation compared to the year ending December 2021.



**Fig. 2 – Gambling Behaviour 2018-2022 (Gambling Commission)**

Overall, in the year ending December 2022, 27 percent of adults had gambled online in the previous four weeks, which is statistically stable since the year ending December 2021, but does show a steady long-term increase over time.<sup>3</sup>



**Fig. 3 – Gambling Behaviour 2018-2022 (Gambling Commission)**

### 3. The Local Picture – Stevenage

Stevenage is 1 of 10 districts in the county of Hertfordshire in the East of England, and borders Greater London to the South, Cambridgeshire to the North, Essex to the East and Bedfordshire and Buckinghamshire to the West.

Stevenage is an urban borough covering 25.96sq km, and represents 1.58% of the total land area of the county of Hertfordshire. The borough is made up of 13 wards and has direct borders with the neighbouring districts of North Hertfordshire and East Hertfordshire.

The 2021 Census published by the Office for National Statistics (ONS) puts the population of Stevenage at 89,500 an increase of 6.6% from just under 84,000 in 2011. (44,158 males and 45,337 females).

The mean age of Stevenage residents is 38 years old (40 years in England) based on figures from the 2021 census. In Stevenage, residents aged between 50 and 64 years of age had increased by 2.3% . 8.1%of the population is aged between 65 and 74 years and 2.24% of the population is aged 85 years or over.

The number of occupied households in Stevenage was 36,512 in 2021 with 58.3% of residents owning their own home compared to an average of 63.4% for England. Stevenage had the second largest percentage fall in the proportion of households in the social housing sector (from 28.4% in 2011 to 26.3% in 2021) Despite this decrease Stevenage was the highest (10%) of English local Authority areas for the share of households in the social housing section in 2021<sup>4</sup>.

### **3.1 Gambling Premises**

Licensing authorities, as defined in Section 2 of the Act, are responsible for licensing gambling premises<sup>5</sup>. For the purpose of this profile, licences currently in force across the borough have been categorised in two ways; those relating to 'high risk' premises and those relating to 'low risk' premises.

High risk premises include gaming centres, betting shops, bingo halls and premises with more than two gaming machines and/or machines with higher stakes and pay-outs. Low risk premises include those with two or less low stake gaming machines and unlicensed family entertainment centres.

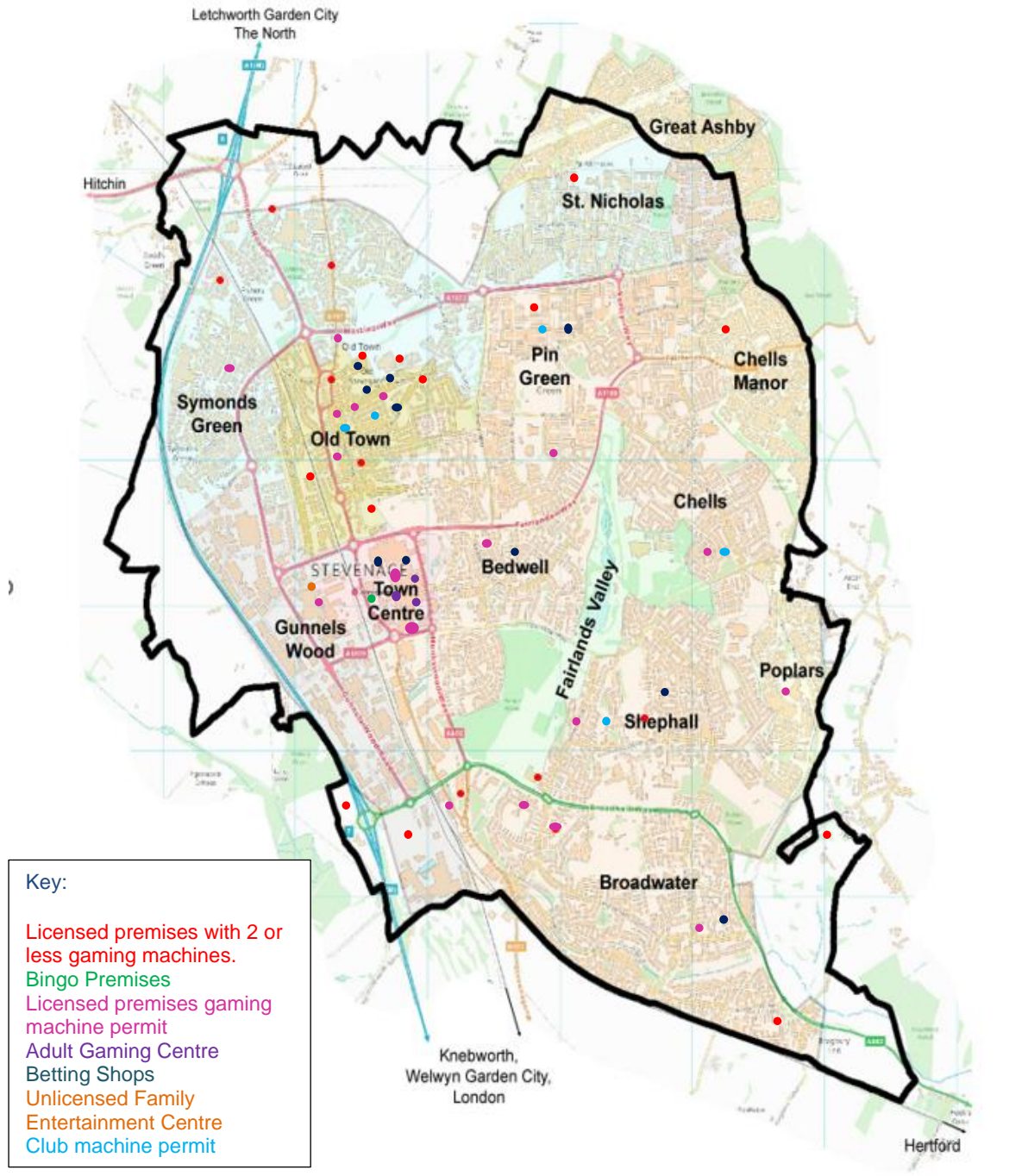
Nationally, gambling premises tend to be found in more urban areas, town centre locations or around coastal areas. Gambling venues also cluster in certain areas within towns and cities<sup>6</sup>. A report by the University of Bristol in 2021 also found that as of November 2020, 21% of gambling premises were based within the most deprived decile of areas in the country, compared to just 2% in the least deprived decile<sup>7</sup>.

In total, 93 gambling permissions are currently granted across Stevenage. thirty-two of these permissions are small lotteries, which are registrations by non-commercial

societies. Figure 4 maps the licensed gambling premises in Stevenage (not including small lotteries). There is a concentration of licensed gambling premises in the Town Centre (Danestrete) and at the High Street.

In the main, participation in all gambling activities is predominately online, with exception of National Lottery and other lottery draws, bingo & football pools. (year to December 2019)<sup>7</sup>

Fig 4: Licensed gambling premises in Stevenage



### 3.2 Problem Gambling and 'At Risk' Groups in Stevenage

Problem gambling is defined as 'gambling to a degree that compromises, disrupts or damages family, personal or recreational pursuits'<sup>8</sup>. In 2023, Public Health England published a review of the evidence on gambling harms<sup>9</sup>. The report provided a comprehensive estimate of the economic burden of gambling on society, these include not only harms to associated with the individual gambler at risk of harm, but also their children, their families, and their communities. The total financial costs associated with gambling harms was estimated at £1.05 to 1.77 billion nationally in 2023.

Data collected by Gamble Aware across different Local Authorities has given a clearer view of how the rates of Gambling has affected the population of Stevenage and how this compares both across the County and nationally<sup>10</sup>. The Problem Gambling Severity Index (PGSI) is used as a tool to help identify people who are experiencing problems or negative consequences associated with gambling, these people are referred to as 'problem & at-risk gamblers. There are 9 questions and a possible score ranging from 0 to 27. A PGSI score of 8 or more suggests the person is gambling at risky levels and is a common threshold for a clinical diagnosis. Scores between 3 and 7 suggest 'moderate risk' gambling. Persons scoring 1 or two suggests 'low risk' gambling.

**Fig 5. Estimates of prevalence of gambling behavior, fiscal costs and % of people seeking help across Hertfordshire (Annual GB Treatment and Support Survey 2022) <sup>11</sup> :**

District	Prevalence of gambling behaviour			Estimated Fiscal Cost	% of people seeking help		
	PGSI1+	PGSI3+	PGSI8+		PGSI1+	PGSI3+	PGSI8+
National	13.4%	5.9%	2.9%	NA	14.8%	32.1%	65.5%
Broxbourne	14.4%	6.3%	4.0%	£2.1 million	15.1%	32.7%	66.0%
Dacorum	13.7%	6.1%	3.3%	£3.6 million	14.1%	31.5%	61.0%
East Herts	12.0%	4.8%	2.1%	£2.2 million	12.2%	29.0%	63.8%
Hertsmere	13.0%	5.8%	2.6%	£1.9 million	14.6%	31.0%	66.6%
North Herts	12.5%	5.2%	2.5%	£2.2 million	14.3%	33.3%	68.4%
St Albans	12.1%	5.2%	2.4%	£2.5 million	13.3%	29.5%	64.0%
<b>Stevenage</b>	<b>15.1%</b>	<b>6.3%</b>	<b>3.2%</b>	<b>£2.0 million</b>	<b>14.8%</b>	<b>32.9%</b>	<b>65.0%</b>
Three Rivers	12.8%	5.5%	2.5%	£1.6 million	14.0%	30.8%	65.8%
Watford	15.1%	7.4%	3.9%	£2.6 million	19.6%	38.5%	71.4%
Welwyn Hatfield	13.8%	6.0%	3.0%	£2.6 million	15.8%	34.1%	66.0%

Analysis of Hertfordshire Joint Strategic Needs Assessment briefing with regards to gambling related harms was published in September 2023<sup>12</sup>. Gambling premises were mapped according to Lower Layer Super Output Areas (LSOAs) and the LSOAs' level of deprivation in Hertfordshire. It showed that gambling premises



across Hertfordshire were clustered around areas with higher levels of deprivation. 41% of gambling premises were situated in LSOAs in the most deprived areas of Hertfordshire compared to 2.56% of gambling premises situated in LSOAs in the least deprived areas of Hertfordshire.

**Fig 6. Type and total gambling premises by Hertfordshire district and rate of gambling premises per 100,000 adults aged 18 years and older by Hertfordshire district, September 2023: (Office for Health Improvement and Disparities, 2023)<sup>13</sup>**

District	Adult Gaming Centre	Betting Shop	Bingo	Total gambling premises	Premises per 100,000 adults aged 18+
Broxbourne	1	15	0	16	19.5
Dacorum	2	11	0	13	10.8
East Herts	0	13	0	13	11.1
Hertsmere	4	12	1	17	20.4
North Herts	1	9	0	10	9.5
St Albans	0	5	1	6	5.4
Stevenage	3	10	1	14	20.2
Three Rivers	0	6	0	6	8.3
Watford	1	15	2	18	22.9
Welwyn Hatfield	0	11	0	11	11.6
Hertfordshire	11	112	5	128	13.7

In 2015-6, Geofutures' Gambling and Place Research Hub undertook research for Westminster and Manchester City Councils to explore the concept of area vulnerability to gambling related harm<sup>14</sup>.

The first phase of the research involved a detailed literature review aimed at identifying which groups in society are vulnerable to gambling related harm. The research found evidence to support suggestions that the following groups are more vulnerable:

- children, adolescents and young adults (including students)
- people with mental health issues, including those experiencing substance abuse issues (problem gambling is often 'co-morbid' with these substance addictions<sup>9</sup>)
- individuals from certain minority ethnic groups, such as Asian/Asian British, Black/Black British and Chinese/other ethnicity
- the unemployed
- the homeless
- those with low intellectual functioning
- problem gamblers seeking treatment
- people with financially constrained circumstances

- those living in deprived areas.

In addition, the Gambling Act 2005 identifies children and vulnerable persons as requiring specific regulatory focus to prevent harm and exploitation. Vulnerability is likely to include; *“people who gamble more than they want to, people who gamble beyond their means and people who may not be able to make informed or balanced decisions about gambling due to, for example, mental health, a learning disability or substance misuse relating to alcohol or drugs”*<sup>11</sup>.

The remainder of this report will set out the local picture in Stevenage in terms of some of the vulnerable groups listed.

### 3.2.1 Children & Young People

Protecting children from being harmed or exploited by gambling is a licensing objective of the Act. There is also strong evidence that children, adolescents and young adults are vulnerable to the experience of gambling problems, or at risk of experiencing gambling problems<sup>15</sup>. Generally in the UK, the minimum legal age for gambling is 18. Exceptions to this include lotteries, scratch cards and football pools where the participant can be 16<sup>12</sup>.

The Young People and Gambling Survey 2022<sup>16</sup> reports that amongst the people aged between 11 and 16 years of age who were surveyed, the estimated prevalence of problem gambling was 0.9% and a further 2.4% were identified as at risk gamblers. There are concerns around the newer forms of gambling which have no age restriction, such as loot boxes within online games which children and young people pay for. The Gambling commission reports a quarter (24%) of the 11 to 16 year olds who were surveyed had paid to open loot boxes to get in-game items.

In Stevenage, figures obtained from the 2021 census suggests that 6,712.50 people, or 7.5% of the population are aged between 10 and 15 years of age. 3,759 people or 4.2% of the population are aged between 16 and 19 years of age children aged 15 years and under account for 20.4% of the Stevenage population, slightly higher than the county rate of 20.1% and national rate of 18.5%. When considering potential risks to young people, the location of the town's schools and colleges are of particular note. There are 47 education establishments across Stevenage serving all neighbourhoods. North Herts College offers higher education with 2 campuses in Stevenage, at Monkswood Way & Fulton Close. Secondary schools are located off the High Street (Greenside School, Barclay Academy & Thomas Alleyne Academy) and there are no schools in the Town Centre; although a future school is planned in the redevelopment of Stevenage Town Centre.

### 3.2.2 Those who are unemployed

There is a consistent body of evidence showing those who are unemployed and who gamble are more likely to experience adverse outcomes from their gambling than those in paid employment<sup>10</sup>.

The percentage of the working population within Stevenage that were unemployed in the year ending December 2023 was 3.6% compared to 3.7% for the UK.

The percentage of all people of working age claiming Universal Credit in March 2024 was 3.2%, compared to 3.6% in the East of England and 3.7% across the UK.

Employment deprivation is one of the seven domains that comprise the Index of Multiple Deprivation (IMD). It measures the proportion of the working-age population in an area involuntarily excluded from the labour market. The IMD is explored later in this profile.

A further consideration is the location of job centres as they are accessed by people who are likely to be unemployed and considered to have a combination of very low income and large amount of personal disposable time. There is a Jobcentre Plus in Stevenage at The Forum, which serves the Borough population.

### 3.2.3 Those from certain ethnic backgrounds

Results from the British Gambling Prevalence Survey 2010<sup>17</sup> show that although Asian and Asian/British ethnic groups had the lowest prevalence of at-risk gambling by ethnic group, they had the highest prevalence of problem gambling (1.1% compared to 0.5% for White/White British ethnicity groups) the survey also revealed that Asian and Asian/British individuals were over 3 times more likely to suffer gambling related harms, and Black or Black/British individuals were over 2 times more likely than White individuals..

According to the 2021 Census, 82.8% of Stevenage's population identified with the ethnicity of White, a decrease from 97.7% in 2011 but higher than the Hertfordshire and England 2021 averages of 81.8% and 81.0% respectively. The percentage of Stevenage residents who identify with a Black and Minority Ethnic (BAME) ethnicity has increased from 16.9% in 2011 to 17.2% in 2021. Specifically, the Asian / Asian British / Asian Welsh population in Stevenage has risen from 5.8% in 2011 to 7.5% in 2021. The Black / Black British / Black Welsh / Caribbean / African population has grown from 2.3% in 2011 to 4.8% in 2021 within Stevenage. Similarly, the Mixed / Multiple Ethnic Groups have increased from 2.7% in 2011 to 3.6% in 2021. All other ethnic groups in Stevenage have also risen from 0.5% in 2011 to 1.3% in 2021.

### 3.2.4 Those living in deprived areas

Evidence from a range of surveys has shown that those living in more deprived areas are more likely to experience problems with their gambling behaviour<sup>18</sup>. The Index of Multiple Deprivation (IMD) is a measure of relative deprivation for small areas in England, and ranks every small area from 1 (most deprived) to 32,844 (least deprived). These small areas are Lower-layer Super Output Areas (LSOAs). The IMD combines information from the following seven domains to produce an overall relative measure;

- Income Deprivation
- Employment Deprivation
- Education, Skills and Training Deprivation
- Health Deprivation and Disability
- Crime
- Barriers to Housing and Services
- Living Environment Deprivation

According to the 2019 English Index of Multiple Deprivation, Stevenage continues to be the most deprived authority in Hertfordshire, increasing its deprivation score by 5.8% and has dropped in the national ranking of lower tier authorities by 16 places.

Of the ten most deprived neighbourhoods in the county, two are in Stevenage - Bedwell now the second most deprived in the county, up from third in 2015, and Bandley Hill the eighth most deprived, down from sixth in 2015. Bedwell and Martins Wood are the fourth and third most deprived LSOAs (Lower Super Output Areas) in Stevenage. The map in Figure 3 has been colour coded to display the decile the neighbourhood falls into nationally (dark blue indicating relatively more deprived and pale green indicating relatively less deprived). Bedwell ward incorporates the Town Centre and Leisure Park, which together have a large concentration of licensed gambling premises.

The greatest contributors to the increase in deprivation between 2015 and 2019 across the town are health, crime, traffic accidents and housing affordability. Across Stevenage, whilst overall deprivation has increased, inequality across the town has decreased as a result of the least deprived areas performing poorly. Stevenage neighbourhoods have the greatest inequality in income and crime incidents, and least inequality in education and health.

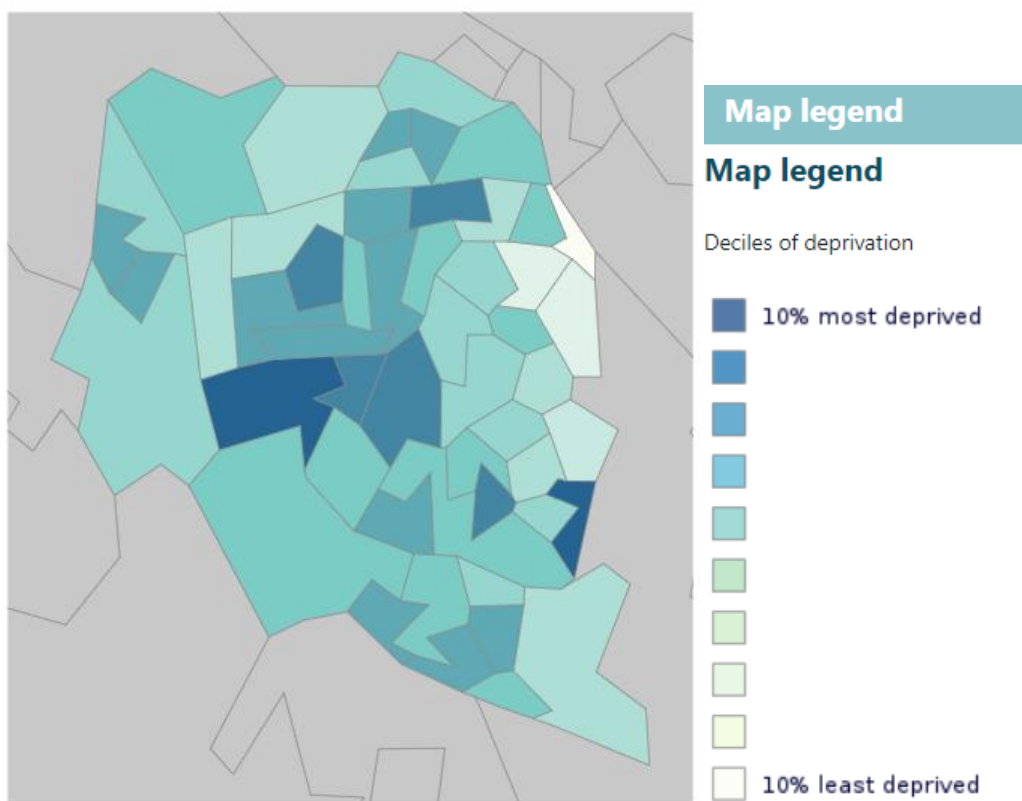


Fig. 7 Indices of Deprivation (IoD) 2019 Interactive Dashboard (Ministry of Housing, Communities and Local Government)

A further objective of the Act is preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime. People harmed by gambling, may commit offences associated with their gambling habits, like theft from family or friends, fraud by taking out loans in other peoples names or selling drugs. This can have an impact on those closely associated with people suffering from gambling harms as well as the larger community. Figure 8 shows the number of reported crimes in Hertfordshire between October 2023 and September 2024<sup>19</sup>. The number of crimes reported in Stevenage has decreased compared to those recorded for other areas in the County, this is and improvement compared to the previous figures recorded in October 2021, where Stevenage and Dacorum consistently reported more crime than other areas in the county. . Unfortunately it has not been possible as part of this report to provide evidence of the links between local crime in Stevenage and gambling.

All reported crimes over the last 12 months* in Hertfordshire												
Name	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24
Hertfordshire	6,462	6,438	5,973	6,174	5,886	6,229	5,972	6,874	7,119	7,183	7,144	6,430
Broxbourne	598	587	559	623	581	610	527	631	657	644	622	560
Dacorum	875	772	834	827	734	771	779	882	910	937	902	794
Hertsmere	677	705	656	610	662	583	644	734	674	672	720	629

All reported crimes over the last 12 months* in Hertfordshire												
Name	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24
North Hertfordshire	556	567	493	504	506	564	501	648	677	738	668	617
Three Rivers	444	459	324	403	379	416	405	432	474	421	439	413
Watford	713	725	658	699	653	621	670	723	798	782	762	626
St Albans	636	697	642	631	683	712	656	787	805	848	901	811
Welwyn Hatfield	786	749	663	683	651	742	633	740	761	736	757	720
East Hertfordshire	639	590	523	538	573	656	622	697	761	748	735	623
Stevenage	538	587	621	656	464	554	535	600	602	657	638	637

Fig. 8 Crime Rates in Hertfordshire (Oct 2023-Sept 2024- )

### 3.2.5 Those with substance abuse/misuse issues and existing problem gamblers

There is a significant link between number of alcohol units consumed per week and increased problem gambling. Addictions are often overlapping.

There are two clinics/treatment centres for addiction in Stevenage; on Bessemer Drive (Alcohol clinic) and Norton Road (Drug & Alcohol Recovery Service). Both are outside of the Town Centre, sited within the Borough's industrial area.

It is not possible to identify how many people living in Stevenage have substance abuse problems and if any links can be established with existing problem gamblers. It is possible however to identify the number of Stevenage residents per 100,000 of the population of Hertfordshire who have died as an outcome of drug misuse between 2015 and 2019. Figure 5 shows that in 2017-19 Stevenage had a slightly lower number of deaths per 100,000 (4) compared with the rest of England (4.7)<sup>20</sup>.

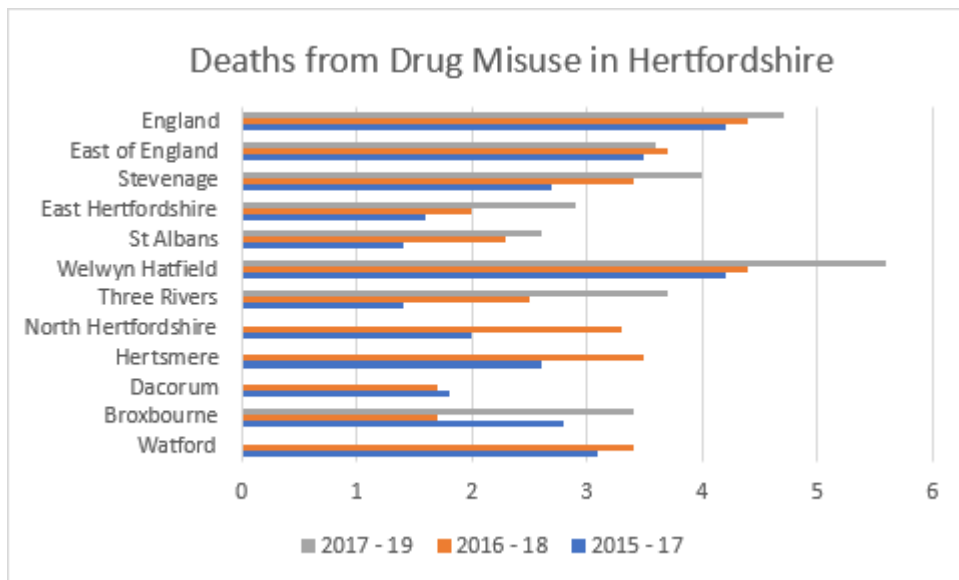


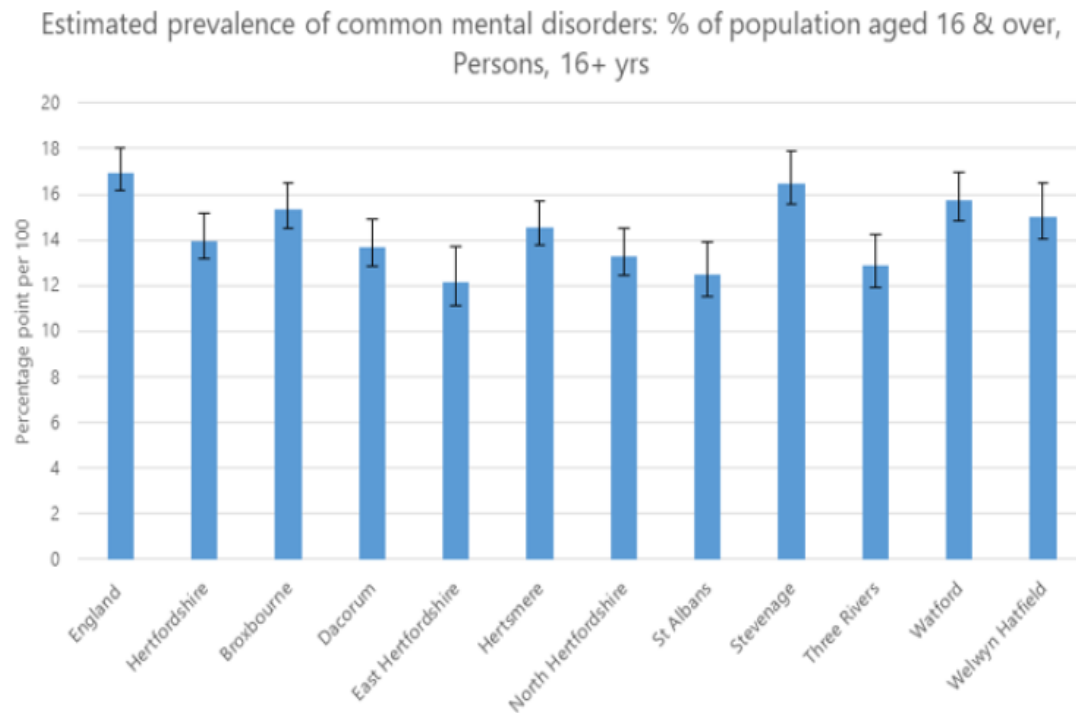
Fig. 9 – Deaths from Drug Misuse in Hertfordshire 2015 - 2019

### 3.2.6 Those with poor mental health

There is a consistent body of evidence demonstrating a strong association between gambling problems and many mental health conditions. This suggests that those with Common Mental Disorders (CMD), substance use/abuse problems, psychoses and other conditions have higher rates of problem or at-risk gambling than those without these conditions<sup>10</sup>.

The Joint Strategic Needs Assessment (JSNA) on Mental Health and Wellbeing in Adults<sup>21</sup> published by Hertfordshire County Council in June 2021 indicates that mental disorders represent the second largest single cause of disability in the UK across all ages, with 1 in 4 adults experiencing at least one diagnosable mental health problem each year. Half of all mental health conditions begin before the age of 14, with three-quarters established by 24 years of age.

Figure 10 shows the prevalence of common mental health disorders across Hertfordshire before the COVID-19 pandemic. Common mental health disorders (CMDs) include: depression, generalised anxiety disorder (GAD), panic disorder, phobias, social anxiety disorder, obsessive-compulsive disorder (OCD) and post-traumatic stress disorder (PTSD). Stevenage was the only district with a statistically significantly higher prevalence of CMDs than Hertfordshire overall. Stevenage, Watford, Welwyn Hatfield and Broxbourne were statistically similar to England, whereas all other districts were significantly lower.



#### 4. Conclusion

The provision of licenced gambling premises in Stevenage Borough is concentrated in the Town Centre, Leisure Park and High Street; this is to be expected as a natural part of the leisure facilities offered by a town. In the neighbourhoods, there is prevalence for betting shops, licenced clubs and premises with gaming machines in each hub area.

The town centre and Leisure Park are situated in Bedwell ward, identified as greatest area of deprivation within Stevenage. The main inequalities leading to deprivation are income and crime.

As a licensing authority, Stevenage Borough Council is not aware that harms from gambling are significant in Stevenage and there is no evidence to suggest that the objectives of the Gambling Commission are not being upheld.

This review has been constructive to outline where gambling harms can be realised.

As such, the Licensing Authority intends to prioritise evaluating premises in the Town Centre to ensure we are content that the licensed gambling premises are meeting the Gambling Commissions operating licence conditions and social responsibility code.

The volume of licensed gambling premises within the Town Centre has been static over the recent years. In 2021, an unlicensed family entertainment centre was



licensed by the Licensing Authority on the Leisure Park and in January 2023 an application for a betting shop was granted on the High Street

Licensed gambling operators in the town centre and on the Leisure Park will be required to produce/review their risk assessment when certain triggers are met. These are,

- New premises application
- Variation of the premises licence
- Significant changes in local circumstances

The Gambling Commission, as part of its current public health strategy, recognises that working collaboratively with Public Health colleagues can assist in developing a true picture of actual and future gambling harms within a Council area. The Licensing Authority intends to collaborate further with our Public Health colleagues and those who are fellow members of the Gambling Harms Alliance Group which first convened in June 2023, to understand the local issues and introduce local controls in response, where required. This will be valuable partnership working as Stevenage town centre is being developed to increase the numbers of residents living in the town centre.

## 5. References & Footnotes

<sup>1</sup> <http://www.gamblingcommission.gov.uk/for-licensing-authorities/GLA/Part-1-General-guidance-on-the-role-and-responsibilities-of-licensing-authorities-in-gambling-regulation>

<sup>2</sup> [Gambling behaviour 2022 - Findings from the quarterly telephone survey \(gamblingcommission.gov.uk\)](#)

[Statistics on gambling participation – Annual report Year 1 \(2023\): Official statistics \(gamblingcommission.gov.uk\)](#)

<sup>3</sup> [Gambling behaviour 2022 - Findings from the quarterly telephone survey \(gamblingcommission.gov.uk\)](#)

<sup>4</sup> [How life has changed in Stevenage: Census 2021 \(ons.gov.uk\)](#)

[http://www.gamblingcommission.gov.uk/for-licensing-authorities/GLA/Part-4-Licensing-authorities.aspx#DynamicJumpMenuManager\\_1\\_Anchor\\_1](http://www.gamblingcommission.gov.uk/for-licensing-authorities/GLA/Part-4-Licensing-authorities.aspx#DynamicJumpMenuManager_1_Anchor_1)

<sup>5</sup> Exploring area-based vulnerability to gambling-related harm [2015]

<sup>6</sup> [The Geography of Gambling Premises in Britain \(2021\)](#)

<sup>7</sup> <https://assets.ctfassets.net/j16ev64qyf6l/7ulxjm1SNQMygdOFV2bzxN/ea74db1104925f015edb11db0596f98b/Gambling-participation-in-2019-behaviour-awareness-and-attitudes.pdf>

<sup>8</sup> [Gambling Behaviour in 2020: Findings for the quarterly telephone survey \(Gambling Commission\)](#)

<sup>9</sup> [The economic cost of gambling-related harm in England: evidence update 2023 \(publishing.service.gov.uk\)](#)

[Gambling Prevalence, Harm & Support Map - Great Britain \(gambleaware.org\)](#)

<sup>10</sup> [Gambling Prevalence, Harm & Support Map - Great Britain \(gambleaware.org\)](#)

<sup>11</sup> [GambleAware 2022 Treatment and Support Report.pdf](#)

ONS Mid-2016 Population Estimates for 2016 Wards in England and Wales

<sup>12</sup> [gambling-related-harms-jsna-briefing-2022.pdf \(hertfordshire.gov.uk\)](#)

<https://www.begambleaware.org/understanding-gambling/how-is-gambling-regulated>

<sup>13</sup> [Public Health Outcomes Framework: September 2023 data update - GOV.UK \(www.gov.uk\)](#)

<sup>14</sup> [Gambling research | Westminster City Council](#)

<sup>15</sup> Public Health Outcomes Framework (Indicator C19d)

<sup>16</sup> [Young People and Gambling 2022: Official statistics \(gamblingcommission.gov.uk\)](#)

<sup>17</sup> [British gambling prevalence survey 2010 - GOV.UK \(www.gov.uk\)](#)

<sup>18</sup> [The Geography of Gambling Premises in Britain \(2020\)](#)

<sup>19</sup> [Local communities | Herts Insight \(hertfordshire.gov.uk\)](#)

<sup>20</sup> Public Health Outcomes Framework (Indicator C19d)

<sup>21</sup> <https://www.hertfordshire.gov.uk/microsites/jsna/jsna-documents/mental-health-adults.pdf>

## **Gambling Act SOLP - consolidated list of consultees**

- Hertfordshire Constabulary [LicensingEasternArea@herts.pnn.police.uk](mailto:LicensingEasternArea@herts.pnn.police.uk)
- Hertfordshire Fire & Rescue Service [administration.cfs@hertfordshire.gov.uk](mailto:administration.cfs@hertfordshire.gov.uk)
- The Gambling Commission [licensing@gamblingcommission.gov.uk](mailto:licensing@gamblingcommission.gov.uk)
- HM Revenue and Customs [nrubetting&gaming@hmrc.gsi.gov.uk](mailto:nrubetting&gaming@hmrc.gsi.gov.uk)
- Development Control (internal)
  - Licensing (internal)
  - Trading Standards (internal)
- Environmental Health (internal)
- Community Safety (internal)
- Legal Services (internal)
- Hertfordshire County Council Safeguarding Children Board [admin.hscb@hertfordshire.gov.uk](mailto:admin.hscb@hertfordshire.gov.uk)
- Hertfordshire Director of Public Health [sarah.perman@hertfordshire.gov.uk](mailto:sarah.perman@hertfordshire.gov.uk)
- All existing Gambling Act 2005 premises licence and permit holders (by post)
- Premises licence and club premises certificate holders under the Licensing Act 2003 affected by this Policy (by post)
- Current small society lotteries registered with the Council (by email and by post)
- Neighbouring local authorities EHDC [Oliver.Rawlings@eastherts.gov.uk](mailto:Oliver.Rawlings@eastherts.gov.uk) ; NHDC [Steven.Cobb@north-herts.gov.uk](mailto:Steven.Cobb@north-herts.gov.uk) ; WHDC [james.vaughan@welhat.gov.uk](mailto:james.vaughan@welhat.gov.uk)
- Institute of Licensing [info@instituteoflicensing.org](mailto:info@instituteoflicensing.org)
- Gambling Harms Alliance. [Lucy.thomas1@hertfordshire.gov.uk](mailto:Lucy.thomas1@hertfordshire.gov.uk)
- Association of British Bookmakers Ltd [mail@abb.uk.com](mailto:mail@abb.uk.com)
- British Amusement Catering Trade Association [info@bacta.org.uk](mailto:info@bacta.org.uk)
- Bingo Association [info@bingo-association.co.uk](mailto:info@bingo-association.co.uk)
- British Association of Leisure Parks, Piers and Attractions Limited [information@balppa.org](mailto:information@balppa.org)
- Business in Sport and Leisure [info@bisl.org](mailto:info@bisl.org)
- Gamcare [info@gamcare.org.uk](mailto:info@gamcare.org.uk)
- BeGambleAware [info@gambleaware.org](mailto:info@gambleaware.org)

- StepChange [administration.team@stepchange.org](mailto:administration.team@stepchange.org)
- Paddy Power Betfair
- Betfred [support@betfred.com](mailto:support@betfred.com)
- Admiral [support@admiralcasino.co.uk](mailto:support@admiralcasino.co.uk)
- Future Machines Ltd., Unit 20 Fleetway West Business Park, Perivale, UB6 7LD (by post)
- British Beer and Pub Association [contact@beerandpub.com](mailto:contact@beerandpub.com)
- National Casino Forum [info@nationalcasinoforum.co.uk](mailto:info@nationalcasinoforum.co.uk)
- Ladbrokes Coral Group [corpdev@gvcgroup.com](mailto:corpdev@gvcgroup.com)
- Mecca Bingo [support@meccabingo.com](mailto:support@meccabingo.com)
- William Hill [support@willhill.com](mailto:support@willhill.com)
- Stevenage Town Centre Manager (internal)
- Stevenage Community Trust [enquiries@stevenagecommunitytrust.org](mailto:enquiries@stevenagecommunitytrust.org)
- Stevenage Community Safety Partnership (internal)
- North Herts Council for Voluntary Services [oonaghsherlock@nhcvs.org.uk](mailto:oonaghsherlock@nhcvs.org.uk)
- North Hertfordshire College [enquiries@nhc.ac.uk](mailto:enquiries@nhc.ac.uk)
- Hertfordshire Chamber of Commerce [enquiries@hertschamber.com](mailto:enquiries@hertschamber.com)
- Stevenage Citizens Advice, Daneshill House, Danestrete, Stevenage SG1 1AF  
[emailadvice@castevenage.org.uk](mailto:emailadvice@castevenage.org.uk)

## Health

East and North Herts NHS Trust [jude.archer@nhs.net](mailto:jude.archer@nhs.net)

East and North Herts CCG (by post)

Healthwatch Hertfordshire [info@healthwatchhertfordshire.co.uk](mailto:info@healthwatchhertfordshire.co.uk)

### GPs and Health Centres

- King George & Manor House Surgeries
- Bedwell MC
- Canterbury Way
- Chells surgery
- Knebworth
- Manor House surgery
- Marymeads
- Poplars
- Roebucks
- Shephall Surgery
- St Nicholas HC
- Stanmore Medical group
- Symonds Green HC

## Community Centres

Bedwell Community Centre [bedwellct@yahoo.co.uk](mailto:bedwellct@yahoo.co.uk)

Chells Manor community Association [chellsmanorcommunitycentre@gmail.com](mailto:chellsmanorcommunitycentre@gmail.com)

Timebridge Community Centre [timebridgeCCA@hotmail.com](mailto:timebridgeCCA@hotmail.com)

Douglas Drive Centre [admin@douglasdrive.co.uk](mailto:admin@douglasdrive.co.uk)  
Hampson Park Community Centre [hampsonparkcc@gmail.com](mailto:hampsonparkcc@gmail.com)  
Symonds Green Community Association [symondsgreen@symondsgreenc.co.uk](mailto:symondsgreen@symondsgreenc.co.uk)  
Shephall Community Centre [paula@shephallcentre.co.uk](mailto:paula@shephallcentre.co.uk)  
Springfield House Community Centre [heather.springfieldhouse@hotmail.co.uk](mailto:heather.springfieldhouse@hotmail.co.uk)  
St Nicholas Community Centre [terrie.snca@gmail.com](mailto:terrie.snca@gmail.com); [shauneen.taylor@btconnect.com](mailto:shauneen.taylor@btconnect.com)  
The Oval Community Centre [enquiries@ovalcommunity.com](mailto:enquiries@ovalcommunity.com)

### **Community safety**

Stevenage Community Trust [enquiries@stevenagecommunitytrust.org](mailto:enquiries@stevenagecommunitytrust.org)  
Stevenage Credit Union [mail@stevenagecreditunion.com](mailto:mail@stevenagecreditunion.com)  
Stevenage Education Trust [set@educationtrust.org.uk](mailto:set@educationtrust.org.uk)  
Stevenage Haven [frankie.packard@stevenagehaven.co.uk](mailto:frankie.packard@stevenagehaven.co.uk)  
The Living Room [enquiries@livingroomherts.org](mailto:enquiries@livingroomherts.org)  
Mind in Mid Herts [sharn@mindinmidherts.org.uk](mailto:sharn@mindinmidherts.org.uk)

### **Faith and inclusion**

Mormon Church [andy@garnham.org.uk](mailto:andy@garnham.org.uk)  
Mountain Of Fire and Miracles Ministries [mfmstevenage@mountainoffire.org.uk](mailto:mfmstevenage@mountainoffire.org.uk)  
Oak Church Stevenage [info@oakchurchstevenage.org](mailto:info@oakchurchstevenage.org)  
Redeemed Christian Church of God [info@rccgstevenage.org.uk](mailto:info@rccgstevenage.org.uk)  
Stevenage Bangladeshi and Mosque & Muslim Cultural Centre [info@smcc786.co.uk](mailto:info@smcc786.co.uk)  
Stevenage Liberal Synagogue [info@stevenageliberalsynagogue.org.uk](mailto:info@stevenageliberalsynagogue.org.uk)  
Stevenage Muslim Community Centre [mohamed.salamkhan@gmail.com](mailto:mohamed.salamkhan@gmail.com)  
Stevenage United Reformed Church [info@stevenageurc.org.uk](mailto:info@stevenageurc.org.uk)  
Stevenage Vineyard Church [foodshed@stevenage-vineyard.co.uk](mailto:foodshed@stevenage-vineyard.co.uk)  
Stevenage World Forum for Ethnic Communities [kate.belinis@cdaherts.org.uk](mailto:kate.belinis@cdaherts.org.uk)  
Shalom Ministries [shalom-ministries@hotmail.co.uk](mailto:shalom-ministries@hotmail.co.uk)  
Destiny International Christian Assembly  [blessingjoseph77@gmail.com](mailto: blessingjoseph77@gmail.com)  
Fountain of Life Church [fountainoflifechurchlondon@gmail.com](mailto:fountainoflifechurchlondon@gmail.com)  
Heaven our Home Ministry International  
Bridge Builder Christian Trust [amanda.bryant@bridgebuildertrust.org.uk](mailto:amanda.bryant@bridgebuildertrust.org.uk)

This page is intentionally left blank

Appendix D  
Consultation Responses:

- Gamcare
- GambleAware
- Hertfordshire Safeguarding Adults Board
- Local Planning Authority
- Hertfordshire Public Health







## GamCare's response to Stevenage Borough Council – Consultation on the revision of statement of principles under the Gambling Act 2005

### About GamCare:

GamCare is an independent charity and the leading provider of information, advice, and support for anyone affected by gambling harms. We operate the National Gambling Helpline, provide structured support for anyone harmed by gambling, and create awareness about safer gambling and treatments. For 26 years, our confidential, non-judgemental services, have supported more than half a million people to get their lives back on track.

We hold data locally and nationally through our National Gambling Helpline. We also work closely with those who have lived experience in shaping and delivering our services and programmes, ensuring that all our work is coproduced with our lived experience community at its heart.

### GamCare's comments on the revision of the statement of principles:

- We welcome the position Stevenage Council is taking to go beyond the mandatory and default conditions of the Gambling Act 2005 in its statement of principles.
- Local authorities can play a greater role in reducing gambling harm, particularly for those of our clients who experience harm in land-based gambling venues, due to council's licensing responsibilities.
- It is vital that Stevenage Council develops a local picture of the level of gambling harms, in order to best target resources and tailor service provision. This could be achieved by gathering data from the National Gambling Helpline, as well as those already providing services in the area.
- Building on the proactive approach the council is already taking, we were pleased to see Stevenage Council commit in its statement of principles to a **public health approach** to gambling.
- This commitment should include training frontline and primary care staff to recognise the signs of gambling harm and develop referral pathways to the National Gambling Helpline or local treatment providers. GamCare has worked with Haringey Council to implement a similar system, that has received widespread support.
- In the absence of Cumulative Impact Assessments as a method by which the "aim to permit" approach can be challenged, Stevenage Council should continue to pursue a [Local Area Profile](#) approach that specifically analyses gambling risk, and use this data as a basis from which to scrutinise and possibly oppose a licensing application.
- The changes to Stevenage Council's statement of principles should be viewed in the context of the Gambling Act Review and subsequent process of white paper consultations, so take account of the rapidly changing regulatory environment.



*If you have any questions or would like to discuss in more detail, please contact Pollyanna Hopkins,  
Senior External Affairs Officer: [pollyanna.hopkins@gamcare.org.uk](mailto:pollyanna.hopkins@gamcare.org.uk)*

## Julie Dwan

---

**From:** Info <info@gambleaware.org>  
**Sent:** 24 October 2024 12:39  
**To:** Julie Dwan  
**Subject:** [External] RE: Consultation on the revised Statement of Principles for Gambling (2025-2028)  
**Categories:** To Do

Hello Julie,

Thank you for consulting us.

You may find GambleAware's recently published [interactive maps](#) useful, which have been designed for use by local authorities. The maps show the prevalence of problem gambling severity in each local authority and ward area as well as usage of, and reported demand for, treatment and support for gambling harms.

GambleAware also strongly commends two publications by the Local Government Association which set out the range of options available to local authorities to deal with gambling-related harms using existing powers:

- <https://www.local.gov.uk/tackling-gambling-related-harm-whole-council-approach>
- <https://www.local.gov.uk/gambling-regulation-councillor-handbook-england-and-wales>

GambleAware is also fully supportive of local authorities which conduct an analysis to identify areas with increased levels of risk for any reason. In particular we support those who also include additional licence requirements to mitigate the increased level of risk. Areas where there are higher than average resident or visiting populations from groups we know to be vulnerable to gambling harms include children, the unemployed, the homeless, certain ethnic-minorities, lower socio-economic groups, those attending mental health (including gambling disorders) or substance addiction treatment services

**Charlotte**  
Project Support Officer  
Pronouns: She/Her

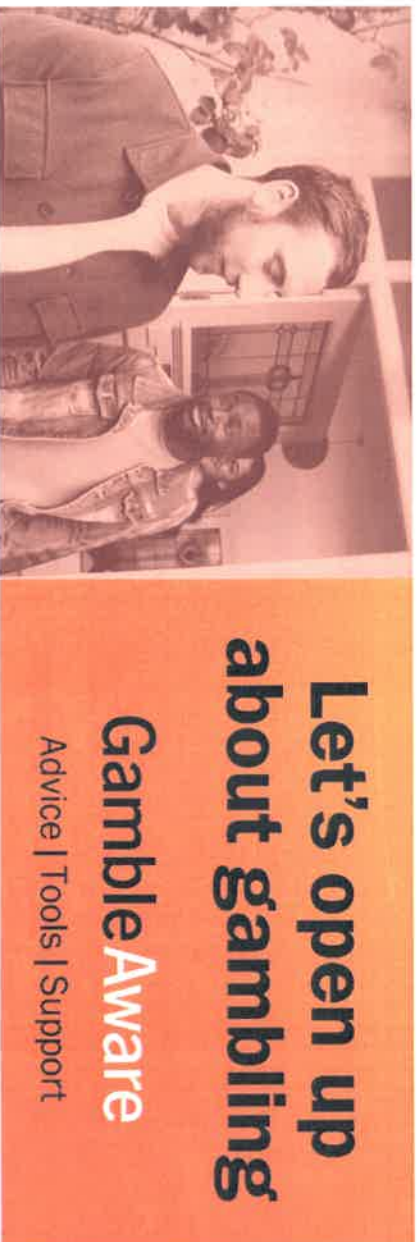
5th Floor, Lincoln House, 296-302 High Holborn, WC1V 7JH

For information/advice & corporate info: [gambleaware.org](https://gambleaware.org)

For confidential support and treatment: National Gambling Helpline 0808 8020 133

GAMBLEAWARE \* Company registered in England No 4384279 ● Charity No England & Wales 1093910 ● Scotland SC049433

GambleAware processes personal information for certain legitimate business interests and records sensitive personal information when necessary to meet its duty of care. To learn more about these interests, when we may process your information in this way, and your rights please [click here](#).



From: Julie Dwan <[Julie.Dwan@stevenage.gov.uk](mailto:Julie.Dwan@stevenage.gov.uk)>

Sent: 23 October 2024 15:37

Subject: Consultation on the revised Statement of Principles for Gambling {2025-2028}

CloudTech24 couldn't recognize this email as this is the first time you received an email from this sender. [Julie.Dwan@stevenage.gov.uk](mailto:Julie.Dwan@stevenage.gov.uk)

You don't often get email from [julie.dwan@stevenage.gov.uk](mailto:julie.dwan@stevenage.gov.uk). [Learn why this is important](#)

Dear Sir or Madam

**Julie Dwan**

---

**From:** Innocentia Dogbatse <Innocentia.Dogbatse@hertfordshire.gov.uk> on behalf of Admin HSCP <Admin.HSCP@hertfordshire.gov.uk>  
**Sent:** 23 October 2024 16:53  
**To:** Julie Dwan  
**Subject:** RE: Consultation on the revised Licensing Policy Statement  
**Attachments:** HSCP Gambling Policy Statement.docx

Hello,

Thank you for your email. Please find attached HSCB Gambling Policy Statement.

Thank you.

Kind regards,

Innocentia Dogbatse  
Business Support Officer

**Hertfordshire Safeguarding Adults Board**

Safeguarding Boards Business Unit

Farnham House, Six Hills Way Stevenage, SG1 2FQ

Post Point Address: CH0116, County Hall, Pegs Lane, Hertford, SG13 8DQ

**Telephone number: 01438844655**

**Commet: 54186**

**Email address:** [innocentia.dogbatse@hertfordshire.gov.uk](mailto:innocentia.dogbatse@hertfordshire.gov.uk)

**Website:** [www.hertfordshire.gov.uk/HSAB](http://www.hertfordshire.gov.uk/HSAB)

**Follow us on Twitter @HertsSab**

**Hertfordshire**

**Safeguarding Adults Board**

*Working together to prevent abuse*



## Hertfordshire Safeguarding Children Partnership– Gambling Policy Statement

The Safeguarding Children Partnership is nominated by the Council under section 157 of the Gambling Act 2005 as being the appropriate body to advise [insert name] Borough Council of any risks posed by the operation of premises providing gambling facilities to children and young people.

The activity of gambling can be harmful to people of all ages, but the law prohibits anyone under the age of 18yrs from gambling due to the significant harm that it can cause them.

The HSCP recognises that certain issues in relation to the protection of children from gambling are considered or regulated at a national level, for instance rules relating to advertising, general rules on access to premises and the availability of online gambling.

HSCP role is to focus on activities carried out a local level from physical premises in the County. HSCP's concerns will relate to preventing or controlling access to gambling premises and preventing the act of gambling by children. Risk assessments should identify risks and have measures in place to mitigate them. HSCP would expect operators to not allow the inside of the premises to be viewed and not to carry advertising on the front of its premises that may be attractive to children or contain images of popular professional sportsmen or celebrities that are likely to make gambling attractive to children.

Where gaming machines are provided in settings which children can access, for instance in pubs, clubs or family entertainment centres, the HSCP will expect the location of machines to be situated in areas where access to them, or the area, is controlled, clearly identified and under the physical supervision of a member of staff at all times.

Operators should consider a challenge 25 policy and the keeping of records such as challenge or refusal registers that provide evidence of the suitability of the procedures.

HSCP will also consider the wider picture of safeguarding of children – it would not normally be the case that the authorities would expect children to be present in or outside premises that provide gambling facilities. HSCP would expect operators to risk assess this, include it as part of their training procedures and be alert to instances where children and young people are regularly seeking access to the premises, being found inside premises or waiting outside premise for money or gifts from an adult who is gambling within.





**Julie Dwan**

---

**From:** James Chettleburgh  
**Sent:** 05 November 2024 15:57  
**To:** Licensing  
**Subject:** FW: Consultation on the revised Statement of Principles for Gambling

Dear Acting Licensing Manager,

**Consultation on the revised Gambling Act 2005 Statement of Principles.**

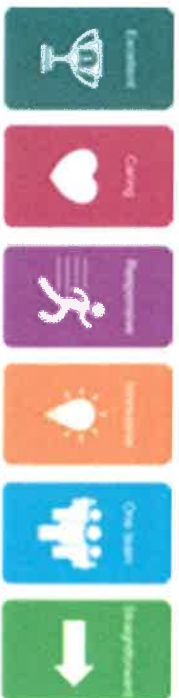
I refer to your recent consultation dated 23<sup>rd</sup> October 2024 with respect to the Council's Gambling Act 2005 Statement of Principles (2025 – 2028). Thank you for giving the Council as Local Planning Authority the opportunity to provide comments on this statement. The only comment we wish to make is the post "Development Control Manager" as referenced on Page 61 has been replaced with the "Head of Planning and Enforcement". Can this be updated to avoid any communications relating to Licensing Matters being missed within the department in the future.

We have no further comments to make on the statement.

Yours sincerely,

Page 369

James Chettleburgh MRTPI | Head of Planning and Enforcement | Development Management | Planning and Regulation | Stevenage Borough Council |  
Daneshill House | Danestrete | Stevenage | SG1 1HN  
Mob: 07593 528253 | Email: [james.chettleburgh@stevenage.gov.uk](mailto:james.chettleburgh@stevenage.gov.uk)





Our Privacy Policy has been updated to reflect changes to data protection legislation and can be viewed at the following link  
<http://www.stevenage.gov.uk/privacy-policy>

*Warning: all information provided on your planning application is now publicly available. Individuals and organisations offering their services may contact you. The Council does not endorse or approve any builders, surveyors, trades persons or other supplier, and advises householders to obtain quotes/references, and check the legitimacy of any contractor who contacts them before making payment.*



Julie Dwan  
Acting Licensing Manager  
Stevenage Borough Council  
Daneshill House  
Danestrete  
Stevenage  
SG1 1HN

Email: [licensing@stevenage.gov.uk](mailto:licensing@stevenage.gov.uk)

Director of Public Health  
Sarah Perman  
Hertfordshire County Council  
Public Health Service  
Farnham House  
Postal point: SFAR232  
Stevenage  
Herts  
SG1 2FQ

Email: [Sarah.perman@hertfordshire.gov.uk](mailto:Sarah.perman@hertfordshire.gov.uk)

Date: 19/11/2024

Dear Julie,

Reference: **Gambling Act 2005 Statement of Principles Consultation**

Thank you for the opportunity to comment on the Gambling Statement of Principles consultation for Stevenage.

We are pleased to see the Gambling Statement of Principles includes a section on “Public Health and gambling” (6.10.13 – 6.10.18). Our response provides sources of evidence which it is recommended to include as references to evidence the harm caused by problem gambling.

### **Hertfordshire Gambling Harms Strategy and Joint Strategic Needs Assessment (JSNA)**

Hertfordshire County Council will be launching its first Gambling Harms Strategy in early 2025. The 12-week public consultation for the strategy ran from 1<sup>st</sup> July – 22<sup>nd</sup> September 2024. 115 consultation responses were received. If you would like to receive the summary report, please contact [PublicHealth@hertfordshire.gov.uk](mailto:PublicHealth@hertfordshire.gov.uk). One of the strategic priorities included in the strategy is “Influencing the licencing and regulatory environment” to protect vulnerable residents from the harm caused by gambling and be clear on the individual roles of the County Council and District and Borough Councils.

The Hertfordshire JSNA Briefing: Gambling-related harms<sup>1</sup> was published in February 2022. It provides a wealth of evidence which is recommended to be referred to in the Gambling Statement of Principles (and in particular paragraph 6.10.18).

---

<sup>1</sup> [gambling-related-harms-jsna-briefing-2022.pdf \(hertshealthevidence.org\)](#)

## Harm caused by problem gambling

The harms associated with problem gambling are wide-ranging. These include not only harms to the individual gambler but their children, their families, and their communities. According to a YouGov data on gambling treatment and support from 2020<sup>2</sup> around 7% of the population of Great Britain (adults and children) were found to be negatively affected by someone else's gambling, most commonly from an immediate family member. The annual excess direct financial cost to government associated with harmful gambling is equivalent to £412.9 million. The annual societal value of health impacts is equivalent to between £635 and £1,355.5 million (in 2021 to 2022 prices). The total financial costs are approximated at £1.05 to £1.77 billion in 2023 nationally<sup>3</sup>.

Gambling-related harms can include the following:

- **Financial harms:** debt, bankruptcy, homelessness and child poverty
- **Relationships:** loss of trust, loneliness, separation, abuse
- **Mental and physical health:** depression, sleep problems, deaths from suicide
- **Employment and education:** unemployment, poor education
- **Criminal activity:** theft from family members and others

## Gambling rates and density of gambling premises higher in areas of higher deprivation

[Data has been collected by Gamble Aware](#) for local authorities to have a clearer view on how the rates of gambling affected their population and how this compares nationally. The Problem Gambling Severity Index (PGSI) is a frequently used tool that helps to identify people experiencing problems or negative consequences from their gambling (problem & at-risk gamblers). This tool was specifically developed to be used in the general population rather than a clinical context. It has 9 questions and a possible score range of 0 to 27. A PGSI score of eight or more represents a person who is gambling at risky levels and is set as a common threshold for clinical diagnosis. Scores between three and seven represent 'moderate risk' gambling and a score of one or two represents 'low risk' gambling. For the 10 districts in Hertfordshire, the estimates are as the following from their Annual GB Treatment and Support Survey 2022 (table 1):

**Table 1: Estimates of prevalence of gambling behaviour, fiscal costs and % of people seeking help**

District	Prevalence of gambling behaviour			Estimated Fiscal Cost	% of people seeking help		
	PGSI1+	PGSI3+	PGSI8+		PGSI1+	PGSI3+	PGSI8+
National	13.4%	5.9%	2.9%	NA	14.8%	32.1%	65.5%
Broxbourne	14.4%	6.3%	4.0%	£2.1 million	15.1%	32.7%	66.0%
Dacorum	13.7%	6.1%	3.3%	£3.6 million	14.1%	31.5%	61.0%
East Herts	12.0%	4.8%	2.1%	£2.2 million	12.2%	29.0%	63.8%

<sup>2</sup> [gambling-treatment-and-support.pdf \(gambleaware.org\)](#)

<sup>3</sup> [Gambling-related harms evidence review: summary - GOV.UK \(www.gov.uk\)](#)

Hertsmere	13.0%	5.8%	2.6%	£1.9 million	14.6%	31.0%	66.6%
North Herts	12.5%	5.2%	2.5%	£2.2 million	14.3%	33.3%	68.4%
St Albans	12.1%	5.2%	2.4%	£2.5 million	13.3%	29.5%	64.0%
Stevenage	15.1%	6.3%	3.2%	£2.0 million	14.8%	32.9%	65.0%
Three Rivers	12.8%	5.5%	2.5%	£1.6 million	14.0%	30.8%	65.8%
Watford	15.1%	7.4%	3.9%	£2.6 million	19.6%	38.5%	71.4%
Welwyn Hatfield	13.8%	6.0%	3.0%	£2.6 million	15.8%	34.1%	66.0%

The data shows a total estimated fiscal cost of £23.3 million for Hertfordshire according to National Institute of Economic and Social Research (NIESR) for problem gambling (PGSI 8+) in 2023.

There are variable numbers of gambling premises in each district (table 2) and analysis in the Hertfordshire JSNA briefing: Gambling Related Harms<sup>4</sup> showed that gambling premises clustered around areas with greater levels of deprivation. A commonly used unit of comparison is Lower Super Output Area (LSOA) which comprises between 400 and 1,200 households and have a usual resident population between 1,000 and 3,000 persons. In Hertfordshire, 41.0% of gambling premises were in LSOAs in the most deprived quintile of Hertfordshire whereas 2.56% of gambling premises were in LSOAs in the least deprived quintile of Hertfordshire.

**Table 2: Type and total gambling premises by Hertfordshire district and rate of gambling premises per 100,000 adults aged 18 years and older by Hertfordshire district, September 2023<sup>5</sup>**

District	Adult Gaming Centre	Betting Shop	Bingo	Total gambling premises	Premises per 100,000 adults aged 18+
Broxbourne	1	15	0	16	19.5
Dacorum	2	11	0	13	10.8
East Herts	0	13	0	13	11.1
Hertsmere	4	12	1	17	20.4
North Herts	1	9	0	10	9.5
St Albans	0	5	1	6	5.4
Stevenage	3	10	1	14	20.2
Three Rivers	0	6	0	6	8.3
Watford	1	15	2	18	22.9
Welwyn Hatfield	0	11	0	11	11.6
Hertfordshire	11	112	5	128	13.7
National (Mar 2023)	1348	5995	650	8301	15.7

<sup>4</sup> [gambling-related-harms-jsna-briefing-2022.pdf \(hertshealthevidence.org\)](#)

<sup>5</sup> Source: Full premises register, The Gambling Commission, 2022; ONS 2020 Mid-Year Population Estimates, HertsInsight. [JSNA](#))

## Increased risks of suicide from problem gambling

The Hertfordshire Suicide Prevention Strategy for 2025-2030 is currently being refreshed with district health and environmental leads involved in the development. The England Suicide Prevention Strategy<sup>6</sup> released in September 2023, contains actions related to gambling. There is a clear relationship between gambling, financial issues and mental health, leading to depression, anxiety and in more serious cases, suicide ideation, attempts and taking of one's own life. It is important that this impact is recognised. This further impacts on families through bereavement, domestic abuse and impact on children and loved ones. The Hertfordshire Suicide Prevention Strategy for 2025-2030 will include priorities to reduce the harm caused by gambling.

District's based on number of cases	2022	2021	2020	2019	2018	2017	2016	2015	2014	2013	2013-2022 Total per District
Dacorum	14	8	9	17	10	9	10	12	7	12	108
St Albans	11	7	10	13	14	6	8	8	11	7	95
East Herts	8	10	10	13	9	11	5	5	11	5	87
North Herts	12	7	6	11	10	11	9	4	12	4	86
Welwyn Hatfield	9	5	9	9	10	9	4	13	9	4	81
Hertsmere	7	5	11	15	8	10	5	7	6	3	77
Three Rivers	6	3	8	5	8	6	7	4	5	6	58
Broxbourne	7	6	4	6	13	5	3	11	4	3	62
Stevenage	6	3	7	11	8	3	5	4	2	1	50
Watford	1	2	3	5	12	6	8	6	4	7	54
<b>Hertfordshire</b>	<b>81</b>	<b>56</b>	<b>77</b>	<b>105</b>	<b>102</b>	<b>76</b>	<b>64</b>	<b>74</b>	<b>71</b>	<b>52</b>	<b>758</b>

## Concerns about vulnerable people being harmed by gambling

Consideration for vulnerable people should be at the heart of licensing applications. This includes awareness of areas of deprivation and/or concentrated presence of children and young people (CYP) and other at-risk individuals within areas of a district.

**CYP:** While prevalence of gambling is lower in CYP, the rates are still alarming. The Young People and Gambling Survey (2019) found that the prevalence of problem gambling was 1.7% in a sample of 11-16 year olds and a further 2.7% were identified as at-risk gamblers. Around 11% had played a gambling game in the past 7 days (13% boys and 7% girls) and gambling participation was highest for placing a private bet for money (e.g. with friends) (5%) and fruit or slot machines (4%)<sup>7</sup>. There is also increased concern over online gaming and gambling in CYP, with the Gambling Commission's report on gambling in young people suggesting that there has been an increase in playing for loot boxes in video games. A

<sup>6</sup> [Suicide prevention strategy for England: 2023 to 2028 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/114242/suicide-prevention-strategy-for-england-2023-to-2028.pdf)

<sup>7</sup> [Health Survey for England 2018: Supplementary analysis on gambling - NHS England Digital](https://www.nhs.uk/health-survey-for-england-2018/supplementary-analysis-on-gambling/)

large-scale survey of 16- to -18-year-olds found a statistically significant link between loot box spending and problem gambling in older adolescents<sup>8</sup>.

**Health/behaviour:** Mental health conditions and behavioural characteristics are risk factors for gambling harms. These include depression, impulsive behaviour, low life satisfaction and wellbeing, high alcohol consumption, loneliness, violent and antisocial behaviour, and poor academic performance<sup>9</sup>.

**Economic factors:** Problem gambling is more frequent in those who are unemployed (2.1%) vs employed (0.7%) & those living in the most deprived quintiles compared to the least deprived (1.2% vs 0.2%). A survey found 42% of problem gamblers said they would gamble more over the next year due to the cost-of-living compared to 6% of the UK<sup>10</sup>.

**Gender and age:** Men are 4.2 times more likely to be harmful gamblers than women. Young to middle aged men have the highest prevalence of problem gambling<sup>9</sup>.

**Ethnicity:** Asian & British Asian groups have the lowest risk of gambling, but the highest risk of problem gambling. Ethnic minority groups are less likely to receive treatment for gambling harm<sup>10</sup>.

**Homelessness and veterans:** Studies indicate a link between homelessness and gambling; one survey found 11.4% of those experiencing homelessness reported problem gambling. One report suggested veterans were over 8 times more likely to be problem gamblers compared to non-veterans<sup>11</sup>.

### Assessing the cumulative impact

Hertfordshire Public Health recommends that section 6.12 (Location) includes that applications will be considered against the ***cumulative impact*** of applications locally to protect children and vulnerable persons from being harmed or exploited by gambling.<sup>12</sup>

We recommend the above noted points are included within the appropriate sections of the Gambling Statement of Principles.

If you have any questions, please do not hesitate to contact me.

Kind regards,

Sarah Perman  
Director of Public Health  
Public Health  
Hertfordshire County Council

---

<sup>8</sup> [Video game loot boxes are psychologically akin to gambling | Nature Human Behaviour](#)

<sup>9</sup> [Gambling-related harms evidence review: summary - GOV.UK \(www.gov.uk\)](#)

<sup>10</sup> [Gambling-related harms evidence review: quantitative analysis of gambling involvement and gambling-related harms among the general population in England \(publishing.service.gov.uk\)](#)

<sup>11</sup> [Rates of Problematic Gambling in a British Homeless Sample: A Preliminary Study | Journal of Gambling Studies \(springer.com\)](#)

<sup>12</sup> [Gambling regulation: Government Response to the Committee's Second Report - Culture, Media and Sport Committee \(parliament.uk\); committees.parliament.uk/writtenevidence/122415/pdf/](#)





Mr M Shaid  
30 Green Lane  
Wixams  
MK42 6BA

Our Ref:  
Contact:  
Direct Line: 01438 242493  
Email: [licensing@stevenage.gov.uk](mailto:licensing@stevenage.gov.uk)  
Date: 23 October 2024

Dear Sir or Madam

### Consultation on the revised Statement of Principles for Gambling

Under the Gambling Act 2005, the Council regulates the provision of premises for gambling (including betting shops, bingo halls and amusement arcades), the provision of gaming machines in clubs and alcohol licensed premises and small society lottery registration.

At least every three years, the Council must review and adopt a Statement of Licensing Principles that details how the Council will undertake its licensing functions. The current Statement of Licensing Principles has been in effect since 9<sup>th</sup> March 2022, therefore the Council has undertaken a full review. The proposed statement of principles will form the basis of the Council's decision-making for licensing gambling premises. This consultation is your opportunity to raise any issues that you think should be taken into account when considering applications and taking enforcement action.

The draft Statement of Principles, with proposed revisions highlighted, is open to public consultation between 23<sup>rd</sup> October and 20<sup>th</sup> November 2024; a copy of the document is available on the Council's website: <https://www.stevenage.gov.uk/gambling-principles-consultation>

All consultation responses must be in writing and submitted by midnight on **20<sup>th</sup> November 2024**. Comments can be made by email to [licensing@stevenage.gov.uk](mailto:licensing@stevenage.gov.uk) or by post to:

Acting Licensing Manager  
Stevenage Borough Council  
Daneshill House  
Danestrete  
Stevenage  
SG1 1HN

All consultation responses may be published in a public report.

Yours sincerely



Julie Dwan  
Acting Licensing Manager





This page is intentionally left blank

# STEVENAGE BOROUGH COUNCIL

## PUBLIC NOTICE

### Revised Gambling Statement of Principles

**The Gambling Act 2005 (Licensing Authority Policy Statement) (England and Wales) Regulations 2006, Section 349**

Under the Gambling Act 2005, the Council regulates the provision of premises for gambling (including betting shops, bingo halls and amusement arcades), the provision of gaming machines in clubs and alcohol licensed premises and small society lottery registration.

At least every three years, the Council must review and adopt a Statement of Licensing Principles that details how the Council will undertake its licensing functions. The current Statement of Licensing Principles has been in effect since 2022 and therefore the Council has undertaken a full review. The proposed statement of principles will form the basis of the Council's decision-making for licensing gambling premises.

This consultation is your opportunity to raise any issues that you think should be taken into account when considering applications and taking enforcement action.

The draft Statement of Principles, with proposed revisions highlighted, is open to public consultation between 23<sup>rd</sup> October and 20<sup>th</sup> November 2024; a copy of the document is available on the Council's website: <https://www.stvenage.gov.uk/gambling-principles-consultation>

All consultation responses must be in writing and submitted by midnight on **20th November 2024**. Comments can be made by email to [licensing@stevenage.gov.uk](mailto:licensing@stevenage.gov.uk) or by post to:

Acting Licensing Manager  
Stevenage Borough Council  
Daneshill House  
Danestrete  
Stevenage  
SG1 1HN

All consultation responses may be published within a public report.



# Public Notices

In Association with



Planning Notices | Traffic Notices | Legal Notices  
 Probate Notices | Other Notices | Church and Religious Notices  
 Tenders and Contracts | Goods Vehicle Operator Licences

To advertise: **020 8478 4444** | email: **sehub@localiq.co.uk**

## OTHER

### NOTICE OF APPLICATION FOR A PREMISES LICENCE UNDER SECTION 17 OF THE LICENSING ACT 2003

Notice is hereby given that **MANNINGS FAIRVIEW COMPANY LIMITED** has applied for a premises licence to Stevenage Borough Council in relation to **STEVENAGE WINTER WONDERLAND, STEVENAGE LEISURE PARK CAR PARK, STEVENAGE, SG1 2UA** to permit the provision of the following licensable activities: Retail Sale of alcohol for consumption on the premises Monday to Sunday 10:00-22:00hrs. The licensing register and details of this application may be inspected during normal office hours at the below address. Any interested party or responsible authority may make representations in writing to, Licensing Authority at Daneshill House, Danestrete, Stevenage, Herts, SG1 1HN or by email: [licensing@stevenage.gov.uk](mailto:licensing@stevenage.gov.uk) Such written representation must be received by 21/11/2024 clearly stating the grounds upon which the representation is made in relation to the four objectives of the Licensing Act 2003. It is an offence to knowingly or recklessly make a false statement in connection with an application. The maximum fine for which a person is liable on summary conviction for the offence is unlimited.

## PLANNING



**NORTH HERTFORDSHIRE DISTRICT COUNCIL**  
 Council Offices,  
 Gernon Road,  
 Letchworth Garden City,  
 Herts, SG6 3JF

The following **PROPOSALS** are the subject of an application submitted to the Council.

### PROPOSAL AFFECTING A CONSERVATION AREA

**24/02214/FP**

**Land On The North West Side Of Green Lane Ashwell Hertfordshire SG7 5LW**

Erection of two 2 bed dwellings, three 3 bed dwelling and two four bed dwellings, with associated access, landscaping and parking.

**24/02215/FP St Marys Church Hall Church Street Baldock Hertfordshire SG7 5AE**

Removal and replacement of windows and dormer structures to front elevation (south), removal and replacement of double opening emergency exit door set to side elevation (east) and creation of concrete pad to form level threshold access point forward of emergency exit.

**24/02236/FPH 20 Sollershott East Letchworth Garden City Hertfordshire SG6 3JN**

Two storey rear extension, alterations to existing fenestration and erection of detached garage following demolition of existing garage.

### PROPOSAL AFFECTING A LISTED BUILDING OR A BUILDING OF SPECIAL ARCHITECTURAL OR HISTORIC INTEREST

**24/02181/LBC 4 Church Lane Kimpton Hertfordshire SG4 8RP**

Replace existing PVC rainwater goods with cast iron rainwater goods

**24/02292/LBC 2 Eastholm Letchworth Garden City Hertfordshire SG6 4TN**

Two storey rear extension with solar roof panels, following demolition of existing conservatory, existing single storey rear extension and two rear dormer windows, and internal alterations.

### PROPOSAL AFFECTING THE SETTING OF A LISTED BUILDING AND AFFECTING A CONSERVATION AREA

**24/02291/FPH 2 Eastholm Letchworth Garden City Hertfordshire SG6 4TN**

Two storey rear extension with solar roof panels, following demolition of existing conservatory, existing single storey rear extension and two rear dormer windows.

The application details can be viewed on the Council's web site at [www.north-herts.gov.uk/home/planning](http://www.north-herts.gov.uk/home/planning). Any person who wishes to make representations about the **PROPOSAL** should submit them in writing to this office by no later than 23 days from the date of this notice. For householder applications, in the event of an appeal against refusal of planning permission, which is to be dealt with on the basis of representations in writing, any representations made about this application will be sent to the Secretary of State, and there will be no further opportunity to comment at appeal stage.

**Shaun Greaves Development and Conservation Manager**

Correspondence address:  
 North Herts Council, PO Box 10613,  
 Nottingham, NG6 6DW  
 Date: 31/10/2024

**To view more Public Notices in your area**

Visit our dedicated website:  
[publicnoticeportal.uk/stevenage-comet](http://publicnoticeportal.uk/stevenage-comet)

## PLANNING



### STEVENAGE BOROUGH COUNCIL

#### TOWN AND COUNTRY PLANNING ACT 1990

#### NOTICE OF APPLICATION FOR PLANNING PERMISSION

#### THE FOLLOWING APPLICATION(S) AFFECTING THE CHARACTER OR APPEARANCE OF A CONSERVATION AREA HAVE BEEN RECEIVED

**24/00613/FPH** Erection of single storey front and rear extension.  
 14 Burydale  
 Stevenage

**24/00736/FP** New cladding and windows to northern elevation, insertion of roof lights to the flat roof and alterations to existing window openings to southern elevation.  
 31A Queensway  
 Town Centre  
 Stevenage

Members of the public may inspect copies of the applications, plans and other submitted documents online at [www.stevenage.gov.uk](http://www.stevenage.gov.uk) or can be viewed on the Council's computers at the Customer Service Centre, Danestrete between 9.00am and 5.00pm Monday to Friday. Assistance is available if required.

Anyone who wishes to make representations about any of these applications should write to the Council at Council Offices Daneshill House Danestrete Stevenage by **17 November 2024** under the Local Government (Access to Information) Act 1985, any comments can only be taken into account if they are available for public inspection before the applications are determined and therefore they cannot be treated confidentially.

For applications relating to householder developments, in the event of an appeal against the refusal of planning permission, which is to be dealt with on the basis of representations in writing, any representations made about the application will be sent to the Secretary of State, and there will be no further opportunity to comment at appeal stage.

**DATED : 31 October 2024**

**SIGNED : Zayd Al-Jawad**  
 Assistant Director,  
 Planning & Regulation

## PROBATE & Trustee

### IRENEWEDGE Deceased

Pursuant to the Trustee Act 1925 anyone having a claim against or an interest in the Estate of the deceased, late of 1 Church Close, Codicote, Hitchin, Hertfordshire, SG4 8YT, who died on 15/09/2023, must send written particulars to the address below by 02/01/2025, after which date the Estate will be distributed having regard only to claims and interests notified.  
**Jenna Harrington**  
 c/o Attwaters Jameson Hill,  
 72-74 Fore Street, Hertford,  
 SG14 1BY.  
 Ref: JDH/3004125-0001/Wed

## What are Public Notices?

Public notices are adverts placed by councils and other local authorities to inform people of developments in their areas.

They can cover a wide variety of topics that may impact your life

## STATUTORY

### STEVENAGE BOROUGH COUNCIL

#### PUBLIC NOTICE

#### Revised Gambling Statement of Principles

#### The Gambling Act 2005 (Licensing Authority Policy Statement) (England and Wales) Regulations 2006, Section 349

Under the Gambling Act 2005, the Council regulates the provision of premises for gambling (including betting shops, bingo halls and amusement arcades), the provision of gaming machines in clubs and alcohol licensed premises and small society lottery registration.

At least every three years, the Council must review and adopt a Statement of Licensing Principles that details how the Council will undertake its licensing functions. The current Statement of Licensing Principles has been in effect since 2022 and therefore the Council has undertaken a full review. The proposed statement of principles will form the basis of the Council's decision-making for licensing gambling premises.

This consultation is your opportunity to raise any issues that you think should be taken into account when considering applications and taking enforcement action.

The draft Statement of Principles, with proposed revisions highlighted, is open to public consultation between 23<sup>rd</sup> October and 20<sup>th</sup> November 2024; a copy of the document is available on the Council's website: <https://www.stevenage.gov.uk/gambling-principles-consultation>

All consultation responses must be in writing and submitted by midnight on **20th November 2024**. Comments can be made by email to [licensing@stevenage.gov.uk](mailto:licensing@stevenage.gov.uk) or by post to:

Acting Licensing Manager  
 Stevenage Borough Council  
 Daneshill House  
 Danestrete  
 Stevenage  
 SG1 1HN

All consultation responses may be published within a public report.

### STEVENAGE BOROUGH COUNCIL

#### PUBLIC NOTICE

#### Revised Statement of Licensing Policy Statement LICENSING ACT 2003, Section 5

Under the Licensing Act 2003, Stevenage Borough Council is the Licensing Authority and has responsibility for granting premises licences, club premises certificates, temporary event notices and personal licences in the Borough in respect of the sale and/or supply of alcohol and the provision of regulated entertainment and late-night refreshment.

At least every five years, the Council must review and adopt a Licensing Policy Statement that details how the Council will undertake its licensing functions. The current Licensing Policy Statement has been in effect since 2020 and therefore the Council is undertaking a full review. The proposed policy statement will form the basis of the Council's decision-making for licensing alcohol and entertainment premises.

This consultation is your opportunity to raise any issues that you think should be taken into account when considering applications and taking enforcement action.

The draft Licensing Policy Statement, with proposed revisions highlighted, is open to public consultation between 23<sup>rd</sup> October 2024 and 20<sup>th</sup> November 2024; a copy of the document is available via the following page on the Council's website:

<https://www.stevenage.gov.uk/licensing-policy-statement>

All consultation responses must be in writing and submitted by midnight on **20th November 2024**. Comments can be made by email to [licensing@stevenage.gov.uk](mailto:licensing@stevenage.gov.uk) or by post to:

Acting Licensing Manager  
 Stevenage Borough Council  
 Daneshill House  
 Danestrete  
 Stevenage  
 SG1 1HN

All consultation responses may be published within a public report.

**You'd want to know if someone was planning to dig up the road next to your house, right?**

## Don't be caught out

Every day hundreds of applications are made for permission to close roads.

The **Public Notice Portal** is a free to use, online service that will tell you who is applying for what and for where. It's free to use and if you register and tell us the area you are interested in, we'll keep checking the updates and will email to tell you about any plans for your community before they become a reality.

Find, save and share **Public Notices** that affect you in your local area.



Telling you their plans before they become your problems

## Notice Definitions: Statutory


Legally required notices of varying purpose that don't typically fit within one of the aforementioned notice categories, for example council tax, local elections or bankruptcy.


You can learn more about the wide range of legislation pertaining to public notices at **legislation.gov.uk**

This page is intentionally left blank




Gambling will go out today at midday and Tuesday 19 November at 2pm – on all channels – Facebook, Twitter and Insta:

 **Twitter**

 **StevenageBC** @Steven... • Just now

📢 Have Your Say! We're updating our Gambling Act Statement of Principles for 2025-2028 and want to hear your thoughts! The consultation closes on 20 November.

📖 Read the document and share your feedback:  
<https://www.stevenage.gov.uk/gambling-principles-consultation>



🗨️ 🔄 ❤️ ✉️

This page is intentionally left blank

Appendix 11.1 Map of Stevenage Borough Council Area



This page is intentionally left blank

## Appendix 11.2. Responsible Authorities

Responsible Authority	Contact Details
Environmental Health	Commercial Environmental Health Manager Stevenage Borough Council Daneshill House Danestrete Stevenage Herts. SG1 1HN <a href="mailto:envhealth@stevenage.gov.uk">envhealth@stevenage.gov.uk</a>
Safeguarding Children Board	Safeguarding Manager Hertfordshire Safeguarding Children Partnership Postal Point CH0116 Room 152, County Hall Pegs Lane Hertford SG13 8DF  <a href="mailto:admin.hscb@hertfordshire.gov.uk">admin.hscb@hertfordshire.gov.uk</a>
HM Revenues and Customs	National Registration Unit Portcullis House 21 India Street Glasgow G2 4PZ  <a href="mailto:nrubetting&amp;gaming@hmrc.gov.uk">nrubetting&amp;gaming@hmrc.gov.uk</a>
Gambling commission	Victoria Square House Victoria Square Birmingham B2 4BP  <a href="mailto:info@gamblingcommission.gov.uk">info@gamblingcommission.gov.uk</a>

Licensing Authority	<p>Stevenage Borough Council  Daneshill House  Danestrete  Stevenage  Herts.  SG1 1HN</p> <p><a href="mailto:licensing@stevenage.gov.uk">licensing@stevenage.gov.uk</a></p>
Hertfordshire Constabulary	<p>Stevenage Police Station  Lytton Way  Stevenage  Herts SG1 1HF</p> <p><a href="mailto:LicensingEasternArea@herts.police.uk">LicensingEasternArea@herts.police.uk</a></p>
Hertfordshire Fire & Rescue Service	<p>Fire Protection  Mundells – MU103  Welwyn Garden City AL7 1FT</p> <p><a href="mailto:administration.cfs@hertfordshire.gov.uk">administration.cfs@hertfordshire.gov.uk</a></p>
Planning	<p>Head of Planning &amp; Enforcement  Stevenage Borough Council  Daneshill House  Danestrete  Stevenage  Herts.  SG1 1HN</p> <p><a href="mailto:plan.devcon@stevenage.gov.uk">plan.devcon@stevenage.gov.uk</a></p>

### Appendix 11.3. Summary of gaming machine categories and entitlements

Category of machine	Maximum stake (from April 2019)	Maximum prize (from Jan 2014)
A	Unlimited – No category A gaming machines are currently permitted	Unlimited – No category A gaming machines are currently permitted
B1	£5	£10,000 <sup>†</sup>
B2	£2	£500
B3A	£2	£500
B3	£2	£500
B4	£2	£400
C	£1	£100
D – non-money prize	30p	£8

D – non-money prize (crane grab machines only)	£1	£50
D – money prize	10p	£5
D – combined money and non-money prize	10p	£8 (of which no more than £5 may be a money prize)
D – combined money and non-money prize (coin pusher or penny falls machines only)	20p	£20 (of which no more than £10 may be a money prize)

## References

† With option of max £20,000 linked progressive jackpot on premises basis only



	<b>Machine category</b>						
<b>Premises type</b>	<b>A</b>	<b>B1</b>	<b>B2</b>	<b>B3</b>	<b>B4</b>	<b>C</b>	<b>D</b>
<b>Large casino</b> (machine/table ratio of 5-1 up to maximum)	Maximum of 150 machines Any combination of machines in categories B to D (except B3A machines), within the total limit of 150 (subject to machine/table ratio)						
<b>Small casino</b> (machine/table ratio of 2-1 up to maximum)	Maximum of 80 machines Any combination of machines in categories B to D (except B3A machines), within the total limit of 80 (subject to machine/table ratio)						
<b>Pre-2005 Act casino</b> (no machine/table ratio)	Maximum of 20 machines categories B to D (except B3A machines), or any number of C or D machines instead						
<b>Betting premises and tracks occupied by pool betting</b>	Maximum of 4 machines categories B2 to D (except B3A machines)						
<b>Bingo premises<sup>1</sup></b>				Maximum of 20% of the total number of gaming machines which are available for use on the premises categories B3 or B4**		No limit on category C or D machines	
<b>Adult gaming centre<sup>2</sup></b>				Maximum of 20% of the total number of gaming machines which are available for use on the premises categories B3 or B4**		No limit on category C or D machines	
<b>Licensed Family entertainment centre<sup>3</sup></b>						No limit on category C or D machines	
<b>Family entertainment centre (with permit)<sup>3</sup></b>						No limit on category D machines	
<b>Clubs or miners' welfare institute (with permits)<sup>4</sup></b>				Maximum of 3 machines in categories B3A or B4 to D*			
<b>Qualifying alcohol-licensed premises</b>				1 or 2 machines of category C or D automatic upon notification			

<b>Qualifying alcohol-licensed premises</b> (with licensed premises gaming machine permit)						Number of category C-D machines as specified on permit
<b>Travelling fair</b>						No limit on category D machines

<sup>1</sup> Bingo premises licence are entitled to make available for use a number of category B gaming machines not exceeding 20% of the total number of gaming machines on the premises. Where a premises licence was granted before 13 July 2011, they are entitled to make available eight ([The Gambling Act 2005 \(Gaming Machines in Bingo Premises\) Order 2009 \(opens in new tab\)](#)) category B gaming machines, or 20% of the total number of gaming machines, whichever is the greater. Category B machines at bingo premises are restricted to sub-category B3 and B4 machines, but not B3A machines.

<sup>2</sup> Adult gaming centres are entitled to make available for use a number of category B gaming machines not exceeding 20% of the total number of gaming machines which are available for use on the premises and any number of category C or D machines. Where a premises licence was granted before 13 July 2011, they are entitled to make available four category B gaming machines, or 20% of the total number of gaming machines, whichever is the greater. Category B machines at adult gaming centres are restricted to sub-category B3 and B4 machines, but not B3A machines.

<sup>3</sup> Only premises that are wholly or mainly used for making gaming machines available may hold an unlicensed FEC gaming machine permit or an FEC premises licence. Category C machines may only be sited within licensed FECs and where an FEC permit is in force. They must be in a separate area to ensure the segregation and supervision of machines that may only be played by adults. There is no power for the licensing authority to set a limit on the number of machines under the FEC permit.

<sup>4</sup> Members' clubs and miners' welfare institutes with a club gaming permit or with a club machine permit, are entitled to site a total of three machines in categories B3A to D but only one B3A machine can be sited as part of this entitlement.

<sup>5</sup> Commercial clubs with club machine or gaming permits are entitled to a total of three machines in categories B4 to D.

#### Appendix 11.4. Table of Delegations

The Licensing Authority will delegate its functions under the Gambling Act 2005 as follows:

Matter to be dealt with	Full Council	Licensing Committee	Officers
Final Approval of 3 year Gambling Statement of Principles	X		
Policy not to permit Casinos	X		
Application for premises licences		Where representations have been received and not withdrawn	Where no representations received/ have been withdrawn
Application for a variation to a licence		Where representations have been received and not withdrawn	Where no representations received/ have been withdrawn
Application for a transfer of a licence		Where representations have been received from the Commission	Where no representations received from the Commission
Application for a provisional statement		Where representations have been received and not withdrawn	Where no representations received/ have been withdrawn
Review of a premises licence		X	
Application for club gaming/club machine permits		Where objections have been made (and not withdrawn)	Where no objections made/ have been withdrawn
Cancellation of club gaming/club machine permits		X	
Applications for other permits			X

Application for permits in alcohol licensed premises (for any number of machines)			X
Cancellation of licensed premises gaming machine			X

<b>Matter to be dealt with</b>	<b>Full Council</b>	<b>Licensing Committee</b>	<b>Officers</b>
Consideration of temporary use notice			X
Decision to give a counter notice to a temporary use notice			X
Determination as to whether a representation is relevant.			X
Fee Setting (within bands)			X
Small society lottery registration			X



This page is intentionally left blank

## Appendix 11.5. Glossary of Terms

Term	Definition
Act	Gambling Act 2005
Adult Gaming Centres	Commercial premises offering a variety of games and gaming machines. Category B, C and D gaming machines available.
Betting Premises	Currently known as a betting office
Bingo Premises	A commercial club which promotes equal chance gaming in the form of cash or prize bingo.
Casino	A commercial gaming club whereby people are given an opportunity to participate in one or more casino games. Casino games are defined as a game of chance which is not equal chance gaming.
Club gaming permits	Members club (not commercial clubs) permits which authorise the establishment to provide gaming machines, equal chance gaming and games of chance.
Code of Practice	Any code of practice under section 24 of the Gambling Act
Default condition	A specified condition provided by regulations to be attached to a licence, unless excluded by Stevenage Borough Council
Family entertainment centres (FEC)	A centre with a variety of rides and games including amusement machines and skills games. Licensed FECs provide category C and D machines. Unlicensed FECs provide category D machines only, and are regulated through
Gaming Machine	A game of chance machine which requires coins or tokens to be activated
Interested Party	Defined by the Act as a person who: <ul style="list-style-type: none"> <li>1) Lives sufficiently close to the premises to be likely to be affected by the authorised activities;</li> <li>2) Has business interests that might be affected by the authorised activities;</li> </ul>
Licensing Authority	Stevenage Borough Council
Licensing Committee	This term shall include any duly constituted Licensing Sub-Committee.

Licensing objectives	<p>There are 3 licensing objectives defined in the Gambling Act as:</p> <ol style="list-style-type: none"> <li>1) Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.</li> <li>2) Ensuring that gambling is conducted in a fair and open way</li> <li>3) Protecting children and other vulnerable persons from being harmed or exploited by gambling</li> </ol>
----------------------	---

Mandatory Condition	A specified condition provided by regulations to be attached to the licence
Premises	Any place
Prize gaming permits	A permit issued to authorise the provision of facilities for gaming with prizes
Regulations	Regulations made under the Gambling Act 2005
Responsible Authority	<p>Defined by the Act as:</p> <ol style="list-style-type: none"> <li>1) Licensing Authority</li> <li>2) Gambling Commission</li> <li>3) Police</li> <li>4) Fire Service</li> <li>5) Planning</li> </ol>
Small Society Lottery	A lottery promoted on behalf of a non-commercial society that is registered by the licensing Authority
Temporary Use Notices	These allow use of a premises for gambling where there is no premises licence, but where a gambling operator wishes to use the premises temporarily for providing facilities for gambling
Tracks	Tracks are sites that include horse racecourses and dog tracks
Travelling Fair	A fair consisting wholly or principally of the provision of amusements, provided by people who travel from place to place providing fairs AND in a place which has been used for no more than 27 days in that calendar year
Vulnerable persons	This group includes people who gamble more than they want to; people who gambling beyond their means; and people who may not be able to make informed or balanced decisions about gambling due to a mental impairment, alcohol or drugs.



Estimated time taken to complete: 2 hours\*

\*Please note that this should be a working document and should be actively reviewed throughout the lifetime of the project/policy/service change



# Revised Gambling Statement of Principles Equality Impact Assessment (EqIA) Form

March 2025 - March 2028

<b>Date created</b>	November 2024
<b>Approved by</b>	Assistant Director – Planning & Regulation
<b>Owner</b>	Head of Environmental Health & Licensing
<b>Version</b>	V1.1
<b>Author</b>	Julie Dwan Acting Licensing Manager
<b>Business Unit and Team</b>	Environmental Health & Licensing

Please [click this link](#) to find the EqIA guidance toolkit for support in completing the following form.

For translations, braille or large print versions of this document please email [equalities@stevenage.gov.uk](mailto:equalities@stevenage.gov.uk).

**First things first:**

**Does this policy, project, service, or other decision need an EqlA?**

<b>Title:</b>	<b>Revised Gambling Statement of Principles</b>	
<b>Please answer Yes or No to the following questions:</b>		
Does it affect staff, service users or the wider community?		<b>Yes/No</b>
Has it been identified as being important to particular groups of people?		<b>Yes/No</b>
Does it or could it potentially affect different groups of people differently (unequal)?		<b>Yes/No</b>
Does it relate to an area where there are known inequalities or exclusion issues?		<b>Yes/No</b>
Will it have an impact on how other organisations operate?		<b>Yes/No</b>
Is there potential for it to cause controversy or affect the council's reputation as a public service provider?		<b>Yes/No</b>

<b>Where a positive impact is likely, will this help to:</b>	
Remove discrimination and harassment?	N/A
Promote equal opportunities?	N/A
Encourage good relations?	<b>Yes/No</b>

**If you answered 'Yes' to one or more of the above questions you should carry out an EqlA.**

Or if you answered 'No' to all of the questions and decide that your activity doesn't need an EqlA you must explain below why it has no relevance to equality and diversity.

You should reference the information you used to support your decision below and seek approval from your Assistant Director before confirming this by sending this page to [equalities@stevenage.gov.uk](mailto:equalities@stevenage.gov.uk).

I determine that no EqlA is needed to inform the decision on the .

Name of assessor:

Decision approved by:

Role:

Role: Assistant Director

Date:

Date:

# Equality Impact Assessment Form

For a policy, project, strategy, staff or service change, or other decision that is new, changing or under review

Page 403

<b>What is being assessed?</b>		<b>Revised Gambling Statement of Principles</b>			
Lead Assessor	Julie Dwan			Assessment team	
Start date	March 2025	End date	March 2028		
When will the EqIA be reviewed? (Typically every 2 years)		November 2027, unless there are significant changes to the legislation which would require the Council to review the Gambling Statement of Principles sooner.			

Who may be affected by the proposed project?	All residents and businesses within Stevenage, and gambling premises in particular.
What are the key aims of the proposed project?	To provide information and guidance on the general approach that the Council will take to licensing. The Statement does not prevent anyone from making an application, and each application will be considered on its individual merits.

<b>What positive measures are in place (if any) to help fulfil our legislative duties to:</b>					
Remove discrimination & harassment	N/A	Promote equal opportunities	N/A	Encourage good relations	Promotion of better understanding between those providing gambling opportunities and

					those potentially affected by them.
--	--	--	--	--	-------------------------------------

What sources of data / information are you using to inform your assessment?	Information provided by the Gambling Commission, feedback from the local consultation on the revised Statement and data collected in the Local Area Profile.
---	--

In assessing the potential impact on people, are there any overall comments that you would like to make?	The purpose of the Council's Gambling Statement of Principles is to provide information and guidance on the general approach that the Council will take to licensing. The Statement does not prevent anyone from making an application, and each application will be considered on its individual merits.
--	---

## Evidence and Impact Assessment

Explain the potential impact and opportunities it could have for people in terms of the following characteristics, where applicable:

Age					
Positive impact	X	Negative impact		Unequal impact	
Please evidence the data and information you used to support this assessment	The Gambling Act has as an objective to protect children and vulnerable groups from being harmed. The policy embraces the promotion of this licensing objective and thus ensures that this age demographic is protected from certain licensable activities that may cause them harm. Each licence application is assessed on its merits and takes into account the views of all concerned, including those of the listed Responsible Authorities. However, we seek to minimise restrictions through the use of appropriate conditions, where possible, and only in extreme cases is there a refusal of an application.				

What opportunities are there to promote equality and inclusion?	N/A	What do you still need to find out? Include in actions (last page)	N/A
---	-----	--	-----

**Disability e.g., physical impairment, mental ill health, learning difficulties, long-standing illness**

Positive impact	X	Negative impact		Unequal impact	
-----------------	---	-----------------	--	----------------	--

Please evidence the data and information you used to support this assessment	<p>The Gambling Act has as a licensing objective to 'protect children and vulnerable groups from being harmed and exploited by Gambling'. The policy embraces the promotion of this objective.</p> <p>It is difficult to define the term 'vulnerable person'. The Gambling commission, in its guidance to Local Authorities does not seek to offer a definition, but for regulatory purposes we will assume that this group includes people: 'Who gamble more than they want to, people who gamble beyond their means, elderly persons and people who may not be able to make informed or balanced decisions about gambling due to their mental impairment'. (Paragraph 6.9.7 of the policy refers)</p> <p>This policy seeks to protect vulnerable persons or those with such disabilities.</p> <p>Each licence application is assessed on its merits and takes into account the views of all concerned, including those of the listed Responsible Authorities. However, we seek to minimise restrictions through the use of appropriate conditions, where possible, and only in extreme cases is there a refusal of an application.</p> <p>Gambling operators when submitting an application for a gambling premises are required to provide a risk assessment and details of suitable measures which will be provided to protect children and vulnerable persons from harm or risk of being exploited by gambling. This includes the provision of training for employees focussing on their ability to detect a person who may be vulnerable and providing appropriate support for those persons.</p>				
--	---	--	--	--	--

What opportunities are there to promote	N/A	What do you still need to find out?	N/A
---	-----	-------------------------------------	-----

equality and inclusion?		Include in actions (last page)	
-------------------------	--	--------------------------------	--

**Gender Reassignment**

Positive impact		Negative impact		Unequal impact	
Please evidence the data and information you used to support this assessment	No differential impact.				
What opportunities are there to promote equality and inclusion?	N/A		What do you still need to find out? Include in actions (last page)	N/A	

Page 406

S70

**Marriage or Civil Partnership**

Positive impact		Negative impact		Unequal impact	
Please evidence the data and information you used to support this assessment	No differential impact.				
What opportunities are there to promote equality and inclusion?	N/A		What do you still need to find out? Include in actions (last page)	N/A	

**Pregnancy & Maternity**

Positive impact		Negative impact		Unequal impact	
Please evidence the data and information you used to support this assessment	No differential impact.				
What opportunities are there to promote equality and inclusion?	N/A		What do you still need to find out? Include in actions (last page)	N/A	

Race					
Positive impact		Negative impact		Unequal impact	
Please evidence the data and information you used to support this assessment	No differential impact.				
What opportunities are there to promote equality and inclusion?	N/A		What do you still need to find out? Include in actions (last page)	N/A	

Religion or Belief					
Positive impact		Negative impact		Unequal impact	
Please evidence the data and information you used to support this assessment	No differential impact.				

What opportunities are there to promote equality and inclusion?	N/A	What do you still need to find out? Include in actions (last page)	N/A
---	-----	--	-----

Sex					
Positive impact		Negative impact		Unequal impact	
Please evidence the data and information you used to support this assessment	No differential impact.				
What opportunities are there to promote equality and inclusion?	N/A	What do you still need to find out? Include in actions (last page)	N/A		

Sexual Orientation e.g., straight, lesbian / gay, bisexual					
Positive impact		Negative impact		Unequal impact	
Please evidence the data and information you used to support this assessment	No differential impact.				
What opportunities are there to promote equality and inclusion?	N/A	What do you still need to find out? Include in actions (last page)	N/A		



<p align="center"><b>Socio-economic<sup>1</sup></b></p> <p align="center">e.g., low income, unemployed, homelessness, caring responsibilities, access to internet, public transport users, social value in procurement</p>					
Positive impact	X	Negative impact		Unequal impact	
Please evidence the data and information you used to support this assessment	<p>The Gambling Act has as an objective to protect children and vulnerable groups from being harmed. The policy embraces the promotion of this licensing objective and thus ensures to protect those people who may be at risk of gambling harms due to their social or economic status.</p> <p>The Council engages with Hertfordshire Public Health and the Hertfordshire Gambling harms Alliance in the development of this statement of principles and the Local Area Profile which accompanies it. The Local Area Profile is referred to throughout this statement and helps the Council to identify areas of Stevenage where people may be more at risk of gambling harms due to their social and economic status.</p> <p>Each licence application is assessed on its merits and takes into account the views of all concerned, including those of the listed Responsible Authorities. However, we seek to minimise restrictions through the use of appropriate conditions, where possible, and only in extreme cases is there a refusal of an application.</p>				
What opportunities are there to promote equality and inclusion?	N/A		What do you still need to find out? Include in actions (last page)	N/A	

<p align="center"><b>Additional Considerations</b></p> <p align="center">Please outline any other potential impact on people in any other contexts</p>					
Positive impact		Negative impact		Unequal impact	
Please evidence the data and information	N/A				

<sup>1</sup>Although non-statutory, the council has chosen to implement the Socio-Economic Duty and so decision-makers should use their discretion to consider the impact on people with a socio-economic disadvantage.

you used to support this assessment			
What opportunities are there to promote equality and inclusion?		What do you still need to find out? Include in actions (last page)	

## Consultation Findings

Document any feedback gained from the following groups of people:

Page 410

Staff?	None	Residents?	None
Voluntary & community sector?	None	Partners?	<p>Consultation responses have been received from two Responsible Authorities. Stevenage Borough Council Planning Department, and Hertfordshire Safeguarding Adults Board</p> <p><b>The Planning Department</b> have asked for the post 'Development Control Manager' referenced on page 61 to be replaced with 'Head of Planning and Enforcement' to avoid communications relating to licensing matters being missed.</p> <p><b>Hertfordshire Safeguarding Adults Board</b> have provided a copy of the Hertfordshire Safeguarding Children Partnership Gambling Policy Statement.</p> <p><b>Hertfordshire Public Health</b> -Are pleased that the Council's statement of principles includes a section on 'Public Health and gambling' and have provided sources of evidence which they recommend including as references evidence of the harms caused by problem gambling. They refer to the Hertfordshire Gambling Harms Strategy, which is to be launched in early 2025, one of</p>

			<p>the strategic priorities included in the strategy is 'Influencing the licensing and regulatory environment' to protect vulnerable residents from the harm caused by gambling and be clear on the individual roles of the County Council and district and borough Councils. Public Health have recommended that 6.12 of the draft policy (Location) includes that applications will be considered against the cumulative impact of applications locally to protect children and vulnerable persons from being harmed or exploited by gambling</p>
<p>Other stakeholders?</p>	<p>Two Consultation responses have been received from GambleAware and Gamcare. These are organisations which offer free, confidential information, advice and support for people affected by gambling harm. GambleAware have provided some useful links to <a href="#">interactive maps</a> to show the prevalence of problem gambling and its severity in each local authority as well as usage of, and reported demand for treatment and support for gambling harms.</p> <p><b>GambleAware</b> are supportive of local authorities which conduct analysis to identify areas with increased risk levels. In particular they support those who also include additional licence requirements to mitigate the increased level of risk. Areas where there are higher than average resident or visiting populations from groups we know to be vulnerable to gambling harms include children, the unemployed, the homeless, certain ethnic-minorities, lower socio-economic groups, those attending mental health (including gambling disorders) or substance addiction treatment services.</p> <p><b>Gamcare</b> welcome the position the Council is taking to go beyond the mandatory and default conditions of the Gambling Act 2005 in it's statement of principles and express the importance of the Council developing a local picture of the level of gambling harms. In the absence of cumulative Impact Assessments as a method to which the 'aim to permit' approach can be challenged; Stevenage council should continue to pursue a Local Area Profile approach that specifically analysis gambling risk and use this data as a basis to scrutinise and possibly oppose a licensing application. It is also suggested that the changes to the Council's statement of principles should be viewed in the context of the Gambling Act Review and the process of the white paper consultations.</p>		

## Overall Conclusion & Future Activity

Page 412

Explain the <b>overall findings</b> of the assessment and <b>reasons for outcome (please choose one):</b>	
1. No inequality, inclusion issues or opportunities to further improve have been identified	<p>The statement is intended to aid with local decision making in conjunction with the Gambling Act 2005 and the Gambling Commission's guidance to licensing authorities.</p> <p>The statement supports a culture of openness where appropriate information can be accessed by all parties. Licensing Committee hearings, when required, will generally be held in public and any enforcement will be in line with the principles promoted within the Regulators' Code. Partnership working and exchange of information (within legal constraints) is also supported with a view to promoting better understanding between those providing gambling opportunities and those potentially affected by them.</p> <p>The Gambling Act has as an objective to protect children and vulnerable groups from being harmed. The policy embraces the promotion of this licensing objective and thus ensures that the age demographic, those with disabilities and those at risk of gambling harms because of their social or economic status are protected from certain licensable activities that may cause them harm. The Council will seek to mediate between applicants and objectors and reach negotiated settlements wherever possible.</p>
Negative / unequal impact, barriers to inclusion or improvement opportunities identified	2a. Adjustments made
	2b. Continue as planned
	2c. Stop and remove

Detail the <b>actions that are needed</b> as a result of this assessment and how they will help to <b>remove discrimination &amp; harassment, promote equal opportunities</b> and / or <b>encourage good relations</b> :				
Action	Will this help to remove, promote and / or encourage?	Responsible officer	Deadline	How will this be embedded as business as usual?

N/A				



**Approved by Assistant Director / Strategic Director:**

**Date:** 11<sup>th</sup> November 2024

Please send this EqIA to [equalities@stevenage.gov.uk](mailto:equalities@stevenage.gov.uk) for critical friend feedback and for final submittance with the associated project.

This page is intentionally left blank

**Meeting** Council  
**Portfolio Area** Community Advice and Support  
**Date** 26 February 2025



## COMMUNITY SAFETY STRATEGY 2025 - 2028

**AUTHORS:** SARAH PATEMAN  
**CONTRIBUTOR:**  
**LEAD OFFICER:** KERRY CLIFFORD

## KEY DECISION

### 1 PURPOSE

- 1.1 To present a final version of the draft Community Safety Strategy 2025-28, Appendix A, which outlines the emerging priorities of the SoSafe partnership for the next three years.
- 1.2 It is a statutory requirement under the Crime and Disorder Act 1988 (as amended by the Police and Justice Act 1996) for responsible authorities within an area to formulate and implement a Strategy for the reduction of crime and disorder (including anti-social behaviour adversely affecting the local environment); combatting the misuse of drugs, alcohol, and other substances and for education to prevent re-offending.
- 1.3 The Council's Constitution includes the Community Safety Strategy as a Budget and Policy Framework item and requires the final Strategy to be considered by Cabinet and recommended to Council for adoption.

### 2 RECOMMENDATIONS

- 2.1 That the Council:
  - a) Notes the duty placed on the Council and other responsible authorities to publish and implement a Community Safety Strategy that addresses the reduction of crime and disorder.
  - b) Notes the feedback from Cabinet (January and February 2025) and Overview and Scrutiny Committee (January and February 2025) and

recommends that the Community Safety Strategy is approved by Council.

- c) That delegated authority be given to the Strategic Director (RP) after consultation with the relevant Portfolio Holder and the So-Safe partnership, to agree and publish an annual Community Safety Action Plan and to make minor amendments to the Strategy.

### **3 BACKGROUND**

- 3.1 Community Safety is about feeling safe whether at home, in the community or at work. Stevenage is changing at speed with new homes being built and investment being made in the town to develop its commercial, food & beverage and leisure / cultural offers.
- 3.2 Community Safety Partnerships (CSPs) were introduced by Section 6 of the Crime and Disorder Act 1998 and brings together local partners to formulate and implement strategies to tackle crime, disorder and antisocial behaviour in their communities.
- 3.3 The responsible authorities that make up the Stevenage Community Safety Partnership are:
  - Stevenage Borough Council
  - Hertfordshire Constabulary
  - National Probation Service
  - Hertfordshire County Council
  - Hertfordshire Fire and Rescue Service
  - Local voluntary services
- 3.4 Community Safety Partnerships are also required to develop effective annual action plans to ensure that the priorities set out in the Strategy are achieved.
- 3.5 This Strategy will ensure that the SoSafe Community Safety Partnership utilises its resources in the most effective manner possible to deliver meaningful crime reduction outcomes. SoSafe is committed to building on progress achieved in recent years and will strive to continue to drive down crime and disorder in Stevenage. In the last three years, partners have continued to work to tackle Anti-Social Behaviour and Crime. SoSafe has introduced initiatives that have supported some of the most vulnerable people in the town making best use of partners' resources and targeting them effectively.
- 3.6 SoSafe actively engages with residents and facilitates co-production of interventions through consultation sessions, various forums, satisfaction surveys and forums. Working with members of the community enhances the profile of the Partnership and co-operative working.
- 3.7 The proposed Strategy accompanies this report. It is suggested that, subject to Members approving the Strategy for implementation, it should be adopted by the SoSafe partnership at the next SoSafe meeting in April 2025.
- 3.8 The key points for consideration are set out in the following sections of the report which outline the rationale upon which the recommendations are presented.

### **4. REASONS FOR RECOMMENDED COURSE OF ACTION AND OTHER OPTIONS**



4.1 The current SoSafe Community Safety Strategy 2021-2024 has now expired and the SoSafe Community Safety Strategy 2025-2028 builds on the previous Strategy and the key achievements that have been made against the previous five key priorities as identified below;

For the period **2021/24** the identified priorities were:

- Divert young people from becoming involved in crime and ASB.
- Provide safe reporting and support to domestic abuse survivors and victims of modern slavery.
- Promote reporting of hate crime and further promote equality in the community.
- Tackle the harms caused by drugs and alcohol.
- Work with partners to encourage reporting of crime and address perceptions of crime.

These priorities were underpinned by two overarching objectives to:

- Consult with the community and work co-operatively with partners and residents.
- Promote reporting of crime and Anti-Social Behaviour (ASB)

4.2 During April-October 2024, the SoSafe Community Safety Partnership engaged with key local partners to help shape the draft Strategy. The themes for the Strategy were further developed through engagement with residents and visitors to the town and were captured through social media consultations, surveys with clients and from data collected via the police Echo platform. The Council has engaged with over 1,200 residents and partners through the various consultation channels and the feedback gained, along with data from annual strategic assessments and information shared at both Partnership and client led meetings, has been analysed and used in the development of the Strategy.

4.3 The SoSafe partnership also actively engages with residents and facilitates co-production of interventions through consultation sessions, various forums, satisfaction surveys and working groups. Working with members of the community enhances the profile of the Partnership and co-operative working as well as giving live feedback during the duration of the Strategy.

4.4 Following consultation, the six key priorities identified and proposed for **2025-2028** are:

<p><b>Highlight the risks to the community of drug possession and crime.</b></p>	<p>Determined as a result of the community views collected anonymously through the Police’s Echo system. It has been identified that the biggest concern in Stevenage relates to drug use or dealing. This is followed by anti-social behaviour including noise and vehicle nuisance drug and parking.</p>
<p><b>Provide safe reporting and support to victims of Violence Against Women and Girls, including Domestic abuse.</b></p>	<p>After review of Community Safety Partnership Strategic Assessment and consultations with the community, we are aware that Violence Against Women and Girls, including domestic abuse is a point of concern. The SADA service records 1551 referrals for 2023-2024.</p> <p>For this reason, Violence Against Women and Girls, including domestic abuse has been made a priority and the SoSafe Partnership have created a Violence Against Women and Girls action plan.</p>

<b>Promote awareness of Cuckooing and the support available to victims.</b>	Cuckooing has been determined as a local priority as part of the Community Safety Partnership Strategic Assessment. Hertfordshire County Council have released a Cuckooing Pathway and Practice Guide to support agencies in relation to victims of cuckooing.
<b>Divert individuals from becoming involved in Anti-Social Behaviour.</b>	Determined because of the community views collected through resident consultations, street-meets and the Police's Echo system identifying that anti-social behaviour; including noise and vehicle nuisance, drug dealing and parking is of great concern to residents.
<b>Collaborate with Partners and Young People regarding the risks around County Lines and associated Anti-Social Behaviour.</b>	As a result of The Community Safety Partnership Strategic Assessment and feedback from partnership working with local schools, we have identified County Lines as a local priority. Local intelligence also highlights concerns around gang culture and peer pressure.
<b>Raise awareness around online fraud and the warning signs to the community.</b>	As a consequence of concerns raised by the community at various resident feedback sessions and partnership agencies, it has been agreed that online fraud will be a local priority.

The priorities above are underpinned by two proposed overarching objectives:

- Engage with the community and work co-operatively with partners/residents and those that visit the town.
- Work with the community to increase the reporting of crime and Anti-Social Behaviour (ASB).

4.5 Alongside the Strategy, a detailed action plan is produced each year, which identifies how SoSafe will achieve its aims and objectives. A copy of the action plan is attached at Appendix C. The action plan contains specific targets and is monitored, updated, and reviewed regularly ahead of each SoSafe meeting. The Action Plan is a working document that is updated as crime trends change and problem-solving strategies to tackle crime and anti-social behaviour are implemented.

4.6 The Community Safety Strategy has been developed with due regard to the following:

- National developments and changes to legislation
- Hertfordshire Police and Crime Commissioner (PCC) plan Everybody's Business
- Annual Strategic Assessment for Stevenage 2023/2024
- County Community Safety Unit (CCSU) domestic abuse strategy and the Survivors Against Domestic Abuse Strategy
- CCSU drugs and alcohol strategy
- Hertfordshire's Criminal Justice Board Strategy 2022-2025
- Historical and Current Crime Data.
- Customer Surveys
- Police Echo data

- 4.7 The draft Strategy report was recommended at Cabinet on the 15 of January 2025 and there were no further recommendations or comments.
- 4.8 Overview and Scrutiny sitting on the 21 January had oversight of the strategy where it was minuted that there were no questions or comments.
- 4.9 It is recommended that Cabinet recommends to Council that the Strategy is approved so that it can be adopted by the SoSafe Partnership in April, at the next SoSafe Community Safety Partnership meeting.

## **5 IMPLICATIONS**

### **5.1 Financial Implications**

- 5.1.1 The Council will utilise existing resources to support implementation of the strategy. There is a recognition that a number of existing activities that are securing positive impacts are reliant on time-limited funding which includes that from external sources. Given budgetary constraints within local government and the wider public sector, some of these activities will remain at risk unless sufficient core or external funding can be identified. SoSafe will continue to work with other commissioners and funders to help lever in investment wherever possible, this includes match-funding or pump priming opportunities related to specific initiatives and projects. Stevenage Borough Council have previously committed to funding internal services including Survivors Against Domestic Abuse, The No More Service and The Welfare, Benefit and Debt Advice team to enable residents and customers to access continued support.

### **5.2 Legal Implications**

- 5.2.1 Production of the strategy is a statutory requirement under the Crime and Disorder Act 1988 (as amended by the Police and Justice Act 1996). This act requires the responsible authorities for an area to formulate and implement a strategy for the reduction of crime and disorder (including anti-social behaviour adversely affecting the local environment); combatting the misuse of drugs, alcohol, and other substances and for the education of re-offending in the area.

### **5.3 Risk Implications**

- 5.3.1 The strategic commitment of key stakeholders in the development and implementation of the strategy will help mitigate key risks such as focussing on the wrong priorities or those over which the partners have little impact or influence. Risks will continue to be considered as interventions develop through the ongoing work of the SoSafe Partnership.

### **5.4 Policy Implications**

- 5.4.1 The Strategy links into other key SBC policies and Strategies including the safeguarding of children and vulnerable adults and the health and wellbeing strategy, and SADA Domestic Abuse Strategy.

### **5.5 Staffing and Accommodation Implications**

- 5.5.1 Community Safety is an overarching commitment. Officers in various positions across Community Advice & Support and Housing and Investment support implementation of the Strategy and the SoSafe Action Plan and other related policies

and procedures.

## **5.6 Equalities and Diversity Implications**

- 5.6.1 The Council is committed to providing high quality services that are relevant to the needs and responsive to the views of all sections of the local community, irrespective of their race, gender, disability, culture, religion, age, sexual orientation, or marital status. The General Equality Duty (Section 149 of the Equality Act 2010) requires the Council to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations in the exercise of its functions.
- 5.6.2 A full Equalities Impact Assessment has been completed, considering the implications of the Strategy for all communities. A copy of this Assessment is attached at Appendix D.
- 5.6.3 There is recognition that crime and anti-social behaviour can disproportionately impact upon those with protected characteristics outlined in the Equality Act. The emphasis on Hate Crime as part of the Strategy highlights the potential for this to happen at a local level. The partnership will be working with the community to encourage reporting of Hate Crime and further promote equalities across our communities. SoSafe strives to engage the community in the design and delivery of the interventions which tackle crime and drive down disorder and anti-social behaviour. Relationships will continue to be built with groups around the town, including those from different faiths, different communities, women, girls, and older people. It will be essential to ensure interventions meet specific needs for different parts of the community and are delivered in a meaningful and empowering way. The SoSafe Partnership works with the Equalities Commission and other partners to set up to explore the particular challenges facing people living in Stevenage and seeks to pro-actively tackle community safety issues as they emerge.

## **5.7 Service Delivery Implications**

- 5.7.1 The Strategy will influence and shape the work of the SoSafe Partnership and its delivery strands are clearly aligned back to the outcomes that are sought. This will also apply to the function of the Responsible Authorities Group that will oversee delivery of the strategy reporting to Stevenage Together.

## **5.8 Information Technology Implications**

- 5.8.1 The Team have established understanding and use of the REACT system, as well as Jigsaw and NEC.

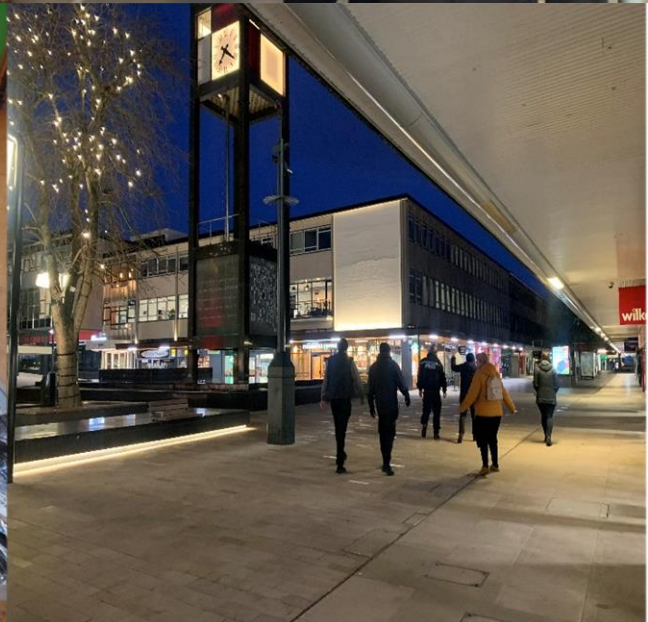
## **6 APPENDICES**

Appendix A – Draft Community Safety Strategy 2025/28  
Appendix B – SoSafe Action Plan  
Appendix C – EQIA

# Working Together to Make Stevenage Even Safer



## Community Safety Strategy 2025/2028



# Contents

Foreword	4
Introduction to SoSafe	6
Equalities and Data Protection	8
Findings from the Stevenage Borough Council 2024 Community Survey	9
Achievements	10
Key Differences between 2021/2024 and 2025/2028 strategies	11
Monitoring and Measuring our Performance	12
<b>Aims and Objectives</b>	13
How our services support the objectives	14
<b>Objective One -</b> Highlight the risks to the community of drug possession and crime.	15
<b>Objective Two -</b> Provide safe reporting and support to victims of violence against women and girls, including Domestic abuse.	16
<b>Objective Three -</b> Promote awareness of Cuckooing and the support available to victims.	17
<b>Objective Four –</b> Divert individuals from becoming involved in Anti-Social Behaviour	18
<b>Objective Five -</b> Collaborate with Partners and Young People regarding the risks around County Lines and associated Anti-Social Behaviour.	19
<b>Objective Six -</b> Raise awareness around online fraud and the warning signs to the community.	20
SoSafe Feedback	21
Acronyms/Glossary	22

# Foreword

I am pleased to present SoSafe's Community Safety Strategy for 2025/28. It outlines some of our successes and our priorities over the next three years and the actions we will take to address them.

Stevenage is a co-operative council that prides itself on collaborative working with partners and our communities. SoSafe will continue to address the issues our residents, visitors and those that work in our town see as a priority, by involving you in the decision making and by consulting with you.

Page 424  
In future years, as in the past three years, our priorities are what the people of the town have told us they want to see us focusing on. We have refreshed and focused our priorities following a local assessment of safety, crime, disorder and ASB in the town, which was supported by the results of consultation. There have been a number of new government policies and strategies, as well as legislative changes since the last Strategy, some of which have placed additional duties on Community Safety partners, and this new Strategy will ensure that these developments are reflected locally through robust multi-agency plans and joined-up working.

Within this Strategy there is an increased focus on violence and anti-social behaviour, setting out what we will do to tackle this, in recognition of the level of harm and fear that these can bring to communities. This reflects the national focus on serious violence and anti-social behaviour as outlined in the government's ASB Action Plan and in the measures around serious violence set out in the Police, Crime, Sentencing and Courts Act.

The SoSafe Community Safety Partnership approaches the next three-year plan from a sound foundation of achievement. However, challenges remain, and we want to do more. By working together in partnership with agencies and local communities we can tackle the root causes of crime, disorder, and anti-social behaviour, and break the generational cycle to build a safer, stronger community.

**Matt Partridge**  
*Chief Executive*



*Matt Partridge*



I am pleased to introduce our SoSafe Community Safety Strategy for the town for the next three years. In the past three years we have built strong relationships and working together, the Partnership has enjoyed many successes in reducing crime and antisocial behaviour, protecting, and supporting people with vulnerabilities. We are proud of these achievements, but there is more for us to do. The nature of crime and antisocial behaviour, and the impact upon individuals and our communities, are constantly evolving.

As a Partnership we must also evolve in our response, continuing to listen, learn, improve, and develop our approach and our ways of working. Over the next three years SoSafe will be working hard together with partner agencies and the community to continue to make Stevenage a safe place for everyone.

SoSafe is committed to building on progress made in recent years and will continue to work to reduce crime and disorder across Stevenage. Our partnership is strong and benefits from the clear commitment from a range of local organisations. SoSafe remains passionate about supporting the wellbeing of our residents, the town and creating safe environments for all of our communities. As there continues to be unprecedented pressures on public sector funding; this strategy will ensure that, as a co-operative council, we are effectively utilising all available resources to achieve value for money.

The values that underpin this strategy are based on co-operation. We will only tackle crime and anti-social behaviour through a shared approach, reliant on our residents and our partners. Over the following pages we have outlined those activities we have undertaken over the past 3 years and our plans for the next 3 years. I hope by reading this strategy you will see how SoSafe is working for the benefit of us all now and into the future.

**Councillor Conor McGrath**  
***Portfolio Holder – Stronger Communities***



*Councillor Conor McGrath*

# Introduction to SoSafe

SoSafe (Stevenage Community Safety Partnership [CSP]) is a strategic partnership, working to reduce crime and offending in accordance with the Crime and Disorder Act 1998. SoSafe is made up of key agencies that each bring their own unique specialism to the partnership. By working collaboratively with partners and our local communities, we have been able to make significant changes to the lives of those people who need support, guidance, and advice, whilst tackling crime, disorder and antisocial behaviour.

The CSP includes the following organisations:

- Stevenage Borough Council (SBC)
- Hertfordshire Constabulary
- National Probation Service
- Hertfordshire County Council (HCC)
- Hertfordshire Fire and Rescue Service (HFRS).
- Local voluntary services

This strategy provides a framework for the many activities and initiatives that the partnership aims to deliver to improve community safety and community confidence in the town. Following consultation with members of the public and partners, this strategy identifies the priorities that SoSafe will focus on over the next three years.

Alongside this strategy, a detailed action plan is produced each year, which shows how SoSafe will achieve its aim and objectives. It contains specific targets and is monitored, updated, and reviewed regularly.

The Community Safety Strategy has been developed with due regard to the following:

- National developments and changes to legislation
- Hertfordshire Police and Crime Commissioner (PCC) plan Everybody's Business
- Annual Strategic Assessment for Stevenage 2023/2024
- County Community Safety Unit (CCSU) domestic abuse strategy and the Survivors Against Domestic Abuse Strategy
- CCSU drugs and alcohol strategy
- Hertfordshire's Criminal Justice Board Strategy 2022-2025
- Historical and Current Crime Data.
- Customer Surveys
- Police Echo data
- Partnership Consultation

SoSafe could not achieve its objectives without help from the public. It is the duty of all citizens to play their part in making their communities safer. People can contribute by reporting crime and disorder, supporting criminal justice agencies, and by taking responsibility for their personal safety and the safety of others.

For ideas on other ways to get involved, please visit our website: [Community Safety Partnership \(stevenage.gov.uk\)](https://www.stevenage.gov.uk/community-safety-partnership)

## Stevenage Community Safety Partnership

Strategic

Operational

### SoSafe Strategic Partners Group (SSSPG)

Responsible authorities are under a statutory duty to ensure partnership work is in place within the Community Safety Partnership (CSP). The group meet regularly to review the strategic action plan, evaluate progress against identified priorities and share information

The responsible authorities are:

- Stevenage Borough Council (SBC)
- Hertfordshire Constabulary
- Hertfordshire Fire and Rescue (HFRS)
- East and North Herts Clinical Commissioning Group (ENHCCG)
- Hertfordshire County Council - Children's Services (HCC)
- County Community Safety Unit (CCSU)
- BeNCH Community Rehabilitation Company (CRC)

Co-operating bodies are:

- Police and Crime Commissioner's Office

Each responsible authority has the statutory duty to nominate a Designated Liaison Officer, whose role is to proactively facilitate information sharing between partners, ensure legislation is adhered to and that at least the minimum information sharing requirements are complied with.

Chair: Matt Partridge; Chief Executive, SBC  
Meet: Quarterly

Identify & Review

Deliver & Report

### County groups

- Community Safety Managers (CSM) meetings
- Multi Agency Risk Assessment Conference (MARAC)
- Multi Agency Public Protection Arrangements (MAPPA)
- Domestic Abuse Risk Management Sub Group
- Herts Safeguarding Board

### Youth action Panels

- Drug & Alcohol Networking meeting
- Multi Agency (MACE) Child Exploitation Group

### Community Safety Strategy

1. Divert young people from becoming involved in crime and ASB
2. Provide safe reporting and support to domestic abuse survivors and victims of modern slavery
3. Promote reporting of Hate Crime and equality in the community
4. Tackle the harms caused by drugs and alcohol
5. Work with partners to encourage reporting of crime and address perception of crime

### Action Plan Priorities 2024/25

1. Tackling All ASB
2. Serious Violence
3. Cuckooing
4. Drugs, Possession and Associated crime
5. Violence Against Women and Girls
6. County Lines and Serious & Organised Crime

### Joint Action Group (JAG)

JAG is an operational, multi-agency group responsible for delivering the Community Safety Action Plan. The group meet regularly to update on action points, identify any emerging problems and develop resolutions and initiatives aimed at reducing levels of crime and antisocial behaviour (ASB). The group also review and monitor community safety funding grants and ensure money is spent appropriately to deliver the priorities and issues identified.

The agencies involved include:

- Stevenage Borough Council – Community Safety; ASB; Safeguarding; Licensing; CCTV; No More Service; Homelessness; Environmental Health and Enforcement
- Hertfordshire Constabulary – ASB and Safer Neighbourhood Team (SNT)
- Hertfordshire Fire and Rescue (HFRS)
- Hertfordshire County Council (HCC) – Shared Anti-Fraud Service (SAFS) and Trading Standards
- Youth groups – Youth Connexions; YMCA and Child UK
- Spectrum CGL
- Stevenage Haven homeless shelter
- Local housing associations

Chair: Insp Nick Redfearn, Mel Cucos and Jessica Warren

### Multi-agency groups

- Multiple Needs Working Group  
SBC Meet: Six-weekly
- Healthy Relationships Healthy Babies  
Meet: Quarterly
- Stevenage Against Domestic Abuse (SADA) Working Group  
Meet: Six-weekly
- Stevenage Domestic Abuse Forum  
Meet: Monthly

### Police and Crime Commissioners Community Safety and Criminal Justice Plan

- Offender Pays
- Victims at the centre
- Business sense
- Public focus
- Protect local policing

# Equalities

Under the Equality Act (2010) the Council has a legal duty to fulfil the requirements of the Public Sector Equality Duty (PSED). Through this duty and in the application of this strategy, the council will carry out its functions in a way that:

- a. Removes discrimination, harassment, victimisation and any other conduct that is unlawful under the Equality Act (2010)
- b. Promotes equal opportunities between people who have a protected characteristic(s) and those who don't
- c. Encourages good relations between people who have a protected characteristic(s) and those who don't

Further information on the Council's fulfilment of the Equality Act (2010) is set out in the Equality, Diversity and Inclusion (EDI) Policy (2022) and Reasonable Adjustment Policy (2024).

Page 428

## Data Protection

The Council regards respect for the privacy of individuals and the lawful and careful treatment of personal information as very important to delivery of services.

The Council will ensure that it treats personal information lawfully and proportionately as set out in the General Data Protection Regulation (GDPR) and Data Protection Act (2018). For further information on the Council's approach to handling information please see [Data Protection Act \(stevenage.gov.uk\)](https://www.stevenage.gov.uk/data-protection-act).

# Findings from the Partnership Consultation and Customer Surveys

We asked members of the community: what makes Stevenage a safe place to live, work and visit? Some of the responses included:

- *Good Community Spirits*
- *Strong Police Presence*
- *Strong Response to Anti-Social Behaviour*
- *Good Levels of CCTV*
- *Well-lit areas.*

We also asked members of the community if there was anything that makes Stevenage unsafe. Some of the responses included:

- *Drug Use/Drug Dealing*
- *Anti-Social Behaviour*
- *Youth Nuisance*
- *Cuckooing*
- *Violence Against Women and Girls*

Page 129

The Police have also been collecting community views through their anonymous Echo system. The most talked about topic in Stevenage relates to drug use or dealing. This is followed by anti-social behaviour including noise and vehicle nuisance, drug dealing and parking.

Using local data, and information received from the public and elected members, we asked members of the community to vote and comment on the six aims proposed for this strategy. 89% of votes agreed with the priorities proposed:

- *Highlight the risks to the community of drug possession and crime.*
- *Provide safe reporting and support to victims of violence against women and girls, including Domestic abuse.*
- *Promote awareness of Cuckooing and the support available to victims.*
- *Divert individuals from becoming involved in Anti-Social Behaviour.*
- *Collaborate with Partners and Young People regarding the risks around County Lines and associated Anti-Social Behaviour.*
- *Raise awareness around online fraud and the warning signs to the community.*

These findings, together with talking to residents through surveys and events have helped us to determine our SoSafe aims and objectives for the next three years and influence our Action Plan. As our action plan is a live document, engaging with residents is an ongoing and key part of our approach as a co-operative Council. Throughout 2021 we completed a resident's survey which we will look to do again in Spring of 2025 to develop our understanding of resident views which will help us to update our action plan throughout 2025-2028.

# Achievements

The themes for the 2021/2024 strategy and the 2025/2028 were developed through engagement with residents and visitors to the town through social media consultations, surveys with clients and data collected from the police Echo platform. We also analysed data from strategic assessments and information shared at both partnership and client led meetings to develop our strategies and direct our achievements and future aims.

What we did in 2021/2024	What we are aiming to do in 2025/2028
Listened to community and together with partners implemented “build a better bedwell”, supported with funding from The Home Office’s Safer Streets Fund.	Co-operative working with external partners, The No More Service and The Rough Sleeper team to focus on highlighting the dangers of drug and alcohol among vulnerable people.
Worked with survivors of Domestic Abuse to support key areas, including Safeguarding of Children and Vulnerable Adults, and implementing a direct duty number for customers to contact the SADA service directly.	Implement a Violence Against Women and Girls partnership action plan to highlight the concerns around domestic abuse, rape and other sexual offences, stalking, ‘honour-based’ abuse as well as many others, including offences committed online.
Introduced youth interventions into local schools in Stevenage focusing on Peer Pressure, County Lines, and the dangers of drug use.	Continue to work with local schools and run awareness sessions with years 6 and 7 classes in relation to Peer Pressure, County Lines, and the dangers of drug use.
Attended “street-meets” within the local community in partnership with the Police and other agencies.	Further embed the work with partners and the community to encourage the reporting of Anti-social behaviour and use social media platforms to inform the community of positive outcomes.
Supported and raised awareness about Hate Crime around the Third-Party reporting centres across the town.	Using our various social media platforms and partner platforms, highlight issues around online fraud and the warning signs to the community.

# Key differences between 2021/2024 and 2025/2028 strategies

We continue to take a co-operative approach with partner agencies, volunteers, and residents to help make Stevenage a safer place to live, visit and work. The 2025/28 Community Safety Strategy highlights how we work together by using multi-agency problem solving methods and consulting with the community of Stevenage. The aim is to promote effective long-term change and to tackle crime and ASB. We have continued to monitor crime rates throughout the last three-year period through Police Priority Setting meetings. These meetings, which take place every three months, consider the crime and ASB concerns within local communities and then set the community priorities for the following quarter.

During 2021/24, our focus was on deterring communities away from ASB and crime as well as providing support to those that need it. As part we have implemented schemes to drive out organised crime and improving the quality of life for local residents. These projects have been targeted around supporting children and vulnerable adults to mitigate any risk around exploitation or criminal behaviour.

We continue to prioritise safeguarding people. The partnership provides safe reporting together with support for victims of hate crime, domestic abuse survivors, victims of modern slavery. The Safe Space innovative approach continues to expand as it aims to meet the needs of victims and survivors. We also provide domestic abuse perpetrator intervention through the No More Services; this includes providing 1-1 support to change offending behaviour and housing for perpetrators. This project allows us to safeguard victims of domestic abuse by housing and monitoring perpetrators away from their victims.

The end of 2024 has seen the introduction of Transformation at Stevenage Borough Council. Transformation is a journey to alter how the council operates and delivers services to customer to better improve customer experience. Transformation has brought together the Community Advise and Support Team, a large team built by a number of services that all have a collective goal – how can we provide advice and support to our customers? For more information about The Community advice and support team, please visit our website: [Community Advice and Support \(stevenage.gov.uk\)](https://www.stevenage.gov.uk)

The 2025/2028 strategy remains a key component of the Council's focus to continue efforts to tackle crime and help people feel safer. The strategy promotes partnership working to raise awareness and provide support to the residents of Stevenage.

We aim to help people feel safe and supported to report incidents of crime and Antisocial behaviour, helping us identify areas of concern so we can focus on implementing supportive measures in the areas that need them most.

The impact of drugs and alcohol continue to be a concern for the community. We are working co-operatively with residents to encourage the reporting of misuse of drugs and alcohol so we can address these issues. We continue to provide support to our residents with the most complex needs to help them make positive changes to their lifestyle and reduce the disruptive impact that they have on the community. The strategy will also focus partnership working to tackle crime and ASB in the town and help to make Stevenage a safer place to live, work and visit.

# Monitoring and Measuring our Performance

The SoSafe Action Plan and the commitment of the partners, and volunteers, are paramount to successfully implementing this strategy. As a co-operative council we are aware that we can achieve more by working together to deliver the services that ensure SoSafe achieves its objectives and delivers for the needs of the town.

The SoSafe partnership must rely on existing resources and making additional funding applications.

Below is a list of some of the successful External Funding Bids secured in 2021-2024:

<b>SADA</b>	Stevenage/Survivors Against Domestic Abuse	£1,423,000.00
<b>Safer Streets</b>	Supporting the work in Bedwell to help make the area safer	£350,000.00
<b>Family Intervention</b>	Supporting families to sustain their tenancies	£72,000.00
<b>Tacking youth crime</b>	The No More youth project	£399,000.00
<b>Op educa8</b>	Police and partner funding project in schools in Stevenage	£3,000.00

## How will we measure performance?

Performance indicators are agreed annually and reflect the agreed priorities and outcomes whilst considering the views of our customers. We will set SMART targets and measure these four times a year to check that we are making progress.

We will report on the progress made at our monthly SoSafe meetings with partners, at the SADA Board meetings and the Responsible Authorities Group (RAG) meetings.

To understand crime and associated disorder the Partnership needs to work together to address the underlying problems. Effective crime reduction relies on the partnership working with our communities to better understand what and where the issues lie. This helps us to direct Partnership resources efficiently and effectively and to deliver services in the right place at the right time.

Crime trends are monitored regularly, and performance against our targets is reported to the SoSafe group. This group includes SoSafe's most senior managers and the elected councillor with responsibility for community safety. Additionally, elected councillors sit on a scrutiny committee which challenges SoSafe's performance.

Hertfordshire's Police and Crime Commissioner (PCC) is the elected representative for policing matters who maintains strong links with the county's CSPs.



# So safe Aims

We have established two overarching aims for the 2025/28 strategy:

- Engage with the community and work co-operatively with partners/residents and those that visit the town.
- Work with the community to increase the reporting of crime and Anti-Social Behaviour (ASB).

# So safe Objectives

Within So Safe's overarching aims, we have established six key objectives:

1. Highlight the risks to the community of drug possession and crime.
2. Provide safe reporting and support to victims of violence against women and girls, including Domestic abuse.
3. Promote awareness of Cuckooing and the support available to victims.
4. Divert individuals from becoming involved in Anti-Social Behaviour.
5. Collaborate with Partners and Young People regarding the risks around County Lines and associated Anti-Social Behaviour.
6. Raise awareness around online fraud and the warning signs to the community.

# How Services Support the Objectives

**Objective One - Highlight the risks to the community of drug possession and crime.**

*Partnership working with No More Service, Adult Offender Protocol, Rough Sleeper Team, Op Educa8, Voluntary Sector organisations, Police and Probation Service.*

**Objective Two - Provide safe reporting and support to victims of violence against women and girls, including Domestic abuse.**

*Partnership working with SADA, Beacon, Herts County Council, Police, and other Local Authorities.*

**Objective Three - Promote awareness of Cuckooing and the support available to victims.**

*Partnership working with Housing Management, Police, Probation, CGL, No More Service and Rough Sleeper Team.*

**Objective Four - Divert individuals from becoming involved in Anti-Social Behaviour.**

*Partnership working with Police, No More service, Rough Sleeper Team, Housing Management, Probation and Neighbourhood Wardens.*

**Objective Five - Collaborate with Partners and Young People regarding the risks around County Lines and associated Anti-Social Behaviour.**

*Partnership working with Police, Probation, No More Service, Rough Sleeper Team, and Modern Slavery Service.*

**Objective Six- Raise awareness around online fraud and the warning signs to the community.**

*Partnership working with Police, Hertfordshire County Council, Citizens Advice, Welfare benefit Debt advice Team and Trading Standards.*



National  
Probation  
Service



HERTFORDSHIRE  
CONSTABULARY

Stevenage  
BOROUGH COUNCIL



# Objective One – Highlight the risks to the community of drug possession and crime

There were 1,769 drug possession offences and 272 drug trafficking offences recorded in Hertfordshire during 2023, Stevenage saw an increase in drug possession offences. Drug possession and the using of drugs impacts in several ways including crime, ASB, sleeping rough/homelessness and debt including rent arrears.

It is difficult to quantify exactly how much violence is directly linked to drug supply, as this is also exacerbated by lack of co-operation from victims where a drug link is suspected.

Cannabis use and growing for own use continues to be an issue that is not easy to tackle, with some people not even realising that smoking cannabis is illegal. The cultivation in Hertfordshire is heavily driven by cross-border criminality who exploit the private rented accommodation sector to obtain properties for cannabis grows.

## What will we do?

Use social media platforms to highlight the dangers of drug use and associated crime. We will work with partners and the community to highlight “hot spot areas” of drug use and associated crime.

Meet with the community through street-meets and other community engagement events to encourage reporting of crime and anti-social behaviour.

We will continue to promote services to engage as many clients as we can. We will continue with clients who are in prison to start their support plans before their release. We will be making contacts with the NHS, including at Lister Hospital and local GPs to encourage them making referrals to the No More Service for support around the misuse of drugs and alcohol. We will continue to work as a partnership to identify members of the community that needs access to support.

We will continue to support people to break the cycle of substance misuse or offending behaviour by putting practical solutions in place to tackle issues that cause or exacerbate this behaviour. By doing this, the No More Service will reduce the impact that drugs; alcohol and crime have on the individual and the community. We work alongside other support and enforcement agencies to take a collaborative approach providing an individually tailored support plan to help break entrenched behaviour. The ethos of the No More Service is to improve the person’s self-worth, help them to achieve positive outcomes (such as housing or a role in the community) enabling and motivating them to break the cycle of crime or substance use.

# Objective Two – Provide safe reporting and support to victim of violence against women and girls, including Domestic Abuse

Page 436

The term 'Violence Against Women and Girls' refers to acts of violence or abuse that we know disproportionately affect women and girls. Crimes and behaviour covered by this term include domestic abuse, rape and other sexual offences, stalking, 'honour-based' abuse (including female genital mutilation and forced marriage), as well as many others, including offences committed online.

Crimes of violence against women and girls are many and varied. While different types of violence against women and girls have their own distinct causes and impacts on victims and survivors, evidence shows that women and girls are disproportionately affected by many of these crimes. These crimes are deeply harmful, not only because of the profound effect they can have on victims, survivors, and their loved ones, but also because of the impact they can have on wider society, freedom and equality.

The most common offences being assaults with injury, assaults without injury and sending letters with the intent to cause distress or anxiety (this offence type includes the sending of texts, emails, social media).

## What will we do?

We will produce a Violence Against Women and Girls action plan feeding into local and national agendas which will raise awareness by informing the public about how and where they can

report Violence Against Women and Girls (including domestic abuse), empowering victims to come forward and seek advice from our dedicated Survivors Against Domestic Abuse (SADA) team and the volunteers from the SADA Forum.

SADA Drop-in services are currently available to victims of domestic abuse and will be extended to victims of Violence Against Women and Girls. This will provide a method for people to engage with those who are affected by Violence Against Women and Girls and grow their own peer support network. The support is available weekly in both a virtual and face to face capacity.

We will continue to work co-operatively with partners and survivors of domestic abuse to produce services that are customer-led and listen to the voice of the victim and survivor.

The service has been extended to offer support for those that have perpetrated domestic abuse. The aim of this is to provide intensive 1-1 support to change offending behaviour to work with the No More Service to change offender's behaviour by providing 1-1 support to address offending behaviour and complex needs.

# Objective Three – Promote awareness of Cuckooing and the support available to victims.

The most prevalent form of known exploitation is 'cuckooing'. By definition: *"Cuckooing is a practice where people take over a person's home and use the property to facilitate exploitation. It takes the name from cuckoos who take over the nests of other birds. The most common form of cuckooing is where drug dealers take over a person's home and use it to store or distribute drugs."*

Victims of cuckooing are usually vulnerable either through drug use or other vulnerabilities (e.g., mental health problems, learning difficulties) and are often subjected to other forms of exploitation including financial, psychological, and sexual exploitation, modern slavery, and drug-related labour (e.g., working as drug runners). Cuckooed properties and victims are also at risk of aggravated burglary and robbery from rival drug lines attacking occupants in order to steal drugs and money.

In Stevenage we have set up a joint process with the police to try and map who may be "vulnerable" to cuckooing and who may be perpetrators.

Cuckooing investigations in Hertfordshire usually fall into one of two scenarios, the first being where drug dealers take over a property, usually of one of their customers, to stay and deal from, the second where class A users will take over the address of other vulnerable persons as somewhere to sleep and associate, as well as consume drugs.

## What will we do?

We will work with our partnering agencies to encourage all local organisations working with drug users and/or vulnerable adults to routinely record intelligence of cuckooing and drug supply exploitation.

We will develop an awareness campaign for professionals and the public to identify signs of cuckooing and encourage reporting. Campaigning will include the use of social media platforms and community engagement events.

We will encourage regular recording of cuckooing and drug supply exploitation when identified in adult safeguarding referrals.

Through collaboration with local services and Hertfordshire Constabulary we will utilise powers under the Modern Slavery Act 2015 for prosecuting County Lines offenders where the criminal exploitation of vulnerable victims is involved.

The partnership will work with local services, including voluntary organisations to develop a multi-agency response to support the complex needs of victims of cuckooing.

# Objective Four – Divert individuals from becoming involved in Anti-Social Behaviour

Anti-social behaviour (ASB) is any conduct or activity that causes harm to an individual, to a community or to their environment. Incidents of ASB can range from something that is a mild annoyance (but causing harm) to something that causes fear and insecurity. ASB incidents can be one-off events or recurring situations.

Examples of ASB include neighbour nuisance, youth nuisance, fly tipping, begging, littering and graffiti, noise complaints and rowdy or inconsiderate behaviour.

Page 138

As a Local Authority we have a number of powers to tackle ASB: Criminal Behaviour Orders; Community Protection Notices; Public Space Protection Orders; closure power; dispersal powers; and civil injunctions.

In Stevenage we take a partnership approach to tackling ASB and have joint protocols with the police, this includes Closure Orders, supporting those that need to flee the area and the serving and prosecution of Community Protection Orders.

## What will we do?

We will raise awareness in the community and signpost people for support through Prevention programs for young people who are at risk of committing a crime or are involved in Anti-Social Behaviour.

We will work with Hertfordshire Constabulary by using interventions such as behavioural contracts and Community Protection warnings and notices which can be effective for reducing nuisance behaviour.

As a partnership we will introduce more Restorative Justice approaches. This is the practice of victims to meeting or communicating with their offender to explain the real impact of the crime. These approaches can be effective and support community projects.

We will continue with School-based programs, particularly with year 6 and 7 students to educate young people about the risks of committing a crime or becoming involved in Anti-Social behaviour.

We will signpost vulnerable individuals for support through services such as the No More Service to provide ongoing support to an individual that has previously committed crime/ Anti-Social behaviour.

# Objective Five – Collaborate with Partners and Young People regarding the risks around County Lines and associated Anti-Social Behaviour

The 2018 Home Office Serious Crime Strategy advises the NPCC definition of a County Line is *“a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas (within the UK), using dedicated mobile phone lines or other form of “deal line”. They are likely to exploit children and vulnerable adults to move and store drugs and money and will often use coercion, intimidation, violence (including sexual violence) and weapons”*.

Page 43

Drug supply in Hertfordshire continues to be dominated by the use of “deal” lines, either trafficking into the county remotely or based within Hertfordshire itself. Most known Organised Crime Groups (OCGs) operating in or from Hertfordshire are actively engaged in drug trafficking both Class A and Class B drugs.

In Stevenage we have been running awareness sessions with years 5/6 students in schools and as of 2022 in secondary schools. The aim is to talk to children and young people about peer pressure, County Lines, and gang culture.

Where lines are identified which match the National Crime Agency (NCA) county line definition, these are recorded on the National County Lines Intelligence Collection Matrix (CLICM), which is held by the National County Lines Coordination Centre (NCLCC). In terms of peripheral risk relating to county lines, Hertfordshire has low levels of recorded violence that can be linked or is suspected to be linked to drug dealing.

## What will we do?

We will continue to work with partners to offer a specialist youth service to run the No More Youth service in districts across the county. The project works with young people who are at risk of, or already involved in, violent offending, anti-social behaviour, crime or becoming involved in gang culture.

The No More Youth Support Worker provides intensive 1-1 support to assist clients to change their behaviours and make positive choices. Clients are assisted in employment, housing, and education. 150 young people in Stevenage have been referred to the No More Youth Service since the start of the project in 2021.

To complement the support offered by the No More Youth Service we will continue our work with local schools, partners, and the voluntary sector to deliver educational programs within school settings, to raise awareness about the risks surrounding County Lines and associated Anti-Social Behaviour.

# Objective Six – Rise awareness around online fraud and the warning signs to the community

Fraud is legislated under the Fraud Act 2006. It can be defined as *“when a person demonstrates dishonest conduct with intent to make a gain; or cause a loss or the risk of loss to another”*.

The National Fraud Intelligence Bureau (NFIB) reports that fraud reporting has transitioned back to pre-pandemic levels. National trends have been influenced by new events including the war in Ukraine and the cost-of-living crisis in the UK.

Overall reporting to Action Fraud decreased between 2022 and 2023 but the level of losses has increased, particularly among business victims. During 2023, Action Fraud received 326,199 reports of fraud with a loss of £2.1bn.

There are 49 fraud classifications designated by the Home Office. The top 10 classifications remain unchanged from 2022.

Online Shopping and Auction Fraud remains the most prevalent, followed by Other Advanced Fee Fraud and Cheque, Plastic Card, and Online Bank Account Fraud. In general terms, local reporting tends to mirror the national landscape.

## What will we do?

We want to raise awareness to the community that anyone can fall victim to fraud. We will use social media platforms to highlight the dangers of fraud and associated crime. We will be focusing on the various forms in which fraud can occur including, emails, social media, phone calls or in person. Our social media posts will provide advice and guidance that the community can use to keep themselves safe from fraud.

We will work in partnership with agencies to support victims of crime to report their experiences to Trading Standards, Anti-Fraud Services, Action Fraud, and other supporting services.

Often when discussing fraud, the focus is on the financial impact, not the emotional impact. We understand that falling victim to fraud can leave people feeling embarrassed, unsettled, and unsafe, and it can have a lasting impact on confidence.

We know the importance of talking about what's happened and helping people understand that incidents of fraud are increasingly sophisticated and are purposefully designed to posing as people or organisations you would trust. To ensure people know they are not alone or at fault, we will signpost victims to local services who can offer specialised support.



# SoSafe Feedback

Page 441



# Acronyms and Glossary

<b>ASB</b>	Anti-social Behaviour
<b>DASH</b>	Coordinated Action Against Domestic Abuse: domestic abuse, stalking and honour based violence (risk assessment tool)
<b>CCSU</b>	County Community Safety Unit
<b>CCTV</b>	Closed Circuit Television
<b>Class A Drugs</b>	Heroin, methadone, cocaine, crack, ecstasy, LSD and amphetamines
<b>CPS</b>	Crown Prosecution Service CPN/W
<b>CPN/W</b>	Community Protection Notice/Warning
<b>CSE</b>	Child Sexual Exploitation
<b>CSP</b>	Community Safety Partnership
<b>Cuckooing</b>	Cuckooing is a practice where people take over a person's home and use the property to facilitate exploitation. It takes the name from cuckoos who take over the nests of other birds. The most common form of cuckooing is where drug dealers take over a person's home and use it to store or distribute drugs
<b>DA</b>	Domestic Abuse
<b>DHR</b>	Domestic Homicide Review
<b>E&amp;NH CCG</b>	East & North Herts Clinical Commissioning Group
<b>HBV</b>	Honour Based Violence
<b>HCC</b>	Herts County Council
<b>HFRS</b>	Herts Fire and Rescue Service
<b>IOM</b>	Integrated Offender Management
<b>LGBT</b>	Lesbian, Gay, Bisexual and Transgender

<b>LIFE</b>	Local Intervention Fire Education
<b>LSP</b>	Local Strategic Partnership
<b>MNWG</b>	Multiple Needs Working Group
<b>NMS</b>	No More Service
<b>NPS</b>	New Psychoactive Substances
<b>NTE</b>	Night Time Economy
<b>OPCC</b>	Office of the Police and Crime Commissioner
<b>OWL</b>	Online Watch Liaison
<b>PCC</b>	Police and Crime Commissioner PCSO
<b>PCSO</b>	Police Community Support Officer
<b>RAG</b>	Responsible Authorities Group Strategic meetings with partners that meet quarterly to discuss the towns' Community Safety priorities
<b>RJ</b>	Restorative Justice
<b>SADA</b>	Survivors Against Domestic Abuse
<b>SARA</b>	Scanning, analysis, response and Assessment
<b>SMART</b>	Specific, measurable, attainable, realistic, timely
<b>SNT</b>	Safer Neighbourhood Team
<b>SOC</b>	Serious Organised Crime
<b>SoSafe</b>	Stevenage community safety Partnership
<b>SoStevenage</b>	Stevenage local strategic partnership
<b>YC Herts</b>	Youth Provision in Stevenage



This page is intentionally left blank



## Action plan 2024/25

The aims in this action plan were identified through our Annual Strategic Assessment and partnership survey. The aims are:

- Support those reporting or who are victims of crime and or Anti-Social Behaviour
- Work Co-operatively with Partners, elected members, and the community

The priorities for 2024/25, identified from the strategic assessment are:

- All ASB
- Serious violence
- Cuckooing
- Drugs possession and associated crime, which includes trafficking, cuckooing and knife crime
- VAWG, including domestic abuse sexual assaults, rape, and stalking & harassment
- County lines and Serious & Organised Crime (SOC)
- Fraud has been added following strategic conversations at the SoSafe meeting

They directly relate to the five strategic objectives within the SoSafe Community Safety Strategy 2021-24:

- 1. Understand the underlining causes as to why young people become involved in ASB and crime.**
- 2. Provide safe reporting, accommodations and support to domestic abuse survivors and victims of Modern Slavery.**
- 3. Promote reporting of hate crime and equality in the community and further develop training with staff.**

4. **To tackle fly tipping and related environmental crime co-operatively with partners.**
5. **Work with partners to encourage reporting of crime and address perceptions of crime.**

This action plan also has regard to relevant county wide strategies and the Police and Crime Commissioner's plan; and provides details about how priorities will be addressed by SoSafe throughout the year.

This document records actions that are conducted through partnership working – and is updated by the Joint Action Group (JAG). It **does not** record the work of individual agencies in tackling our priorities.

The action plan will be updated quarterly by the lead officers for each action. This is a 'live' document and will be assessed regularly by JAG considering shifting priorities, emerging issues and financial implications. Through quarterly police and councillor priority setting meetings, local area priorities may be subject to regular change, and may not necessarily directly reflect the priorities within this action plan.

The SoSafe Community Safety Partnership will receive quarterly updates on progress against the action plan. The Police and Crime Commissioner will receive half yearly budget updates.

## 1. Divert young people from becoming involved in crime and ASB

Aim	Action	Lead	Partners	Resources	Expected outcomes	Progress to date
<p>1.1 <b>Continue to promote the No More Youth service</b></p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 447</p>	<p>Visiting schools and other services to advertise the service</p>	<p>NMS</p>	<p>Police</p>	<p>Leaflets Posters Social Media Campaigns Visits to schools Events</p>		<p>Q1 NMYS – new leaflet completed and is being handing out by the team across Hertfordshire.</p>
	<p>Send messages out via social media</p>		<p>Community Development</p>			<p>Q2 Officers have been attending schools to promote the services and attending partnership events.</p>
	<p>Create posters and leaflets to hand out to individuals we are working</p>		<p>GP surgeries</p>			<p>Q3 Promotion of NMSY at Jackmans community day in Letchworth</p>
	<p>Produce videos on the service to share with partners</p>		<p>CAMHS</p>			<p>Q4</p>
<p>No More Youth team to visit schools in Stevenage to support pupils and teachers</p>	<p>Intensive Family Support Team (IFST)</p>	<p>Look at funding opportunities for 2025/26</p>	<p>SASH</p>			

<p>Page 448</p> <p><b>1.2 Educate young people in the dangers of using and becoming involved with “gangs” and carrying knives</b></p>	<p>Education campaigns on the impact that drugs have on a person wellbeing, Peer pressure and County Lines.</p>	<p>Police/JAG members</p>	<p>Police</p>	<p>Posters</p> <p>Social Media Campaigns</p> <p>Visiting schools</p>	<p>To provide education to young people to help them make better informed decisions of their actions.</p>	<p>Q1 NMYS has contacted junior schools in Stevenage about Op Educ8 and Leo has three sessions booked in already for The Leys, Giles and Longmeadow.</p>	
	<p>Research project regarding understanding the underlying reasons why young people get involved in crime/ASB</p>		<p>Community Development</p> <p>CGL</p> <p>Youth Connections</p>			<p>Social Media Campaigns</p>	<p>Q2 Overview of schools’ project shared with SoSafe members in July</p>
	<p>NPCC Drink Driving Campaign</p> <p>Educate young people on the impact their actions have on others in the Community.</p>		<p>Herts Road Safety Partnership</p> <p>JAG Members</p> <p>No More Service</p>			<p>JAG Members to lead on review of the Knife crime action plan</p>	<p>Q3 Sceptre week in November: test purchases in retail stores – all passed.</p>
	<p>Op Educ8</p> <p>To reduce the number of crimes including knives in Stevenage</p> <p>To promote Lives not Knives events facilitated by the police</p>		<p>Youth Offending Teams</p> <p>Turnaround Service</p>				<p>Q4</p>
<p><b>1.3 To educate young people about Child Criminal Exploitation (CCE)</b></p>	<p>Promote with partners and schools the ‘Are You Listening’ video</p> <p>Peer pressure talks in schools</p>	<p>Police</p>	<p>Police</p> <p>Community Development</p> <p>JAG Members</p> <p>Youth Connections</p>	<p>Video link</p> <p>Social Media</p>	<p>To promote the video ‘Are You Listening’ to help educate young people from the dangers of Child Criminal Exploitation</p>	<p>Q1 Events taking place during school holidays with No More Youth service around the county</p>	



			Herts Fire and Rescue SASH and Youth Offending Team			Q2 HCC are drafting an exploitation JSNA, once completed this will be shared with partners including SoSafe and JAG
						Q3
						Q4

## 2. Provide safe reporting and support to domestic abuse survivors and victims of modern slavery

Aim	Action	Lead	Partners	Resources	Expected outcomes	Progress to date
<p>2.1 To promote the Women's Centre and the courses it runs</p>	<p>To invite groups to use the Women's Centre to host training, learning and group sessions</p> <p>Promote the "Care" courses use hybrid method for attendance</p> <p>Promote the virtual drop in with Housing Associations</p>	<p>SADA (Tania King)</p>	<p>JAG members Police Community Safety</p>	<p>Existing Staff and Resources</p> <p>Attending schools</p>	<p>To expand the courses run and peer support for victims, survivors, and their families</p>	<p>Q1 Courses have been implemented for 2024/25 – CARE programme, You and Me, Mum</p> <p>Courses have been run in North Herts and Stevenage. A foodbank has also been run from the Stevenage drop-in</p>
						<p>Q2 Courses are being expanded to include evening sessions of You and Me, Mum</p>
						<p>Q3</p>
						<p>Q4</p>
<p>2.2 Expansion of SADA refuge provision and safe accommodation</p>	<p>To expand the SADA refuge service across all of Hertfordshire and provide support to victims of Domestic Abuse</p> <p>To expand the work with children and capturing their voice</p>	<p>SADA (Sarah Pateman)</p>	<p>JAG members Police Community Safety</p> <p>Schools</p>	<p>TBC</p>	<p>To have another refuge for those fleeing Domestic abuse that offers support</p> <p>Support for children and the recognition that they are victims too</p>	<p>Q1 Funding received to continue with the work with children in North Herts £10,000 from the Letchworth Heritage Foundation</p> <p>Q2 Further funding has been applied for to continue with the work</p>

						<p>around deprivation, the work in schools for this year commences January 2025</p> <p>Q3 Work has commenced with the food bank at North Herts to support clients through the winter months</p> <p>Q4</p>
<p>2.3 SADA staff to have IDVA training, You me and mum, modern slavery, and safeguarding</p> <p>109451</p>	<p>To have team members trained to be able to support visits, survivors, and their families</p>	<p>SADA (Tania King)</p>	<p>Police Women's Aid</p>	<p>Training course</p>	<p>Support for victims, survivors, and their families</p>	<p>Q1 1 member of the team completed management training 1 completed training to become a trainer 2 IDVA qualifications 1 ISVA Qualification</p> <p>Q2 Training was completed by the police around VAWG. The training was offered to partner agencies and was well attempted. The training was funded through a central fund which we applied for</p> <p>Q3 Work is to commence regarding plotting VAWG offences so we can</p>

						analyse what types of crime are recorded
						Q4
<b>2.4 Continuation and expansion of the County Modern Slavery project</b>	Backpacks to be given around the county to be provided to victims of modern slavery  Modern Slavery Action Plan signed off for 2024/25 by SBC/police	SADA (Roxie Chambers)	JAG members Police Community Safety	Backpacks Leaflets Posters	Training for partner agencies being carried out so colleagues have a better understanding and can spot the signs	Q1 Training continues around the county with partners, shared service with NHDC
						Q2
						Q3
						Q4

Page 452

**Promote reporting of hate crime and equality in the community**

<b>Aim</b>	<b>Action</b>	<b>Lead</b>	<b>Partners</b>	<b>Resources</b>	<b>Expected outcomes</b>	<b>Progress to date</b>
<b>3.1 To promote reporting of Hate Crime.</b>	Advertise where the Hate Crime 3 <sup>rd</sup> party reporting centres are and encourage residents to utilise them when they are needed.  For the team to receive ongoing training and know how and where to report Hate Crime	CCSU (Helen Whitehead)  SBC	CCSU JAG members Police Housing	The Hate Crime Strategy  Social Media  Existing staff and resources	Members of the public to be aware of where the Hate Crime 3 <sup>rd</sup> Party reporting centres are	Q1 Football matches arranges with residents of the IBIS hotel in July, with the Police
						Q2 Training and ongoing work with the NHS at the Lister to encourage the reporting of hate crime
						Q3 Hate crime awareness week and black history month including hate including pitch

Page 453						side talk with Stevenage FC at Noble School.
						Q4
	Advertise what the 5 types of Hate Crime are through further social media campaigns and at events	CCSU (Helen Whitehead) SBC	CCSU JAG members Police Housing	Social Media  Existing staff and resources	Raising awareness of what the 5 types of Hate Crime are and encouraging individuals to report if they are a victim of Hate Crime.	Q1 MAY - Hate crime leaflet produced in partnership with the police
	Planning group pulled together, following concerns around protests and possible riots in the town.	SoSafe members, Police, SBC	SBC, elected members, Police	Existing staff and resources	Support for ethnic minorities residing in the town and community reassurance	Q2 Reassurance social media posts  Q3 The Hate Crime JSNA for the county will be shared with partners  Q4

#### 4. Tackle the harms caused by drugs, alcohol and offending.

Aim	Action	Lead	Partners	Resources	Expected outcomes	Progress to date
<b>4.0 Supporting individuals to maintain current accommodation using the Housing Futures Model</b>	Partnership working to ensure the individual is getting all the support they need to help them maintain their accommodation.	SBC (Will Peters/Mel Cucos/Maddy Heredia)	Income Police Debt Advice Team Citizen's Advice Job Centre	Professionals' meetings  Food parcels	For individuals struggling with substance misuse to maintain accommodation instead of becoming homeless.	Q1 A team member will be sitting all the MAPPAs across the county as part of the AOP Hertfordshire Project

	<p>Adult Offender Protocol project being rolled out across Hertfordshire with funding from the serious violence fund and probation the project will run for 12 months from April 2024</p>	<p>SBC (Maddy Heredia)</p>	<p>Probation (MAPPA) prisons, approved premises, Public Protection Officers, local authorities</p>			<p>Q2 AOP project is being rolled out across the County with panels taking place for Stevenage, East Herts, Broxbourne, and Watford during August</p>	
	<p>DA perps being supported as part of the Evolve programme can access two properties managed by NMS</p>	<p>SBC (Mel Cucos)</p>	<p>Probation Police Debt Advice</p>	<p>Two self-contained flats Food parcels</p>		<p>Q3 NMS Evolve properties for high-risk offenders continue to be inhabited by clients supported by NMS</p>	
						<p>Q4</p>	
<p><b>Added August 2024</b></p> <p><b>4.1 Dangerous Dogs</b></p>	<p>Review process for dealing with dangerous dogs internally, update partners and website</p>	<p>SBC (Sarah Pateman, Karen Long, Donna Smith)</p>	<p>Co-operative Teams</p>	<p>Existing resources</p>	<p>Process to be written following meetings with Environmental Health</p>	<p>Q1 N/A</p>	
			<p>JAG members</p>			<p>Share process with partners internally and externally</p>	<p>Q2 Initial meeting took place 13/08/24</p>
							<p>Q3 Further meeting took place with Environmental Health who are looking into the legislation further and powers available</p>

						Q4
<p>4.2 <b>Develop a robust partnership process to support those who have experienced Cuckooing</b></p> <p>Page 455</p>	<p>Review the process implemented in 2023/24 and report to SoSafe Meeting Qtr3</p>	<p>SBC (Jessica Warren/Maddy Heredia/Mel Cucos)</p>	<p>Co-operative Neighbourhood teams JAG members</p>	<p>Existing staff and resources</p>	<p>Partners know the process and how to refer</p>	<p>Q1 Continuing to work with Police and partners to support victims of cuckooing including holding street meets in areas where we believe someone is being cuckooed.</p>
	<p>Work with partners to create a cuckooing process to help and support victims of cuckooing.</p>	<p>Police</p>			<p>To create a standard process to support victims of cuckooing and a fleeing framework to support them to leave their home and flee to another safe area.</p>	<p>Q2 Received cuckooing leaflets that have been distributed at events to make residents aware of the signs their neighbours may have been cuckooed.</p>
	<p>Work with partners through JAG so they know the process and how to refer</p>					
<p>Continue to use Police leaflet to inform residents of signs of cuckooing and what to report</p>						
<p>Work with the police on the review of the Serious &amp; Organised Crime profiles</p>		<p>Police (SOC team) SBC Sarah Pateman</p>				
						<p>Q3 Shared social media messaging from HSAB's campaign to coincide with ASB Week (18-24 November)</p>

	Build a better Bedwell & Safer Streets funding, report for SoSafe in Q3	SBC Jane Konopka	Police Housing Rough Sleeper Team			Q4
Page 456	<p>4.3 <b>Educate all drivers on the effects of drugs/alcohol and the Fatal 5</b></p> <p>Develop educational programmes (some online) to be delivered into schools, colleges and directly to vulnerable groups</p> <p>Raise awareness and educate the public about illegality of e-scooters</p> <p>Seasonal drink driving awareness campaign</p>	Suzanne Aldridge (HCC) Hertfordshire Road Safety Partnership	Police HFRS PCC Road Victims Trust National Highways	Existing staff and resources	To reduce the amount of killed and seriously injured on Hertfordshire roads.	Q1 Young driver/passenger programme offered to schools and colleges free of charge
						Q2 Visits to schools and colleges during safety events
						Q3 Designed education SM comms packages for distribution and include VMS
						Q4 Attended older people's safety events and other engagement activities.
4.4. <b>Expand "Evolve" in supporting perpetrators of domestic abuse</b>	Further develop the Evolve model to support perpetrators under the age of 18	SBC (Mel Cucos)	NMS For Baby's Sake Change Project Probation	Existing staff and resources	RESPECT Accredited  To reduce the number of repeat DA perpetrators in Hertfordshire.	Q1 Evolve youth program, now offered across Herts as part of the NMYS



	Review the two properties that support the Evolve project and the clients that have been through the program	Home Office Sarah Harris	Police SADA			Two houses for the Evolve perpetrator programme are up and running.
						Q2 A member of the SADA Board visited NMS Evolve properties and will feed back to the Board at the next meeting.
						Q3
						Q4

### 5. Work with partners to encourage reporting of crime and address perceptions of crime

Aim	Action	Lead	Partners	Resources	Expected outcomes	Progress to date
5.0 Promote the use of Crime Stoppers to report crimes anonymously, and encourage sign-ups to Herts	Educate members of the public on what Crime Stoppers is and how to use it	Police	Police	Social Media campaigns  Leaflets	An increase in use of Crime Stoppers as more individuals will feel safe reporting crimes and nuisance to the Police	Q1
						Q2
						Q3

<b>Connected and Business Watch</b>	Encourage signups to Business Watch and Herts Connected			Town-wide engagement events  Herts Connected platform	An increase in use of Herts Connected platform, as more individuals will feel safe reporting crimes and nuisance to the Police	Q4
<b>5.1 Tackle graffiti, fly-tipping and associated enviro crime</b>  Page 458	Review the Graffiti Project, including the work with schools  Produce data regarding the amount of fly tipping reported in the town  Review data for graffiti and fly-tipping so we can plot the trends throughout the year	SBC (Jessica Warren)  Police (NPT Inspector)	JAG members	Social Media  Town-wide engagement events	To educate members of the public the importance of reporting so that action can be taken.	Q1 Social media posts have been put out around Environmental Crime and the importance of reporting if someone has evidence of this.
						Q2 Continuing work on a graffiti action plan with partners and councillors. A Steering group has now been put together to tackle this.
						Q3 Meeting held to review graffiti process and highlight any areas for improvement, action plan created
						Q4

<b>5.2 Tackle perceptions of crime, by giving the public the facts, evidence, and statistical information, through social media posts</b>	Use the Herts Connected platform to inform elected members at the Police Priority Setting meetings  Continue to identify at events and through consultation what people's perceptions are of ASB and crime  Use information from street meets and neighbourhood surveys to review the views of the community regarding nuisance and crime	Police (NPT Inspector)  SBC (Jessica Warren)	HFRS Youth Connexions One YMCA Play Centres Targeted Youth Support Fire & Rescue JAG members	Existing staff / resources.  Town wide engagement events  Herts Connected platform	Increased understanding of the perception of ASB and crime in Stevenage  Year-on-year decrease in the perception of ASB and crime.  Positive engagement with the community	Q1  Q2 Echo is now closed. Everything is on Herts Connected.  Q3  Q4
	b) Actively promote ECHO and Herts Connected at events	Police (Neighbourhood Watch Co-ordinator?)	JAG members Housing, Fire & Rescue, Community Development, Wardens	Existing staff / resources.  Funding for publicity materials	Campaign undertaken.  Positive media stories  Social media campaign	

	c) Engage with the community to provide reassurance and develop information around crime.	SBC (Jessica Warren, Community Wardens, Housing staff)  Police (NPT Inspector)	Police, Housing, Community Advice & Support, SDS Community Development/ Neighbourhood Wardens	Existing staff / resources	Reports and information provided from patrols  ASB forum members reviewing policies/procedures  Social media posts  Partnership events	We have recently reset up the ASB forum and invited residents who have been through the ASB service in to speak with us and engage with them around the updated ASB Policy and
Page 460	d) Monitor ASB/crime from privately rented accommodation, and review to see if there are any patterns	SBC (Jessica Warren, Community Wardens, Housing staff)  Police (NPT Inspector)	Police, Housing, Community Advice & Support, SDS Community Development/ Neighbourhood Wardens	Existing staff / resources	Reports and information provided from patrols  ASB forum members reviewing policies/procedures  Social media posts  Partnership events	We have put out a post on social media to inform residents that cannabis use is illegal and that SBC can and will take action against private rented residents and homeowner as well as SBC tenants.
	<b>5.3 Promote Community Case Reviews (Community Trigger)</b>	Review of Case Reviews to be taken to SoSafe meeting Q4  Promote the use of Community Case reviews with a blog on the website	SBC (Madeline Heredia)  Police (NPT Inspector)	JAG members	Leaflets  Events  Social media	Increased awareness of trigger process  Q1 Case reviews are overseen by JAG members  Q2 Reviews will take place at the end of the JAG meetings and a report will be shared with SoSafe regarding the numbers and other data including vulnerability of the customer, whether

						<p>they are a tenant, enforcement action taken etc.</p> <p>Q3 Case Reviews continue to be heard by JAG</p> <p>Herts Police improving internal processes in Force Control Room when a Case Review-related call is received</p> <p>Q4</p>
<p>Ps Qd 461</p> <p>4.4 <b>Build Community Resilience for Scams and Fraud</b></p>	<p>Take action against perpetrators of scams and fraud</p>	<p>Trading Standards</p>	<p>JAG members Citizen's Advice Police</p>	<p>Existing staff / resources.</p>	<p>To support the scheme past its pilot stages and grows into a standard scheme within Stevenage.</p>	<p>Q1 Fraud has been highlighted as a priority for 2024/25</p>
	<p>Educate partners and the public about scams and fraud, to help build community resilience</p>					<p>Q2 Fraud is being highlighted as a hotspot and this will be included in the SoSafe Community Safety Strategy</p>
						<p>Q3 Citizens Advice created social media messages for the "12 days of scams" to be shared by all partners</p>

						Q4
5.5 <b>Promote the work around the VAWG agenda</b>	Social media campaign highlighting professional resources available to support safeguarding and promote safer cultures	Members of JAG	Police (NPT Inspector)  SBC (Mel Cucos)	Existing staff / resources	Increase awareness of resources available	Q1 A VAWG Action plan is being produced in partnership with the Police
	Review the action plan with partners at JAG and reviewed by SoSafe Q3					Q2 A piece of work is taking place regarding the reporting of crime under this heading, they will be reviewed at the SoSafe meeting
	Capture the voice of women and girls through surveys and interviews, to build and understand needs in Stevenage	Tania King (SBC) HCC Police				Q3 Police presentations at North Herts college to students, 2 x sites in September and October 2024. Ongoing inclusion with the years' curriculum.  Presentation to Taxi Driver Forum re: VAWG November 2024.  Ongoing NTE duties at licensed premises and

P 6.6 Promote safe travel by conducting campaigns						presentations during the winter months, leading up to Christmas/New year.  Work with Pub Watch to re-promote VAWG  Project Vigilant is being run in Stevenage High Street.
						Q4
	National seatbelt safety campaign event to be carried out.  Social media to advertise the campaign	Police (Georgina Yeasley)	NPT Inspector Catherine Davies	Existing staff / resources	To raise awareness around drivers and passengers wearing seatbelts.	Q1  Q2  Q3 Joint working between SBC and Police around taxis and spotting CCE/VAWG, as well as educating the public about how to recognise properly licensed taxis

						Q4
<p>5.7 Home Office Anti-Social Behaviour Strategy Boards 'local delivery principles' which seek to describe a consistent approach to understanding and addressing ASB in local communities</p>	<p>1. Victims should be encouraged to report ASB and expect to be taken seriously. They should have clear ways to report, have access to help and support to recover, and be given the opportunity to choose restorative approaches to tackling ASB.</p> <p><b>Victims and complainants are all ways taken seriously and encouraged to report any nuisance they witness. There are clear pathways to reporting ASB currently, but this can all ways be improved, we will therefore review this process. We have previously used Restorative Justice and media as a tool to resolving ASB. I do have an issue with using the word "victim" it implies that someone is a victim and although they may have experienced ASB or crime this doesn't necessarily make them a "victim" we prefer to use the name "complainant"</b></p> <p>2. Agencies will have clear and transparent processes to ensure that victims can report ASB concerns, can understand how the matter will be investigated and are kept well informed of progress once a report is made.</p> <p><b>Our policies and procedures are clear and transparent; an action plan is completed with the complainants so that they have a clear understanding of the process. The plan also asks how they would like to be contacted and how often. A risk assessment is also completed.</b></p> <p>3. Agencies and practitioners will work across boundaries to identify, assess and tackle ASB and its underlying causes. Referral pathways should be clearly set out between services and published locally. This includes pathways for the community trigger and health services.</p> <p><b>The ASB Officers, and Officers with Community Advice &amp; Support have established excellent links with partners, referral pathways are clear and are essential for the running of the different</b></p>					



**services within the team. Pathways for reporting ASB are set out on the website; this can also be accessed by telephone or in person.**

**4. The public's ASB concerns should always be considered both nationally and locally in strategic needs assessments for community safety. Best practice should be shared through a network of ASB experts within each community safety partnership, each policing area and nationally. For 2024/25 we want to introduce dip sampling of ASB cases and those specifically where there has been a partnership input so we can be sure of best practice and support for our customers**

**The strategic assessment is initially discussed with the Chief Inspector and the Community Advice & Support Manager; it is then shared with partners at JAG and once agreed shared with colleagues at SoSafe.**

**5. Adults and children who exhibit ASB should have the opportunity to take responsibility for their behaviour and repair the harm caused by it. Agencies should deliver appropriate interventions, which may include criminal justice options, based on the seriousness, risks and vulnerabilities of the case.**

**Both the community safety team and the wardens work closely with probation and their pay back scheme. The team can also offer restorative justice and mediation.**

## Partnership principles

The CSP has a set of guiding principles which can be applied to all of the partnership's projects, initiatives and operational work.

1. Partners share information in order to reduce and prevent crime.
2. Partnership resources are used intelligently.
3. Problems are better solved collectively.
4. Partners trust each other's expertise and integrity.
5. Strong leadership is guided by a set of overarching strategic priorities.
6. Operational strategy is based on the expected outcomes.
7. Evaluation is important, in order to encourage improvement.

8. Innovation and imagination enable change and growth.
9. Partners are willing to adapt and change in order to learn, develop, and improve.
10. Early intervention is usually a better solution than intervention.
11. Public engagement and good communications ensure Stevenage people receive consistent messages.

<b>Abbreviations</b>			
ASB	Anti-social behaviour	NhW	Neighbourhood Watch
CSE	Child Sexual Exploitation	OWL	Online Watch Link
DA	Domestic Abuse	PCC	Police and Crime Commissioner
DHR	Domestic Homicide Review	PPO	Prolific, persistent offender
FGM	Female Genital Mutilation	RAG	Responsible Authorities Group
JAG	Joint Action Group	SADA	Survivors Against Domestic Abuse
HCC	Herts County Council	SAFS	Shared Anti-Fraud Service
HFRS	Hertfordshire Fire and Rescue Service	SBC	Stevenage Borough Council
HYH	Herts Young Homeless	SFCF	Stevenage Football Club Foundation
MAPPA	Multi Agency Public Protection Arrangement	SOC	Serious and Organised Crime
MARAC	Multi Agency Risk Assessment Conference	WHBC	Welwyn Hatfield Borough Council



Community Safety Strategy 2024-2029

# Equality Impact Assessment (EqIA) Form

[October 2024 - October 2028]

<b>Date created</b>	October 2024
<b>Approved by</b>	Cabinet
<b>Owner</b>	Sarah Pateman
<b>Version</b>	1
<b>Author</b>	Sarah Pateman
<b>Business Unit and Team</b>	Strategic Community Safety Community Advice and Support

Please [click this link](#) to find the EqIA guidance toolkit for support in completing the following form.

For translations, braille or large print versions of this document please email [equalities@stevenage.gov.uk](mailto:equalities@stevenage.gov.uk).

**First things first:**

## Does this policy, project, service, or other decision need an EqlA?

<b>Title:</b>	Community Safety Strategy 2025-2028	
<b>Please answer Yes or No to the following questions:</b>		
Does it affect staff, service users or the wider community?		Yes
Has it been identified as being important to particular groups of people?		No
Does it or could it potentially affect different groups of people differently (unequal)?		No
Does it relate to an area where there are known inequalities or exclusion issues?		No
Will it have an impact on how other organisations operate?		Yes
Is there potential for it to cause controversy or affect the council's reputation as a public service provider?		No

<b>Where a positive impact is likely, will this help to:</b>	
Remove discrimination and harassment?	Yes
Promote equal opportunities?	Yes
Encourage good relations?	Yes

**If you answered 'Yes' to one or more of the above questions you should carry out an EqlA.**

Or if you answered 'No' to all of the questions and decide that your activity doesn't need an EqlA you must explain below why it has no relevance to equality and diversity.

You should reference the information you used to support your decision below and seek approval from your Assistant Director before confirming this by sending this page to [equalities@stevenage.gov.uk](mailto:equalities@stevenage.gov.uk).

I determine that no EqlA is needed to inform the decision on the .

Name of assessor:

Decision approved by:

Role:

Role: Assistant Director

Date:

Date:

# Equality Impact Assessment Form

For a policy, project, strategy, staff or service change, or other decision that is new, changing or under review

<b>What is being assessed?</b>		Community Safety Strategy 2025-2028			
Lead Assessor	Sarah Pateman			Assessment team	Community Advice and Support
Start date	October 2024	End date	October 2028		
When will the EqIA be reviewed? (Typically every 2 years)	October 2026				

Page 469

Who may be affected by the proposed project?	All residents in Stevenage will benefit through agencies working effectively in partnership together.
What are the key aims of the proposed project?	<p>It is a statutory requirement that Crime &amp; Disorder Reduction Partnerships (CDRPs) produce a three-year crime reduction plan which is refreshed annually in the form of an action plan.</p> <p>The aim of the partnership plan is to identify how agencies will work together to tackle crime and disorder in Stevenage. The plan sets out the three-year priorities and the actions that will be taken to meet the priorities.</p> <p>The priorities were identified through a strategic assessment which analysed patterns and trends in crime over 2021/2024</p> <p>The outcome will be reduced levels of crime and disorder in Stevenage, achieved through a co-ordinated response from partners.</p>

What <b>positive measures</b> are in place (if any) to help <b>fulfil our legislative duties</b> to:					
Remove discrimination & harassment	SBC is a third party reporting centre for hate crime / discrimination and actively encouraging more organisations to sign up as third party reporting centres to reach the wider community.	Promote equal opportunities	The service priorities aim to promote equalities through partnership working to ensure that all Stevenage residents have equal opportunity access services.	Encourage good relations	Engagement with a wide range of residents, community safety partners and Services. Developing relationships with vulnerable groups through targeted outreach.

What sources of data / information are you using to inform your assessment?	<p>We have used data/information available both locally and nationally, assessments are up to-date.</p> <p>The strategic assessment highlighted particular groups of people that are affected by certain types of crime. This includes victims and perpetrators. This information can be used to identify trends that need to be targeted by the partnership.</p>
---	---

In assessing the potential impact on people, are there any overall comments that you would like to make?	It has been identified that more widespread engagement with different groups within the community needs to take place. Engagement tends to happen most easily with people who have an issue to discuss, for example, those who attend the Street Meet events. Over the coming year we will be seeking ways of ensuring engagement is more widespread and covers those groups which are harder to reach.
--	---

## Evidence and Impact Assessment

Explain the potential impact and opportunities it could have for people in terms of the following characteristics, where applicable:

**Age**

Positive impact	Positive impact	Yes	Negative impact	None	Unequal impact
Please evidence the data and information you used to support this assessment	<p>Younger people are often vulnerable to being involved in crime. Education and diversionary activities are carried out with these groups. Young offenders have specific services provided for them.</p> <p>Older people are often vulnerable to certain types of crime and can be more fearful than other age groups. Crime prevention advice and visits are provided. A lack of understanding between generations can lead to mistrust and anxiety. We aim to increase understanding between generations.</p>				
What opportunities are there to promote equality and inclusion?	Support is provided to those of all ages who may be at risk of criminal exploitation or vulnerable to being a victim.		What do you still need to find out? Include in actions (last page)		

**Disability e.g., physical impairment, mental ill health, learning difficulties, long-standing illness**

Positive impact	Positive impact	Yes	Negative impact	None	Unequal impact
Please evidence the data and information you used to support this assessment	<p>Those with disability support needs may be considered more vulnerable to becoming a victim of crime and less likely to report crime or access support.</p>				
What opportunities are there to promote	Specialist support is provided to those who may need it. Including raising awareness in		What do you still need to find out?		Further research needs to take place in relation to the services we can provide for

equality and inclusion?	the community in relations to vulnerable disabled individuals being exploited in relation to fraud and cuckooing.	Include in actions (last page)	people who have a disability. Exploring what provisions are available for those with learning difficulties, deaf and deaf-blind.
-------------------------	---	--------------------------------	--

### Gender Reassignment

Positive impact	Yes	Negative impact	None	Unequal impact	None
Please evidence the data and information you used to support this assessment	Gender reassignment may make individuals more vulnerable to crime. Data shows that 80% of transgender individuals have experienced at least one incident of domestic abuse in their lifetime. SoSafe partnership works with specialist domestic abuse services to ensure male and female victims of domestic violence are fully supported.				
What opportunities are there to promote equality and inclusion?	Specialist support is provided to those to victims of violence against women and girls and domestic abuse, regardless of gender reassignment.	What do you still need to find out? Include in actions (last page)			

Page 472

### Marriage or Civil Partnership

Positive impact	None	Negative impact	None	Unequal impact	None
Please evidence the data and information you used to support this assessment	Within the last year we have not had any service data to show that there would be any impact on this group. Staff do have an awareness of this particular group and as with any other groups will ensure that no group is disadvantaged.				
What opportunities are there to promote equality and inclusion?			What do you still need to find out? Include in actions (last page)		



Pregnancy & Maternity					
Positive impact	Positive Impact	Negative impact	None	Unequal impact	None
Please evidence the data and information you used to support this assessment	The partnership notes that with some crimes, pregnancy and maternity may be a factor. Data shows that when a woman is in a domestic abuse relationship and she is pregnant/had a baby in the last 18 months, she is more likely to be assaulted.				
What opportunities are there to promote equality and inclusion?	Specialist support is provided to those to victims of domestic abuse and the partnership will continue to raise awareness of domestic abuse.	What do you still need to find out? Include in actions (last page)			

Race					
Positive impact	Positive Impact	Negative impact	None	Unequal impact	None
Please evidence the data and information you used to support this assessment	This strategy will be for all those living within Stevenage, Including BME groups. Hate crime can be a problem for some ethnic groups and language can be a barrier to understanding the services provided.				
What opportunities are there to promote equality and inclusion?	The partnership will continue to raise awareness of the support services available and the methods of accessing those services. It will also raise awareness that the council is a third-party reporting centre for hate crime and support those that are victims of hate crime.	What do you still need to find out? Include in actions (last page)			

### Religion or Belief

Positive impact	Positive Impact	Negative impact	None	Unequal impact	None
Please evidence the data and information you used to support this assessment	The strategy is for all within Stevenage irrespective of religion or beliefs but the partnership notes that hate crime can be a problem for some religious/belief groups.				
What opportunities are there to promote equality and inclusion?	The partnership will continue to raise awareness that the council is a third-party reporting centre for hate crime and support those that are victims of hate crime.	What do you still need to find out? Include in actions (last page)			

### Sex

Positive impact	Positive Impact	Negative impact	None	Unequal impact	None
Please evidence the data and information you used to support this assessment	The partnership acknowledges that some crimes, like domestic abuse are more gendered. While data shows that the majority of victims are from women, the team are aware that men can also be at risk of domestic abuse and the same consideration should be given to them as well as women. SoSafe partnership works with specialist domestic abuse services to ensure male and female victims of domestic violence are fully supported, as well as victims of violence against women and girls.				
What opportunities are there to promote equality and inclusion?	Continue to raise awareness about domestic abuse and what support services are available to victims.	What do you still need to find out? Include in actions (last page)			

### Sexual Orientation e.g., straight, lesbian / gay, bisexual

Positive impact	Positive Impact	Negative impact	None	Unequal impact	None
Please evidence the data and information you used to support this assessment	The strategy will be for all communities within Stevenage irrespective of sexual orientation, but the partnership notes that hate crime can be a problem for the LGBTQ+ community.				
What opportunities are there to promote equality and inclusion?	The partnership will continue to raise awareness that the council is a third-party reporting centre for hate crime and support those that are victims of hate crime.	What do you still need to find out? Include in actions (last page)			

<b>Socio-economic<sup>1</sup></b>					
<b>e.g., low income, unemployed, homelessness, caring responsibilities, access to internet, public transport users, social value in procurement</b>					
Positive impact	Yes	Negative impact	None	Unequal impact	None
Please evidence the data and information you used to support this assessment	Data reflects that individuals from lower socio-economic communities are more vulnerable to crime and are likely to be exposed from a young age, leading to those young people likely committing crime themselves.				
What opportunities are there to promote equality and inclusion?	Support from services is available for free to those who need to access it.	What do you still need to find out? Include in actions (last page)			

<sup>1</sup>Although non-statutory, the council has chosen to implement the Socio-Economic Duty and so decision-makers should use their discretion to consider the impact on people with a socio-economic disadvantage.

	Continue to work with schools to reach young people who may be considered deprived and exposed to crime to provide support and negate their likeliness of future criminal activity.		
--	---	--	--

## Consultation Findings

Document any feedback gained from the following groups of people:

Page 476

Staff?	Staff reported that working with partners is the key to problem solving and providing support the community.	Residents?	Residents are consulted with at various opportunities through service surveys. This allows us to adapt to resident needs and report back any trends to the partnership.
Voluntary & community sector?	Voluntary Sectors agree that in order to make a difference it is essential that we work co-operatively, and information is shared regularly.	Partners?	Partners agree that in order to make a difference it is essential that we work co-operatively, and information is shared regularly.
Other stakeholders?			

## Overall Conclusion & Future Activity

Explain the <b>overall findings</b> of the assessment and <b>reasons for outcome (please choose one)</b> :		
1. No inequality, inclusion issues or opportunities to further improve have been identified		
Negative / unequal impact, barriers to inclusion or improvement opportunities identified	2a. Adjustments made	As below
	2b. Continue as planned	
	2c. Stop and remove	

Detail the <b>actions that are needed</b> as a result of this assessment and how they will help to <b>remove discrimination &amp; harassment, promote equal opportunities</b> and / or <b>encourage good relations</b> :				
Action	Will this help to remove, promote and / or encourage?	Responsible officer	Deadline	How will this be embedded as business as usual?
To engage more fully with the public in informing them of the work of the partnership and seeking their views on community safety issues.	This will promote the work of the SoSafe partnership and shaping the partnerships focus on what the community needs are.	SoSafe Partnership Partnership Services	October 2028	Will become part of the normal monitoring processes.
Further research needs to take place in relation to the services we can provide for people who have a disability. Exploring what provisions are available for those with learning difficulties, deaf and deaf-blind.	This will promote equal opportunities for all residents by ensuring everyone in the community can access the services they need to in a way that suits them.	SoSafe Partnership Partnership Services	October 2028	Will become part of the normal monitoring processes.

Page 477

**Approved by Assistant Director / Strategic Director:**

**Date: October 2024**

Please send this EqIA to [equalities@stevenage.gov.uk](mailto:equalities@stevenage.gov.uk) for critical friend feedback and for final submittance with the associated project.





**Meeting:** COUNCIL

Portfolio Area: Members' Services

**Date:** 26 FEBRUARY 2025

## **MEMBERS' ALLOWANCES SCHEME 2025/2026 – REPORT OF THE INDEPENDENT REMUNERATION PANEL**

Author –	Luke Fattorusso	Ext. 2714
Lead Officer –	Matt Partridge	Ext. 2456
Contact Officer –	Luke Fattorusso	Ext. 2714

### **1. PURPOSE**

- 1.1 To receive the report of the Independent Panel (IRP) on Members' Allowances and, subject to consideration, approve the Scheme of Allowances for 2025/26 onwards.

### **2. RECOMMENDATIONS**

- 2.1 That the report of the Independent Remuneration Panel be noted and, subject to Members' consideration, that the findings of the report form the basis of the formal Members' Allowances Scheme for 2025/26 onwards, including:
- the Basic Allowance, Special Responsibility Allowances, and all other Discretionary Allowances remained unchanged from 2024/25 for 2025/26, and
  - That for 2026/27 and 2027/28 the Basic Allowance, Special Responsibility Allowances, and the Co-optees' Allowances increase in line with the Retail Price Index [RPI].
- 2.2 That, in the light of Recommendations 2.1 above, the draft formal Members' Allowances Scheme, as shown at Appendix B to this report, be approved for 2025/2026 onwards.
- 2.3 That an Independent Remuneration Panel be convened in the Autumn of 2027 to consider the Members' Allowances Scheme for 2028/2029 onwards.
- 2.4 That the Democratic Services Manager undertakes a campaign in advance of 2027 to recruit new members to form the Independent Remuneration Panel.

### **3. BACKGROUND**

- 3.1 In accordance with the Local Authorities (Members' Allowances) (England) Regulations 2003, before an authority makes or amends a Members'

Allowances Scheme, that authority shall have regard to the recommendations made to it by an independent remuneration panel.

3.2 The Council's Independent Remuneration Panel currently comprises –

- Marian Hurlle BEd, DMS, Former CEO Stevenage Citizens Advice Bureau;
- Nicholas Moss OBE JP, Independent Person, North Hertfordshire District Council; and
- Bill Welch ACIS, Former Corporate Director, Stevenage Borough Council

3.3 The last full review of the Stevenage Members' Allowances Scheme by an Independent Panel was reported to Council in January 2024.

#### **4. REASONS FOR RECOMMENDED COURSE OF ACTION AND OTHER OPTIONS**

4.1 The report of the Panel is attached at Appendix A and the proposed Members' Allowance Scheme for 2025/26 can be seen at Appendix B.

4.2 As well as convening to consider the Members Allowances in the context of amounts payable to members of other boroughs and districts in Hertfordshire, the IRP also included benchmarking information with comparator authorities which, like SBC, still possess their own Housing stock, as recommended by Council at its meeting on 24 January 2024.

4.3 Following on from the report of the previous year, the Panel acknowledged that the allowances currently paid to Members of Stevenage Borough Council remain higher than those paid to members of most other Borough and District councils in Hertfordshire.

4.4 The Panel further noted that there was no correlation between the size of a council's housing stock and allowances paid to Members. The basic allowance payable to Stevenage Members is still the highest even though the Council's housing stock is not the largest in the comparator group.

4.5 The Panel therefore recommended that that the Basic Allowance, Special Responsibility Allowances and Discretionary Allowances remain unchanged for the year from 1 April 2025.

4.6 In accordance with the regulations, on receipt of the Panel's report the Council has ensured that copies are available for inspection by members of the public at Daneshill House and placed a public notice in the 6 February 2025 edition of the Comet newspaper. The public notice stated that recommendations from the Panel have been received; describes the main features of the Panel's recommendations and the recommended amounts for each allowance; and stated that copies of the report were available for inspection at the Council's offices.

4.7 It is for Council to consider the report of the Panel and agree a Scheme.



## **5. IMPLICATIONS**

### **5.1 Financial Implications**

5.1.1 Subject to approval of the recommendations in this report, the funding for the proposed Scheme is included in the Cabinet's February 2025 Council Tax and General Fund Budget report for 2025/26.

### **5.2 Legal Implications**

5.2.1 The provisions of the Local Authorities (Members' Allowances) (England) Regulations 2003 have directed the convening of the Independent Panel; its consideration, report and recommendations; and the process of publicising the recommendations

5.2.2 In making or revising the Scheme, the Council must have regard to the Panel's report but is not strictly obliged to follow its recommendations, although it would be advisable to have good reasons for not doing so.

5.2.3 The 2003 Regulations stipulate that a Panel can make recommendations for one year or index-link annual increases to Members' Allowances for a maximum of four years. However, as the Stevenage Panel's recommendations only relate to the years 2025/26, 2026/27 and 2027/28, the Panel will need to be convened in the Autumn of 2027 to consider a Scheme for 2028/2029 onwards.

## **APPENDICES**

- Appendix A – Report of Independent Remuneration Panel: December 2024
- Appendix B – Proposed Members' Allowances Scheme for 2025/2026

## **BACKGROUND DOCUMENTS**

- Local Authorities (Members' Allowances) (England) Regulations 2003
- Comparative Benchmarking Information – Members' Allowances paid by other Hertfordshire Borough/District Councils

This page is intentionally left blank

# **Stevenage Borough Council**

## **Members' Allowances Scheme**

### **The report of the Independent Remuneration Panel**

**December 2024**

## 1. Introduction

There is a statutory \* requirement for regular independent review of the Allowances Scheme for Members of Stevenage Borough Council (the Council). The scheme was last reviewed in 2023. The Council commissioned another review earlier in 2024. For this purpose, an Independent Remuneration Panel was convened by the Council's Chief Executive.

*(\*Local Authorities (Members' Allowances) (England) Regulations 2003, as amended.)*

## 2. Panel members

- **Marian Hurle BEd, DMS, Former CEO Stevenage Citizens' Advice Bureau (Panel Chair)**
- **Nicholas Moss OBE, JP, Independent Person, North Hertfordshire District Council.**
- **Bill Welch ACIS, Former Corporate Director, Stevenage Borough Council.**

## 3. Terms of Reference

The Panel was asked to produce a report for the Council with recommendations for a Members' Allowances Scheme from 2025-2026 onwards.

## 4. Conduct of the review

The Panel met five times between October and December 2024.

We interviewed the Leader of the Council, the Leader of the Opposition party and a newly-elected Councillor. We received, also, written representations from three other newly-elected members.

In addition, we were briefed by the Chief Executive and by one of the Council's Strategic Directors.

We were supported very ably by Lisa Jerome (Senior Democratic Services Officer). Our thanks to her also for the research she carried out on our behalf and for the material that she provided so efficiently. We are most grateful not only to her, but also to other colleagues for their help.

In addition to interviews with Members and Officers we reviewed our 2023 report and current information about allowances payable to members of other authorities in Hertfordshire and elsewhere. This research helped to inform our review.

Our recommendations comply with the Local Authorities (Members' Allowances) (England) Regulations 2003.

## 5. Context

At its meeting in December 2023, where it considered and approved the Panel’s recommendations for 2024-25 [the current year], the Council resolved, “...*That an Independent Remuneration Panel be convened in the Autumn of 2024 to consider the Members’ Allowances Scheme for 2025/2026 onwards.*” In addition, the Leader asked at the meeting, “...*that the next IRP Review should include benchmarking information with comparator authorities which, like SBC, still possess their own Housing stock...*”

This report is the Panel’s response to that commission.

Given the proximity of the present review to the review leading to the 2023 report, we felt it would be helpful to set out the Members’ Allowances scheme that operates now and until the end of the civic year 2024-25.

<b>Basic Allowance</b> Payable to all Members	£8,819
<b>Special Responsibility Allowances</b>	
Leader of the Council	£24,756
Executive Members	£12,124
Chair of Planning and Development Committee	£12,124
Chair of Overview & Scrutiny Committee	£10,888
Chair of Licensing Committee	£4,952
Chairs of Select Committees	£6,189
Chair of Audit Committee	£4,952
Leader of the Majority Opposition Party	£443.06 per majority opposition group member.
Leader of Minority Opposition Party	£443.06 per minority opposition group member.
Travelling and Subsistence Allowance	The existing arrangements for Members’ travel and subsistence allowances.
Dependants' Carers' Allowances	
Child Care	Up to a maximum of £12.36 per hour
Adult care	Up to a maximum of £28.26 per hour
Both of the dependants’ carers’ allowances to be set at a maximum of 360 hours over the year, subject to Leader’s limited discretion.	

We have looked at the allowances afresh in the light of the Council’s resolution and of the Leader’s question about housing stock.

[IRP](#) Report 2024/25

## 6. The Panel's considerations

We have approached our commission in two stages:

### 1. *Basic allowance; 2. Housing stock.*

In respect of stage 1, as for earlier Panel reviews, we have considered the basic allowance in the context of amounts payable to members of other boroughs and districts in Hertfordshire. That inquiry has enabled us to determine any significant mismatch among sums payable across the county; and whether any mismatch identified might be to the detriment of Stevenage Members.

In respect of stage 2, we have considered whether there were grounds to recommend an increase in the basic allowance unrelated to any findings at stage 1 but taking account, instead, any allowance implications for Members of the Council's responsibilities for its own housing stock.

### 1. *Basic allowance*

Given the closeness of this report to our report last year we did not feel that a Council-wide survey of Members' views was necessary. In our opinion, of equal value and relevance on this occasion is the table below showing basic allowances payable currently to members of the 10 boroughs and districts in Hertfordshire.

<b>Local authority</b>	<b>Basic allowance</b>
Stevenage	£8,819
Broxbourne	£5,885
Dacorum	£6,120
East Herts	£5,679
Hertsmere	£7,234
North Herts	£5,763
St. Albans	£6,478
Three Rivers	£5,733
Watford	£8,441
Welwyn/Hatfield	£6,357

As can be seen, the basic allowance payable to Members of Stevenage Council is more than that payable to members of other Hertfordshire councils. In most instances, it is substantially more.

As noted at 4. above, we spoke to and heard from a number of Members. One observed that, "...*If allowances were adjusted I could consider dropping a day of full time work in order to focus on Council activities...*" The Leader said that personally he thought that the basic allowance should be more.

Nevertheless, all the other comments that we received this time supported there being no increase for 2025-6. One commented that it was *more than enough*. Another commented that it was *generous*.

### 2. *Housing stock*

We have approached with an open mind the question of whether the existence of directly-controlled housing stock meant that Members' work had increased significantly compared to members of non-housing-stock councils; and, if so, whether such an increase would warrant

an uplift in the basic allowance. We felt that we needed evidence to support, or to discount, the notion.

As a starting point we recognised that responding to housing enquiries from constituents is the principal housing-related responsibility which engages all Members to some degree. However, for all its significance to Members, we recognised that it should be seen, also, as a duty that is reflected in the value of the basic allowance. <sup>1</sup>

Nevertheless, to establish a context for this strand of our review, we looked first at the number of properties for which each stockholding Hertfordshire authority has direct responsibility; and at their associated allowances. As part of our benchmarking we looked also at Harlow and Crawley because they, like Stevenage, are designated as new towns and also manage their own housing stock.

<b>Local Authority</b>	<b>Housing stock (rounded figures)</b>	<b>Basic Allowance</b>	<b>Cabinet Member Allowance</b>
Stevenage	8,000	£8,819	£12,124
Dacorum	10,000	£6,120	£12,240
St Albans	5,000	£6,478	£ 7,741
Welwyn /Hatfield	9,000	£6,357	£11,443
Crawley	8,300	£7,434	£ 8,923
Harlow	9,000	£7,000	£11,200

It became apparent that there was no correlation between the size of a council's housing stock and allowances paid to members. It is evident from the table above that the basic allowance payable to Stevenage Members is still the highest even though the Council's housing stock is not. The Cabinet member allowance - a special responsibility allowance - is the second highest.

Next, we looked for evidence that Members of comparator housing-stock councils might deal with more contacts from constituents than members without housing stock. We felt that such evidence might justify an increase in the basic allowance.

However, as the Council does not collect data on housing enquiries from constituents to Members, we were not able to undertake any comparisons with other authorities. In any event, from our conversations with Members there is nothing to suggest that the Council's management of its properties has a significant bearing on the scale of work of Members.

## **7. The Panel's conclusions and recommendations**

### ***Mandatory allowance 2025-26***

#### Basic allowance

We have noted in our report that the basic allowance for Stevenage Councillors continues to

<sup>1</sup> We note here a principle underpinning the allowances scheme: the expectation that there is a voluntary element to the role of councillor.

be significantly greater than amounts payable to members of other councils in Hertfordshire.

We have taken into account the Council's activities including regeneration and actions to mitigate climate change. We have noted also the Leader's comments about the Council's responses to homelessness and overcrowding. We have concluded that none of these initiatives would have a substantive impact on workload for Members and, therefore, on the value of the basic allowance.

Similarly, our inquiries into Members' involvement with housing stock revealed nothing to suggest that the Council's management of its properties had any significant bearing on the scale of the work of Members.

For these reasons we have found no grounds for recommending an increase.

Therefore, we recommend that the basic allowance remains unchanged for the year from 1st April 2025.

### ***Discretionary allowances 2025-26***

#### Special responsibility allowance.

As indicated above, the basic allowance is mandatory. The other allowances in the regulations – typically the special responsibility allowances [SRA] – are discretionary. We acknowledge, of course, that significant demands are placed on Portfolio Holders, which are reflected in the SRAs.

In considering the allowance made to the Housing Portfolio Holder, we have considered the allowances made to all the Portfolio Holders. The SRAs made by Stevenage compare favourably with those made by the comparator authorities. In addition, we have heard nothing to suggest that the duties and responsibilities of the Housing Portfolio Holder here are any greater than the duties and responsibilities of other Portfolio Holders.

Accordingly, we have come to the view that there are no grounds for believing that the current SRA for the Housing Portfolio holder at Stevenage is insufficient and, similarly, we are satisfied that all the SRAs for Portfolio Holders remain appropriate for 2025-2026.

#### Dependant carers' allowance

Similarly, we are satisfied that the dependant carers' allowance remains appropriate. In reaching that view, we take into account the Leader's discretion to increase sums payable where demonstrably necessary. The impact of market forces on carers' rates might satisfy that criterion.

#### Travelling and subsistence allowance

As to the travelling and subsistence allowance, we remain content that sums payable might increase in line with those that officers of the Council are entitled to claim.

#### Co-optees' allowance

We offer the same view in respect of any allowance payable to co-optees to the Council as we have set out for the basic and special responsibility allowances for elected members.



### ***Allowances post 2025-26.***

As noted at the start of this report, we have been asked to make recommendations not only for 2025-26 but also 'onwards.'

Thus, we recognise the possibility of economic volatility, typically inflation and other factors than can increase costs. Of course, they are unpredictable, but it remains a possibility that such contingencies might have an impact on the value of the mandatory and a discretionary allowance.

For that reason, we recommend that for 2026-7 and 2027-8 the basic, the special responsibility and the co-optees' allowances increase in line with the Retail Prices Index [RPI]. That is to say, these allowances for 2026-27 will be fixed by applying to the current [2024-25] allowances the uplift in accordance with the increase in RPI as between 1st April 2025 and 1<sup>st</sup> April 2026 and similarly for 2027-28 .

We recommend, also, that the sums that may be claimed by members for travel and subsistence continue to rise in line with arrangements for officers.

### **8. Existence of Allowances for Councillors**

During our interviews with witnesses last year, we were surprised to learn that it is not political parties' practice routinely to advise potential candidates that allowances are available to elected Members. This year we found that this is still the case. We recommend, again, that all parties include information about allowances to encourage the widest range of candidates to come forward.

### **9. Postscript**

For the reasons we have given, we do not consider that it would be appropriate for the Council to continue to increase the allowances for 2025-2026. However, that position should not be taken as qualifying or diminishing our recognition of Members' commitment to their borough and their impressive service to their electors, who have entrusted them with the management of local affairs.

We commend our recommendations to the Council for Members' consideration.

**Marian Hurle**

**Nicholas Moss**

**Bill Welch**

**December 2024**

This page is intentionally left blank

**STEVENAGE BOROUGH COUNCIL**

**MEMBERS' ALLOWANCES SCHEME**

**EFFECTIVE FROM 1 April 2025 to 31 March 2026**

Stevenage Borough Council has made the following Members' Allowances scheme under the Local Government Act 2000 and the Local Authorities (Members' Allowances) (England) Regulations 2003.

1. This scheme may be cited as the Stevenage Borough Council Members' Allowances Scheme, and shall have effect for the year 1 April 2025 to 31 March 2026.

2. In this scheme,

“Councillor” means a Member of the Stevenage Borough Council who is a Councillor; “year” means the period ending on 31 March 2026.

3. Basic Allowance

A basic allowance shall be paid to each Councillor from 1 April 2025.

4. Special Responsibility Allowances

1) For each year a special responsibility allowance shall be paid to those Councillors who hold the special responsibilities in relation to the authority that are specified in the schedule to this scheme.

2) Subject to paragraph 6, (part year entitlements) the amount of each such allowance shall be the amount specified against that special responsibility in that schedule.

3) Members are only able to claim one SRA.

5. Renunciation

A Councillor may by notice in writing to the Chief Executive elect to forego any part of their entitlement to an allowance under this scheme.

6. Part-year Entitlements

Payment of Basic and Special Responsibility Allowances will be pro-rata where Councillors do not serve for a full year on the Council.

7. Payments

Payments shall be made on a regular monthly basis. Claims for dependent carer's allowances and travel and subsistence allowance shall be made within two months of being incurred.

## 8. Suspension of Payments

The Council will withhold all allowances to any Councillor who is suspended for misconduct and will require Councillors to repay any allowance already paid during a period of suspension.

### **Basic Allowances**

Basic Allowance	Paid to All Members	£8,819
-----------------	---------------------	--------

### **Special Responsibility Allowances**

(i)	Leader of the Council	£24,756
(ii)	Executive Members	£12,124
(iii)	Chair of Planning and Development Committee	£12,124
(iv)	Chair of Overview & Scrutiny Committee	£10,888
(v)	Chair of Licensing Committee	£4,952
(vi)	Chairs of Select Committees	£6,189
(vii)	Chair of Audit Committee	£4,952
(viii)	Leader of the Majority Opposition Party	£443.06 per Member
(ix)	Leader of the Minority Opposition Party(ies)	£443.06 per Member

### **Payment to Specific Co-opted Members**

Independent Member - Audit Committee	£1,497
Independent person who must be consulted on alleged breaches of a code of conduct	£1,497

### **Carer's Allowance**

The following amounts may be claimed for Councillors attending approved duties.

Childcare	Maximum of £12.36 per hour
Dependant care	Maximum of £28.26 per hour

Payment to relatives that live in the same household as the Councillor will not be admissible and there will be a maximum annual allowance of 360 hours (with the Leader having discretion to increase the maximum allowance where demonstrably necessary). Receipts will need to be provided.

### **Travel, Subsistence and Other Allowances**

The allowances for travel and subsistence will be the same as those fixed for employees of the Council from time to time. Claims to be submitted within 2 months of the date to which they relate.

**Meeting:** COUNCIL

**Agenda Item:**

Portfolio Area: Resources and Transformation

**Date:** 26 February 2025

## **REVISION TO CONTRACT PROCEDURE RULES 2025**

Author – Kirsten Brown

Lead Officer – Brian Moldon

Contact Officer – Kirsten Brown

### **1. PURPOSE**

- 1.1. To update Members on the revision to the Council's Contract Standing Orders, now known as Contract Procedure Rules.

### **2. RECOMMENDATIONS**

- 2.1. That revised Contract Procedure Rules be approved.

### **3. BACKGROUND**

- 3.1. Contract Standing Orders form an essential part of the control framework within which the Council operates.
- 3.2. Contract Standing Orders (CSO's) are a collection of rules, which must be adhered to when officers purchase goods, works or services or dispose of Council plant and equipment. They have been designed to ensure that the Council is compliant with UK legislation, follows best practice and achieves value for money in all its procurement activities.
- 3.3. A review of the Council's Contract Standing Orders was last undertaken in January 2020 and this report updates Members on the proposed updates to the CSO's. Changes have been made to reflect organisational changes, legislative changes and to clarify policies.
- 3.4. These changes were recommended for approval at Audit Committee 4<sup>th</sup> February 2025

### **4. REASONS FOR RECOMMENDED COURSE OF ACTION**

- 4.1. The Contract Procedure Rules have been updated as at February 2025 and the changes are detailed in Appendix B attached to this report, the main changes relate to:

- Changing the name to Contract Procedure Rules as this title is more in common with current best practice.
- Increasing the threshold for all bands
- To update the rules to reflect the Procurement Act 2023 which becomes law on 24 February 2025
- To change the internal direction regarding the use of a direct award under a Framework agreement.
- To increase the direction given to officers in regard to pre procurement market engagement and contract management to reflect their increased importance.

## **5. IMPLICATIONS**

### **5.1. Financial Implications**

It is anticipated that the revised Contract Procedure Rules (CPR) will improve the Council's financial standing through the following of best practice, the achievement of value for money and the mitigation of risk.

### **5.2. Legal Implications**

The updated CPR's include any legal implications within the regulations.

### **5.3. Policy Implications**

Contract Procedure Rules are in themselves a policy change.

## **6. BACKGROUND DOCUMENTS**

Contract Standing Orders version 9 dated January 2020

## **7. APPENDICES**

Appendix A – Revised Contract Procedure Rules

Appendix B – Table of Changes with proposed changes for 2025



# CONTRACT PROCEDURE RULES

Date: February 2025  
Version 10

## CONTENTS:

<b>SECTION</b>	<b>TITLE</b>	<b>PAGE</b>
<b>SECTION 1</b>	<b>INTRODUCTION AND GENERAL REQUIREMENTS</b>	<b>D133</b>
<b>SECTION 2</b>	<b>CONTRACT PROCEDURE RULES – PROCUREMENT OBJECTIVES</b>	<b>D136</b>
<b>SECTION 3</b>	<b>EXEMPTIONS TO CONTRACT PROCEDURE RULES</b>	<b>D137</b>
<b>SECTION 4</b>	<b>CONTRACTS BELOW £100,000 (BAND 1 AND 2)</b>	
	4.1 Overview	D139
	4.2 Supplier Selection	D139
	4.3 The Invitation to Quote	D141
	4.4 Contract Evaluation and Award	D141
<b>SECTION 5</b>	<b>CONTRACTS BETWEEN £100,001 AND THE PUBLIC CONTRACTS THRESHOLD (BAND 3)</b>	
	5.1 Overview	D143
	5.2 Supplier Selection: Public Notice & Purchasing Consortium	D143
	5.3 Pre Market Engagement	D144
	5.4 The Invitation to Tender	D145
	5.5 Submission, Receipt and Opening of Tenders	D147
	5.6 Not Used	D147
	Tender Evaluation	D147
	5.8 Contract Award and Contract Management	D148
<b>SECTION 6</b>	<b>CONTRACTS ABOVE THE PUBLIC CONTRACTS THRESHOLD (BAND 4)</b>	
	6.1 Overview	D151
	6.2 Procurement Act 2023	D151
	6.3 Supplier Selection	D152
	6.4 Short Listing	D153
	6.5 The Invitation to Tender	D153
	6.6 Submission, Receipt and Opening of Tenders	D155
	6.7 Tender Evaluation	D155
	6.8 Contract Award and Contract Management	D157
<b>SECTION 7</b>	<b>SPECIAL CONTRACTS</b>	
	7.1 Engagement of Consultants	D160
	7.2 Disposal Contracts	D162
	7.3 Not Used	D162
	7.4 Contract Hire and Lease/Rental Agreements	D162
	7.5 Nominated Sub-contractors and Suppliers	D162
	7.6 Term Contracts and Framework Agreements	D163



	<b>7.7 Partnerships &amp; Shared Services</b>	<b>D163</b>
	<b>7.8 Income Generating / Commercial or Concession Contracts</b>	<b>D164</b>
<b>SECTION 8</b>	<b>OTHER CONSIDERATIONS</b>	
	<b>8.1 Contractual Disputes</b>	<b>D166</b>
	<b>8.2 Termination of Contracts</b>	<b>D166</b>
	<b>8.3 Bankruptcies and Liquidations</b>	<b>D166</b>
	<b>8.4 Contract Variations</b>	<b>D166</b>
	<b>8.5 Contract Extensions</b>	<b>D167</b>
	<b>8.6 Green Environment and Sustainable Sources</b>	<b>D168</b>
	<b>8.7 Diversity</b>	<b>D168</b>
	<b>8.8 Equality</b>	<b>D168</b>
	<b>8.9 Innovative and Abnormal Contract Action</b>	<b>D168</b>
	<b>8.10 Declaration of Interest</b>	<b>D168</b>
	<b>8.11 Freedom of Information Act (2000)</b>	<b>D169</b>
	<b>8.12 Security of Performance and Performance Liability</b>	<b>D169</b>
	<b>8.13 TUPE and the Best Value Code of Practice on Workforce Matters</b>	<b>D169</b>
	<b>8.14 Health and Safety</b>	<b>D169</b>
	<b>8.15 Safeguarding Children</b>	<b>D170</b>
	<b>8.16 Accessibility</b>	<b>D170</b>
	<b>8.17 GDPR</b>	<b>D171</b>
	<b>8.18 Social Value</b>	<b>D171</b>
	<b>8.19 Modern Slavery</b>	<b>D171</b>
	<b>8.20 Fraud Prevention</b>	<b>D171</b>
<b>Appendix A</b>	<b>Table of Definitions / Terms</b>	<b>D172</b>
<b>Appendix B</b>	<b>Procurement Act 2023 Notice requirements</b>	<b>D176</b>

## SECTION 1 INTRODUCTION AND GENERAL REQUIREMENTS

- 1.1 These Contract Procedure Rules (CPR's) are a framework of rules, which must be adhered to when purchasing goods, services, works or income generating contracts or disposing of Council property. These Contract Procedure Rules<sup>1</sup> have been established to ensure that the Council is compliant with UK legislation, follows best practice and achieves best value for money in its procurement activities. These Contract Procedure Rules do not apply to employment contracts, contracts for the sale or purchase of land or buildings or any other contracts which are exempt under the Procurement Act 2023 or subsequent/associated UK legislation<sup>2</sup>.
- 1.2 These Contract Procedure Rules promote good purchasing practice, public accountability, data transparency and help protect officers from any complaints. Following the rules is the best defence against any possible allegation that a purchase or disposal has been made incorrectly or inappropriately.
- 1.3 Officers responsible for purchasing goods, services, works or income generating contracts are bound by and have a duty to read and be familiar with these Contract Procedure Rules. these Contract Procedure Rules lay down **minimum** requirements. A more thorough procedure may be appropriate for a particular contract.
- 1.4 Officers must ensure that any necessary pre-purchasing steps have been taken. This may include<sup>3</sup>:
- conducting a value for money review
  - drafting a business case,
  - conducting pre procurement market engagement
  - considering any workforce implications including TUPE
  - health and safety and business continuity requirements
  - complying with *Key Decision requirements*
  - Equality Impact Assessment
  - GDPR (Data Protection)
  - Safeguarding considerations
  - Section 20 considerations if housing
  - Collaboration opportunities
  - considering Social Value
- 1.5 Unless an exemption provided for in Section 3 has been approved, it is a disciplinary matter to fail to comply with these Contract Procedure Rules. Responsibility for compliance rests with everyone who carries out procurement of goods, services or works (including contracts for consultancy) for or on behalf of the Council. The ultimate responsibility for identifying the need to start a procurement, creating the procurement, managing it through its contract term and requirement to re-procure rests with the Assistant Director (or Strategic Director in the case of direct reports) for the relevant area.
- 1.6 These Contract Procedure Rules should be read in conjunction with the Council's Financial Regulations as appropriate. Officers should also consider the Co-operative Procurement Strategy when considering embarking on a procurement<sup>4</sup>. These Contract Procedure Rules will be reviewed and updated on a periodic basis (the latest version will be held on the

---

<sup>1</sup> Referred to from now on throughout this document as These Contract Procedure Rules or CPR's

<sup>2</sup> Contact the Recruitment Officer regards employee contracts (for the avoidance of doubt, contracts with agencies or companies who supply temporary staff are subject to CPR's) and the Estates Manager regards contracts for sale of land.

<sup>3</sup> Checklists to help ensure correct steps are addressed are available on the intranet under Procurement

<sup>4</sup> Co-operative Procurement Strategy is held on the intranet under Procurement

intranet).

- 1.7 Officers must also ensure that any agents or consultants acting on their behalf in purchasing or disposal matters also comply with the Council's Contract Procedure Rules, Financial Regulations and with all UK legal requirements.
- 1.8 **Contracts** mean any arrangement, for pecuniary interest, for the supply of goods (including hire, rental or lease arrangements), services or works to the Council. "Pecuniary interest" includes arrangements where the Council pays for goods, services or works and/or where the Supplier has the right to exploit works or services and to generate its income from doing so (i.e. a Concession Contract). Contracts do not include and, these Contract Procedure Rules do not apply to, purely compensatory or supportive arrangements such as grants, although officers must ensure any such arrangements comply with the Subsidy Control Act 2022 and associated regulations. Advice should be sought from Legal Services about any potential subsidy control implications.
- 1.9 The Procurement Act 2023 and Procurement Regulations 2024 set out what is legally required for UK public contracts procurement. This includes some rules for procurements below the Public Contracts Threshold; these have been incorporated into the CPR's.

1.10 All contracts must be subject to competition, as follows:

Band 1	Up to £15,000 (£25,000 if Works)	One quote (confirmed in writing if greater than £1,000)
Band 2	£15,001 – £100,000 (£250,000 if Works)	Three quotes to a purchaser specification via the Council's e-tendering system
Band 3	£100,001 (£250,001 if Works) – Public Contracts Threshold	Invitation to Tender via the Council's e-tendering system
Band 4	Above Public Contracts Threshold	<i>Procurement Act 2023 Procedures</i> via the Council's e-tendering system

- 1.11 An officer must neither enter into separate contracts nor select a method of calculating the *Estimated Contract Value* in order to circumvent the application of These Contract Procedure Rules or The Procurement Act 2023. If it is not possible to estimate the value of a contract (for example because the duration is unknown), the contract must be treated as having an estimated value above the Public Contracts Threshold.
- 1.12 Where the value of a contract exceeds £175,000, it should generally (where practicable) be made in the form of a deed and signed under seal by the Council. Should an officer wish to depart from this requirement, authorisation must be given by the Borough Solicitor and Legal Services must first be consulted for advice on the legal implications of doing so. Notwithstanding the forgoing, a contract of any value may be entered into as a deed if requested by the applicable Head of Service or Legal Services – for example where an extended limitation period of 12 years is required (the normal limitation period is 6 years).



**Clare Fletcher -Strategic Director**

---

**For Further Advice on these Contract Procedure Rules:**

The authorised version of These Contract Procedure Rules and various supporting written guidance are held on the Council's intranet site, under "Procurement".

If you have any queries about These Contract Procedure Rules or the various supporting written guidance please contact one of the following as appropriate:

- Corporate Procurement Manager [procurement@stevenage.gov.uk](mailto:procurement@stevenage.gov.uk)
- Finance – Assistant Director

***If you are unclear about the procurement rules please seek relevant advice before taking any purchasing or disposal action.***

## **SECTION 2 CONTRACT PROCEDURE RULES – PROCUREMENT OBJECTIVES**

All Procurement exercised should take into consideration the following, but these are essential for band 4 procurements which are contracts at or above the threshold for The Procurement act 2023 and are known as covered procurements.

- 2.1 In carrying out a covered procurement, a contracting authority must have regard to the importance of—
  - (a) delivering value for money;
  - (b) maximising public benefit;
  - (c) sharing information for the purpose of allowing suppliers and others to understand the authority’s procurement policies and decisions;
  - (d) acting, and being seen to act, with integrity.
- 2.2 In carrying out a covered procurement, a contracting authority must treat suppliers the same unless a difference between the suppliers justifies different treatment.
- 2.3 If a contracting authority considers that different treatment is justified in a particular case, the authority must take all reasonable steps to ensure it does not put a supplier at an unfair advantage or disadvantage.
- 2.4 In carrying out a covered procurement, a contracting authority must—
  - (a) have regard to the fact that small and medium-sized enterprises may face particular barriers to participation, and
  - (b) consider whether such barriers can be removed or reduced.

## SECTION 3 EXEMPTIONS TO THESE CONTRACT PROCEDURE RULES

- 3.1 An exemption under this Section allows an officer to partly depart from the normal contract action required in following these Contract Procedure Rules.

These Contract Procedure Rules shall not prevent expenditure being incurred where an emergency or disaster involving destruction of or danger to life or property occurs or is imminent. Where in the opinion of a Senior Leadership Team (SLT) member, in consultation if possible with the Chief Executive and the Assistant Director (Finance), (where over £250k the key decision urgency process also applies) the urgency of the situation will not permit delay, nothing in Financial Regulations or these Contract Procedure Rules shall prevent the Council from incurring the expenditure as an exemption. Where the contract value is over £100,001, action under this exemption shall be reported to the next meeting of the Cabinet.

- 3.2 Subject to adhering to The Procurement Act 2023 and any subsequent /associated UK legislation, the following exemptions from the requirement to obtain the requisite number of quotations or tenders must be the subject of prior and written approval by either the Corporate Procurement Manager, Strategic Director (S151), Assistant Director (Finance), or the Borough Solicitor:

- a) For the purchase of goods, works or services which are of a specialist nature or are Officer. A record obtainable from only one or a limited number of Suppliers and there are no other satisfactory alternative options.<sup>5</sup>
- b) Where exceptional circumstances clearly show it is in the best interests of the Council to negotiate a new contract with an existing Supplier.<sup>6</sup>
- c) Unforeseen works or circumstances where delay will adversely impact on the service delivery for the council or access to external funds.<sup>7</sup>
- d) Tenders or quotes for similar goods, works or services have been obtained in the last 24 months.
- e) The goods are classed as used or second hand - where the Borough Solicitor, the Assistant Director (Finance) or the Corporate Procurement Manager is satisfied that the market for such goods or materials is such that it would be unreasonable to tender or where the time required to complete the tender process is likely to lead to the loss of opportunity to purchase a used or second hand item and where the relevant officer has ensured that a Value for Money approach has been applied.
- f) Other exceptional circumstances that don't fit with any of the above authorised by both the Corporate Procurement Manager and the Borough Solicitor

- 3.3 Once a request to waive these Contract Procedure Rules has been received, a Waiver Action Form will be completed by the Officer requesting the waiver and reviewed by the Approving of the decision approving or rejecting a waiver request and the reasons for it must be kept and an entry made in the waiver request register which will be maintained by the Corporate Procurement Manager

- 3.4 Officers applying the exemption rules in 3.3 must, **as a minimum**, draft a specification and use the Council's preferred contractual documents, where appropriate (as outlined in Section 5). Unless otherwise stated, Financial Regulations (including key decision processes) will still

---

<sup>5</sup> The officer must provide evidence to prove that there are no other satisfactory alternatives, such as a recent public notice where no suitable candidates responded.

<sup>6</sup> For example, where the Council have received consultancy services for a complex project and wish to employ the same consultant for additional consultancy services relating to that project, because the use of an alternative consultant would result in the loss of an important skillset or knowledge, which is not easily transferable.

<sup>7</sup> Must have been unforeseeable, not caused by a lack of prompt action by the Council

apply and will need to be adhered to.

- 3.5 Officers must ensure the contract is recorded on the contracts register if an agreed exemption to CPR's results in a change to existing contract details or constitutes the award of a new contract with a value over £5000<sup>8</sup>.
- 3.6 Compliance with UK legislation is considered to satisfy the Council's These Contract Procedure Rules and Financial Regulations. **No exemption shall be granted if the giving of that exemption would cause a breach of The Procurement Act 2023 or subsequent / associated UK legislation.**

---

<sup>8</sup> See guidance on the intranet on how this is achieved.

## SECTION 4 SPECIFIC REQUIREMENTS FOR CONTRACTS BELOW £100,000 (BAND 1 AND 2)

### 4.1 Overview

Band	Estimated Contract Value	Minimum No. of Quotes	Contract Signature
1	Up to £15,000 (£25,000 if Works <sup>9</sup> )	At least one oral quote (written if over £1,000)	Officers authorised to sign purchase orders within this value banding.
2	£15,001 to £100,000 (£250,000 if Works)	At least three written quotations to a purchaser specification.	Officers authorised to sign or seal contracts within this value banding <sup>10</sup>

Where the preliminary estimated contract value is within 10% of a higher category value, the appropriate provisions for the higher category of contract should be applied (unless the preliminary estimate is based on a firm quote). If the existing contract you are using has a total contract value within the Band 2 threshold and you anticipate the new final contract total may be within the Band 1 threshold, you must still continue to follow the Band 2 process unless the new contract is fundamentally different.

The value of any contract is calculated on the basis of the maximum amount the Supplier could expect to receive under or in connection with the contract (including from payments to be received from the Council or third parties) over the entire contract period to include any optional extension periods. Contract periods should be appropriate to the market in question and not artificially shortened to bring the value into a particular band. It should also be considered if the requirement can be combined across the Council or combined with similar works e.g. electrical works needed over x years rather than singular works to various buildings over multiple contracts, to provide the council with better value.<sup>11</sup>

#### Band 1

Contracts with a value between £5,000 and £15,000 (£25,000 if works) should be considered as to whether conducting a procurement exercise would be more expensive in officer time than the value of any savings, if that is the case a band 1 waiver form must be submitted to your Tier 4 manager or AD if you are Tier 4 for approval before proceeding. This is more likely to apply to services and works, where quality has to be assessed or site visits to quote arranged and unlikely to apply to goods.

### 4.2. Supplier Selection

4.2.1. Suppliers invited to quote within these bands can be sourced from any means, including the Internet, suppliers registered on [www.supplyhertfordshire.uk](http://www.supplyhertfordshire.uk) or based on previous satisfactory experience with the Council. There is no requirement to issue public notices for contracts within these bands, although this may be appropriate in some instances. However, when inviting quotations in Band 2, Officers must invite a Stevenage based supplier if one such exists on [www.supplyhertfordshire](http://www.supplyhertfordshire) and is appropriate for the requirement. If no Stevenage based look to Hertfordshire based as this supports the Councils community

<sup>9</sup> Works are defined as activities having a Works CPV code see intranet for further guidance on what constitutes a works contract.

<sup>10</sup> As per the authorised contract signatory list held by Exchequer Services.

<sup>11</sup> Guidance document "Estimating the total value of your procurement correctly" is available on the intranet under Procurement.



wealth building agenda. Officers should also document the reasons for selecting the suppliers (such evidence may be required should the decision be challenged at a later date).

If you are sourcing contracts of a similar nature on a regular basis i.e. low value bespoke building alterations it is a requirement to ensure that you invite at least one supplier not invited last time so that more suppliers are given the opportunity to quote for the Council's business.<sup>12</sup>

### Framework Agreements

4.2.2. Framework agreements let by other contracting authorities, where the council has been named as being able to use the framework agreement, can be used. Examples of contracting authorities that let framework agreements of this nature are: Crown Commercial Services (CCS), Eastern Shires Purchasing Organisation (ESPO), Procurement for Housing (PfH), Homes England, and Yorkshire Purchasing Organisation (YPO).

4.2.3. The officer may utilise any of the above purchasing consortiums framework agreements (or any other framework agreements approved by either the Corporate Procurement Manager or Borough Solicitor). Any procedures provided by the purchasing consortium must be followed; generally mini competition is likely to achieve the best value as it allows Contractors to submit tailored bids to our requirement.

Direct Award is not available on all frameworks, where it is an option then generally it is only permitted if one of the below applies;

- The framework is sole supplier; or
- Where there is a ranked call off provision; or

Officers wishing to use Direct award for other reasons may apply to do so using one of the Waiver reasons in section 3.

4.2.4. When conducting a mini competition, the officer must follow the procedures provided by the contracting authority to conduct the mini competition amongst all the capable suppliers on the framework. It is not permitted to include suppliers in the mini-competition who are not listed on the framework.

4.2.5. Officers should use existing contracts where these are provided for and suitable, details of which can be found on the shared drive under Corporate> Central Contracts Database. Officers must liaise with the contract manager of the contract before proceeding to ensure they are compliant. All procurement of ICT Hardware and Software must be in consultation with the IT team.

Officers should consider if the requirement could be satisfied by another department through insourcing or through another contract tendered within the council or another public body and contact the relevant team to enquire before going out externally.

4.2.6. In exceptional circumstances and for contract values under £1,000 only, an officer may be permitted to contract with a supplier or group of suppliers without first obtaining an oral quote. In this instance, the officer must first submit the request in writing to either the Corporate Procurement Manager, Assistant Director (Finance), or the Borough Solicitor and obtain his or her prior written approval before awarding the contract(s).<sup>13</sup>

---

<sup>12</sup> Guidance on supplier selection at quote level is available on the intranet under Procurement.

<sup>13</sup> An example of where this may be acceptable would be contracting with a supplier to top up of the Depot's bulk fuel storage facility. The charge per litre will have been pre-agreed before awarding a contract, but the number of litres to be supplied will not be not known until the goods have been supplied.

### **4.3. The Invitation to Quote (Band 2 only)<sup>14</sup>**

- 4.3.1. Officers must provide adequate instructions to respondents, outlining what is required (specification), in what format and by when. The Invitation to Quote<sup>15</sup> should also define the award criteria, whether lowest cost or most advantageous quote (See 5.4.1). Officers are reminded that further instructions may be necessary depending on the nature of the contract. For example, specific insurances and equality requirements may be appropriate where the purpose of the contract is to supply services directly to the public.
- 4.3.2. The officer responsible for the purchase may consult potential Suppliers prior to the issue of the Invitation to Quote in general terms about the nature, level and standard of the supply, contract packaging and other relevant matters provided this does not prejudice any potential Supplier.
- 4.3.3. Quotations must be submitted through the In-Tend e-tendering system. If there is a reason why Intend cannot be used, this needs to be agreed with the Corporate Procurement Manager in advance of the procurement<sup>16</sup>. A return date must be specified and adhered to. When using In-Tend the receiving officer can open the returns as soon as the system makes them available.
- 4.3.4. Suppliers must be given a minimum of 5 working days to respond to an invitation to quote, but they may require longer timescales if the contract is considered complex in any way.

### **4.4. Contract Evaluation and Award (Band 2 only)**

- 4.4.1. To ensure adequate competition, there must be at least two satisfactory responses from the number of quotations requested (and this is expected when conducting a mini competition from a framework as well) i.e. responses which meet a minimum quality standard under which the Council could award the contract. If the Council receives only one satisfactory response, the officer must not open the responses before seeking advice from Corporate Procurement who will determine if the officer should obtain an additional quote, re-run as an advertised process or obtain an exemption under CSO 3.3.
- 4.4.2. All quotes must be evaluated based on the defined award criteria in the Invitation to Quote. Post tender negotiation may be used for certain contracts, in accordance with CPR's 5.7.4 and 5.7.5.
- 4.4.3. If the quoted contract value for the preferred supplier falls into the higher band 3 when processes for the lower Band 2 were followed, the officer must provide either the Assistant Director (Finance), the Borough Solicitor or the Corporate Procurement Manager with a written explanation and supporting evidence as to the basis for estimating the contract value at the lower band. The Borough Solicitor, Assistant Director (Finance) or Corporate Procurement Manager will decide whether the contract should be re-tendered following the procedures within the higher band.
- 4.4.4. Officers must not agree to contract conditions where payment is made before the goods, works or services are received, unless otherwise approved in writing by either the Corporate Procurement Manager, the Assistant Director (Finance), or the Borough Solicitor. Staged payments are acceptable but must be proportionate to the cost of the goods, works or services received.

---

<sup>14</sup> A checklist is available on the intranet under staff into/finance/corporate procurement to help you through the steps of a quote process.

<sup>15</sup> SBC invitation to quote templates are available on the intranet under Procurement

<sup>16</sup> An example of an exemption could be where we are not in a market position to impose the use of Intend.

- 4.4.5. Successful and unsuccessful Suppliers should be informed of the decision within 14 days of the closing date and feedback provided if requested.
- 4.4.6. Contracts or agreements over £5,000 must be signed by an authorised signatory. If there is no written contract, the authorised signatory must confirm in writing (either via letter or email) that the quote has been accepted, stating the cost and any other terms (such as payment terms and delivery date) to which the Council is agreeing to. In the absence of a written contract, a Purchase Order containing the above mentioned information and signed by an authorised signatory is sufficient.
- 4.4.7. For contracts over £5,000 officers must ensure the details are entered onto the Central Contracts Database<sup>17</sup>.
- 4.4.8. All documentation must be kept in accordance with the Document Retention Schedule which can be found on the intranet.

---

<sup>17</sup> See guidance on the intranet about how this is achieved

## SECTION 5 CONTRACTS BETWEEN £100,001 AND PUBLIC CONTRACTS THRESHOLD<sup>18</sup>

### 5.1 Overview

Band	Estimated Contract Value	Minimum No. of Respondents	Contract Signature
3	£100,001 (£250,001 if works) to Public Contract Threshold (see CSO 6.1 for values)	N/A unless Works over £177,500 excluding VAT <sup>19</sup>	Officers authorised to sign contracts within this value banding <sup>20</sup> , unless under seal (see CSO 5.8.7)

Where the preliminary Estimated Contract Value is within 10% of a higher category value, the appropriate provisions for the higher category of contract should be applied (unless the preliminary estimate is based on good evidence). If the existing contract you are using has a total contract value within the Band 3 threshold and you anticipate the new final contract total may be within the Band 2 threshold, you must still follow the Band 3 process unless the new contract is fundamentally different.

The value of any contract is calculated on the basis of the maximum amount the Supplier could expect to receive under or in connection with the contract (including from payments to be received from the Council or third parties) over the entire contract period to include any optional extension periods. Contract periods should be appropriate to the market in question and not artificially shortened to bring the value into a particular band. It should also be considered if the requirement can be combined across the Council or combined with similar works e.g. electrical works needed over x years rather than singular works to various buildings over multiple contracts, to provide the council with better value.<sup>21</sup> Collaboration with other Hertfordshire authorities is encouraged and can be promoted via the Hertfordshire Procurement Group by talking to Corporate Procurement.

### 5.2 Supplier Selection: Public Notice & Purchasing Consortium

- 5.2.1. Within this contract value banding, either a public notice or a suitable framework agreement that the council is entitled to use can be used.

#### Public Notice

- 5.2.2. If the chosen method is a public notice, officers must follow the: Open procedure – all Suppliers expressing an interest are sent an Invitation to Tender (ITT) and all responses are evaluated. An exception can be made for Works contracts with a value between the Public Contract Threshold for services and the Public Contract Threshold for Works which allows for conditions of participation to be assessed before issuing the ITT to a limited number of participants.

The Public notice will be placed via the Corporate Procurement team on the Council's E procurement portal, In-Tend- and on the Find a Tender Service website in order to maximise competition. The notice will state how to register on the In-Tend system, the

<sup>18</sup> Checklists are available on the intranet under Procurement to assist you with the process

<sup>19</sup> If the number of respondents is being restricted invite at least three to tender where sufficient qualify

<sup>20</sup> As per the Authorised Signatory list held by Exchequer Services.

<sup>21</sup> Guidance document "Estimating the total value of your procurement correctly" is available on the intranet under Procurement.

scope of the requirement and the deadline for submission.

### Framework Agreements

- 1.1.1. Framework agreements let by other contracting authorities, where the council has been named as being able to use the framework agreement, can be used. Examples of contracting authorities that let framework agreements of this nature are Crown Commercial Services (CCS), Eastern Shires Purchasing Organisation (ESPO), Procurement for Housing (PfH), Homes England (HE), Yorkshire Purchasing Organisation (YPO).
- 1.1.2. The officer may utilise any of the above purchasing consortiums framework agreements (or any other framework agreements approved by either the Corporate Procurement Manager or Borough Solicitor). Any procedures provided by the purchasing consortium must be followed, generally mini competition is likely to achieve the best value as it allows Suppliers to submit tailored bids to our requirement.

Direct Award is not available on all frameworks, where it is an option then generally it is only permitted if one of the below applies;

- The framework is sole supplier; or
- Where there is a ranked call off provision.

Officers wishing to use Direct award for other reasons may apply to do so using one of the Waiver reasons in section 3.

- 1.1.3. When conducting a mini competition, the officer must follow the procedures provided by the contracting authority to conduct the mini competition amongst all the capable suppliers on the framework. It is not permitted to include suppliers in the mini competition who are not listed on the framework.

In the same way it is a requirement to obtain two compliant bids when utilising a quotation exercise, the same applies when utilising a mini competition via a framework. Therefore, it is vital to conduct some pre market engagement to be sure that the framework is suitable. Some frameworks have the option of an expression of interest to alert potential bidders of the forthcoming competition. Should you be looking to award more than one contract as a result of the mini competition then proportionally more compliant bids must be received.

## **5.3 Pre Market Engagement**

- 5.3.1 Pre-procurement engagement with the market (including talking to potential suppliers) is encouraged provided that it does not prevent an effective competition taking place when the requirement is put out to the market. In fact, engaging with the market before starting the formal procurement process is best practice and helps to maximise value for money from the resulting procurement.<sup>22</sup>
- 5.3.2 Officers must conduct an appropriate level of pre market engagement prior to launching the invitation to tender:  
As a minimum they must get feedback from some potential bidders to ascertain:  
There is interest in the opportunity at this time  
Our estimate of the value is in the right ball park  
Suggestions on how the service, product or works may be delivered differently.

Advice on conducting pre market engagement is available from Corporate Procurement

## **5.4 The Invitation to Tender**

---

<sup>22</sup> Further information on pre procurement market engagement is available on the intranet under Procurement

5.4.1 The **Instructions to Tenderers**<sup>23</sup> must, as a minimum, include the following:

- a) List the information which must be provided by the supplier in their response, including any forms, tables or pricing schedules to be completed.
- b) State the method of response required. All tenders shall be issued through the Council's E-tendering System – In-Tend (see CSO 5.5).
- c) Outline a timetable for the remainder of the procurement exercise, detailing the closing date for receipt of responses, the evaluation period and when a response on contract award is expected.
- d) State the method which will be via In-Tend and the deadline for obtaining additional information or clarification (usually 7-14 days before the closing date for receipt of responses) and that additional information requested will be distributed to all suppliers (this should be distributed to all suppliers at the same time through Intend no later than one week before the closing date for receipt of responses<sup>24</sup>).
- e) Outline how the responses will be evaluated, listing the appropriate award criteria and their relative weightings, which shall be based on the "most advantageous tender". The award criteria may include price, service, quality of goods, running costs, previous experience, delivery date, cost effectiveness, relevant environmental considerations, employment considerations, aesthetic and functional characteristics, safety, after-sales services, technical assistance, contract terms and conditions and any other relevant matters. Lowest price must not be used as the sole award criteria unless approved by Corporate Procurement.
- f) The measurement system may include the following 4 elements:
  - Any pass/ Fail considerations
  - A point scoring system for individual quality/value for money considerations.
  - Weightings applied to quality/value for money issues in accordance with their importance to the completion of the contract.
  - A "Quality Threshold" which sets the minimum standard expected. Tenders which fall below this shall be excluded from consideration.
- g) State that late responses will not be considered unless it is proven that a third party is at fault and that the Council is not bound to accept any Tender.
- h) State the price validity period (usually up to a maximum of six months).
- i) Provide a statement to the effect that under the Freedom of Information Act (2000), the Council may be obliged to provide information regarding the procurement exercise or a subsequent contract award and that respondents will be advised of any requests for information and be given an opportunity to comment before disclosure of such information (information whose disclosure would be likely to prejudice anyone's commercial interests is exempt from disclosure provided the public interest in withholding the information outweighs the public interest in disclosing it)
- j) The level of economic and financial standing required

---

<sup>23</sup> An template Invitation to Tender can be requested from Corporate Procurement.

<sup>24</sup> A Clarification/Query template spreadsheet is available from Corporate Procurement

- k) The level of insurance required
  - l) Any Pass/Fail elements or minimum thresholds to be met
- 5.4.2 An adequate **specification** must be included. The specification must describe clearly the Council's requirements in sufficient detail to enable the submission of competitive offers.
- 5.4.3 For contracts within this value banding, the following **Standard Forms**<sup>25</sup> should form part of the Invitation To Tender and should be included in the final contract documentation:
- a) Form of Tender
  - b) Certificate that the Tender is Bona Fide
  - c) Parent Company Guarantee (if applicable).
  - d) Performance Bond Certificate (if applicable).
  - e) Insurance requirements
- 5.4.4 Where appropriate to the type of contract being let, the officer should use standard industry contracts ie JCT<sup>26</sup> or the **Council's own standard contracts**,. Where the Council does not supply a suitable standard contract for the type of contract being let, the officer should liaise with Legal Services to identify contract terms relevant to that specific contract. The officer must seek advice from Legal Services if he/she is unclear as to what terms and conditions should be included in the contract. Supplier standard terms and conditions should only be accepted following consultation and approval by Legal Services. In any event, it should be stated in the Invitation to Tender which contract terms will apply to the contract. SBC's standard clauses and contracts are available from corporate procurement.<sup>27</sup>
- 5.4.5 Suppliers invited to tender must be given an adequate period in which to prepare and submit a proper tender, consistent with the urgency of the contract requirement. Normally at least **four weeks** should be allowed for submission of Tenders but this can be less if the Contracting Officer has ascertained, during pre procurement market engagement, that a lesser time period is practical and realistic. All tender documents for a contract shall be despatched to the Suppliers invited to tender on the same day via in-Tend.
- 5.4.6 A tender period can be extended if there are justifiable reasons, and it is practical to do so. The reasons for any extension of time should be recorded and communicated in writing to all respondents ideally at least one week prior to the closing date.
- 5.4.7 Suppliers must demonstrate that they carry a range and level of insurance cover acceptable to the type of contract being let. As a starting point it would be prudent to assume the following minimum levels of indemnity, Public Liability £5m, Employers Liability £10m (although the legal minimum is £5m), Professional Indemnity £2m, Products Liability between £1m and £5m. These must be reviewed for adequacy in light of the various risk factors affecting the contract. Only in very low risk scenarios would levels of indemnity lower than these be acceptable .If in doubt, contact the Council's Insurance Officer.<sup>28</sup>

<sup>25</sup> Standard Forms can be obtained from corporate procurement

<sup>26</sup> Standard amendments to JCT Minor Works or Measured Term contracts are available from Corporate Procurement

<sup>27</sup> It is prudent that Officers obtain the standard clauses and contracts as and when the procurement need arises, as they are subject to change.

<sup>28</sup> An insurance checklist can be found on the intranet under staff info/finance/insurance

5.4.8 The advice of Legal Services must be sought as necessary, particularly for contracts which are complex.

## 5.5 Submission, Receipt and Opening of Tenders

5.5.1. Tenders shall be submitted through the Council's E-tendering System – In-Tend. Instructions on how to register on the e-tendering system must be provided in the public notice. The system sends full guidance documents on how to use the system to respondents when they register and has on line guidance at every stage. Within the Invitation to Tender documents respondents must be provided with a contact point in case they experience any problems in using the E-Tendering system. Respondents must also be advised that failure to advise the Council of the problem **before** the deadline for return of tenders will mean they have lost their opportunity to tender. Where a notification of a problem is received in time, consideration should be given to extending the deadline for submission and all tenderers should be advised accordingly of any extension of time.

## 5.6 Not Used

## 5.7 Tender Evaluation

5.7.1. The following should be checked by the Officer:

- a. The Tenders are actually from the Suppliers invited to tender (where using a framework or works contracts where a suitability stage was used);
- b. That there are no errors or omissions in the completion of the documents.
- c. Where a check of the prices quoted suggest collusion among tenderers or 'ring' pricing, the case should be referred to the Assistant Director (Finance);
- d. If the supplier invited to tender is on the gov.uk debarment list. If they are consult with Corporate Procurement.

5.7.2. To ensure adequate competition, there must be at least two satisfactory responses to the Invitation to Tender i.e. two responses which meet the minimum quality threshold. If there is only one satisfactory response, the officer must either re-tender the contract, advising respondents accordingly, or obtain an exemption under CSO 3.3.

5.7.3. Where necessary, clarifying some aspect of a Tender response in writing or by way of a meeting is permitted. If a meeting is held then relevant notes should be made of the results of the meeting and matters should be confirmed in writing for contractual purposes.

The officer must use the award criteria and measurement system<sup>29</sup> as set out in the Invitation to Tender.

5.7.4. The Procurement process should take no longer than 10 months from issue of advertisement to award of contract. Should the procurement process take longer than 10 months, authorisation must be sought from the Borough Solicitor, Assistant Director (Finance) or Corporate Procurement Manager to proceed with the contract award.

**Within (and below) this contract value banding only, *Post-Tender Negotiations* may only be used** where the officer justifies the need for post tender negotiation in writing to either the Corporate Procurement Manager, the Assistant Director (Finance), or the Borough Solicitor and that the request is authorised by either the Corporate Procurement Manager, the Assistant Director (Finance), or the Borough Solicitor in writing. Post-Tender Negotiations

---

<sup>29</sup> A sample criteria and measurement template can be found on the intranet under Procurement.



will only be authorised when lawful.

- 5.7.5 Negotiations must be conducted by a team of at least two suitable officers with the involvement of Legal Services, as required. Changes should be confirmed in writing for contractual purposes. Where Post Tender Negotiation results in a significant change to the specification (or contract terms) the contract must not be awarded but re-tendered.
- 5.7.6 Officers must not agree to contract conditions where payment is made before the goods, works or services are received, unless otherwise approved in writing by either the Corporate Procurement Manager, the Assistant Director (Finance) or the Borough Solicitor. Staged payments are acceptable but must be proportionate to the cost of the goods, works or services received and must be submitted for checking to Treasury and Capital in Accountancy, see CSO 5.8.10.
- 5.7.7 If the tendered contract value for the preferred Supplier falls into the higher band 4 (above the Public Contract Threshold) when processes for the lower Band 3 were followed, the officer must provide either the Corporate Procurement Manager, the Assistant Director (Finance), or the Borough Solicitor with a written explanation and supporting evidence as to the basis for estimating the contract value at that lower band. The Corporate Procurement Manager, the Assistant Director (Finance), will decide whether the contract should be re-tendered following the procedures within the higher band.

#### Checks on Financial Status

- 5.7.8 For contracts within this value banding, the officer must ensure the supplier has the level of economic and financial standing that they self certified that they have. To do so obtain two years annual accounts for the preferred Supplier before contract award (unless this is not possible, for example where a company has recently been established). Annual accounts are to be provided to Corporate Procurement, who will check that the supplier self certified correctly. Please allow at least 1 week for this process to be completed.
- 5.7.9 If the veals an unsatisfactory appraisal, yet the officer still wishes to use the Supplier, he/she must submit a written request to the Assistant Director (Finance) or nominated deputy for his/her approval. Approval will not be given in circumstances where the Supplier has failed any minimum pass/fail requirements set out in the Invitation to Tender or associated procurement documents. Any conditional approval given by the Assistant Director (Finance) or nominated deputy must be strictly complied with.
- 5.7.10 At the discretion of Corporate Procurement, financial checks may not be necessary for specific Suppliers. For example, where the contracting body is a local authority.
- 5.7.11 All contracts in this value banding with a term of over 24 months or that are considered high risk will need to be registered with Corporate Procurement for monitoring updates on financial status.

### **5.8 Contract Award and Contract Management**

- 5.8.1 Consult Financial Regulations to ascertain the correct process to gain approval to award<sup>30</sup>
- 5.8.2 All Suppliers who have expressed an interest in a proposed contract should be notified in writing through the Council's E-tendering system whether they have or have not been successful in winning the contract. Tenderers should be notified of their score against each award criteria, the score the winning tenderer obtained and the name of the winning tenderer.

---

<sup>30</sup> An Approval flowchart is available to assist on the intranet under Procurement

If requested additional feedback should be provided.

5.8.3 All contracts in this value band will be in the form of a written contract (see 5.4.4 above) and signed by an authorised signatory of both the Council and the Supplier, unless the contract is required to be sealed under CSO 5.8.6. The written contract must set out (as a minimum):

- a) Description of the work, services or goods (which may comprise the specification);
- b) The contract price (exclusive of VAT) and payment terms;
- c) Any performance dates or milestones;
- d) The contract period including details of any permitted extension options;
- e) The applicable terms and conditions including provisions for the Council to terminate the contract; and
- f) Any other applicable contract documents (e.g. tender, correspondence, specification, drawings, KPI's, project brief/proposal and signed/completed Standard Forms (see 5.4.3)). A copy of these documents should form part of the contract.

5.8.4 Letters of Intent shall only be used in exceptional circumstances and with the approval of the Borough Solicitor who should be satisfied that they are adequately worded.

5.8.5 If acceptance of a tender is for any reason delayed beyond the appropriate tender price validity period, the Supplier must be asked to confirm his tender in writing before the acceptance is issued. This letter of confirmation must be included as part of the contract. If the recommended tenderer submits a revised price, Legal Services must be consulted for advice on how to proceed.

5.8.6 A contract must be sealed<sup>31</sup> in the following cases:

- a) For all formal construction/works contracts over the current Public Contract services threshold (see 6.1)
- b) Where an extended limitation period of 12 years is required (the normal limitation period is 6 years after the end of the contract).

5.8.7 **For contracts within this value banding**, officers must ensure the details are entered onto the Central Contracts Database **An electronic copy of the contract pack must be provided to Corporate Procurement for the Central Contracts Database followed by a scan of the relevant contract pages holding signatures/seals at point of execution.**<sup>32</sup>

5.8.8 The officer may wish to use a contract management checklist to ensure all required steps have been followed. An example checklist can be found on the intranet under "Procurement", although Business Units may use their own forms to reflect their special requirements.

5.8.9 All documentation and records of communications pertaining to the tender must be kept in accordance with Document Retention Schedule which can be found on the intranet.

5.8.10 The officer must monitor and manage the performance of the Supplier throughout the contract to ensure that requirements are delivered satisfactorily. In performing this task the officer must monitor:

- a) Key performance indicators as set out in the contract where applicable

---

<sup>32</sup> Information on process for recording contracts is on the intranet

<sup>32</sup> Information on process for recording contracts is on the intranet

- b) Work performance
- c) Compliance with specification and contract terms and conditions
- d) Cost
- e) Any Value for Money requirements
- f) User satisfaction
- g) Risk management
- h) Variations to the original contract ensuring these are recorded

Further guidance is available on the intranet under "Procurement".

## SECTION 6 CONTRACTS AT OR ABOVE THE PUBLIC CONTRACTS THRESHOLD (BAND 4)

### 6.1 Overview

The value is set by central government and values for 2025 are £214,000 inclusive of VAT for services or supplies and £ 5,372,609 inclusive of VAT for works or concessions. See intranet for current value.

A check list can be found on the intranet to guide procuring officers through the tender exercise (under the “Procurement” section). Further advice should be sought by contacting Corporate Procurement.

The value of any contract is calculated on the basis of the maximum amount the Supplier could expect to receive under or in connection with the contract (including from payments to be received from the Council or third parties) over the entire contract period to include any optional extension periods.

Contract periods should be appropriate to the market in question and not artificially shortened to bring the value into a particular band. It should also be considered if the requirement can be combined across the Council, or combined with similar works e.g. electrical works needed over x years rather than singular works to various buildings over multiple contracts, to provide the council with better value.<sup>33</sup>

Collaboration with other Hertfordshire authorities is encouraged and can be promoted via the Hertfordshire Procurement Group by talking to Corporate Procurement.

### 6.2 Procurement Act 2023

6.2.1 The detailed complex advertising, tendering and reporting processes imposed by the Procurement Act 2023 and Procurement Regulations 2024 are not fully covered in These Contract Procedure Rules. Separate advice and instructions may be issued from time to time by the Corporate Procurement Manager and Legal Services relating to The Procurement Act 2023 and Procurement Regulations 2024. Such advice and instructions These Contract Procedure Rules can be found on the intranet under “Procurement” and should be followed by officers. In the event of any conflict between These Contract Procedure Rules and the Procurement Act 2023/Procurement Regulations 2024, the Procurement Act 2023/Procurement Regulations 2024, will prevail.

6.2.2 Works contracts generally fall under the scope of construction projects, such as new build, or major renovations involving the bringing together of different services and supplies. The Procurement Act 2023 is very specific as to what falls into their definition of ‘Works’ so do not assume ‘Works’ without consulting with Corporate Procurement or Legal Services. If in doubt apply the Services or Supplies thresholds.

6.2.3 ‘Open and Competitive Flexible Procedure are the procurement procedures applied via the Procurement Act 2023<sup>34</sup>, whereby:

- a) in the case of **open procedures**, any interested Supplier may submit a tender;

---

<sup>33</sup> Guidance document “Estimating the total value of your procurement correctly” is available on the intranet under Procurement.

- b) In the case of **the Competitive Flexible Procedure**, Suppliers must follow the process that has been designed. If a request to participate is part of the process then only suppliers invited by the Council after shortlisting may progress to the next stage of the procedure;

6.2.4 It is a requirement of the Procurement Act 2023 to conduct some Pre Market Engagement or to state in the tender notice why you didn't publish a preliminary market engagement notice. Therefore it is strongly advised that some formal Pre Market engagement is undertaken and a preliminary market engagement notice published.

6.2.5 The advice of the Corporate Procurement Manager and/or Legal Services must be sought where following the Procurement Act 2023, especially if intending to use the Competitive Flexible Procedure.

6.2.6 The officer must provide the information needed to enable the procurement team to place notices required by the Procurement Act 2023. Some notices are optional but the procurement teams advice must be taken

### **6.3 Supplier Selection**

6.3.1 Under the Procurement Act 2023, the officer must liaise with Corporate Procurement to place a Tender Notice to the Find a Tender service. Public notices may also be placed in trade journals and approved Suppliers can be advised of the tender exercise, so long as this is done after the Tender Notice has been published..

6.3.2 Framework agreements, Dynamic purchasing systems (DPS) and Dynamic Markets managed by other contracting authorities can be used when the contract value is above the Public Contract Threshold, so long as the contracting authorities have awarded the framework agreement (or DPS/Dynamic Market) in accordance with PCR2015 or the Procurement Act 2023, and on behalf of the Council. Where it is proposed to use any of the above for a procurement above the Public Contract Threshold, approval must first be sought from either the Corporate Procurement Manager, the Assistant Director (Finance), or the Borough Solicitor and Legal Services must be consulted as to whether the proposed route is legally compliant and any terms and conditions to be used are appropriate. Framework agreements, DPS' and Dynamic Markets must not be used to award concession contracts.

6.3.3 Any procedures provided by the purchasing consortium must be followed and the procedure must be undertaken in compliance with the PCR 2015 or the Procurement Act 2023 (as applicable). Generally mini competition is likely to achieve the best value as it allows Suppliers to submit tailored bids to our requirement.

6.3.4 Direct Award is not available on all frameworks, and never on a DPS or Dynamic Market, where it is an option then generally it is only permitted if the officer can establish that best value considerations have been taken into account and one of the following apply;

- The framework is sole supplier; or
- Where there is a ranked call off provision.

Officers wishing to use Direct award for other reasons may apply to do so using one of the Waiver reasons in section 3.

The officer must follow the procedures provided by the contracting authority to conduct the mini competition amongst the suppliers on the framework. It is not permitted to include suppliers in the mini-competition who are not listed on the framework.

It is expected that when conducting a mini competition at least one more bid than the number of contracts to be let is received, therefore a level of pre market engagement needs to be undertaken to ascertain if this is an appropriate route to market.

## 6.4 Short Listing

- 6.4.1 Short Listing will be applicable if the Council is using the Competitive Flexible procedure, as outlined in the Procurement Act 2023.
- 6.4.2 For contracts within this value banding (unless utilising an approved framework) a financial check must be undertaken as part of the evaluation process. See CSO 6.7.10.
- 6.4.3 All Suppliers who have expressed an interest in a proposed contract should be notified in writing whether they have or have not been successful in making the next stage promptly after the decision has been made. Feedback should be provided in the letter.
- 6.4.4 The Supplier's status on the Central Digital Platform and on the debarment list together with any conditions of participation relating to legal and financial capacity to perform the contract and/or technical ability to perform the contract should be considered at the Short listing stage as the Council is generally precluded from taking these factors into account as 'award criteria' within the tender stage.<sup>35</sup> When using the open procedure these factors should be considered as part of the tendering process (although separately to evaluation of tenders).

## 6.5 The Invitation to Tender

- 6.5.1 The Instructions to Tenderers<sup>36</sup> must, as a minimum, include the following:
  - a) Set out how the procurement will be conducted. If not using the open process explaining how the competitive flexible procedure will be conducted;
  - b) List the information which must be provided by the Supplier in their response, including any forms, tables or pricing schedules to be completed and that they need to ensure the information held on the Central Digital platform is up to date;
  - c) State the method of response required. All tenders must be issued through the Council's E-tendering System – In-Tend (see CSO 5.5);
  - d) Outline a timetable for the remainder of the procurement exercise, detailing the closing date for receipt of responses, the evaluation period and when a response on contract award is expected;
  - e) State the method and deadline for obtaining additional information or clarification (usually 14-21 days before the closing date for receipt of responses) and that additional information requested will be supplied to all respondents (this should be supplied to all suppliers at the same time no later than 7 days before the closing date for receipt of responses<sup>37</sup>);
    - Set out in detail how the responses will be evaluated, listing the appropriate award criteria and their relative weightings, which shall be based on the "most advantageous tender". "Lowest price" must not be used as the sole award criteria unless approved by Corporate Procurement ;
  - f) "" – ""
  - g) State that late responses will not be considered and that the Council is not bound to accept any Tender;

<sup>35</sup> If you are unsure about the 'conditions of participation' please contact the Corporate Procurement Team

<sup>36</sup> An outline Invitation To Tender can be obtained from Corporate Procurement.

<sup>37</sup> A Clarification/Query template spreadsheet is available from corporate procurement

h) State the price validity period (usually up to a maximum of six months);

Provide a statement to the effect that under the Freedom of Information Act (2000) and the requirements for transparency, the Council may be obliged to provide information regarding the procurement exercise or a subsequent contract award and that respondents will be advised of any requests for information and given an opportunity to comment before disclosure of such information (information whose disclosure would be likely to prejudice anyone's commercial interests is exempt from disclosure provided the public interest in withholding the information outweighs the public interest in disclosing it)

6.5.2 An adequate **specification** must be included. The specification must describe clearly the Council's requirements in sufficient detail to enable the submission of competitive offers.

6.5.3 For contracts with an estimated value of over £5m it is mandatory to set at least 3 KPIs unless the Council considers that the supplier's performance under the contract could not appropriately be assessed by reference to KPIs.

6.5.4 For all contracts within this value band, the following **standard forms** must either form part of the participation document or the Invitation To Tender and should be included in the final contract documentation<sup>38</sup>:

- a) Form of Tender
- b) Certificate that the Tender is Bona Fide
- c) Parent Company Guarantee (if applicable)
- d) Performance Bond Certificate (if applicable)
- e) Insurance requirements

The officer should seek advice from Legal Services as to what terms and conditions should be included in the contract. Where appropriate to the type of contract being let, the officer should use standard industry contracts ie JCT<sup>39</sup> or the **Council's own standard contracts**. Where the Council does not supply a suitable standard contract for the type of contract being let, the officer should liaise with Legal Services to identify contract terms relevant to that specific contract. The officer must seek advice from Legal services if he/she is unclear as to what terms and conditions should be included in the contract. In any event, it should be stated in the Invitation to Tender which contract terms will apply to the contract. SBC's standard clauses and contracts are available from corporate procurement.

6.5.5 A tender period can be extended if there are justifiable reasons and it is practical to do so. The reasons for any extension of time should be recorded and communicated in writing to all respondents with as much notice as possible of the change. For Open tenders a notice must be placed notifying the change to the tender period. This will also apply to the Competitive Flexible Procedure if an extension is made to the first stage within the procurement process.

6.5.6 Suppliers must carry a range and level of insurance cover acceptable to the type of contract being let. As a starting point it would be prudent to assume the following minimum levels of indemnity, Public Liability £5m, Employers Liability £10m (although the legal minimum is £5m), Professional Indemnity £2m, Products Liability between £1 and £5m. These must be reviewed for adequacy in light of the various risk factors affecting the contract. Only in very low risk scenarios would levels of indemnity lower than these be acceptable. If in doubt, contact the Council's Insurance Officer.<sup>40</sup>

---

<sup>38</sup> Standard forms can be found within the template tender documents available from corporate procurement

<sup>39</sup> Standard amendments to JCT Minor Works or Measured Term contracts are available from Corporate Procurement

<sup>40</sup> An insurance checklist can be found on the intranet under staff info/finance/insurance

- 6.5.7 The advice of Legal Services must be sought as necessary, particularly for contracts which are complex.
- 6.5.8 The Procurement Act 2023 lays down specific time periods for submission of Tenders, which must be followed (see guidance in the Intranet under "Procurement")
- 6.5.9 If the procurement is a mini competition (tender) under an approved framework agreement that has been let in accordance with PCR2015 or the Procurement Act 2023 and covers the Council, then normally at least four weeks should be allowed for the submission of Tenders. This can be less if the Contracting Officer has ascertained, after consultation with all short listed Suppliers, that a lesser time period is practical and realistic.
- 6.5.10 It may be necessary during the tender period for the Council to clarify some aspects of its tender documents. This may be done in writing or by way of a meeting i.e. Bidders Day. Parity of tendering must be preserved so it is important that all tenderers are issued with the same information.
- 6.5.11 Before a tender notice is published, the officer must consider if the requirement could be split into lots. If the requirement could reasonably be split into lots and a decision is made not to do so, reasons for such must be provided in the tender notice.
- 6.5.12 The Public Services 2012 Social Value Act requires commissioners to consider securing economic, social, or environmental benefits when buying services at or above the Public Contracts Threshold. To comply with the Act, commissioners must think about how what they are going to buy, or how they are going to buy it, could add these benefits, and must also consider whether they should consult on these issues. This consideration needs to be documented and retained in line with the councils retention guidance.

## **6.6 Submission, Receipt and Opening of Tenders**

For contracts within this value banding, CSO 5.5 must be followed.

## **6.7 Tender Evaluation**

- 1.1.1 The following should be checked by the Officer:
  - a) The Tenders are actually from the firms invited to tender (Not applicable in an open tender);
  - b) That the Tenderers are not on the debarment list;
  - c) Whether or not Tenderers are "excluded" or "excludable" suppliers;
  - d) Check that the price of the tenders as set out on the Opening of Tenders is correct;
  - e) That there are no errors or omissions in the completion of the documents; and
  - f) Where a check of the prices quoted suggest collusion among tenderers or 'ring' pricing, the case should be referred to the Assistant Director (Finance).
- 6.7.2 Guidance is available from Corporate Procurement on carrying out checks of the debarment list and considering whether a Tenderer is an "excluded" or "excludable" supplier. If a Tenderer is on the debarment list and/or is an "excluded" or "excludable" supplier within the meaning of the Procurement Act 2023, advice must be sought from Corporate Procurement and Legal Services.
- 6.7.3 Where necessary, clarifying some aspect of a Tender response in writing or by way of a



meeting is permitted. If a meeting is held then relevant notes should be made of the results of the meeting and as necessary significant matters should be confirmed in writing for contractual purposes. It is possible to upload the notes to the Council's Intend system if required.

- 6.7.4 The Procurement process should generally take no longer than 10 months from issue of advertisement to award of contract. Should the procurement process take longer than 10 months, authorisation must be sought from the Borough Solicitor, Assistant Director (Finance) or Corporate Procurement Manager to proceed with the contract award.
- 6.7.5 **Post Tender Negotiation must not be conducted unless authorised by Corporate Procurement in consultation with Legal Services. It is unlikely to be agreed except in particularly complex procurements**
- 6.7.6 The officer must use the award criteria and measurement system as set out in the public notice and Invitation to Tender<sup>41</sup>. The measurement system should usually include the following three elements:
- a) A point scoring system for individual quality/value for money considerations;
  - b) Weightings applied to quality/value for money factors in accordance with their importance to the completion of the contract. Any sub-criteria must also be identified at this stage and the appropriate breakdown weighting disclosed;
  - c) A "Quality Threshold" which sets the minimum standard expected. Tenders which fall below this shall be excluded from consideration.
- 6.7.7 All suppliers must be notified in writing through the Council's E-tendering system whether they have or have not been successful either in making the next stage or winning the contract. Suppliers must be given an assessment summary so they can understand why they scored as they did and a copy of the winning bidders assessment summary (redacted of commercially confidential information). Template assessment summaries are available from Corporate Procurement.
- 6.7.8 Once the assessment summaries have been sent the council can publish a contract award notice. **The contract with the successful supplier must not be entered into until 8 working days (standstill period) after the date on which the contract award notice was published** allowing unsuccessful suppliers time to dispute any decision made.<sup>42</sup> Certain contracts are not subject to a mandatory standstill period but the Council's default position (absent authorisation from Corporate Procurement) is to apply a standstill period to all contracts valued at or above the Public Contracts Threshold.
- 6.7.9 Officers must not agree to contract conditions where payment is made before the goods, works or services are received, unless otherwise approved in writing by either the Corporate Procurement Manager, the Assistant Director (Finance) or the Borough Solicitor. Staged payments are acceptable but must be proportionate to the cost of goods, works or services received and must be submitted to Treasury and Capital in Accountancy for checking, please see CSO 6.8.13.

### **Checks on Financial Status**

(Note 6.4.2 above)

---

<sup>41</sup> A sample criteria and measurement template can be obtained from Corporate Procurement.

<sup>42</sup> Compliant template letters showing the standstill period are available from Corporate Procurement

- 6.7.10 When using the Competitive Flexible Procedure financial appraisals should be conducted at the first stage that may cut down the numbers of tenderers. When using the open procedure, financial appraisals should be carried out as part of the tendering process.
- 6.7.11 At the discretion of Corporate Procurement, financial checks may not be necessary for specific Suppliers. For example, when the contracting body is a local authority.
- 6.7.12 All contracts in this value banding with a term of over 24 months or are considered high risk will need to be registered with Corporate Procurement for monitoring updates on financial status.

## 6.8 Contract Award and Contract Management

- 6.8.1 Consult Financial Regulations regarding the process to be followed to gain approval to award
- 6.8.2 Officers must obtain and check copies of all documents that were self-certified by the supplier during the tender process before awarding the contract.
- 6.8.3 All contracts over the Public contracts services threshold must be made under the common seal of the Council. Unless in exceptional circumstances approval to sign under hand is sought and obtained, from the Borough Solicitor, prior to competition.<sup>43</sup> Officers must follow the sealing process as detailed on the intranet.<sup>44</sup>
- 6.8.4 If acceptance of a tender is for any reason delayed beyond the appropriate tender price validity period, the Supplier must be asked to confirm his tender in writing before the acceptance is issued. This letter of confirmation must be included as part of the contract. If the recommended tenderer submits a revised price, Legal Services must be consulted.
- 6.8.5 A written report must be compiled that satisfies section 98 of the Procurement Act 2023 and records of all communications between the Council and suppliers involved in the procurement process must be retained. The report and records must be kept with the signed contractual documents for a minimum of 3 years from the date the contract is entered into or, if the contract is awarded but not entered into, the date it was awarded.<sup>45</sup>
- 6.8.6 Contract details notices must be published by the Corporate Procurement team on Find a Tender the within 30 days of the day on which the contract is entered into (120 days in the case of a light touch contract) via the Council's E-tendering system – In-Tend<sup>46</sup>.
- 6.8.7 For contracts within this value banding, **an electronic award notification form must be completed and passed to Corporate Procurement<sup>47</sup> An electronic copy of the contract pack must be provided to Corporate Procurement for the Central Contracts Database followed by a scan of the fully signed contract pages holding signatures/seals at point of execution.**
- 6.8.8 On-line Publication is required of a full copy of the contract for contracts valued at over £5mill (redacted for commercially sensitive information). The contract must be published before the

<sup>45</sup> The award notification form contains a page to complete Regulation 98 information advice is available from Corporate procurement.

<sup>45</sup> The award notification form contains a page to complete Regulation 98 information advice is available from Corporate procurement.

<sup>45</sup> The award notification form contains a page to complete Regulation 98 information advice is available from Corporate procurement.

<sup>46</sup> The Corporate Procurement Team will undertake this task.

<sup>47</sup> The Award notification forms are found on the intranet under Procurement

end of the period of 90 days (180 days in the case of a light touch contract) beginning with the day on which the contract is entered into, although if possible this should be done at the same time as publishing the contract details notice.

- 6.8.9 For contracts with an estimated value of over £5m it is mandatory to set at least 3 KPIs unless the Council considers that the supplier's performance under the contract could not appropriately be assessed by reference to KPIs. A description of the 3 KPIs which the Council regards as most material to performance of the contract must be set out in the contract details notice. The requirement to set and publish details of KPIs does not apply to concession contracts or light touch contracts, although it is best practice and generally advisable to set KPIs.
- 6.8.10 The officer may wish to use a contract management checklist form to ensure all required steps have been followed. An example checklist can be found on the intranet under "Procurement", although Business Units may use their own forms to reflect their special requirements. All documentation and records of communications pertaining to the tender must be kept in accordance with Document Retention Schedule which can be found on the intranet.
- 6.8.11 The officer should provide his or her line manager, or Senior Leadership Team member as considered necessary, with regular reports on the financial position of a contract for budget or funding monitoring purposes and to enable corrective action to be taken as necessary.
- 6.8.12 All interim valuations and final accounts in respect of staged payment contracts must also be submitted for checking by Treasury and Capital in Accountancy for recording in the Central Contracts Database before they are sent for payment to Exchequer.
- 6.8.13 The officer must monitor the performance of the Supplier to ensure that requirements of the contract are delivered satisfactorily<sup>48</sup>. In performing this task the officer must monitor:
- a) Work performance (including KPI's if applicable). If the contract is over £5m then performance must be assessed against KPIs set in accordance with the requirements of the Procurement Act 2023 at least once in every 12 month period and on termination and details of the assessment must be published online. Officers are required to consult with Corporate Procurement on this requirement.
  - b) Compliance with specification and contract terms and conditions.
  - c) Cost
  - d) Any Value for Money requirements
  - e) User satisfaction
  - f) Risk management (to include checking that relevant certificates such as insurance are up to date and financial monitoring is being undertaken)
  - g) Ensure that variations are considered, checking before agreeing that they are lawful and providing information to corporate procurement in a timely manner to enable notices to be published where applicable.
- 6.8.14 Should there be a breach of contract or a failure to perform to the Council's satisfaction, then a contract performance notice may need to be published within 30 days. This applies to contracts awarded under the Procurement Act 2023. Where there are performance issues or where there has been a breach of contract, officers must consult with Corporate Procurement

---

<sup>48</sup> Guidance on contract management is available on the intranet under Procurement

and/or Legal Services on this issue.

- 6.8.15 Mandatory Contract Termination Notices for any contract terminations of Covered Public Contracts including natural expiry within 30 days of termination/expiry must be published. Details must be provided to Corporate Procurement team who will publish the required notice.
- 6.8.16 All documents, communications and minutes pertaining to the tender exercise and contract award must be kept in accordance with the Document Retention Schedule which can be found on the intranet under the section marked Freedom of Information.
- 6.8.17 All staff that manage contracts and have this within their job description must attend the Council's training on Contract Management.

## SECTION 7 SPECIAL TYPES OF CONTRACTS

### 7.1 Engagement of Consultants

- 7.1.1 It is important that value for money is obtained when employing consultants.<sup>49</sup> Therefore, for all instances where the Contract Value of a consultancy appointment is over £10,001, the commissioning officer must provide a report to the Assistant Director responsible containing as a minimum the details listed under CSO 7.1.2.
- 7.1.2 Before consultants are invited to bid/tender the Assistant Director is responsible for:
- a) identifying the project objectives; and
  - b) documenting the reasons for the employment of consultants including the benefits of employing consultants against in-house staff or agency staff; and
  - c) documenting the residual in-house costs to support the consultant and ensuring that sufficient budget is available to meet all identified costs;
  - d) Preparing a project brief with action dates to be recorded against each section, including:
    - (i) background; and
    - (ii) objectives; and
    - (iii) timetable; and
    - (iv) total costs; and
    - (v) performance monitoring arrangements; and
    - (vi) documentation standards; and
    - (vii) contact names and numbers for enquiries
- 7.1.3 All consultants must provide evidence of adequate professional indemnity insurance prior to their appointment. The requirement for insurance and the levels required should be advertised in the specification of works, if in doubt about the levels required consult with the Council's Insurance Manager
- 7.1.4 Human Resources must be consulted to help determine if the appointment is within IR35 or if a consultant is appointed and employed through an agency or through the council's payroll the consultant may fall under the Agency Workers Regulations 2010.
- 7.1.5 It should be a condition of contract with any consultant, agent or professional advisor who is to be responsible to the Council for the award or supervision of a contract on its behalf, that in relation to that contract they shall:
- a) comply with these These Contract Procedure Rules as though they were an employee of the Council; and
  - b) produce on request all the records maintained by them in relation to the contract award and award of contract; and
  - c) on completion of the contract, transmit all records that they have produced or received that relate to the contract to the appropriate Assistant Director
- 7.1.6 Any letter of appointment or contract must set out the consultants legal obligations to the Council including where the ownership of intellectual property rights will sit. Advice on intellectual property can be sought from Legal Services. Every written contract shall provide that the consultant shall not assign directly or indirectly the whole or any part of the contract without the written approval of the Council.

---

<sup>49</sup> A consultant is a professional who provides expert advice in a specific field; they either operate within the organisation or are employed externally by an organisation for a fee.

## **The Invitation to Quote / Tender**

- 7.1.7 When procuring consultants the total estimated contract value should be used to adopt the procurement band to use.
- 7.1.8 Where it can be demonstrated that there are insufficient suitably qualified consultants to meet the competition requirement, the officer must record in writing the reason why the services are so specialist and obtain an exemption approval as required by paragraph 3.3 of Section 3 of these Contract Procedure Rules to invite fewer consultants.
- 7.1.9 For consultancies over £10,001 related to construction, estates or building surveying work, the use of conditions of engagement is permitted where they are considered appropriate by the Assistant Director in consultation with Legal Services<sup>50</sup>. Other consultancies over £10,001 including management and IT should use terms and conditions either supplied or approved by Legal Services .

## **Tender Evaluation and Contract Award**

- 7.1.10 The tendering, evaluation and award procedure, as outlined in Section 5, shall apply to all consultancies where the total estimated value is over £100,001 and under the Procurement Act 2023 threshold and in cases below that value where there is a strong likelihood of additional work (i.e. serial or extension contracts), which would bring the total value above £100,001.

## **Contract Monitoring**

- 7.1.11 For contracts over £100,001, the Senior Leadership Team member shall be responsible for ensuring that the Consultants work is properly monitored on an ongoing basis. This includes:
- a) Appointing a named Project Officer or Group
  - b) Specifying key tasks and dates for Consultants
  - c) Monitoring costs against budgets and total contract value (payment schedules should include the agreed fees and the frequency of invoicing)
  - d) Arranging regular progress meetings with Consultants
- 7.1.12 The project officer shall maintain and keep all records pertaining to the tender, award and ongoing maintenance of the contract.
- 7.1.13 The project officer shall maintain the following documentation:
- a) project brief/objectives; and
  - b) minuted authority, where required; and
  - c) the agreement with the consultant and any subsequent variations; and
  - d) records that can demonstrate contractors' compliance with contract standards prior to payments being made; and
  - e) record of payments made to the consultant and for the project; and
  - f) a project evaluation form
- 7.1.14 The project officer shall report immediately to the Assistant Director any material technical or financial deviation by the consultant from the specified agreement.

---

<sup>50</sup> Standard terms and conditions for consultants approved by Legal are those in the services quotation document provided on the intranet under Procurement.

## 7.2 Disposal Contracts

- 7.2.1 Where items, excluding land and buildings over the cost of £1000 (at the time of purchase) cannot be re-used elsewhere in the Council an asset disposal certificate form found on the staff intranet under Finance must be completed, explaining why the items are surplus or redundant, any health and safety issues, and the proposed method of disposal. The form should be submitted to the relevant Assistant Director for approval to proceed with disposal of the items. All vehicles must be disposed of through sale by public auction or by quotations from a reputable dealer.
- 7.2.2 Where small items of equipment such as keyboards are scrapped under the cost of £1000 (at the time of purchase), they must be recorded on a list held by each relevant Assistant Director and signed off at year end. The list must be passed to Treasury and Capital in Accountancy at year end.
- 7.2.3 The highest bid received for an item if reasonable should be accepted. One of the following methods of disposal should be used:
- a) Invite quotations or tenders from outside organisations<sup>51</sup>
  - b) Sale by Public Auction.
  - c) Trade in for a new item when the circumstances are appropriate.
  - d) Scrap the items in a safe manner.
- 7.2.4 The proposed method of disposal should be approved by a Assistant Director. All disposals must comply as applicable with the Waste Electrical & Electronic Equipment Directive and Health & Safety legislation. All Council and personal data must be removed from any IT or recording equipment prior to their disposal.

### Competition Rules

- 7.2.5 Where inviting quotations or tenders from outside organisations the following number of bidders should be invited as follows:

<b><u>Estimated Value</u></b>	<b><u>Minimum number of bidders to be invited (for Plant &amp; Equipment only)</u></b>
Up to £15,000	At least one bidder by quote
Over £15,001 up to £100,000	At least three bidders by quote
Over £100,001	At least four bidders by invitation to tender

- 7.2.6 Records of the bids received and written approval by an authorised officer to accept the most favourable bidder should be kept. The acceptance will be by letter signed by SLT Member or Assistant Director if the value is under £100,000 or a Senior Leadership Team member if the value is over £100,001.

## 7.3 Not Used

## 7.4 Contract Hire and Lease/Rental Agreements

- 7.4.1 Contract hire and lease/rental agreements are procurements and are subject to the provisions contained in These Contract Procedure Rules.

---

<sup>51</sup> Quotations or tenders can be issued through the Councils Intend e-tendering system if required

7.4.2 Before entering into a contract hire or lease/rental agreement the officer shall ensure that the financial implications have been assessed by Accountancy. Lease/Rental agreements can only be signed off following approval from the Assistant Director (Finance) or their nominated deputy.

## **7.5 Nominated Sub-Contractors and Suppliers**

7.5.1 If nominations are to be used then the terms of the contract between the Council and the main contractor should make it clear that the main contractor will be expected to enter into contract with the sub-contractors or Suppliers nominated by the Council.

7.5.2 *Tenders* for the nominated sub-contractors or Suppliers will be invited, opened and evaluated by the Council in accordance with These Contract Procedure Rules. The officer shall nominate the successful tenderer(s) to the main contractor.

7.5.3 The main contractor will ensure that the main contract indemnifies them against the sub-contractors own obligations in relation to the works, supplies or services included in the sub-contract.

## **7.6 Term Contracts and Framework Agreements**

7.6.1 An officer may consider it advantageous to the Council, to invite tenders on a Term basis or under a Framework Agreement where payment is based not on defined works, services or supplies, but on a Schedule of Rates, Bill of Quantities or fixed unit cost over a defined period of time.

7.6.2 Unless a long term partnership, term contracts should not exceed five years or in the case of framework agreements four years, but will not normally exceed two years unless the contract contains a price fluctuation clause. It is not permitted to extend a contract that is renewed yearly on more than four occasions without re-tendering. Such cases should be reviewed annually and a written record of the decision (with reasons) to either, extend the contract or carry out a new competitive tendering exercise must be kept. Officers must not enter into contracts that auto renew unless authorised by Corporate procurement.

7.6.3 The relevant procedures and regulations in Sections 3 to 6 of These Contract Procedure Rules are applicable to all Term Contracts.

7.6.4 Any Framework Agreement must be tendered in accordance with These Contract Procedure Rules or under The Procurement Act 2023, as applicable.

7.6.5 The estimated value of the Term Contract should be based on the full length of the contract (including any options for contract extensions) or for four years if the contract is renewable yearly or is a framework agreement.

7.6.6 Where additional items of work are required but not contained within the Schedule of Rates consult with Corporate Procurement to check these are legally valid variations, If agreed all suppliers on the framework agreement or term contract shall be given the opportunity of pricing such items which will then be added to the main Schedule of Rates to be used in the future.

## **7.7 Partnerships & Shared Services**

7.7.1 The term 'Partnership' is used to cover a wide variety of joint ventures and other procurement arrangements. The Senior Leadership Team member or contracting officer shall ensure that



the prior approval of The Assistant Director (Finance) or the Borough Solicitor for the proposed partnership arrangement is obtained. The financial implications must be assessed by the Assistant Director (Finance) and all proposed partnership agreements must be cleared with the Borough Solicitor **at the earliest stage**.

7.7.2 All partnership agreements shall include *where relevant*:

- a) The principles of the partnership
- b) Output specification and specified inputs
- c) Partnership board
- d) Open book accounting
- e) Any profit sharing arrangement and payment mechanism
- f) Hierarchy of dispute resolutions mechanisms
- g) Quality and Environment management systems
- h) Asset transfer
- i) Withdrawal arrangements

7.7.3 Partnership agreements which involve a joint venture/contractual arrangement with private sector bodies are subject to the provisions of These Contract Procedure Rules.

7.7.4 A competitive exercise shall be undertaken in accordance with the provisions of These Contract Procedure Rules to select the partner and award the work. In any cases where the proposed partnership would mean that These Contract Procedure Rules of another public sector body would take precedence over those of Stevenage Borough Council, the written approval of either the Assistant Director (Finance) or Borough Solicitor must first be obtained before any partnership is formalised.

7.7.5 Procurements undertaken through an existing Shared Service will be made using the These Contract Procedure Rules of the contracting lead authority.

**7.8 Income Generating/Commercial Contracts or Concession Contracts**

7.8.1 All income generating contracts must be subject to competition, as follows:

	<b>Estimated Value of the contract to bidders</b>	<b>Minimum Number of Bidders to be Invited</b>
<b>Band 1</b>	Up to £15,000	At least one bidder by quote
<b>Band 2</b>	£15,001 – £100,000	At least three bidders invited to quote (a minimum of two responses received)
<b>Band 3</b>	Above £100,001	Public advertisement used

7.8.2 Details of income generating/commercial contracts in band 2 or above must be reported to and approved in writing by a Strategic Director.

7.8.3 For contracts with an estimated value above £100,001, CSO 5.5 (regarding the submission, receipt and opening of tenders) must be followed.

7.8.4 Where income generating/commercial contracts also incur a cost to the Council, the cost element may be subject to These Contract Procedure Rules in its own right. In this

instance, the advice of the Corporate Procurement Manager, Assistant Director (Finance) or Shared Legal Service Commercial Law team should be sought.

## **SECTION 8 OTHER CONSIDERATIONS**

### **8.1 Contractual Disputes**

- 8.1.1 The officer should seek the advice and involvement of Legal Services as appropriate in contractual disputes with Suppliers.
- 8.1.2 In the event of a claim from a Supplier for loss or expense incurred (either permitted by the terms of the contract or extra-contractual), seek advice from Legal Services immediately.

### **8.2 Termination of Contracts**

- 8.2.1 Subject to the terms and conditions of the contract, where the Supplier has demonstrably failed to deliver the work, services or goods in accordance with the contract the Council will be at liberty to terminate the contract either wholly or in part and to procure the works, supplies or services of the same or similar description elsewhere, in order to make good such default.
- 8.2.2 Should the Supplier become debarred during the course of the contract consult with Legal Services.
- 8.2.3 Adequate written evidence of poor unacceptable performance must be kept. Such records would include relevant correspondence and records of relevant meetings with the Supplier.
- 8.2.4 For contracts let under the Procurement Act 2023 Contract performance notices may be required and termination notices will be required once the contract is terminated. Involve the Corporate procurement team to ensure appropriate publication.
- 8.2.5 Legal Services must be involved in the termination of any formal contract to ensure that:
  - a) The Council's case for termination is legally sound; and,
  - b) The termination is carried out in accordance with the terms of the contract.

### **8.3 Bankruptcies, Liquidations and Novations**

- 8.3.1 In the event that a Supplier ceases to trade as a result of a bankruptcy, liquidation or otherwise then Legal Services must be involved in any of the following:
  - a) Terminating the contract
  - b) The appointment of new Supplier to complete the work or service;
  - c) Negotiations with liquidator/receiver/administrator
  - d) Assignment of contract and Novation
- 8.3.2 If a Supplier indicates that it wishes to transfer, assign or novate a contract, Legal Services must be consulted prior to any agreement to accept. Equally, if a supplier's business is transferred to another supplier, legal advice must be sought from Legal Services as to whether a novation or assignment is needed and as to any other steps that must be taken before any such assignment or novation is accepted.

### **8.4 Contract Variations**

- 8.4.1 For contracts equal to or above the Public Contracts Thresholds, officers must seek advice from Corporate Procurement and/or Legal Services before any variation is agreed. This includes any contracts below the Public Contracts Threshold where the proposed variation will or may take the overall estimated value of the contract over the threshold.
- 8.4.2 No variation shall take place that contravene the Public Contracts Regulations 2015 or the Procurement Act 2023 in any circumstances.
- 8.4.3 Depending on the circumstance the council may need to publish a public notice prior to committing to the variation and a voluntary standstill period should be considered for contracts equal to or above the Public Contracts Threshold.
- 8.4.4 Variation shall relate to the work specified in an existing contract only and shall not be given in circumstances where a separate contract should or ought to have been entered into. E.g. the variation must not materially change the contract.
- 8.4.5 All variation must normally be issued to the Supplier prior to the relevant work being carried out but, in exceptional circumstances, should be given as soon as possible thereafter.
- 8.4.6 Unless agreed otherwise with Legal Services, variations shall be documented in the form required by the written contract or (if none) documented in writing and signed by an authorised signatory on behalf of the Council and the Supplier. In the case of sealed documents Legal Services must be consulted. Officers should consult with Legal Services if in doubt about the process for formalising a variation (or if support is required).
- 8.4.7 All contract variations regarding contract value or expiry dates for both under and over threshold contracts must be reported to Corporate Procurement to enable the changes to be updated on the Council's contracts register.

## **8.5 Contract Extensions**

- 8.5.1 Term contracts often have the provision for extensions, e.g.. the contract term is 3 years with the option to extend for a further 2 years. When considering taking up the extension option consider if this will be in the councils best interest to extend. e.g. is the service still required in the existing form? Has the market changed? Could re procuring produce a saving? Do the research in sufficient time so that if the answer is re procure there is sufficient time to re procure well, the default should not be to extend because it's not been thought about it in time for any other option. The decision to extend is signed off by the officer with delegated rights to sign contracts of the value of the extension.
- 8.5.2 Should the contract not have provision to extend but is it considered desirable then all requests must be made in writing to either the Corporate Procurement Manager, the Assistant Director (Finance) or the Borough Solicitor for their approval. No extension that contravenes the Public Contracts Regulations 2015 or the Procurement Act 2023 will be granted and no extension to an existing contract shall be given unless it can be clearly demonstrated that a change of Supplier would result in one or more of the following:
  - a) Unacceptable technical difficulties
  - b) A significant and unacceptable increase in costs to the Council
  - c) Significant disruption to the delivery of Council services.
- 8.5.3 Should the value of the extension being requested bring the contract value up to and above

the Public Contract Threshold or tip a previously under £5m contract to above that value then consult Corporate Procurement on the implications that brings before making the formal request.

- 8.5.4 It is not permitted to extend a contract that is renewed yearly on more than four occasions without re-tendering. Such cases should be reviewed annually and a written record of the decision (with reasons) to either, extend the contract or carry out a new competitive tendering exercise must be kept. Officers must not enter into contracts that auto renew unless authorised by Corporate Procurement.
- 8.5.5 Legal Services shall be consulted about the process to document the extension.
- 8.5.6 Where the total contract value (including the original contract value) exceeds £5,001, details of the contract extension must be provided to Corporate Procurement for recording on the Central Contracts Database. If a contract record has already been entered on the central register then this will need to be updated with the contract extension details<sup>52</sup>.

## **8.6 Green Environment and Sustainable Sources**

Goods or services which are known to be harmful to the environment, and where there are other adequate options, will not be used. Wherever practical and cost effective, only materials from sustainable sources will be used.

## **8.7 Diversity**

Officers should take steps in the procurement exercise to encourage a diverse and competitive supply market, including small firms, social enterprises, ethnic minority businesses and voluntary and community sector suppliers.<sup>53</sup>

## **8.8 Equality**

The Council must have due regard to the requirements of the public sector equalities duty under the Equalities Act 2010, which must be taken into account when procuring goods, works, or services from external providers.

## **8.9 Innovative Procurement/Abnormal Contract Action**

New or different ways of purchasing goods, services or works, which give better value for money, are encouraged. However, any proposals for innovative procurement or abnormal contract action (including the use of another organisation's Contract Procedure Rules and E-auctions) must be discussed with the Corporate Procurement team and then be cleared by the Borough Solicitor to ensure the proposal is legally sound.

## **8.10 Conflicts of Interest**

Officers must be mindful of any conflicts of interest or perceived conflicts of interest at all stages of the procurement process and must document for band 4 procurements as a minimum that this has been considered (and mitigated if needed) at pre procurement, tender, evaluation, and contract management stages. Further guidance is available from Corporate Procurement. Confirmation that this has been done will be required before

---

<sup>52</sup> A variation form to amend central contract database details is available on the intranet under Procurement

<sup>53</sup> Further guidance on how to encourage a diverse and competitive supply market using pre-procurement is available on the internet under Procurement.

publishing any notices in relation to the procurement at band 4 or above.

In addition Section 117 of the Local Government Act 1972 provides that, if it comes to the attention of any officer, that the Council has entered or is proposing to enter into a contract in which he or she has “pecuniary” interest, he or she must give notice in writing of that interest to the Authority as soon as is practicable. It is a criminal offence not to comply with this provision.

- a) The register in which the written notice is to be given is held by the Constitutional Services Manager.
- b) “Pecuniary” includes any direct or indirect interest and is defined by reference to Section 95 of the Local Government Act 1972. The Borough Solicitor’s advice should be sought in areas of uncertainty.
- c) The requirement to register applies even if the officer is not involved with the Contract.

### **8.11 Freedom of Information Act (2000)**

The Data protection officer or their appointed nominee should be consulted where requests for information on tenders or contracts are received under the Freedom of Information Act (2000). This also includes requests under the Environmental Information Regulations 2004.

### **8.12 Security of Performance and Performance Liability**

In order to protect the Council from non-performance or poor performance in a contract, the officer should consider whether a performance bond or a liquidated damages clause is required and in what form. These are especially relevant for Works and some Service contracts<sup>54</sup>. Legal Services should be consulted about the type and wording of the bond or liquidated damages clause.

For Works contracts over £500,000 the Council may (dependant on risk analysis) require the Supplier to provide a performance bond for 10% of the total contract value between £500,000 and £2,000,000 and 5% for contracts above £2,000,000.

Supplier contracts should be checked carefully for any limitations of liability and advice should be sought from the Legal Services. The foreseeable damage to the Council which might arise from the failure on the part of the supplier, any limitation on liability, the insurance carried by the supplier (other than public liability cover) and, security for performance, are all interrelated factors and should be considered carefully as a whole.

### **8.13 TUPE and the Best Value Code of Practice on Workforce Matters**

If contracting out a service or re-tendering a term contract, the Transfer of Undertakings (Protection of Employment) Regulations (“TUPE”) 2006 may apply. This is a very complex area where legal guidance and trade union consultation must be sought at an early stage.

### **8.14 Health and Safety**

Officers should take steps during the procurement exercise and throughout the length of the contract to ensure that health and safety is appropriately covered.

---

<sup>54</sup> Standard templates and further explanations/guidance for performance bonds and liquidated damages clauses can be found in the High Value Services Contract available from Corporate Procurement

Considerations include:

- Clearly identify all aspects of work to be carried out by the contractor
- Consider the health and safety implications
- Competency to do the job safely?
- How reliant on sub- contractors and sub-sub-contractors?
- Reputation?
- Prosecutions, notices, accident record?
- Ensure contractors know what is expected
- Show SBC safety policy procedures, permit systems, contractor guidance and confirm they have been read and understood
- Whether Works contractors should be SSIP (or equivalent) registered

Consider requiring your Contractor to:

- Outline recent health and safety performance
- List, with evidence, qualifications and skills
- Provide safety method statement
- Be a member of trade organisation or professional body
- Provide clear information about the risks of the operation
- Provide safety rules and procedures
- Any employee, contractor or sub contractor working on behalf of SBC on SBC premises including tenanted properties must have ID relevant to their employment.

For further guidance, please refer to the Councils Health and Safety Guidance which can be found on the intranet under staff info/hr/health and safety.

## **8.15 Safeguarding Children<sup>55</sup>**

All services commissioned by the Council must operate within the requirements of the Council's Safeguarding Children Policy and meet the relevant legislative standards. Where appropriate, procuring officers will need to ensure that contractors demonstrate that they meet these requirements. As an indicator, contractors/agencies must have in place the following:

- Senior Management Commitment to Safeguarding
- Clear, Accessible Statement of Responsibility (including Safeguarding Policy, Complaints, Equal Opportunities and Incident Monitoring Procedures)
- Clear mechanisms for identification and investigation/action regarding safeguarding concerns
- Clear Line of Accountability for Reporting Safeguarding Concerns
- Child and Family conscious service planning and delivery
- Staff Training programme for Safeguarding
- Safer Recruitment Policy
- Information Sharing procedure

## **8.16 Accessibility**

Consider whether what you are buying needs to meet new Accessibility requirements - it could be websites / apps or even pdf/reports/pictures – anything that is published by SBC to the public or to staff<sup>56</sup>

---

<sup>55</sup> Additional information regarding Safeguarding is available on the Stevenage Borough Council website.

<sup>56</sup> Speak to IT service desk for assistance or <https://www.gov.uk/guidance/accessibility-requirements-for-public-sector-websites-and-apps>

## **8.17 GDPR**

The Council must have due regard to the requirements of the General Data Protection Regulations 2018. Conduct a Data Protection Impact assessment to perform an assessment of privacy risks of performing data processing activities involving personal data handling.<sup>57</sup>

## **8.18 Social Value**

The Council must have due regard to the Public Services 2012 Social Value Act. As such the Council requires 10% of the evaluation of band 3 procurements and above for services and works to be dedicated to additional social value. See guidance from Corporate Procurement as to how this is implemented..<sup>58</sup>

## **8.19 Modern Slavery**

The council must consider the risk of modern slavery existing within its supply chain. Procuring officers need to research the level of risk that exists in the relevant market. If the risk is medium or high they should consult with Corporate Procurement suitable measures to take above and beyond the questions asked as standard in the SBC quotation and tender templates available via the intranet or Corporate Procurement.<sup>59</sup>

## **8.20 Fraud Prevention**

The council must comply with the Bribery Act 2010 and consider the risk of fraud within its supply chain. Procuring officers need to think about whether their actions could be perceived as fraudulent or favoring a particular supplier and also be alert to possible fraudulent behavior from bidders during the procurement and evaluation process. Within contract management processes consideration needs to be given to preventing fraudulent behavior by contractors or Council officers. Any suspicion of fraudulent behaviour should be reported to the Shared Anti-Fraud Service or use the Councils Whistleblowing policy<sup>60</sup>.

---

<sup>57</sup> See intranet staff info/data protection.

<sup>58</sup> See information on the intranet under Procurement

<sup>59</sup> See intranet procurement.

<sup>60</sup> See intranet for more information



## Appendix A - Table of Definitions / Terms

Authorised Contract Signatory	The named officer who has been sanctioned via SLT to sign contract with suppliers to a specified contract value. The list of authorised signatories and respective values are maintained by Exchequer Services.
Bond	A bond is a legally enforceable financial guarantee given by a third party (the guarantor) to the Council to guarantee the obligations of a <i>Supplier</i> under a contract. The guarantor agrees to pay the Council a sum of money if the <i>Supplier</i> does not do what has been promised under a contract with the Council (e.g. a bond is often 10% of the total contract value). The purpose of a bond is to help the Council meet the extra expenses to remedy the contract default and/or complete the contract.
CCS	Crown Commercial Services - a local authority approved purchasing consortium, which is an executive agency of the Cabinet Office.
Contracts Finder	Government mandated advertising portal for all contract notices and awards under PCR 2015 advertised by Local and National Government and it's agencies.
Concession Contract	Means a contract for the supply, for pecuniary interest, of Works or services to the Council where at least part of the remuneration for that supply is the right for the Supplier to exploit the works or services and under the contract the Supplier is exposed to a real operating risk (i.e. a risk they will not be able to recover their costs of providing the Works or services).
CPV	Common Procurement vocabulary - a list of codes in a hierarchy which defines the requirements. Referred to in the Procurement Act 2023 and used in public notices
CPR	These Contract Procedure Rules
ESPO	Eastern Shires Purchasing Organisation - a local authority approved purchasing consortium.
Estimated Contract Value	Means the estimated total value of a contract, calculated in accordance with paragraph 5.1 of these Contract Procedure Rules
Financial Regulations	The Council's financial regulations set out rules/procedures for financial management and the conduct required of Council staff in dealing with financial matters. They are issued by the <i>Assistant Director (Finance)</i> and form part of the <i>Constitution</i> .
Framework Agreements	Framework Agreements are agreements entered into between a contracting authority and one or more <i>Suppliers</i> , setting out the terms and conditions (e.g. pricing mechanisms, quantity and scope of services/supplies/works and duration) under which future purchases (or call offs) can be made throughout the term of the agreement.

Homes England	Homes England is the non-departmental public body that funds new affordable housing in England. It was founded on 1 January 2018 to replace the Homes and Communities Agency.
Insurance cover and indemnity / liability limits	<p>Normally, contracts should require suppliers to indemnify (protect) the Council from public liability and employers liability to an appropriate limit, but products liability and professional liability may be required when relevant to a particular contract. The appropriate limit of indemnity should be judged individually depending on the nature of the contract, risk assessment, size of contracting firm etc. A brief explanation of each type of liability follows:</p> <p><b>Public Liability</b> provides indemnity for damages the insured is legally obliged to pay to a third party who has suffered damage or injury as a result of the insured's action. It does not extend to damage or injury suffered by employees of the insured. It does not include pure financial loss suffered as a result of advice given. The contract may include a co-indemnity or cross-indemnity clause, which effectively extends the supplier's cover to include SBC.</p> <p><b>Employers' Liability</b> provides indemnity for damages the insured is legally obliged to pay to an employee who has suffered damage or injury as a result of the insured's action. The contract should include a wide definition of "employee" so as to include apprentices, work-experience people, and volunteers if appropriate.</p> <p><b>Products Liability</b>, often included as part of general Public Liability Section of a policy, provides indemnity for damages the insured is legally obliged to pay to a third party who has suffered damage or injury as a result of the product for which the insured is responsible.</p> <p><b>Professional Liability (or Indemnity)</b> covers loss or damage (except bodily injury or damage to property) arising from the negligence or accidental error/omission of any official or employee while the Council is acting in a statutory capacity.</p>
In-Tend	The Councils E tendering system software, also known as Supply Hertfordshire
ITT	Invitation to Tender.
Key Decision	Decisions that are defined as Key Decisions in the <i>Constitution</i> . If the purchase is a Key Decision, the Officer must ensure that all appropriate steps have been taken. If the Contract value exceeds £250,000 or the contract will be significant in terms of its effects on communities living or working in the area, then the purchase is likely to be a key decision (See Decision Making - Article 11 in the Constitution for further information).
Nominated Suppliers and Sub-contractors	These are sub-contracts specified in the main contract where the Council nominates specific <i>Suppliers</i> or sub-contractors to the main contractor. The main contractor is expected to establish sub-contracts with the <i>Suppliers</i> nominated by the Council.
Novation	The agreed transfer to another <i>Supplier</i> of the full obligations and rights under the contract.

Parent Company Guarantee	The parent company (or holding company) guarantees the proper performance of a contract by one of its subsidiaries (the contractor). The conditions of the parent company guarantee will usually give the parent company the opportunity to remedy any default within a period of notice before the guarantee is called. The liability can take several forms including a financial guarantee of completion of the project itself or the employment of another <i>Supplier</i> to complete the project.
Post Tender Negotiation	Post tender negotiation means negotiations with any tenderer after submission of a <i>Tender</i> and before the award of the contract with a view to obtaining an adjustment in price, delivery or content.
PFH	Procurement for Housing – a local authority approved purchasing consortium, more specifically for Housing
Public Contracts Regulations 2015 or PCR 2015	Public Contract Regulations 2015 are the legally required processes for UK public procurement which were transposed from EU Procurement Directives 2014 along with some UK specific rules (PCR 2015 is often referred to as EU Regulations) These are superseded by the Procurement Act 2023 from 24 <sup>th</sup> February 2025.
Public Contracts Threshold	Means the threshold amount for a particular contract to be classified as a "public contract" and subject to the substantive requirements of the Procurement Act 2023, as set out in Schedule 1 of the Procurement Act 2023 and as updated from time to time.
Procurement Act 2023	Legislation in force from 24 <sup>th</sup> February 2025 succeeding PCR2015
Quotation	"Quotation" means an offer to supply or purchase goods, or materials, execute works or provide services including consultancy, at a stated price based on terms and conditions agreed with the <i>Supplier</i> . For the purpose of These Contract Procedure Rules, the Council uses the term 'Quote' rather than 'Tender' for the more simplistic procurement process to be followed for estimated contract values below £100,000.
SBC	Stevenage Borough Council
Short Listing	Where <i>Suppliers</i> are selected: <ul style="list-style-type: none"> <li>• to quote or bid or</li> <li>• to proceed next stage of the process.</li> </ul>
Supplier	Any person, organisation or economic operator who supplies the Council with Goods, Works or Services. For the purpose of These Contract Procedure Rules, the term supplier includes contractors, consultants and service providers.
Senior Leadership Team member	The Assistant Directors, Strategic Directors and Chief Executive.
Tender	"Tender" means a formal offer to supply or purchase goods, or materials, execute works or provide services including consultancy, at

a stated price based on set terms and conditions. For the purpose of These Contract Procedure Rules, the Council uses the term 'Tender' as opposed to 'Quote' for the more complex procurement procedure required for estimated contract values over £100,001.

TUPE	Transfer of Undertakings (Protection of Employment) Regulations
Works	are (for the purpose of the PCR 2015) given the meaning set out in the PCR 15 and (for the purpose of the Procurement Act 2023) activities having a "works" CPV code in Schedule 3 of the Procurement Regulations 2024
YPO	Yorkshire Purchasing Organisation - a local authority approved purchasing consortium



This page is intentionally left blank

Contract Standing Orders Table of Changes – February 2025

	<u>Description</u>	<u>Existing Contract Standing Orders</u>	<u>New Contract Procedure Rules</u>
1.	<b><i>Thresholds for competition</i></b>	<p>Band 1 – up to £10,000</p> <p>Band 2 £10,001 – £75,000</p> <p>Band 3 £75,000 – EU thresholds</p> <p>No option available for Procurement to allow the use a band down</p>	<p>Band 1 – up to £15,000 for services and supplies. Up to £25,000 for works</p> <p>Band 2 £15,001 – £100,000 for supplies and services. Up to £250,000 for works</p> <p>Band 3 £100,001 (£250,000 works) – Procurement Act 2023 thresholds</p> <p>Option to request permission in exceptional circumstances to use a less onerous band or more informal process.</p>
2.	<b><i>Overview and responsibly</i></b>		Obtain a Contract reference at the start of the process.
3.	<b><i>Exemptions</i></b>	Delete exemption for Goods and materials sold at a fixed price or are wholly controlled by trade organisations or government order as not used	<p>Create new exception for “unforeseen works or circumstances where delay will adversely impact on the service delivery for the council or access to external funds”.</p> <p>Create new exception for “exceptional circumstances not covered by above” (other exemptions) which must be approved by Borough Solicitor and Corporate Procurement Manager</p>
4.	<b><i>Using Framework agreements</i></b>		<p>Duty to consider and research if there is an appropriate framework that is likely to provide better value than our own procurement exercise.</p> <p>Prohibit the use of direct award options where the framework has a mini competition option. Waiver can be applied for using waiver reason B or new waiver option above if circumstances warrant.</p>

Contract Standing Orders Table of Changes – February 2025

5.	<b>Social value thresholds</b>	Not currently detailed in CSOs but has been	<p>All Band 3 procurements to have 10% of the evaluation given over to social value. Unless works with duration under 9 months. To be evaluated and contract managed in house.</p> <p>All over Procurement Act 2023 Threshold. To have 10% evaluation given over to social value and the use the Social Value portal for evaluation and contract management and reporting.</p>
6.	<b>Pre market engagement</b>	Currently quite light touch, suggests it would be a good idea	<p>To make it a requirement to do some pre-market engagement.</p> <p>Guidance of what to be on the intranet rather than in CPR's</p>
7.	<b>Using existing council services or existing contracts</b>		If in existence, make proportionate efforts to engage with service or contract manager with a view to use if appropriate.
8.	<b>Contract Management</b>	Wholesale re write	<p>Expectation that contract managers ensure contractors are fulfilling their obligations under the contract Insurance, qualifications, certifications etc and of course perform under the contract.</p> <p>Expectation to have a contract file stored centrally within the department to enable a new contract manager to take over without a formal handover.</p> <p>Need to inform procurement for over threshold contracts of issues that will need a notice published.</p> <p>Need to inform procurement on over threshold contracts when the contract finishes.</p> <p>Need to consider next procurement (if an ongoing need) in sufficient time.</p> <p>Formal KPI monitoring for over £5Million contracts.</p> <p>All staff with contract management in Job descriptions must attend contract</p>



Contract Standing Orders Table of Changes – February 2025

			management training as soon as possible after appointment.
<b>9.</b>	<b><i>Contract Extensions and Contract Variations</i></b>		Include requirement to consult with Corporate Procurement before invoking extensions and before agreeing variations where the contract is covered by or where it may become covered by the Procurement Act 2013.

This page is intentionally left blank