

EXECUTIVE

Date: Tuesday 17 March 2026

Time: 5.30 pm

Venue: Rennes Room, Civic Centre, Paris Street, Exeter

Members are invited to attend the above meeting to consider the items of business.

If you have an enquiry regarding any items on this agenda, please contact Mark Devin, Democratic Services Officer - democratic.services@exeter.gov.uk

Entry to the Civic Centre can be gained through the Customer Service Centre, Paris Street.

Membership -

Councillors Bialyk (Chair), Wright (Deputy Chair), Asvachin, Foale, Patrick, Vizard, Williams, R and Wood

Agenda

Part I: Items suggested for discussion with the press and public present

1 **Apologies**

To receive apologies for absence from Committee members.

2 **Minutes**

To approve and sign the minutes of the meeting held on 3 February 2026.

(Pages 5 -
20)

3 **Declarations of Interest**

Councillors are reminded of the need to declare any disclosable pecuniary interests that relate to business on the agenda and which have not already been included in the register of interests, before any discussion takes place on the item. Unless the interest is sensitive, you must also disclose the nature of the interest. In accordance with the Council's Code of Conduct, you must then leave the room and must not participate in any further discussion of the item.

Councillors requiring clarification should seek the advice of the Monitoring Officer prior to the day of the meeting.

4 **Local Government Act 1972 - Exclusion of Press and Public**

It is considered that the Committee would be unlikely to exclude the press and public during consideration of any of the items on the agenda, but if it should wish to do so, the following resolution should be passed:-

RECOMMENDED that, under Section 100A(4) of the Local Government Act 1972, the press and public be excluded from the meeting for the consideration of the particular item(s) on the grounds that it (they) involve(s) the likely disclosure of exempt information as defined in the relevant paragraphs of Part 1, Schedule 12A of the Act

5 Questions from the Public Under Standing order No. 19

To receive questions relating to items on the Agenda from members of the public and responses thereto.

Details of questions should be notified to the Democratic Services Manager by 10am at least three working days prior to the meeting. Further information about speaking at a committee can be found here: [Speaking at a Committee](#)

6 Matters referred by Scrutiny Committees

To consider recommendations made to the Executive from Scrutiny Committees.

7 Lord Mayoralty

To nominate the Lord Mayor Elect and the Deputy Lord Mayor Elect for the 2026/27 Municipal Year.

8 Exeter City Council's Carbon Reduction Plan

To consider the report of the Strategic Director for Place.

(Pages 21
- 34)

9 Adoption of Revised Non-Infrastructure Habitat Mitigation (SAMM) Contributions

To consider the report of the Strategic Director for Place.

(Pages 35
- 48)

10 Devon Local Nature Recovery Strategy

To consider the report of the Strategic Director for Place.

(Pages 49
- 60)

11 Crisis and Resilience Fund: Housing Payments and Crisis Payments

To consider the report of the Strategic Director for Corporate Resources.

(Pages 61
- 102)

12 Corporate Complaints Policy

To consider the report of the Strategic Director People and Communities.

(Pages
103 - 160)

13 Gender Pay Gap Report

To consider the report of the Strategic Director People and Communities.

(Pages
161 - 166)

Date of Next Meeting

The next scheduled meeting of the Executive will be held on **Tuesday 28 April 2026** at 5.30 pm in the Civic Centre.

A statement of the executive decisions taken at this meeting will be produced and published on the Council website as soon as reasonably practicable.

Find out more about Exeter City Council services by looking at our web site <http://www.exeter.gov.uk>. This will give you the dates of all future Committee meetings and tell you how you can ask a question at a Scrutiny Committee meeting. Alternatively, contact Democratic Services at democratic.services@exeter.gov.uk

Individual reports on this agenda can be produced in large print on request to Democratic Services democratic.services@exeter.gov.uk

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EXECUTIVE

Tuesday 3 February 2026

Present:

Councillor Bialyk (Chair)

Councillors Wright, Asvachin, Patrick, Vizard, Williams, R and Wood

Apologies:

Councillor Foale

Also present:

Councillor Rees (as Chair of the Customer Focus Scrutiny Committee – for Minute No. 101 below);

Councillor Holland (as an opposition group Leader);

Councillor M. Mitchell (as an opposition group Leader); and

Councillor Moore (as an opposition group Leader).

Also present:

Chief Executive, Strategic Director for Place, Strategic Director for Corporate Resources, Strategic Director for People and Communities, Head of Legal and Democratic Services & Monitoring Officer, Head of Service - Finance, Head of Service - Customers and Communities and Democratic Services Officer (MD)

98

MINUTES

The minutes of the meeting held on 16 December 2025, were taken as read, approved and signed by the Chair as a correct record.

99

DECLARATIONS OF INTEREST

No declarations of disclosable pecuniary interests were made.

100

QUESTIONS FROM THE PUBLIC UNDER STANDING ORDER NO. 19

No questions from members of the public were received.

101

MATTERS REFERRED BY SCRUTINY COMMITTEES

Strategic Scrutiny Committee meeting held on 15 January 2026 - Minute No. 33 – Unauthorised Encampments

The Executive considered the recommendation from the Strategic Scrutiny Committee meeting held on 15 January 2026 on exploring the viability and impact of a Negotiated Stopping Policy.

The Leader advised that the Strategic Management Board (SMB) would be asked to provide views on requirements and implications of the recommendation and explore whether the existing policy could be reviewed and updated as needed to ensure it remained appropriate and current. He further advised that a report could be brought back to Members if required.

The Leader moved the recommendation, which was seconded by Councillor Wright, voted upon, and CARRIED unanimously.

RESOLVED that the Executive Committee agreed to explore the viability and impact of a Negotiated Stopping Policy.

Customer Focus Scrutiny Committee meeting held on 22 January 2026 - Minute No. 100 – Medium Term Financial Plan

The Executive considered the recommendations from the Customer Focus Scrutiny Committee meeting held on 22 January 2025. He welcomed Councillor Rees as Chair of the Customer Focus Scrutiny Committee to speak to the recommendations.

Councillor Rees provided context of the scrutiny process as follows:

- this was the first full year of a complete budget scrutiny cycle through the Customer Focus Scrutiny Committee, following an evolving process over several years;
- the original intention was for the quarter 4 budget scrutiny to take place in November 2025, to align but due to unforeseen circumstances, the meeting was postponed to January 2026;
- the November period provided an earlier influence for scrutiny budget development, but the January reported provided more up-to-date financial information;
- budgets were living documents which could be adjusted during the year and Scrutiny recommendations were intended to support existing work, rather than introduce unexpected proposals; and
- Scrutiny was advised not to recommend specific figures or funding sources, as this was the responsibility of the Executive.

Councillor Rees explained the recommendations as follows:

- For the recommendation on the Peppercorn Rent - discussions were already underway, as confirmed by officers.
- The recommendation for the Community Asset Transfer, arose from cross-party discussions during the scrutiny work on Northbrook Pool. The aim was to improve supporting communities who wished to retain local assets and Officers had already begun making progress and improvements to processes.
- The recommendation for the Climate Action Plan was informed by a recent Government paper on global biodiversity Loss and ecosystem collapse. The purpose of which, would provide an opportunity to enhance the existing plan by incorporating climate adaptation strategies and community resilience measures.
- The recommendation for Parks and Green Spaces had been proposed by the Chair to address long-term reductions in council funding, following evidence that the service had been operating with minimal staffing. The ambition and income generation ideas had been shared with officers and within the context of a three-year budget, there may be opportunities to strengthen the service to realise its vision.

The Leader thanked Councillor Rees for attending and the work undertaken by the Customer Focus Scrutiny Committee. He confirmed that:

- The Peppercorn rent issues were already being addressed.
- Parks and Green Spaces resourcing would be considered but highlighted that many departments were also facing operational pressures, which needed to be considered.

- The Resident survey results indicated there was already a high satisfaction with parks and open spaces.
- Regarding the Climate Action Plan, officers regularly reviewed Government publications and relevant policy implications were assessed by Directors and brought forward as appropriate.
- There was no intention to sell community assets and directors would review the asset transfer policy to ensure it was fit for purpose and advise on any potential improvements.
- the council was still making £1.1 million of budget changes and emphasised the need to consider proposals within the wider strategic and financial context.

He advised that the Strategic Management Board (SMB) would reflect on the scrutiny recommendations and discuss with the Chief Executive to advise on what was achievable within current priorities and resources. He reiterated his appreciation for the role of scrutiny and confirmed that Members would be kept informed as work progresses.

The Leader moved the recommendations, which were seconded by Councillor Wright, voted upon, and CARRIED unanimously.

RESOLVED that the Executive Committee agreed to consider:

- (1) that a peppercorn rent continue for Citizens Advice Exeter;
- (2) whether more resources can be directed to the Parks and Green Spaces Team;
- (3) whether the Climate Action Plan could be strengthened by adding an Adaptation and Resilience plan; and
- (4) strengthening support for the community asset transfer.

102

**EXETER PLAN: PROCESS FOR AUTHORISING PROPOSED CHANGES
RESULTING FROM THE EXAMINATION**

The Executive received the report which outlined the process for agreeing proposed modifications to the Exeter Plan during the forthcoming examination. The Exeter Plan Examination Hearings would commence in March 2026 and scheduled to conclude by May 2026. The report was seeking Council approval to grant delegated authority to the Strategic Director for Place, in consultation with the Portfolio Holder for City Development, to authorise modifications arising during the hearings.

Members were advised that the delegated authority would enable officers and the Portfolio Holder to:

- meet regularly during the hearings to consider and respond promptly to modifications tabled by the Planning Inspectors;
- support efficient progress of the plan and reduce the risk of delays to the examination process;
- all proposed modifications would be subject to further technical assessment and public consultation following the conclusion of the hearings; and
- any final modifications would require approval by Executive and Council after the Examination, prior to adoption of the Plan.

During the discussion, Executive Members raised the following points and Questions:

- clarification was sought on the schedule of proposed modifications, how it was compiled, whether it is an exhaustive list of all third-party representations, and what methodology officers used to determine it;

- the high level of public reach achieved during the prior consultation was highlighted; and
- what level of modifications are anticipated during examination and what factors would give rise to further modifications.

The Portfolio Holder for City Development highlighted the need for an efficient process due to the short time span and the importance of the Exeter Plan for the city's development. The plan had already undergone extensive consultation and redrafting and assurance was given that weekly meetings had been arranged with the team to review and discuss modifications as they arise.

In response to questions raised by Executive Members, the Strategic Director for Place advised that:

- the schedule of proposed modifications listed were put forward informally by officers to assist the planning inspectors in considering evidence and representations from third parties;
- the modifications did not constitute formal modifications, and only the Inspectors could formally propose modifications during the Examination process;
- delegated authority was procedural and would apply once modifications were formally proposed by the Inspectors;
- the delegated authority would allow officers to consider the proposed modifications and undertake any technical assessment and public consultation without suspending the examination or having to seek approval from the executive and council for each modification;
- the officer suggested modifications were informed by a review of all representations submitted by third parties to the examination;
- the potential scale of modifications could range from minor terminology changes to more significant changes such as the inclusion or removal of development sites, or amendments to policy wording;
- the purpose of any modification, whether minor or significant, was to ensure the plan met the tests of soundness and legal requirements, allowing it to be adopted; and
- failure to introduce necessary modifications, risked the plan not being adoptable.

An opposition group leader raised the following points and questions:

- welcomed clarification on the status of contributions already submitted to the examination;
- expressed concern that one proposed amendment appeared to significantly alter the intent of the Plan notably the amendment affecting the status of Ludwell Valley Park and the Valley Parks Masterplan;
- the change appeared to remove or weaken the requirement to 'have regard to' the Masterplan, which was considered to substantially dilute the original wording; and
- it was enquired whether the Council intended to challenge any such proposed amendments and whether officers planned to accept them as presented to the Examination.

In response to question raised by the opposition Member, the Strategic Director for Place sought clarification on whether the question related to the officer proposed modifications or third-party representations, and received confirmation that the question was from the officer-proposed list.

The Leader advised that the matter was a specific and detailed query, which was not appropriate for a wider debate. He requested that the Opposition Leader email the full detail to the Strategic Director Place outside of the meeting to respond to.

The Deputy Leader & Portfolio Holder for Corporate Services, Community Safety and City Centre requested for future references to report items, that Members include specific reference numbers to help Members locate them within the large agenda documents. The Leader supported the request.

The Leader moved the recommendations, which were seconded by Councillor Wright, voted upon, and CARRIED unanimously.

RESOLVED that the Executive notes the latest progress made on the Exeter Plan.

RECOMMENDED that Council grants delegated authority to the Strategic Director for Place, in consultation with the Portfolio Holder for City Development, to authorise any proposed modifications that may arise during the Exeter Plan Examination to ensure the Plan is considered sound.

103

GENERAL FUND ESTIMATES AND CAPITAL PROGRAMME 2026/27

The Executive received the report on the General Fund revenue estimates for 2026/27 and to recommend the Band D level of Council Tax for 2026/27. The report also included the proposed Capital Programme for 2026/27 and future years.

Particular reference was made to:

- the provisional Local Government Finance Settlement had been received, with the final settlement expected in the next week;
- the business rates reset was anticipated, which would normally result in a significant reduction in council resources, but had been offset by a favourable outcome from the Government's funding formula review, largely neutralising the impact of the business rates reset for Exeter;
- Exeter fell within 5% of its previous funding level, and as such, the Council would receive support through a funding floor grant, resulting in a cash-flat settlement;
- the settlement would result in Exeter receiving the same level of core spending power for 2026–27 as it did in 2025–26;
- the Government had confirmed a three-year, multi-year settlement, projecting a cash-flat settlement across that period;
- the cash-flat settlement assumed Councils would increase their Council Tax by the maximum permitted level each year., which for Exeter was 2.99%, in line with referendum principles;
- the budget had therefore been prepared on the assumption of a 2.99% Council Tax increase, subject to Member approval at Council on 25 February 2026;
- the General Fund minimum balance was proposed at £3.010 million, which was a reduction from the previous year, based on the removal of business rate risk for 2026–27;
- the Government were now providing a guarantee of 100% business rates income, compared to the previous 92.5% threshold;
- a provision of £500,000 was included in the revenue budget to support the transitional work associated with the Local Government Reorganisation (LGR);
- a new Appendix 10 for a flexible use of Capital Receipts Strategy had been included which enabled the Council to apply to Government to use capital receipts for specific revenue-type expenditure; and

- the Capital Receipts Strategy was intended solely to support work related to local government reorganisation and was not required to balance the budget, which was already balanced within the Medium-Term Financial Plan.

In response to the Leader's clarification, it was confirmed that a 2.99% Council Tax increase equated to approximately £5 per year for a Band D property, or around 10.5p per week.

During the discussion, Executive Members raised the following points and Questions:

- referencing Appendix 3 of the report, it was noted that income over-performance within Parks and Green Spaces, included £10,000 additional income from events and £23,000 additional rental income;
- the strong performance within Waste Operations was highlighted, with an additional £100,000 in recycling income, contributing to keeping Council Tax low;
- the recycling income totalled approximately £1 million per annum, and the teams involved were commended for their performance;
- clarification was sought regarding a budget change of £510,740 on page 45 of the report shown against the Chief Executive line;
- the confirmation that future government funding was cost neutral, with no reduction in overall funding levels was welcomed;
- confirmation was sought that Exeter City Council only retained approximately 8% of the total Council Tax paid;
- finance officers were commended for achieving a balanced budget with minimal impact on frontline services; and
- the scale and effectiveness of the financial adjustments compared to previous years was highlighted.

In response to questions raised by Executive Members, the Strategic Director for Corporate Resources advised that:

- the £510,740 change in the Chief Executive's budget related to the provision for Local Government Reorganisation (LGR) work, managed within the Executive Support team;
- the Council received approximately 8% of total Council Tax, with the remainder allocated to Devon County Council, the police, and fire services; and
- he commended the Operational Management and Finance teams for identifying budget adjustments to maintain a balanced budget despite inflationary pressures.

The Leader reminded Members that the 2026–27 budget was subject to Council approval on 25 February and that all Group Leaders had been contacted to provide input on other budget proposals or changes.

An opposition group leader made the following points and questions:

- clarification was sought on how the Executive intended to review the Community Asset Disposal Policy, particularly Part 3 on qualifying disposals and the objective of disposal;
- it was emphasised that including objectives such as improving community infrastructure allow assets to remain in community ownership or enable communities to bid or purchase assets, without necessarily giving them away for free;

- clarification was requested on the total expected LGR costs, referring to page 27 showing £27 million to 2029 and page 22 showing £500,000 revenue allocation in Chief Executive's budget; and
- the report also showed £1.5 million capital receipt, creating a total of £2 million for 2026–27 and request that the budget and Medium-Term Financial Plan should clearly identify total LGR costs, council contributions, and anticipated government funding.

In response to questions raised by opposition Members, the Strategic Director for Corporate Resources advised that:

- the proposed 2026–27 budget included £500,000 revenue for LGR work;
- to use the £1.55 million capital receipts, Council approval was needed for the Flexible Use of Capital Receipts Policy and a successful application to central government;
- if approved by Council, a supplementary budget request would be submitted to add the £1.5 million to the LGR budget;
- currently there was no government approval or final strategy secured and the budget currently remained at £500,000; and
- for future years, transitional costs for any new unitary authority were expected to rise, and funding proposals would need to be identified.

The Leader advised that the cost for LGR would impact on all Councils, regardless of the option chosen by the Secretary of State.

The Leader moved the recommendations, which were seconded by Councillor Wright, voted upon, and CARRIED unanimously.

RECOMMENDED that Council

- (1) approve the Council's overall revenue spending proposals in respect of the General Fund;
- (2) approve the Council's General Fund Capital Programme;
- (3) notes and considers the budget assessment by the Section 151 Officer as set out in Section 11 of the report, when agreeing the recommendations;
- (4) approve for the General Fund minimum Balance to be set at £3.010 million for 2026/27;
- (5) approve the Council Tax for each Band as set out in section 12 of the report, subject to Devon County Council, OPCC Devon and Cornwall and the Devon and Somerset Fire Authority confirming their Band D levels respectively; and
- (6) approve the Council's Flexible Use of Capital Receipts Strategy, as set out in Appendix 10 of the report.

RESOLVED that the Executive agree that once the actual Council Tax amounts for Devon County Council, the Devon and Cornwall Police and Crime Commissioner, and the Devon and Somerset Fire Authority are confirmed, the revised Council Tax levels be submitted to Council on 25 February 2026 for approval.

104

HRA ESTIMATES AND CAPITAL PROGRAMME 2026/27

The Executive received the report which proposed the Housing Revenue Account (HRA) budget for 2026-27, covering both the revenue account and capital programme.

Particular reference was made to:

- the Housing Revenue Account (HRA) being separated into its own report for clarity on proposed budgets and the capital programme;
- housing rent increases approved in December 2025 had been factored into the budget;
- there was no significant additional spending required this year and the budget was balanced; and
- the minimum level of reserves would remain the same as in 2025–26 and the HRA Capital Programme remained significant.

The Leader highlighted the importance of building more **council homes** to provide affordable housing in Exeter.

The Leader moved the recommendations, which were seconded by Councillor Wright, voted upon, and CARRIED unanimously.

RECOMMENDED that Council:

- (1) approves the Council's overall spending proposals in respect of the HRA revenue;
- (2) approves the HRA Capital Programme;
- (3) notes and considers the budget assessment by the Section 151 Officer as set out in Section 10 of the report when agreeing the recommendations; and
- (4) sets the HRA minimum balance at £3.525 million for 2026/27.

105

CAPITAL STRATEGY 2026-27

The Executive received the report on the proposed 2026/27 Capital Strategy, which explained that the Capital Strategy was designed to ensure all elected members had a full understanding of the Council's long-term policy objectives, the associated capital requirements, governance arrangements, and the Council's risk appetite.

Particular reference was made to the statutory requirement for Council approval and that there were no significant changes from the previous year. A Capital Programme Board had also been established, chaired by the Chief Executive and attended by Strategic Directors, to oversee major projects and improve delivery.

The Leader moved the recommendations, which were seconded by Councillor Wright, voted upon, and CARRIED unanimously.

RECOMMENDED that Council approve the Capital Strategy as set out in Appendix A of the report.

106

TREASURY MANAGEMENT STRATEGY REPORT 2026/27

The Executive received the report on the Treasury Management Strategy for 2026/27, which included the Annual Investment Strategy and updated Treasury Management Practices. The report advised that, in line with CIPFA and MHCLG guidance, the Council was required to approve a strategy for managing its financial investments each year. It further highlighted the need to manage risks associated with borrowing and investments, including potential losses and the impact of changing interest rates.

Particular reference was made to:

- there was a statutory requirement for annual Council approval and there were no significant changes from the previous year; and
- there was still a big disconnect between the base rates and the amount that local authorities were able to borrow, making borrowing for the capital programme still very expensive.

During the discussion, Executive Members raised the following points and Questions:

- that was the specific difference between borrowing rates and the base rate, and whether there was any projection on when they might realign;
- it was enquired about the plan for a £10 million debt maturing on 12 March 2026, which had a 4.87% rate, and how this would be refinanced; and
- the net interest payable on the council's total debt, was calculated to be well under 1% (approx. 0.7-0.8%).

In response to questions raised by Executive Members, the Strategic Director for Corporate Resources advised that:

- the £10 million debt was part of a short-term borrowing policy used as a cash flow management tool due to high PWLB (Public Works Loan Board) rates;
- it would likely be refinanced, but the decision depended on the Council's cash position at the time;
- a reduction in cash was expected by March 2026 as council tax and business rates were collected over 10 months;
- interest rates for local authority borrowing was significantly higher than the base rate;
- the PWLB 50-year loan for the HRA was 5.8%, the PWLB loan for General Fund was 6.02% and the Bank of England Base Rate was 3.75%; and
- the future of PWLB rates depended on the market's view of government borrowing rather than on the Bank of England's base rate.

The Leader moved the recommendations, which were seconded by Councillor Wright, voted upon, and CARRIED unanimously.

RECOMMENDED that Council approve the adoption of the Treasury Management Strategy and Treasury Management Practices and the delegations contained therein.

107

**THE PRUDENTIAL CODE FOR CAPITAL FINANCE IN LOCAL AUTHORITIES
(INCORPORATING THE ANNUAL STATEMENT OF MINIMUM REVENUE
PROVISION)**

The Executive received the report on the Treasury Management Strategy for 2026/27, which included the Annual Investment Strategy and updated Treasury Management Practices. The report advised that, in line with CIPFA and MHCLG guidance, the Council was required to approve a strategy for managing its financial investments each year. It further highlighted the need to manage risks associated with borrowing and investments, including potential losses and the impact of changing interest rates.

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- the £10 million debt was part of a short-term borrowing policy used as a cash flow management tool due to high PWLB (Public Works Loan Board) rates;
- it would likely be refinanced, but the decision depended on the Council's cash position at the time;
- a reduction in cash was expected by March 2026 as council tax and business rates were collected over 10 months;
- interest rates for local authority borrowing was significantly higher than the base rate;
- the PWLB 50-year loan for the HRA was 5.8%, the PWLB loan for General Fund was 6.02% and the Bank of England Base Rate was 3.75%; and
- the future of PWLB rates depended on the market's view of government borrowing rather than on the Bank of England's base rate.

The Leader moved the recommendations, which were seconded by Councillor Wright, voted upon, and CARRIED unanimously.

RECOMMENDED that Council approve the adoption of the Treasury Management Strategy and Treasury Management Practices and the delegations contained therein.

108

LOCAL COUNCIL TAX SUPPORT SCHEME 2026/27

The Executive received the report which sought Member's agreement on the Local Council Tax Support (CTS) scheme for working age residents for 2026-27, which Members were required to agree the working age scheme rules annually.

Particular reference was made to the annual report which was required for approval before the start of the next financial year. The scheme provided council tax reductions for care leavers and working age residents on low incomes and no changes were proposed to the scheme for the upcoming year, which would mirror the current structure.

During the discussion, Executive Members raised the following points and Questions:

- clarification was sought on whether the figure of 79 individuals referred to total individuals receiving support or specifically care leavers;

- £4.6 million had been provided to 4,300 households, which highlighted significant support given; and
- the migration of working-age claims to Universal Credit, which was due to be completed before April 2026; and
- clarification and details was sought on the 97% of the council's working age council tax support households who were now receiving Universal Credit.

In response to questions raised by Executive Members, the Head of Service Finance advised that:

- 79 individual care leavers had received support since the scheme change in April 2024, covering two financial years; and
- the migration of working-age claims to Universal Credit was nearly complete and had increased administrative workload, as complex means-tested assessments were required for claimants that had migrated to Universal Credit.

The Chair requested that questions relating to ongoing promotion of Pension Credit following last year's government threshold change and the interaction with the Winter Fuel Allowance be provided as a written response.

The Leader moved the recommendations, which were seconded by Councillor Wright, voted upon, and CARRIED unanimously.

RECOMMENDED that Council agree that the scheme in place for the current year continue for 2026-27.

109

CONSULTATION AND ENGAGEMENT STRATEGY

The Executive received the report on the Consultation and Engagement Strategy 2026–2028, which sought Council approval for its adoption. The report outlined feedback from the public and the VCSE sector on the draft strategy and the changes made in response.

Particular reference was made to:

- a typo in the recommendation was highlighted which should state that the Executive recommends to council **the** adoption of the consultation and engagement strategy;
- the strategy outlined the council's approach to consulting and engaging with communities to ensure diverse voices were integrated into decision-making; and
- the report included the draft strategy, stakeholder feedback, and resulting changes.

During the discussion, Executive Members raised the following points and Questions:

- the strategy and the process used for its consultation was commended;
- it was enquired how recent consultation successes had informed the strategy and how it would improve outreach to harder to reach groups;
- the team were commended for their work, particularly for using innovative, inclusive, and representative methods;
- it was noted that the representative approach was time intensive but had been beneficial compared to less structured consultation methods;

- it was asked if there would be a way to measure and publicly show how consultation results fed directly into decision-making to demonstrate the value of public engagement; and
- it was asked what ongoing feedback mechanisms with community groups would be in place for the strategy, which ran until 2028.

In response to questions raised by Executive Members, the Strategic Director for People and Communities advised that:

- a variety of consultation techniques and tools were needed rather than a one-size-fits all approach;
- traditional, homegrown surveys had been shown to be unrepresentative as they did not capture representative feedback from the community;
- the new strategy involved a constant cycle of testing, learning, evaluating, and reviewing different techniques to see what was successful;
- success would be measured by the reach of consultation and whether gathered feedback was useful for informing the council's decision-making; and
- the process of continuous evaluation was embedded within the strategy itself.

Opposition group leaders made the following points and questions:

- the work and the consultation results presented were commended;
- a question was raised about the Civil Society Covenant and whether it was solely a council commitment or required a response from the community/third sector;
- the importance of principles and accountability were highlighted, especially considering varied community interests;
- the next stage of work needed to clarify how data and feedback would be interpreted, including weighting of minority views for complex issues;
- there was a need for transparency in the use of AI for collating and presenting consultation data;
- community engagement strategies were important, particularly in the lead-up to local government reorganisation, and there was a need for a consistent approach that linked consultation to delivery;
- staff should be commended for establishing a clear consultation process;
- a review and update of the current Consultation Charter to reflect the new process was needed;
- there was a need for clarity on how consultations were initiated and whether they should take place; and
- the Charter should be refined as a policy document that clearly supported and worked in conjunction with the consultation process.

In response to questions raised by opposition Members, the Strategic Director for People and Communities advised that:

- the strategy aligned with principles set out in the Civil Society Covenant, and no further work was planned at this stage;
- representative resident surveys showed there was an increased trust in the council which identified groups seeking further engagement;
- the approach to consultation was to build a long-term evidence bank rather than relying on single, one-off exercises;
- all consultation data would be provided to members for interrogation and decision-making through comprehensive, objective reports;
- various methods would be used to engage underrepresented groups and capture both quantitative and qualitative feedback where relevant;

- resources were allocated proportionately, with decisions being made jointly with Portfolio Holders;
- within the Council, officers were using AI within Microsoft Co-Pilot, experimentally for internal reports, with transparency on its use;
- a formal AI use policy would be developed when feasible, but there were difficulties, given the constant changes and development with AI, officers continued to work with other authorities to learn and understand from others;
- the Consultation Charter was Member driven, and was based on principles set by Members, which underpinned the Consultation and Engagement Strategy. It was not intended to be a detailed procedural action plan for every consultation;
- the consultation gateway process ensured that officers held early discussions on possible methodologies with consultation experts so that they could tailor approaches to specific issues and target groups; and
- methodologies were customised per issue and audience, rather than applying a one-size-fits-all process and it was not possible to set out an action plan that covered every consultation eventuality.

The Leader moved the recommendations, which were seconded by Councillor Wright, voted upon, and CARRIED unanimously.

RECOMMENDED that Council approve the adoption of the Consultation and Engagement Strategy 2025–2028.

110

AMENDMENT TO GRANTS PANEL TERMS OF REFERENCE - UKRAINIAN COMMUNITY GRANTS

The Executive received the report on the proposed amendments to the Exeter City Grants Programme Terms of Reference to allow the City Grants Panel to consider and approve grants for Ukrainian community activities. The report explained that this change would integrate the targeted Ukraine funding into the existing grants framework, maintaining transparency, accountability, and aligned with Council priorities.

During the discussion, Executive Members raised the following points and Questions:

- enquired how the proposed alignment complimented the previous processes of the Grants Panel and its effectiveness would compare;
- the initial support for Ukrainian refugees using government funds was done ad hoc and embedding a formal grant strategy for support was commended;
- the importance of specialised advisory input for grant creation while maintaining existing decision structures was highlighted; and
- the grants panel members and staff were thanked for their work.

In response to questions and points raised by Executive Members, the Strategic Director for People and Communities advised that:

- during the crisis, grant funds from central government were spent appropriately under exceptional circumstances; and
- that in the current steady state, all funding must be allocated transparently and in line with policy, which was why the recommendation was being made at the meeting.

The Leader moved the recommendations, which were seconded by Councillor Wright, voted upon, and CARRIED unanimously.

RECOMMENDED that Council:

- (1) approves an amendment to the Grants Panel Terms of Reference to formally include authority for the Panel to make decisions on community grants allocated through the Ukrainian Refugee Support scheme, funded through the Homes for Ukraine tariff income. The Ukrainian community activity grants follow the same governance principles, decision making processes, transparency standards and evaluation requirements as those outlined for the City Grant Fund, with modest variations where required to meet the specialised needs of Ukrainian communities; and
- (2) grant delegated authority to the Director of People & Communities, in consultation with the Portfolio Holder for Communities, to agree future minor amendments to the Grants Panel Terms of Reference where such amendments are administrative, support operational efficiency, or ensure continued alignment with national guidance or funding requirements for Ukrainian support.

111

TEMPORARY ACCOMMODATION ALLOCATIONS POLICY

The Executive received the report on the new Temporary Accommodation Allocations Policy, which was developed following an audit by the South West Audit Partnership in April 2025, who recommended the introduction of a formal policy for allocating temporary accommodation. The policy set out a clear, fair, and consistent approach to allocating temporary accommodation to eligible people who were homeless or facing homelessness and complied with relevant legislation.

During the discussion, Executive Members raised the following points and Questions:

- clarification was sought on why veterans were not explicitly mentioned in Appendix B, given the Council's commitment to the Armed Forces Covenant; and
- clarification was sought on the referral process for individuals at risk of homelessness following discharge from institutions like prisons and probation services, and how that linked with the Council's homelessness team.

In response to questions raised by Executive Members, the Strategic Director for People and Communities advised that:

- veterans were not explicitly listed in Appendix B because prioritisation was needs-based, rather than group based;
- a veteran's specific needs would already lead to their prioritisation under existing criteria. Legal duties for veterans were met through housing needs assessments which required the council to consider needs arising from their military service;
- care-experienced young people were the only group explicitly named due to specific legal duties under the Children's Act and the Council's Corporate Parenting responsibilities;
- there was no single, consistent referral process from institutions such as hospitals or prisons and some institutions followed agreed protocols well, while others did not;
- the council funded an outreach worker within the prison system, though compliance with protocols was inconsistent. The funding for the prison outreach post had been extended for a further year; and

- ongoing team restructuring aimed to improve integration with institutions discharging people at risk of homelessness and remained a work in progress, requiring continued partnership with other public sector bodies.

An opposition group leader made the following points and questions:

- the Equality Impact Assessment did not adequately address temporary accommodation needs of Gypsies, Roma and Travellers;
- concerns were raised on protections and specific requirements for victims of domestic violence which were not clearly reflected, including restrictions on placing survivors in B&B accommodation;
- enquired whether relevant regulations on domestic abuse were sufficiently embedded in the policy;
- highlighted concerns about criteria for moving between temporary accommodation, noting the lack of consideration for the needs of young children, bullying, intimidation, or other safeguarding issues; and
- real-life scenarios should inform how the policy is applied.

In response to questions raised by opposition Members, the Strategic Director for People and Communities advised that:

- the listed criteria related to prioritising moves between temporary accommodation, rather than limiting moves only for those reasons;
- moves would still be considered for other serious issues, such as bullying or safeguarding concerns involving children;
- the policy reflected current legal obligations temporary accommodation for Gypsies and Travellers was provided in exceptional emergency circumstances and this would be clarified outside of the meeting; and
- domestic violence considerations were addressed through legal duties and assessment processes rather than explicit policy wording and agreed to check and provide further clarification outside of the meeting.

The Leader moved the recommendations, which were seconded by Councillor Wright, voted upon, and CARRIED unanimously.

RECOMMENDED that Council approve the adoption of the new Temporary Accommodation Policy.

(The meeting commenced at 5.30 pm and closed at 7.19 pm)

Chair

The decisions indicated will normally come into force 5 working days after publication of the Statement of Decisions unless called in by a Scrutiny Committee. Where the matter in question is urgent, the decision will come into force immediately. Decisions regarding the policy framework or corporate objectives or otherwise outside the remit of the Executive will be considered by Council on 25 February 2026 and 3 March 2026.

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REPORT TO EXECUTIVE

Date of Meeting: 17 March 2026

Report of: Strategic Director Place

Title: Exeter City Council's Carbon Reduction Plan

Is this a Key Decision?

Yes

Is this an Executive or Council Function?

Executive

1. What is the report about?

1.1 The report seeks approval of the City Council's Carbon Reduction Plan.

1.2 The Carbon Reduction Plan has been developed to include all Positive Current Trajectory (PCJ) measures, as set out in the Costed Organisational Carbon Footprint Projections Report. Where possible, it includes measures from the Mid-Term and Max scenario measurers from across the main sectors of the City Council's operation.

1.3 The Carbon Reduction Plan also includes relevant actions from the previous action plan.

2. Recommendations:

2.1 Executive approve the Carbon Reduction Plan (Appendix A).

2.2 Members note work undertaken to incorporate PCJ measures as set out in the Carbon Reduction Plan, into Service Plans with Heads of Service, as well as intended outcomes from the Corporate Plan, and integrating the Corporate Performance Dashboard.

3. Reasons for the recommendation:

3.1 To prioritise carbon reduction measures, setting measurable metrics to track progress against priorities and intended outcomes.

3.2 The Net Zero team continue to work in collaboration with City Council services, including housing, buildings (property owned by the City Council) and transport (fleet), to ensure Green House Gas (GHG) emission reduction measures are supported and implemented as far as practicably possible.

3.3 OMB continue to assess their priorities for carbon reduction activity, in line with the Council's Corporate Plan.

4. What are the resource implications including non-financial resources:

4.1 The original City Council's Carbon Reduction Plan has been reviewed and updated to include all PCJ measures, as set out in the Costed Organisational Carbon Footprint Projections to Report. Funding operational and capital reduction measures is extremely challenging. Estimated capital and operational costs will inform discussions with relevant OMB representatives to support future grant funding bids.

4.2 The Carbon Reduction Plan is being incorporated into service plans, which will form part of future planning of existing service budgets.

5. Section 151 Officer comments:

5.1 The report highlights the significant costs associated with delivering a reduction in carbon. It is noted that grant funding opportunities will be explored.

6. What are the legal aspects?

6.1 Section 1 of the Climate Change Act 2008 states that it is the duty of the Secretary of State to ensure that the net UK carbon account for the year 2050 is at least 100% lower than the 1990 baseline. The target was originally 80% and was increased to 100% by the Climate Change Act 2008 (2050 Target Amendment) Order 2019.

7. Monitoring Officer's comments:

7.1 The Monitoring Officer has no additional comments.

8. Equality Act 2010 (The Act)

8.1 In recommending this proposal potential impacts have been identified on people with protected characteristics as determined by the Act and an Equality Impact Assessment has been included in the background papers for Member's attention.

8.2 In delivering carbon reduction measures, the team have considered the potential impact of actions in relation to age, disability, race/ethnicity (includes Gypsies and Travellers), sex and gender, gender identity, religion and belief, sexual orientation, pregnant women and new and breastfeeding mothers, marriage and civil partnership status in coming to a decision.

9. Carbon Footprint (Environmental) Implications:

9.1 The City Council declared a Climate Emergency in 2019. The Costed Organisational Carbon Footprint Projections Report provides a roadmap to reduce City Council GHG emissions. For context, GHG emissions arising from the City Council's direct activities (Scope 1), indirect energy emissions (Scope 2) and from other indirect activities (Scope 3) and included within the Carbon Reduction Plan.

9.2 Strategic decisions made either have a positive or negative effect on City Council GHG emissions. Additional work needs to be undertaken prior to decisions being made to determine the impact on City Council GHG emissions.

9.3 The Net Zero Risk Register considers GHG reduction measures as well as measures needed to address the impact of extreme weather events to reduce financial risk and to

protect City Council services. This is reported to Audit & Governance Committee every six months.

10. Carbon Reduction Plan:

10.1 In 2025 a report to Executive Committee presented a summary of the City Council's "Costed Organisational Carbon Footprint Projections" Report. The report produced by the Centre for Energy and Environment at the University of Exeter, assessed the potential to achieve net zero by reducing emissions across five sectors: council-owned housing, non-domestic buildings, transport, renewable energy and land use change/afforestation.

10.2 The Report includes cost estimates, and considered three scenarios:

- **Positive Current Trajectory (PCJ):** The level of activity that is already planned for and/or committed to by the City Council. Activity will require additional funding from government, or other external sources.
- **Mid Case (Mid):** An escalation of activity beyond the PCJ scenario i.e., a 'stretch target' which would also require additional government grant funding and operational costs.
- **Net Zero (Max):** A theoretical maximum level of uptake of measures, which would have considerable impact on cost, skills, supply chain and capacity.

10.3 The PCJ measures have been incorporated into the Carbon Reduction Plan, combined with measures from the existing plan. Where possible, some measures from the Mid and Max scenario have also been included in the Carbon Reduction Plan. Actions are labelled as a/b/c, this indicates PCJ/Mid/Max options.

10.4 The Carbon Reduction Plan includes estimated costs (where known), metrics for each action, and the relevant Head of Service as lead officer. If projects have not secured funding to date, they represent future ambition.

10.5 The Carbon Reduction Plan covers seven sectors: Housing, Non-domestic buildings, Transport & Equipment, Land Use Change, Procurement, F-Gases & Waste, Overall Organisation.

10.6 The Carbon Reduction Plan is a live evolving action plan, which will be reviewed every 6 months to update on progress made, as well as any legislative, financial, technical and operational changes. The Plan will be reported to Strategic Scrutiny on 4 June 2026 and then on a six-monthly basis to ensure progress is tracked and priorities and intended outcomes are reported.

10.7 The Net Zero team and relevant representatives from OMB meet twice a year and are responsible for updating the Carbon Reduction Plan, ensuring actions are aligned and included within Service Plans.

10.8 To show progress, each action will be reviewed and the colour based on the following colours: green = near completion, orange = some progress, yellow = slight progress, red = no progress.

10.9 A full list of completed projects to reduce corporate carbon emissions can be found at the end of the Carbon Reduction Plan, indicating year completed. Actions recently completed or in progress include:

- Construction of new homes to Passivhaus standard.
- Loft and cavity Insulation within City Council social homes.
- Solar Photovoltaic (PV) Installations on City Council social homes.
- Riverside Leisure Centre Decarbonisation Project.
- Solar PV installations at Exeter Arena, Wonford Sports Centre and St Sidwell's Point, Senate Court and Guildhall Car Park.
- Council corporate energy contract is from a renewable tariff.
- Migration of Council data from Council based data centres to cloud based.
- Trial of Hydrogenated Vegetable Oil (HVO) fuel within fleet vehicles.
- Expansion of electric fleet and portable equipment.
- Incentives to increase uptake of public transport for staff and cycle storage for active travel.
- Devon & Torbay Local Electricity Vehicle Infrastructure (LEVI) project currently underway with several City Council car parks due to have EV charging infrastructure installed.
- 799 trees planted in 2025. An assessment completed in 2023 by Treeconomics, assessing the canopy cover of the whole city of Exeter, found the estimated canopy cover to be 20.2%, higher than the UK national average (17%) for towns and cities.
- Procurement sends a Carbon Data Request form to all suppliers awarded with contracts over £100k providing for better measurement of scope 3 emissions.

10.10 Carbon reduction discussions have been integrated into OMB meetings, with a separate review held every 6 months with representatives from relevant services.

10.10 Delivery of the Carbon Reduction Plan includes extensive additional benefits of GHG emission reduction, which includes:

- reduced use of fossil fuel lowers pollution levels;
- healthier more comfortable homes and buildings;
- energy efficient, cheaper to run social housing and corporate buildings;
- biodiversity enhancement;
- improved health for our workers and residents;
- reduced operational costs supporting sustainable City Council services;
- improved budget security from a self-supply of renewable energy generation;
- local leadership and dissemination for replication of decarbonisation measures;
- decarbonisation works provide for 'green' jobs and skills training; and
- collaboration and innovation benefit the city and region.

11. How does the decision contribute to the Council's Corporate Plan?

11.1 This report and the work of the Net Zero team links directly to the Corporate Plan 2025-28. Activity to reduce our GHG emissions links to key priorities set out in the Corporate Plan and in collaboration with City Council services, including using specific and measurable metrics to track progress against priorities and intended outcomes.

Local Economy	Work with Building Greater Exeter and Exeter College to support green skills, training and local employment opportunity, as part of new development and retrofit. Collaboration with other Public Sector organisations, such as the University of Exeter, the Met Office and Exeter Science Park to drive forward carbon reduction initiatives.
Sustainable Environment	Net Zero team focuses on reducing City Council GHG emissions. Decarbonisation reduces energy consumption and costs, reducing service delivery costs and supporting sustainable council services.
Homes	Through housing retrofit programme delivers warmer homes reduced energy consumption, reduced carbon emissions, energy bills and improved health outcomes and wellbeing for tenants. Together with Liveable Exeter, working collaboratively with developers in developing sustainable and accessible neighbourhoods and new homes, using sustainable construction methods. A recent example is Whipton Gardens.
People	Working in partnership with Live & Move in developing sustainable travel options for residents. Supporting leisure services through better energy management and efficiencies to maintain provision of affordable facilities. Tree planting provides for reduced surface water runoff, improved air quality, improved biodiversity and habitat, and cooling to address warmer summers.

12. What risks are there and how can they be reduced?

12.1 The City Council's GHG inventory, the Net Zero Risk Register and now the Carbon Reduction Plan inform the work programme of the Net Zero team and that of other services.

12.2 The City Council's Service Plan template has been amended and now includes a section for each Head of Service to complete on carbon reduction activity, which links back to the Carbon Reduction Report. It also includes measurements and metrics to highlight progress for each service in reducing GHG emissions. The Net Zero team have supported Heads of Service to incorporate carbon reduction measures in their service plans.

12.3 Ownership and understanding of the measures needed to reduce GHG emissions is constantly reviewed by the Net Zero Team. The team aim to increase understanding within the organisation and facilitate cultural change, with initiatives undertaken such as Climate and Nature Champions and Carbon Literacy Training.

12.4 The financial cost to reduce carbon emissions is significant, the Costed Carbon Footprint Projection Report for corporate GHG emissions was the first of its kind. If the City Council is not successful in obtaining significant funding, the measures required to reduce GHG emissions will not be delivered, and reductions in GHG emissions will take longer to achieve.

12.5 Legislative changes have and offer the City Council a risk in delivering proposed PCJ measures. For instance, actions within the Housing section of the Carbon Reduction Plan reflect changes to the Housing fabric first work programme to address Awaabs Law.

13. Are there any other options?

13.1 There is the option of not continuing existing or committing additional financial and non-financial resources in reducing carbon emissions within the City Council. This would result in a lack of co-ordination, strategic direction and delivery in reducing our GHG emissions.

13.2 On a regular basis, the Net Zero team are sourcing external funding to support the delivery of the City Council's Corporate Carbon Reduction Plan, working with services to identify capacity and match funding within the City Council. However, without aligning the report to Service Plans and accelerating measures where possible, the reports forecasted emission reductions will not be achieved.

Strategic Director Place, Ian Collinson

Author: Net Zero Project Manager

Local Government (Access to Information) Act 1972 (as amended)

Background papers used in compiling this report:

None

List of Appendices:

- Appendix A – Carbon Reduction Plan

1. Housing

Area of Focus	Action <small>(where labelled a/b/c this indicates options)</small>	Cost estimated	Currently funded? <small>Yes / No / Part</small>	Lead officer	Metric	Current status <small>(green = near completion, orange = some progress, yellow = slight progress, red = no progress)</small>
Construction of new homes to Passivhaus standard	1.1 Build 500 new homes to Passivhaus standard	£2,960,000 uplift from cost of building 500 new homes to non-Passivhaus standard	Part	HoS - Asset maintenance	No. of Passivhaus homes built/year	Around 170 Passivhaus new homes constructed so far. This includes the most recent completion in 2025 of Vaughan Road Phase 1 (35 homes), with Phase 2 (16 apartments) commencing construction in 2026.
	1.2 Install cavity wall insulation in 181 homes a year	£4,840,000	Part	HoS - Asset maintenance	<ul style="list-style-type: none"> • No. of cavity wall insulation installations/year • SAP score 	At current rate, around 40 wall insulation installations/year.
1.3 Install loft insulation in 181 homes a year	Part		<ul style="list-style-type: none"> • No. of loft insulation installations/year • SAP score 		At current rate, around 90 loft insulation installations/year.	
Decarbonising heat	1.4a Replace gas boilers like for like at end of life (~400 replacements per year)	£8,790,000	Yes	HoS - Asset maintenance	No. of gas boilers replaced/year	Current standard approach is for gas boilers to be replaced like for like at end of life. Electrical heating (Quantum) to be investigated in some properties in 26/27 financial year. Air Source Heat Pump (ASHP) trial to be investigated in a small number of suitable properties.
	1.4b Install direct electric heating to all gas homes (609 installations per year)	£20,900,000	No		No. of direct electric heating systems installed/year	
	1.4c Install air source heat pumps (ASHPs) to all gas homes (609 installations per year)	£51,300,000	No		No. of ASHPs installed/year	
Increasing appliance efficiency	1.5 Promoting energy efficiency and use of low energy appliances by promotion of and access to good quality guidance	£0	No	HoS - Asset maintenance	Amount of promotion / guidance available to residents on appliance efficiency	Retrofit and Net Zero teams to work together on leaflet for residents promoting energy efficiency and use of low energy appliances.
Solar photovoltaic (PV) installation	1.6 Install solar PV on 70 homes per year	£3,290,000	Part	HoS - Asset maintenance	<ul style="list-style-type: none"> • kW of solar PV installed/year • No. of homes installed with PV/year 	At current rate, around 40 solar PV installations/year.

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Equality Impact Assessment: Exeter City Council's Carbon Reduction Plan

The Equality Act 2010 includes a general duty which requires public authorities, in the exercise of their functions, to have due regard to the need to:

- **Eliminate discrimination**, harassment and victimisation and any other conduct that is prohibited by or under the Act.
- **Advance equality of opportunity** between people who share a relevant protected characteristic and people who do not share it.
- **Foster good relations** between people who share a relevant protected characteristic and those who do not

In order to comply with the general duty authorities must assess the impact on equality of decisions, policies and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

Authorities which fail to carry out equality impact assessments risk making poor and unfair decisions which may discriminate against particular groups and worsen inequality.

Committee name and date:	Report Title	Decisions being recommended:	People with protected characteristics potentially impacted by the decisions to be made:
Executive Committee 17 March 2026	Exeter City Council's Carbon Reduction Plan	Executive approve the Carbon Reduction Plan (Appendix A). Members note work undertaken to incorporate Positive Current Trajectory measures as set out in	Disability, Age, Sex/Gender, Pregnancy & Maternity

Committee name and date:	Report Title	Decisions being recommended:	People with protected characteristics potentially impacted by the decisions to be made:
		the Carbon Reduction Plan, into Service Plans with Heads of Service, as well as intended outcomes from the Corporate Plan, and integrating the Corporate Performance Dashboard.	

Factors to consider in the assessment: For each of the groups below, an assessment has been made on whether the proposed decision will have a **positive, negative or neutral impact**. This must be noted in the table below alongside brief details of why this conclusion has been reached and notes of any mitigation proposed. Where the impact is negative, a **high, medium or low assessment** is given. The assessment rates the impact of the policy based on the current situation (i.e. disregarding any actions planned to be carried out in future).

High impact – a significant potential impact, risk of exposure, history of complaints, no mitigating measures in place etc.

Medium impact – some potential impact exists, some mitigating measures are in place, poor evidence

Low impact – almost no relevancy to the process, e.g. an area that is very much legislation led and where the Council has very little discretion

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
Race and ethnicity (including Gypsies and Travellers; migrant workers; asylum seekers).			There is no evidence available of specific impact.
Disability: as defined by the Equality Act – a person has a disability if they have a physical or mental impairment	Positive	High	Active travel or sustainable travel initiatives support positive mental health and wellbeing and increased accessibility for those less able. For

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
that has a substantial and long-term adverse impact on their ability to carry out normal day-to-day activities.	Positive	High	those City Council employees that have a disability, some active travel options may not be accessible.
	Positive	High	Buildings built to Passivhaus standard, support positive mental health & wellbeing for individuals. Healthier and warmer homes, no need to switch on heating, as well as energy efficiency of homes. 11.9% of homes in Exeter are classified as being classified as being 'fuel poor'.
	Positive & Negative	Medium	Housing retrofit, provides efficient warmer Council homes warmer homes, improve health outcomes in colder times of the year, and reduce heating costs.
	Positive	Low	Some energy efficiency schemes offering home improvements support those who claim various benefits, dependant on eligibility criteria. Those who are not on various benefits, would not be eligible. 1.4% (750) of homes in Exeter are currently heated through renewable or district heat sources
	Positive	Medium	Those with a disability living in Exeter is 26% of the population. Some active & sustainable travel options may not be accessible to those with mobility challenges. Promotion of sustainable travel options to those able to use alternative methods, and in return support those with a disability. Eg disabled parking spaces. Those that can make changes are encouraged to and staff feedback is sought via an annual travel survey. Engagement with the transport providers, through the Transport Working Group, to improve accessibility for residents.
	Positive	Medium	New EV charging infrastructure will be accessible for those with disabilities. Overall, there may be a small loss of parking bays available for those that are more mobile.

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
Sex/Gender	Positive	High	As a result of tackling the impacts of climate change there will be less pollution and healthier environment for expectant mothers, and those with health conditions. Male workers who work predominantly work in close proximity to diesel vehicles/equipment benefit from electrification of vehicles and equipment.
Gender reassignment			There is no evidence available of specific impact.
Religion and belief (includes no belief, some philosophical beliefs such as Buddhism and sects within religions).			There is no evidence available of specific impact.
Sexual orientation (including heterosexual, lesbian, gay, bisexual).			There is no evidence available of specific impact.
Age (children and young people aged 0-24; adults aged 25-50; younger older people aged 51-75/80; older people 81+; frail older people; people living with age related conditions. The age categories are for illustration only as overriding consideration should be given to needs).	Positive	High	Delivering Net Zero across the city is likely to be embraced by younger people who live, study, work or socialise in Exeter. Research carried out by Cardiff University across the UK, found that younger age groups demonstrated a stronger engagement with climate change action.
	Positive	Medium	Those that are older or frail may need to keep their homes warmer in colder times of the year and cannot make use of sustainable transport options – which has a negative impact on carbon emissions. It is important that the council promotes and supports home improvements to help make homes warmer and heating more sustainable and continue housing retrofit and Passivhaus projects. 16.7% of the Exeter population are aged 65 and over.
	Positive	Medium	The building of new sustainable active travel routes, and provision of leisure activities will support positive mental health and physical wellbeing and increase accessibility young and old. Reduced emissions can provide improvement in air quality, especially beneficial to younger and older people, as well as those with specific health conditions.

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
	Positive	High	Reduced use of fossil fuel within City Council operations, equipment and vehicles lowers pollution levels, resulting in an improvement in air quality and a better working environment for officers. 4.6% (6,005) of the population of Exeter consider themselves to have bad or very bad health, improvements in air quality may support these individuals.
	Negative	Medium	Extreme weather conditions effect officers working outdoors and may result in poorer health for older staff, impacting service delivery. Ensure better work equipment, uniform, and working conditions are risk assessed appropriately.
	Negative	Medium	Not all individuals that are older have access to a mobile device. When promoting/talking about activity, or severe weather warnings, ensure communications are not solely on digital comms /using social media.
Pregnancy and maternity including new and breast feeding mothers	Neutral	Low	As a result of tackling the impacts of climate change there will be a healthier environment for expectant mothers, as well as the ability to walk/exercise in a safe environment
Marriage and civil partnership status			There is no evidence available of specific impact.

Actions identified that will mitigate any negative impacts and/or promote inclusion

Officer: Jo Pearce

Date: 18 February 2026

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REPORT TO EXECUTIVE

Date of Meeting: 17 March 2026

Report of: Strategic Director for Place

Title: Adoption of Revised Non-Infrastructure Habitat Mitigation (SAMM) Contributions

Is this a Key Decision?

Yes

Is this an Executive or Council Function?

Executive

1. What is the report about?

1.1 This report seeks Executive approval to adopt revised non-infrastructure habitat mitigation contributions (Strategic Access Management and Monitoring – SAMM) to be applied to residential development within the defined habitat mitigation zone.

1.2 Residential development within Exeter contributes to increased recreational pressure on internationally protected habitats, including Special Protection Areas (SPAs) and Special Areas of Conservation (SACs). Under the Conservation of Habitats and Species Regulations 2017 (as amended), the Council must be satisfied that development will not result in an adverse effect on the integrity of these sites.

1.3 The non-infrastructure habitat mitigation measures are delivered through a coordinated partnership with neighbouring local authorities, reflecting the cross-boundary nature of the affected protected habitats and recreational catchments. Developer contributions collected by the Council are used solely to fund agreed mitigation measures and are managed through established partnership arrangements to ensure transparency, proportionality, and effective delivery.

1.4 To meet these legal requirements, the Council relies on a package of mitigation measures, including non-infrastructure mitigation delivered through SAMM. These measures are funded through developer contributions secured as part of the planning application process.

1.5 The revised contributions are required to ensure that the costs of delivering SAMM measures are fully and appropriately met, and that the Council can continue to determine planning applications lawfully and robustly.

1.6 The report also seeks delegated authority for the annual index-linking of the contributions, to ensure that the rates remain up to date and reflective of mitigation costs over time.

2. Recommendations:

2.1 Adopt the revised SAMM contributions for all qualifying residential planning applications received on or after 1 April 2026.

For enquiries please contact: democratic.services@exeter.gov.uk

2.2 Delegate authority to the Head of City Development, in consultation with the Portfolio Holder, to apply annual index-linking and publish updated rates.

3. Reasons for the recommendation:

3.1 The existing contribution rates no longer fully reflect the costs of delivering non-infrastructure mitigation.

3.2 Updating the rates ensures continued legal compliance and effective mitigation.

4. What are the resource implications including non-financial resources:

4.1 Contributions are developer funded and ring-fenced for mitigation purposes.

4.2 There are no General Fund implications.

5. Section 151 Officer comments:

5.1 The proposals do not impact the Council's revenue or capital budgets.

6. What are the legal aspects?

6.1 The Council must ensure development does not adversely affect protected habitats under the Habitats Regulations.

6.2 Updated contributions support lawful decision-making.

7. Monitoring Officer's comments:

7.1 The Monitoring Officer has no additional comments.

8. Equality Act 2010 (The Act)

8.1 In recommending this proposal no potential impact has been identified on people with protected characteristics as determined by the Act because:

- The proposals do not discriminate against any protected groups.
- The mitigation measures support inclusive access to protected environments.

9. Carbon Footprint (Environmental) Implications:

9.1 The proposals support habitat protection and sustainable recreation management.

9.2 There are no adverse carbon impacts.

10. Report details:

10.1 Exeter City Council is required, under the Conservation of Habitats and Species Regulations 2017, to assess the impacts of residential development on internationally designated habitats, either alone or in combination with other plans and projects.

10.2 Evidence demonstrates that residential development contributes to increased recreational activity within protected habitats, including walking, dog walking and other leisure activities. Without appropriate management, this increased activity can result in disturbance to protected species and degradation of sensitive habitats.

For enquiries please contact: democratic.services@exeter.gov.uk

10.3 Strategic Access Management and Monitoring (SAMM) is a recognised approach to addressing recreational impacts on internationally designated habitats. It involves a coordinated programme of non-infrastructure measures designed to manage recreational pressure, monitor impacts, and promote responsible use of protected sites.

10.4 SAMM measures typically include:

- wardening and site-based management;
- visitor engagement and education;
- monitoring of habitat condition and visitor activity; and
- coordination across administrative boundaries to address cumulative impacts.

These measures directly reduce recreational disturbance to protected species, including overwintering and breeding bird populations for which the sites are designated. Site-based wardening enables proactive engagement with visitors, supports responsible dog management and access behaviour, and provides a visible presence in sensitive areas. Monitoring allows emerging pressures to be identified and addressed through adaptive management, helping to maintain the integrity and conservation objectives of the designated habitats.

10.5 The Council currently secures a combined habitat mitigation contribution from qualifying residential development, comprising both infrastructure mitigation (including Suitable Alternative Natural Greenspace – SANGS) and non-infrastructure mitigation (SAMM). This report relates solely to the recosted SAMM element. The SAMM contribution is pooled and used exclusively to fund agreed non-infrastructure mitigation measures delivered through the established partnership arrangements.

10.6 The existing contribution rates were set some time ago and no longer fully reflect the current and anticipated costs of delivering SAMM across the mitigation zone. Updated rates are therefore required to ensure that mitigation remains effective and proportionate.

10.7 The revised non-infrastructure habitat mitigation (SAMM) contribution rates have been calculated to reflect these costs and to ensure that development contributes fairly to mitigation. The proposed rates are set out in **Appendix A**.

10.8 The revised SAMM contribution rates were considered by the South East Devon Habitat Regulations Executive Committee (HREC), the joint committee established by Exeter City Council, East Devon District Council and Teignbridge District Council to oversee delivery of the shared habitat mitigation strategy. HREC endorsed the updated non-infrastructure mitigation approach. Formal adoption of the revised contribution rates, insofar as they apply within Exeter, is a matter for the Executive.

10.9 The proposed rates will apply to all planning applications for residential development within the habitat mitigation zone received on or after 1 April 2026, providing clarity and certainty for developers.

10.10 Delegated authority is sought to apply annual index-linking to the contribution rates from April each year, ensuring that the contributions remain up to date without the need for repeated Executive decisions on minor technical adjustments.

For enquiries please contact: democratic.services@exeter.gov.uk

10.11 SAMM contributions are applied and monitored through established partnership arrangements with neighbouring authorities, ensuring that funds are directed to mitigation measures proportionate to the impacts arising from development within Exeter.

11. How does the decision contribute to the Council's Corporate Plan?

11.1 The decision supports a sustainable environment and a well-run Council.

11.2 The decision also supports the Council's commitment to sustainable growth by enabling residential development to proceed in a manner that protects sensitive habitats.

12. What risks are there and how can they be reduced?

12.1 Without updated contributions, legal risk would increase.

12.2 This is mitigated through adoption and index-linking.

12.3 There is also a risk that without updated contributions, mitigation measures cannot be delivered at the scale required.

13. Are there any other options?

13.1 Retaining existing rates is not recommended.

Strategic Director for Place, Ian Collinson

Author: Roger Clotworthy, Head of City Development

Local Government (Access to Information) Act 1972 (as amended)

Background papers used in compiling this report:-

None

List of Appendices:

- Appendix A - Revised Non-Infrastructure Habitat Mitigation (SAMM) Contribution Rates

Appendix A

Revised Non-Infrastructure Habitat Mitigation (SAMM) Contribution Rates

A1. Introduction

This appendix sets out the revised non-infrastructure habitat mitigation (Strategic Access Management and Monitoring – SAMM) contribution rates approved by the Executive.

The contributions are required to mitigate the recreational impacts of residential development on internationally protected habitats within the defined habitat mitigation zone and are secured through the planning application process.

A2. Application of the Contributions

The contribution rates set out below will apply to:

- all planning applications for residential development within the habitat mitigation zone; and
- applications received on or after 1 April 2027.

The rates are calculated on a per-dwelling basis and are payable prior to commencement of development, in accordance with the relevant legal agreement or planning condition.

A3. Contribution Rates

Table A1 – SAMM (Non-Infrastructure) Rates – 2026/27

Habitat Area	SAMM (£ per dwelling)
Exe Estuary	£790.41
Exe & Pebblebed Heaths	£825.41

Table A2 – Combined Habitat Mitigation Rates (2026/27)

(For transparency – SANGS element not subject to amendment through this report)

Habitat Area	SAMM (£)	SANGS (£)	Total (£)
Exe Estuary	£790.41	£796.99	£1587.40
Exe & Pebblebed Heaths	£825.41	£796.99	£1622.40

The contribution rates shown above reflect the current 2026/27 position. In accordance with Recommendation 2.2 of this report, the rates will be index-linked from 1 April 2027 and annually thereafter, with updated figures published by the Council once the relevant index rate is confirmed.

A4. Index-Linking

The contribution rates set out in Table A1 reflect the confirmed 2026/27 position.

In accordance with the Executive decision, the rates will be index-linked from 1 April 2027 and annually thereafter, with updated figures published by the Council once the relevant index rate is confirmed. Index-linking will ensure that contributions remain reflective of the costs of delivering non-infrastructure habitat mitigation over time.

Equality Impact Assessment (EqIA)

Please refer to the [Equality Impact Assessments \(EQIAs\)](#) form for details on how to complete.

The aim of an equality impact assessment is to consider the equality implications of any decision (e.g. new or revised policy, process, project, function, or service) on different groups of people including employees and customers. This document helps to evaluate whether the decision may inadvertently disadvantage groups of people and identify ways to avoid discrimination and proactively advance equality.

1. Details of the proposal

Name of the proposal:	Adoption of Revised Non-Infrastructure Habitat Mitigation (SAMM) Contributions
Version number:	1.0
Does this proposal impact on people?	Choose an item: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Explain your answer whether 'yes' or 'no'	The proposal relates solely to updating developer contribution rates used to fund Strategic Access Management and Monitoring (SAMM) measures. These contributions are technical, regulatory mechanisms required under the Conservation of Habitats and Species Regulations to ensure habitat protection. They do not relate to service delivery, eligibility, access to facilities, or decision-making affecting individuals or groups of people. No impacts on people with protected characteristics have been identified.
Is this a new or existing policy/project/service?	Choose an item: <input checked="" type="checkbox"/> New <input type="checkbox"/> Existing
Person responsible for the proposal:	Head of City Development
Person responsible for the EqIA (if different to above)	Head of City Development
Proposal start date:	01/04/2026

When will this proposal be implemented?	01/04/2026
Briefly describe the aims and objectives of the proposal	To adopt updated SAMM contribution rates so the Council can continue to meet its statutory duty to ensure that residential development does not have an adverse effect on internationally designated habitats. The revised rates ensure that SAMM activities are fully funded and legally robust.
What are the anticipated outcomes of the proposal?	<ul style="list-style-type: none"> • Continued legal compliance with the Habitats Regulations • Adequate resourcing for non-infrastructure habitat mitigation • Transparent and up-to-date developer contribution requirements
Who is likely to be affected by the proposal?	You can select multiple options: <input type="checkbox"/> Staff <input type="checkbox"/> Service users <input checked="" type="checkbox"/> Wider community
How are they likely to be affected?	No direct impacts. The wider community indirectly benefits from the protection of internationally designated habitats.
Is this proposal going to be approved by SMB, Executive or Council?	Select: <input type="checkbox"/> SMB <input checked="" type="checkbox"/> Executive <input type="checkbox"/> Council
When is the proposal going to SMB, Executive or Council?	17/03/2026

3. [Consultation & Engagement](#)

You will nearly always need to involve and consult with stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal. This should include the individuals/groups who are affected by your proposal. Any proposal for consultation or engagement must be done via the [Consultation and Engagement Form](#).

How are you communicating with the individuals/teams who are affected by your proposal?

You can select multiple options:

- Social media
- Focus groups
- Website
- Mail drop
- Via community group
- Other (please describe): The proposal is technical in nature and does not change access to services, policies affecting people, or operational practices. A full public consultation is not required. SAMM contribution revisions were considered by the South East Devon Habitat Regulations Executive Committee (HREC). No equality-related issues were raised or identified.

4. Impacts on People

How will the proposed change affect people with protected characteristics? Make sure that you assess the impact based on evidence.

- Who will benefit, who won't, who can access, who can't access, who is at an advantage, who is at a disadvantage?
- What evidence has been used for this assessment? For example, employee diversity data, national statistics, customer survey, feedback etc. [Sources of equality data](#) are available on Sharepoint. (Please don't include any information that risks identifying people such as names, or the diversity data, if less than six people).

Note: You can copy and paste more rows underneath each protected characteristic if there is more than one impact

How will this proposal affect people with protected characteristics?	Identify Impact:	Why will it have this effect? Use the evidence collated, any engagement or consultation to inform your thinking and record it here. Have you identified any gaps in evidence, if so, what are the gaps? Does this need to be incorporated in the action plan?
Age	No Impact	Financial contributions by developers do not affect age groups differently.

How will this proposal affect people with protected characteristics?	Identify Impact:	Why will it have this effect? Use the evidence collated, any engagement or consultation to inform your thinking and record it here. Have you identified any gaps in evidence, if so, what are the gaps? Does this need to be incorporated in the action plan?
Disability: including sensory, mobility, mental health, neurodiversity, long term ill health	No Impact	No change to physical environments, service access, or communication.
Gender reassignment	No Impact	No differential effect identified.
Marriage and Civil partnership (work related only)	No Impact	Not relevant to the proposal.
Pregnancy & Maternity	No Impact	No effect on access or outcomes.
Race: including ethnic origin, nationality/national origin	No Impact	No differential impact; proposal relates to developer contributions only.
Religion or Belief	No Impact	No relevance to the contribution rate changes.
Sex	No Impact	No differential impact identified.
Sexual Orientation	No Impact	Not affected by habitat mitigation contribution rates.
Intersectionality: Could this proposal have an impact on people who have a combination or intersection	No Impact	No impacts arising for people with intersecting protected characteristics.

How will this proposal affect people with protected characteristics?	Identify Impact:	Why will it have this effect? Use the evidence collated, any engagement or consultation to inform your thinking and record it here. Have you identified any gaps in evidence, if so, what are the gaps? Does this need to be incorporated in the action plan?
of two or more characteristics?		

7. Outcome of Assessment

Select one of the following options:	Tick the relevant box
No barriers identified, proceed with proposed change.	<input checked="" type="checkbox"/>
Adjust the proposal/policy to remove barriers identified by the EqIA.	<input type="checkbox"/>
Continue with the proposal/policy despite potential for adverse impacts.	<input type="checkbox"/>
Stop the proposal/policy as there are adverse impacts that cannot be prevented/mitigated or justified.	<input type="checkbox"/>
Please explain why the option has been chosen: This proposal introduces or amends technical financial contributions paid by developers. It has no equality implications and does not impact individuals or groups with protected characteristics.	

8. Action Plan

Considering the impacts, you have identified above, please detail any actions you will need take to remove barriers, eliminate negative impacts or maximise opportunities. (Add more rows if required). If an action is to meet the needs of a particular protected group please specify this. These actions should be included in your Service Plan.

Action(s) to be taken.	Expected Outcomes	Responsible Person	Timescale	Progress	Complete
No actions are required because no impacts have been identified.					

9. Monitoring

How will you monitor the impact of your proposed change once it has been implemented? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective and your approach is still appropriate. Include the timescale for review in your action plan above.

This EQIA will be reviewed if:

- the SAMM framework changes;
- mitigation measures change in ways that might affect public access;
- evidence emerges of differential impacts.

A scheduled review is recommended in 2029 (aligned with the typical 3–5 year review cycle for planning-related EqIAs).



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REPORT TO EXECUTIVE

Date of Meeting: 17 March 2026

REPORT TO COUNCIL

Date of Meeting: 7 April 2026

Report of: Strategic Director for Place

Title: Devon Local Nature Recovery Strategy

Is this a Key Decision?

No

Is this an Executive or Council Function?

Council

1. What is the report about?

1.1 The publication of a Local Nature Recovery Strategy for the geographical territory that includes the whole of the County of Devon combined with that of Plymouth and Torbay unitary authorities. The Strategy is a new resource, tool and mechanism for improving biodiversity, promoting habitats for rare and endangered species and generally supporting the restoration of a greater abundance of natural flora and fauna.

2. Recommendations:

2.1 That Exeter City Council (as a 'Supporting Authority') should confirm that it is content for Devon County Council (as the 'Responsible Authority') to publish the Devon Local Nature Recovery Strategy.

3. Reasons for the recommendation:

3.1 The draft Devon Local Nature Recovery Strategy addresses requirements set out in the Environment Act 2021. The LNRS has been drafted by Devon County Council as the Responsible Authority in collaboration with a wide range of partners including ECC. ECC is a Supporting Authority in this process and officers have been involved. Elected Members received an 'All Members Briefing' on the strategy from the County Ecologist in the Autumn of 2025. The draft Strategy has now been subject to public consultation and is in its final draft form.

4. What are the resource implications including non-financial resources:

4.1 There are no direct costs associated with this initiative.

4.2 The 'High Opportunity Areas' identified within the Strategy are expected to attract investment / grant-funding to effect ecological improvements to those spaces, creating stronger habitats for nature.

For enquiries please contact: democratic.services@exeter.gov.uk

5. Section 151 Officer comments:

5.1 There are no financial implications for Council to consider.

6. What are the legal aspects?

6.1 A LNRS Strategy is required in order to comply with Sections 104 to 106 of the Environment Act 2021.

6.2 Devon County Council as the Responsible Authority have been required to follow the procedure for creating the Strategy, as laid out in The Environment Regulations 2023 (Local Nature Recovery Strategies) (Procedure).

6.3 All public authorities have a duty to conserve and enhance biodiversity and must 'have regard' to relevant local nature recovery strategies in this process. LPAs should consider how LNRS priorities, actions and mapping are reflected in Local Plans and development management decisions. LNRSs have been given a statutory link to biodiversity net gain (BNG). Simplistically, BNG proposals will be assessed as having a 'high strategic significance' score in the statutory metric if they are located in an area mapped for action in the LNRS Local Habitat Map, and the proposal is consistent with said actions.

6.4 The government has made it clear that LNRSs are not intended to act as a barrier to development or place new restrictions on developing land or making land use changes. LNRSs provide guidance and an evidence base to inform Local Plans and decision making. Planning decisions at both the plan making and planning application stage need to consider all material considerations and the LNRS will be one consideration amongst many.

7. Monitoring Officer's comments:

7.1 No governance or procedural issues arise from this report. The recommendations fall within the City Council's statutory responsibilities under the Environment Act 2021 and associated regulations.

8. Equality Act 2010 (The Act)

8.1 In recommending this proposal no potential impact has been identified on people with protected characteristics as determined by the Act because the Strategy is exclusively about actions affecting ecology and natural systems rather than outcomes that relate to impacts on people.

9. Carbon Footprint (Environmental) Implications:

9.1 No direct negative carbon/environmental impacts arise from the recommendations.

9.2 Clearly, the strategy is intended to greatly improve biodiversity and some of the resulting actions may well also contribute to the other positive environmental improvements as listed at 10.5 below.

For enquiries please contact: democratic.services@exeter.gov.uk

10. Report details:

10.1 England is considered to be one of the most nature-depleted countries in the world following historic losses and ongoing declines. The Government has made legally binding commitments to end these declines and for nature to recover. Part of this commitment includes a statutory requirement through [Sections 104 to 106](#) of the Environment Act 2021 for the preparation of Local Nature Recovery Strategies (LNRS) for identified areas across the Country. Devon is one of 48 such areas.

10.2 All public authorities have a duty to conserve and enhance biodiversity and must have 'regard' to relevant local nature recovery strategies in this process. The LNRSs are new spatial strategies that will inform nature recovery at a strategic local level, by mapping habitats, features and key species to identify opportunities and priorities to boost ecological connectivity, diversity and abundance. They will support the delivery of biodiversity net gain and provide a focus for the strengthened duty on all public authorities to conserve and enhance biodiversity. Online resources aim to help everyone to play a role in nature recovery.

10.3 Devon County Council (DCC) was appointed as the Responsible Authority for Devon LNRS under section 105 of the Environment Act 2021. Responsible Authorities are responsible for preparing, publishing, reviewing and republishing a Local Nature Recovery Strategy following the process set out in The Environment (Local Nature Recovery Strategies) (Procedure) Regulations 2023.

10.4 LNRSs must be produced in collaboration with Supporting Authorities and all other relevant stakeholders. A Supporting Authorities Officer Group was set up and has met regularly throughout the preparation of the LNRS. Exeter City Council is a Supporting Authority for the LNRS, along with other local authorities and Natural England.

10.5 Co-benefits to nature recovery include:

- Climate Change adaptation and mitigation.
- Water quality.
- Natural Capital and ecosystem services.
- Wellbeing.

10.6 The draft LNRS comprises a website and interactive mapping (see Appendix for links). These formats will enable the material and GIS-linked data to be accessible and useful to a wide range of audiences.

10.7 There are strong correlations between the aspirations and objectives of establishing the Strategy with ECC corporate priorities as expressed by the Exeter Vision 2040 and the Corporate Plan priority of achieving a 'Sustainable Environment'. The 'Liveable Exeter' principle of creating 'Places for People and Nature' will also be supported and reinforced.

10.8 DCC's Ecology Team has led the development of the LNRS under the umbrella of the Devon Local Nature Partnership. Funding has been used to engage a team of wildlife experts to pull together the information required for the LNRS and to liaise with relevant partners. DCC has also engaged a web designer, copy writer and other consultants to work on mapping, water quality, natural flood management, etc.

For enquiries please contact: democratic.services@exeter.gov.uk

10.9 An officer working group from ECC have worked with the DCC LNRS team to develop the draft LNRS. This has included officers from City Development, Public and Green Space, Dorset Ecology Services (as ECC's appointed ecology consultants) and the City-Wide Net Zero team. This has ensured that relevant ECC key interests are reflected in/consistent with the final draft LNRS (e.g. Valley Parks identified as 'High Opportunity Areas', initiatives such as habitat bank, habitat mitigation strategy, Clyst Valley Regional Park, Green Circle are all aligned).

10.10 An ECC 'all members briefing' was held (15th September) at which the County Ecologist presented the draft strategy and took questions and observations from participants.

10.11 The public consultation conducted by DCC was predominantly positive and supportive of the Strategy in its final form (see Appendix) and included a variety of engagement techniques with two 'drop-in' sessions organised in Exeter (at the City Library and the Custom House).

10.12 The final draft version of the Strategy is endorsed by the ECC Officer Working Group.

10.13 Existing ECC planning policy supports the enhancement of biodiversity within the city and the draft Exeter Plan makes explicit reference to the LNRS within its specific policy "NE3 Biodiversity".

11. How does the decision contribute to the Council's Corporate Plan?

11.1 The Devon Local Nature Recovery Strategy is fully aligned with the Corporate Plan Strategic Priority "Sustainable Environment" in taking action to mitigate and adapt to the impacts of climate change. This includes the Outcome of providing "Well-maintained parks, open spaces and biodiversity across the city".

12. What risks are there and how can they be reduced?

12.1 There are no direct risks identified – the main challenge to effective delivery will lie in the means of implementation and use of the Strategy. Officers will need to become alert to 'best practice' in how to interpret and give influence to the Strategy, particularly in the plan-making and decision-taking activity of the planning service.

13. Are there any other options?

13.1 The approval to publish could be withheld, but this would delay the Strategy taking effect. Officers are not aware of any inadequacies in the current draft nor of any need for additional work to be undertaken in preparing a Strategy that might be regarded to be more satisfactory.

Strategic Director for Place, Ian Collinson

Authors: Matt Diamond (Assistant Service Lead – Development Management (Major Projects)) + Mark Pearson (Principal Officer, Urban Design + Landscape)

For enquiries please contact: democratic.services@exeter.gov.uk

Local Government (Access to Information) Act 1972 (as amended)

Background papers used in compiling this report:-

Environment Act 2021 (legislation.gov.uk)

The Environment Regulations 2023 (Local Nature Recovery Strategies) (Procedure) (legislation.gov.uk)

Defra [LNRS Supporting Authority Factsheet 0.pdf](#)

Update to the Natural Environment section of [planning practice guidance](#) on 19/02/25

List of Appendices:

- EQIA (attached a separate document)
- The Devon LNRS website www.naturerecoverydevon.org.uk/
- A short Powerpoint explaining the DNLRs (using a series of website screenshots)
 [LNRS Screenshots Updated Jan 26.pptx](#)
- DCC “Draft Devon LNRS Public consultation – Qualitative responses”
(also includes a hyperlink to an overall summary of the quantitative data)
 [Summary of Devon LNRS Public Consultation Qualitative Responses.docx](#)

For enquiries please contact: democratic.services@exeter.gov.uk

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Equality Impact Assessment (EqIA)

Please refer to the [Equality Impact Assessments \(EQIAs\)](#) form for details on how to complete.

The aim of an equality impact assessment is to consider the equality implications of any decision (e.g. new or revised policy, process, project, function, or service) on different groups of people including employees and customers. This document helps to evaluate whether the decision may inadvertently disadvantage groups of people and identify ways to avoid discrimination and proactively advance equality.

1. Details of the proposal

Name of the proposal:	Devon Local Nature Recovery Strategy (ECC to indicate that it is content for DCC to publish the Strategy)
Version number:	1
Does this proposal impact on people?	Choose an item: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Explain your answer whether 'yes' or 'no'	The Strategy is about restoring nature – no human impacts
Is this a new or existing policy/project/service?	Choose an item: <input checked="" type="checkbox"/> New <input type="checkbox"/> Existing
Person responsible for the proposal:	Devon County Council is the Responsible Authority
Person responsible for the EqIA (if different to above)	Mark Pearson (Principal Officer, Urban Design and Landscape)
Proposal start date:	19/02/2026
When will this proposal be implemented?	08/04/2026
Briefly describe the aims and objectives of the proposal	

	To publish a web-based strategy that provides an evidence base, tool and resource for promoting the restoration of habitats and species in the geographical area of Devon (inc. Plymouth and Torbay)
What are the anticipated outcomes of the proposal?	Greater abundance of flora and fauna including rare and endangered habitats and species.
Who is likely to be affected by the proposal?	You can select multiple options: <input type="checkbox"/> Staff <input type="checkbox"/> Service users <input checked="" type="checkbox"/> Wider community
How are they likely to be affected?	They are more likely to encounter and experience wildlife and nature.
Is this proposal going to be approved by SMB, Executive or Council?	Select: <input type="checkbox"/> SMB <input checked="" type="checkbox"/> Executive <input checked="" type="checkbox"/> Council
When is the proposal going to SMB, Executive or Council?	17/03/2026

3. Consultation & Engagement

You will nearly always need to involve and consult with stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal. This should include the individuals/groups who are affected by your proposal. Any proposal for consultation or engagement must be done via the [Consultation and Engagement Form](#).

<p>How are you communicating with the individuals/teams who are affected by your proposal?</p> <p>You can select multiple options:</p> <input type="checkbox"/> Social media <input type="checkbox"/> Focus groups <input type="checkbox"/> Website <input type="checkbox"/> Mail drop <input type="checkbox"/> Via community group
--

Other (please describe):

Devon have conducted a public consultation on the Strategy, no comments about inequalities were raised.

4. Impacts on People

How will the proposed change affect people with protected characteristics? Make sure that you assess the impact based on evidence.

- Who will benefit, who won't, who can access, who can't access, who is at an advantage, who is at a disadvantage?
- What evidence has been used for this assessment? For example, employee diversity data, national statistics, customer survey, feedback etc. [Sources of equality data](#) are available on Sharepoint. (Please don't include any information that risks identifying people such as names, or the diversity data, if less than six people).

Note: You can copy and paste more rows underneath each protected characteristic if there is more than one impact

How will this proposal affect people with protected characteristics?	Identify Impact:	Why will it have this effect? Use the evidence collated, any engagement or consultation to inform your thinking and record it here. Have you identified any gaps in evidence, if so, what are the gaps? Does this need to be incorporated in the action plan?
Age	No Impact	
Disability: including sensory, mobility, mental health, neurodiversity, long term ill health	No Impact	
Gender reassignment	No Impact	
Marriage and Civil partnership (work related only)	No Impact	
Pregnancy & Maternity	No Impact	

How will this proposal affect people with protected characteristics?	Identify Impact:	Why will it have this effect? Use the evidence collated, any engagement or consultation to inform your thinking and record it here. Have you identified any gaps in evidence, if so, what are the gaps? Does this need to be incorporated in the action plan?
Race: including ethnic origin, nationality/national origin	No Impact	
Religion or Belief	No Impact	
Sex	No Impact	
Sexual Orientation	No Impact	
Intersectionality: Could this proposal have an impact on people who have a combination or intersection of two or more characteristics?	No Impact	

7. Outcome of Assessment

Select one of the following options:	Tick the relevant box
No barriers identified, proceed with proposed change.	<input checked="" type="checkbox"/>
Adjust the proposal/policy to remove barriers identified by the EqIA.	<input type="checkbox"/>
Continue with the proposal/policy despite potential for adverse impacts.	<input type="checkbox"/>

Stop the proposal/policy as there are adverse impacts that cannot be prevented/mitigated or justified.	<input type="checkbox"/>
<p>Please explain why the option has been chosen: The strategy has no impacts on the protected characteristics.</p>	

8. Action Plan

Considering the impacts, you have identified above, please detail any actions you will need take to remove barriers, eliminate negative impacts or maximise opportunities. (Add more rows if required). If an action is to meet the needs of a particular protected group please specify this. These actions should be included in your Service Plan.

Action(s) to be taken.	Expected Outcomes	Responsible Person	Timescale	Progress	Complete
Review this impact assessment after a period of 5 years post-publication	Any unforeseen impacts can be identified	Ecology Officer	2031		

9. Monitoring

How will you monitor the impact of your proposed change once it has been implemented? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective and your approach is still appropriate. Include the timescale for review in your action plan above.

Review in 2031

REPORT TO EXECUTIVE

Date of Meeting: 17 March 2026

REPORT TO COUNCIL

Date of Meeting: 7 April 2026

Report of: Strategic Director for Corporate Resources

Title: Crisis and Resilience Fund: Housing Payments and Crisis Payments

Is this a Key Decision?

No

Is this an Executive or Council Function?

Council

1. What is the report about?

- 1.1 This report seeks Members' agreement on the policy for Housing Payments under the Crisis and Resilience Fund from April 2026.
- 1.2 Member agreement is also sought to delegate authority to agree the scheme for disbursing Crisis Payments to the Strategic Director for Corporate Resources in consultation with the Leader and the Portfolio Holder for Housing, Homelessness Prevention & Customer Services.

2. Recommendations:

- 2.1 That Executive RECOMMENDS to Council that the draft policy for Crisis and Resilience Fund: **Housing Payments** is adopted.
- 2.2 That Executive agrees and RECOMMENDS to Council that the Strategic Director for Corporate Resources is given delegated authority to agree the scheme for disbursing funding for Crisis and Resilience Fund: **Crisis Payments** in consultation with the Leader and the Portfolio Holder for Housing, Homelessness Prevention & Customer Services.

3. Reasons for the recommendation:

- 3.1 The Discretionary Housing Payment (DHP) scheme is being replaced by Housing Payments under the Crisis and Resilience Fund from April 2026. This policy allows the vital support provided under the DHP scheme to continue without interruption.
- 3.2 The Household Support Fund (HSF) is replaced by Crisis Payments under the Crisis and Resilience Fund from April 2026. Details of funding amounts and conditions are not yet known. Delegating authority for final scheme design will allow for the shortest possible gap in provision of crisis support.

For enquiries please contact: democratic.services@exeter.gov.uk

4. What are the resource implications including non-financial resources:

4.1 Housing Payments

Department for Work and Pensions have confirmed that the allocations for Housing Payments and administration costs in 2026/27 and 2027/28 will match the DHP funding received in 2025/26 at £133,300 and £22,800 respectively.

Payment will be through a ringfenced consolidated grant as part of the Local Government Finance Settlement rather than a payment of subsidy claimed from Department for Work and Pensions.

4.2 Crisis Payments

Department for Work and Pensions have confirmed that the allocations for Crisis Payments will go to Upper Tier and Unitary authorities.

Devon County Council have indicated that they will enter a Grant Funding arrangement with Exeter City Council to deliver a local Crisis Payments scheme.

4.3 Staffing

Staff resources currently administering DHP and HSF, within the Benefits and Welfare team, will administer the new schemes. It is likely that administering claims for Crisis Payments will take more time than Household Support Fund due to the more comprehensive support offer. This will be kept under review.

5. Section 151 Officer comments:

5.1 The Housing payment element is broadly similar to the former Discretionary Housing Payments and will operate in a similar way. In order to ensure that Crisis Payments can be made as soon as possible once the Council has agreed the Grant Funding Agreement, it is necessary for a delegation to be requested.

6. What are the legal aspects?

6.1 The CRF is a consolidated revenue grant made under Section 31 of the Local Government Act.

6.2 Funding for Housing Payments will come directly from MHCLG and will be subject to the conditions in the CRF Grant Determination Letter and Guidance to local authorities.

6.3 Funding for Crisis Payments will go to Devon County Council directly from MHCLG and will be subject to the conditions in the CRF Grant Determination Letter and Guidance to local authorities.

6.4 Exeter City Council will receive funding from Devon County Council under a Grant Funding agreement which will contain additional conditions.

7. Monitoring Officer's comments:

7.1 The Monitoring Officer has no additional comments.

For enquiries please contact: democratic.services@exeter.gov.uk

8. Equality Act 2010 (The Act)

- 8.1 In recommending this proposal potential impact has been identified on people with protected characteristics as determined by the Act and Equality Impact Assessments for each scheme have been included in the background papers for Members' attention.
- 8.2 The Housing Payments policy largely adopts the policy for Discretionary Housing Payments which this scheme replaces. As funding has been maintained at the same level as the previous scheme, this policy does not create any different impacts on people with protected characteristics.
- 8.3 Adopting the Housing Payments policy allows for the positive impact from supporting low-income households with their housing costs to continue. The individual assessment of needs for applicants under this scheme allows all household characteristics to be considered, even where these are not recognised in the main welfare benefits.
- 8.4 The Crisis Payments scheme replaces the Household Support Fund but with different guidance meaning that different customers will receive awards. Although it is not clear who will gain from the new scheme of support, it is likely that some households with protected characteristics will receive less support than under previous schemes. Targeted support, allowed under HSF but not CRF, saw direct awards made to households with protected characteristics including:
- Pensioner households
 - Large families
 - Households including a disabled member

These households will be required to make an application for a Crisis Payment, and their application will be assessed under the different rules applying to the new scheme.

9. Carbon Footprint (Environmental) Implications:

- 9.1 No direct carbon/environmental impacts arising from the recommendations.

10. Report details:

- 10.1 The Crisis and Resilience Fund (CRF) is a new scheme introduced from April 2026. It is a consolidated revenue grant that is being delivered through the Local Government Finance Settlement, covering the period 1 April 2026 to 31 March 2029.
- 10.2 The CRF has two linked purposes:
- to help people deal with an immediate financial shock and,
 - to prevent future crises by improving citizens' long-term financial resilience, reducing the need for crisis support in the long-term.
- 10.3 There are four components of the scheme:
- Crisis Payments
 - Housing Payments
 - Resilience Services
 - Community Coordination

For enquiries please contact: democratic.services@exeter.gov.uk

10.4 Exeter City Council's role in delivering Resilience Services and Community Coordination is yet to be finalised with Devon County Council and is not covered in this paper.

Housing Payments Policy

- 10.5 This element of CRF funding replicates existing Discretionary Housing Payments and will continue to provide financial support towards housing costs to help people with rent or housing costs (but not council tax). To be eligible the claimant must be on housing benefits or the housing element of Universal Credit.
- 10.6 A total of £133,300 will be available during 2026/27 for Housing Payments. The same amount of DHP has previously supported 232 awards averaging £571 per household.
- 10.7 Payments can help where there is a shortfall between Housing Benefit and a tenant's rent charge or with one-off housing costs which benefits cannot cover. Shortfalls could be because of rent restrictions within the benefit rules or an award which is reduced due to the means test. One-off costs can include rent in advance or deposits payable to allow a tenant to move to more suitable accommodation.
- 10.8 Ongoing freezes to the amount of rent that can be met by benefits makes private sector rents unaffordable to many households relying on benefits. Housing Payments enable more households to stay in their home but can also help tenants afford the costs associated with the move to cheaper accommodation.
- 10.9 Where a customer is not eligible for a Housing Payment they may be considered for a Crisis Payment and referral to resilience services.
- 10.10 The proposed Housing Payments Policy is attached as Appendix 1 and is broadly consistent with the existing Discretionary Housing Payments Policy, with no significant changes to draw to attention.

Crisis Payment Policy

- 10.11 The Crisis Payments scheme replaces the Household Support Fund from April 2026. Crisis Payments are similar to payments issued under the former Household Support Fund. However, HSF provided short-term financial help for basic needs like food and energy (e.g. supporting those that lost the Winter Fuel Allowance) but Crisis Payments are emergency, one-off payments aimed at urgent, genuine crises or housing emergencies.
- 10.12 The CRF is designed to support people facing financial shocks such as disasters, health crises or accidents, domestic abuse, theft, essential household items breaking and short-term income gaps.
- 10.13 Like HSF, responsibility and funding for the Crisis Payments will sit with Devon County Council. It is expected that DCC will enter a similar grant funding agreement with ECC to deliver a local Crisis Payments scheme as was the case for HSF.
- 10.14 The new Crisis Payments scheme will have to be designed and delivered in line with the CRF guidance and any conditions included in the grant funding agreement with DCC. Schemes are required to be available for the whole CRF funding period, so will need to be operational as soon as possible after April.
- 10.15 DWP recognise that the CRF will develop and evolve through the funding period. An outline policy for this scheme (Appendix 2) has been prepared based on published

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guidance and early feedback from DCC. It will be finalised once the funding amount and detailed Grant Funding agreement are available. The outline policy recognises that the detailed offer for Crisis Payments will change through learnings from local delivery and as good practice nationally is fed in.

- 10.16 The Crisis Payments scheme focuses on providing individuals with support in times of crisis. Guidance sets out that support should be provided where low-income households experience a financial shock or to prevent them from entering crisis. Crisis Payments are therefore not intended to provide an alternative source of regular income.
- 10.17 Individuals will need crisis support for a variety of reasons. This could be for the provision of food, utilities, household goods or other essentials. For this reason, Authorities need to adopt a cash-first approach to awarding Crisis Payments. A cash-first approach prioritises cash payments including bank transfer and cash-out vouchers.
- 10.18 Scheme guidance gives examples of circumstances which could be considered as an eligible crisis without imposing a strict definition. This will allow a degree of flexibility in our local scheme and give decision makers the ability to consider the whole of a customer's circumstances.

11. How does the decision contribute to the Council's Corporate Plan?

- 11.1 The Housing Payments scheme assists Exeter's people in their communities and neighbourhoods by helping low income residents meet their rental liability. The policy strengthens the support provided within the main welfare benefit system. This is achieved by providing extra help where benefit rules cause inadvertent hardship or fail to recognise individual circumstances.
- 11.2 The Crisis Payments scheme will support Exeter's communities and neighbourhoods by helping low-income households manage income shocks and deal with financial crises as they occur.

12. What risks are there and how can they be reduced?

- 12.1 Moving from one scheme of housing support to another risks some customers missing out during the transition. By keeping the administration and communication in line with the DHP scheme, a continuous and consistent service can be delivered.
- 12.2 An application scheme for Crisis Payments risks being overwhelmed by applicants who previously received a direct award of Household Support Fund. Clear communication of the different eligibility criteria for a Crisis Payment will help to manage unrealistic expectations.

13. Are there any other options?

- 13.1 Other than Housing Payments, there is no requirement for ECC to be involved in the delivery of CRF. Devon County Council is the responsible authority for the Crisis Payments, Resilience Services and Community Coordination strands of the scheme. Any role ECC takes in these areas is entered into through agreement with DCC.

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Local Government (Access to Information) Act 1972 (as amended)

Background papers used in compiling this report:

[Crisis and Resilience Fund \(1 April 2026 to 31 March 2029\) - GOV.UK](#)

List of Appendices:

- CRF Housing Payments EQIA
- CRF Housing Payments Policy
- CRF Crisis Payments Policy
- CRF Crisis Payments EQIA

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Crisis and Resilience Fund

Housing Payments Policy

April 2026

Contents

Background.....	2
Purpose of the Policy	3
Statement of objectives	3
Eligibility	4
Claiming a Housing Payment	4
Awarding a HP	4
Period of award	5
Method of payment	5
Notification of a decision	6
Unsuccessful applications	6
Changes of circumstances	6
The right to seek a review	6
Overpayments.....	7
Vulnerability and equalities.....	7
Performance and Risk Management	8
Publicity.....	8
Fraud	8

Background

Housing Payments (HP) are an element of the Crisis and Resilience Fund (CRF), introduced from April 2026. For the first two years of the scheme, funds are allocated to local authorities administering Housing Benefit (HB) to help those in receipt of Housing Benefit, or the housing costs element of Universal Credit (UCHC), who require further financial assistance to meet their housing costs.

Further guidance on the national Crisis and Resilience Fund scheme can be found <https://www.gov.uk/government/publications/crisis-and-resilience-fund-guidance-for-local-authorities-in-england-1-april-2026-to-31-march-2029>. Details of Exeter City Council's scheme are at www.exeter.gov.uk/crf

Awards of Housing Payments will support the outcomes required by the CRF funding, in particular:

Outcome 1: Provision of effective crisis support and
Outcome 2: Improving individuals' financial resilience.

Rules set out by The Department for Work and Pensions (DWP) for the Housing Payments closely replicate the Discretionary Housing Payment (DHP) scheme which they replace. Where references to Discretionary Housing Payments or DHP still appear in documents or online after 1 April 2026, these should be taken to be a reference to the new scheme of Housing Payments under CRF.

The Department for Work and Pensions (DWP) have identified an amount that will be allocated to Exeter City Council each year for granting Housing Payments. HPs play an important role in helping tenants retain their tenancies, prevent homelessness, and enable tenants to move to more affordable accommodation. The payments can cover all or part of a shortfall in a tenant's rent, or cover rent in advance, deposits, and other costs that a tenant may incur to secure a new affordable tenancy.

Due to the limited nature of the fund, HPs will normally only be awarded to provide one-off or short-term help and not on an ongoing basis. This will allow applicants time to access resilience services and achieve a long-term sustainable situation. Supporting people in the short term to help them to improve their resilience and reduce their risk of needing crisis support is a key aim of the HP policy.

Housing Payments are discretionary and there is no statutory right to a payment. They are not payments of Housing Benefit or Universal Credit, although payment may be made alongside Housing Benefit payments. The fund is cash limited and other sources of support may be offered.

Purpose of the Policy

The purpose of this policy is to specify how ECC Benefits and Welfare team will operate the scheme and to indicate some of the factors that will be considered when deciding if a HP award can be made.

- Each case will be treated strictly on its merits.
- All applicants will be treated equally and fairly when the scheme is administered.

Statement of objectives

The delivery of Housing Payments will seek to support the principles of the Crisis and Resilience Fund:

- *“person-centred to ensure that people’s preferences, needs and values stay central to professional decisions, providing support that is respectful to them*
- *needs-based to recognise the varied circumstances that individuals may experience, seeking to meet the underlying needs, not just the crisis symptoms*
- *holistic to provide integrated support that helps the individual and their households, with Authorities considering the wide range of services and actions they have access to*
- *encompass a no wrong door approach to connect individuals to the right service and support through warm referrals, regardless of their initial point of contact*
- *trauma informed: Authorities should adopt a Trauma Informed Approach when working with people and families in crisis, considering the six principles of [trauma-informed practice](#)”*

Housing Payments should prevent the occurrence or escalation of a housing or financial crisis and contribute to increased financial resilience for those supported.

Housing Payments will link closely to other strands of the Crisis and Resilience Fund, enabling access to services which may reduce the need for further help in future.

When administering HP, the Council will take a broad view considering: the whole circumstances of an applicant; all the options available to them; how the Council can use HP to help the applicant overcome any barriers; and where necessary refer applicants to appropriate employment, welfare, budgeting and housing advice. Where it is apparent that an applicant is not claiming another state benefit they may be entitled to, they will be advised to make a claim to maximise their income.

Eligibility

To receive a Housing Payment, the applicant must be entitled to either Housing Benefit or Universal Credit Housing Costs. This can include where payment of the qualifying benefit has not yet been received.

The applicant must appear to the decision maker to need extra help with housing costs. Housing costs can include shortfalls in rent or eligible service charges as well as one off costs associated with moving to a new address such as rent deposits or payments in advance.

Claiming a Housing Payment

Housing Payments can be requested from the Benefits and Welfare team through any channel (telephone, face to face, email, in writing etc.) by the applicant or anyone acting on their behalf (family member, landlord, support worker etc.)

Following the initial request an application form may be used to gather full details, unless the claim can be determined without a form. The applicant will be required to return the form to the Benefits and Welfare team within one month of its issue with any relevant supporting evidence.

The Benefits and Welfare team may request evidence in support of an application and may need to verify any information or evidence provided as part of or in support of an application.

Awarding a Housing Payment

The Benefits and Welfare team will retain full discretion when deciding whether to make an award, the amount and duration of any award. Decisions will be made in compliance with the relevant guidance, legislation and case law. When considering applications, regard will be had to this policy, guidance and good practice from the DWP.

Guidance on the Housing Payments scheme is published by DWP on gov.uk and can be found at [this link](#) in the online version of this document.

When making their decision the Benefits and Welfare team will consider:

- the shortfall between Housing Benefit / Universal Credit and the rent liability
- the steps taken by the applicant to reduce their rent liability
- the medical circumstances (including ill health and disabilities) of the applicant, their partner and any dependants and any other occupants of the applicant's home

- the income and expenditure of the applicant, their partner and any dependants or other occupants of the applicant's home
- any savings or capital held by the applicant or their family
- the level of indebtedness of the applicant and their family
- the exceptional nature of the applicant and their family's circumstances
- the length of time they have lived in the property
- the possible impact on the Council and other public authorities of not making such an award, e.g. the pressure on priority homeless accommodation
- previous awards and any conditions placed on the award or advice given
- any other circumstances and information that the officer considers relevant in a particular case

The decision maker may consider it appropriate to meet with the applicant to help achieve full understanding of their circumstances. This could be at the applicant's home or council offices by agreement. Applicants may be asked to provide details of their income and outgoings to assess the extent of their financial hardship.

An award of HP does not guarantee that a further award will be made at a later date even if the applicant's circumstances have not changed. The HP awarded may be less than the difference between the rent liability and the amount of Housing Benefit / Universal Credit paid.

Period of award

Awards may be made as a one-off lump sum or as an ongoing weekly amount. The Benefits and Welfare team will decide the length of time for which a HP will be awarded based on the evidence supplied and the facts known.

Where a weekly award is granted, payment will normally be aligned with Housing Benefit payment cycles and start from the Monday after the claim is received. The maximum length of award will usually be to the end of the tenancy or a period not exceeding 12 months.

The Benefits and Welfare team will consider any reasonable request for starting an award from an earlier date. Awards will normally be limited to starting in the current financial year.

Method of payment

The Benefits and Welfare team will decide the most appropriate person to pay based upon the circumstances of each case. This could include paying:

- the applicant or their partner
- an appointee
- their landlord (or an agent of the landlord) or
- any third party to whom it might be most appropriate to make payment.

The Benefits and Welfare team will pay an award of HP by the most appropriate means available in each case.

This could include payment:

- to a bank account
- by crediting the applicant's rent account;

Payment frequency will normally be in line with payment of Housing Benefit.

Notification of a decision

The Benefits and Welfare team will inform the applicant in writing of the outcome of their application as soon as is reasonably practical. This decision may be notified by email if included in the application. Where the application is unsuccessful, the decision maker will set out the reasons why this decision was made and explain the right of review. Where the application is successful, the decision maker will advise:

- the amount of HP awarded as a one-off award or
- the weekly amount and period of award
- how, when and to whom the award will be paid
- the requirement to report a change in circumstances

Unsuccessful applications

If a claim for Housing Payments does not meet the conditions for an award, the application will also be considered for the crisis support element of CRF. No separate application will be required for this, although officers may ask for further information.

The applicant may also be directed to Resilience Services, whether part of CRF or not, to receive support intended to increase the applicant's financial resilience and reduce their chances of needing crisis support in future.

Changes of circumstances

A person receiving Housing Payments must tell the Benefits and Welfare team about any changes which could reasonably be expected to affect their entitlement to an award. Decisions may be reviewed where it appears necessary to the Benefits and Welfare team. Awards of HP, including periods already paid, may be revised where the applicant's circumstances have materially changed or are found to not be as they were presented in the application.

The right to seek a review

Housing Payments are not payments of Housing Benefit or Universal Credit and are therefore not subject to the statutory appeals process.

The Benefits and Welfare team will operate the following principles when dealing with a review request following a refusal to award HP, a decision to award a reduced amount of HP, a decision not to backdate an HP award or a decision that there has been an overpayment of HP.

- An applicant (or their appointee or agent) who disagrees with the HP decision may request a review. This request should be made in writing, including by email, to the Benefits and Welfare team within one calendar month of the written decision about the HP.

- A different officer within the Benefits and Welfare team will review the case. The officer will review all the evidence held, seeking further information if needed and will make a decision within 14 days of the request or as soon as practicable thereafter.
- The outcome of the review will be notified to the applicant in writing, setting out the reasons for their decision.
- The decision made by the reviewing officer will be final.
- In exceptional circumstances only, any of the above time periods for review may be extended by the officer. In deciding to extend, they will take into account any delay in seeking independent advice that was outside the control of the applicant.

Overpayments

The Benefits and Welfare team will normally seek to recover any overpaid HP if the applicant has misrepresented or failed to disclose a material fact in their application or an error was made at the point of making the decision.

An invoice will be issued to the applicant or the person to whom the award was paid. The decision letter that notifies a decision that there is an overpayment will also set out the right of review. Consideration of the reasonableness of recovery action in a particular case will be in line with the Council's overpayment policy.

Vulnerability and equalities

The Benefits and Welfare team will have regard to the Public Sector Equality Duty (PSED) when considering claims for HP. It is recognised that HP has a pivotal role to play in mitigating the harshest effects of welfare reforms on the most vulnerable households, particularly on individuals with protected characteristics.

Being a flexible and discretionary fund, HP can make finer distinctions than can be achieved through legislation governing statutory entitlements. By identifying those who suffer relative disadvantage because of their protected characteristics, HP awards should aim to minimise or remove that disadvantage.

Examples of where HP can be used to further the aims of the PSED:

- Age – Where young individuals cannot reasonably occupy shared accommodation, HP can be used to top up rent on self-contained property.
- Disability – Where household members are unable to share rooms due to disability but do not meet the threshold in the Housing Benefit regulations for an extra bedroom, HP can cover the Social Sector Size Restriction.
- Pregnancy and maternity – Where applicants are expecting a child which will alter their bedroom requirement, HP can cover the shortfall in advance of the birth allowing the applicant to move and settle before the baby arrives.
- Other protected characteristics (gender reassignment, race, religion or belief, sex and sexual orientation) – In any case where a customer's accommodation is unsuitable due to their protected characteristic, for example harassment from neighbours, HP can be used to help applicants move to more suitable accommodation. It can also be used to support applicants in more expensive accommodation that is particularly suitable to needs arising from their protected characteristic.

Performance and Risk Management

This policy will be regularly reviewed and monitored to ensure that is effective and fit for purpose. The highest risk to the scheme will be the potential to overspend the fund. Expenditure will be reviewed on a monthly basis and reported through the appropriate channels.

Publicity

The Benefits and Welfare team will publicise the scheme and will work with all interested parties to achieve this. A copy of this policy statement will be made available for inspection and will be posted on Exeter City Council's website.

Fraud

The Benefits and Welfare team is committed to the fight against fraud in all its forms. An applicant who tries to fraudulently claim a Housing Payment by falsely declaring their circumstances, providing a false statement or evidence in support of their application, may have committed an offence under the Social Security Administration Act 1992 or the Theft Acts 1968 and 1978. Where the Benefits and Welfare team suspects that such a fraud may have occurred, the matter will be investigated as appropriate and this may lead to criminal proceedings being instigated.

Crisis and Resilience Fund

Crisis Payments Policy

April 2026

Contents

Background	2
Purpose of the Policy	3
Statement of objectives	3
Eligibility	4
Purpose of awards	5
Claiming a Crisis Payment	5
Deciding a Crisis Payment application	6
Method of payment	7
Unsuccessful applications	8
The right to seek a review	8
Resilience Services	9
Fraud	9
Data	9
Monitoring and Reporting	10
Funding model	10
Ongoing Policy Review	10
Scheme of Delegation	11

Background

Crisis Payments (CP) are an element of the Crisis and Resilience Fund (CRF), introduced from April 2026. Funds are allocated by Department for Work and Pensions to Upper Tier and Unitary authorities. Exeter City Council receives funding from Devon County Council through a Grant Funding Agreement to deliver a local scheme of Crisis Payments.

Awards of Crisis Payments will support the outcomes required by the CRF funding, in particular:

Outcome 1: Provision of effective crisis support

- **support low-income households** who encounter a **financial shock** (*a sudden, unexpected expense or drop in income*) or
- **prevent individuals from entering crisis** by providing timely support

Exeter's CP scheme provides financial crisis support to those low-income households experiencing a **financial shock**; as opposed to offering across the board blanket support initiatives to low-income households struggling with the cost of living as was the case under the Household Support schemes.

Further guidance on the national Crisis and Resilience Fund scheme can be found <https://www.gov.uk/government/publications/crisis-and-resilience-fund-guidance-for-local-authorities-in-england-1-april-2026-to-31-march-2029>. Details of other elements of Exeter City Council's scheme are at www.exeter.gov.uk/crf Devon County Council's Crisis and Resilience Fund scheme information is on their website at www.devon.gov.uk/crf

Purpose of the Policy

The purpose of this policy is to specify how ECC Benefits and Welfare team will operate the scheme and to indicate some of the factors that will be considered when deciding if a CP award can be made.

All decisions will be made with due regard to the national guidance and the Grant Funding agreement with Devon County Council. When considering applications, decision makers will:

- Treat each case strictly on its merits.
- Take a person-centred approach, treating all applicants fairly and recognising their unique circumstances and needs.

The Team Devon agreed framework and approach to administering the Crisis & Resilience Fund aims to ensure a degree of consistency across Devon.

Statement of objectives

The Crisis Payments scheme is designed to provide support to low income households who experience a financial shock which either causes or threatens to cause a crisis.

The delivery of Crisis Payments will seek to support the principles of the Crisis and Resilience Fund:

- *“person-centred to ensure that people's preferences, needs and values stay central to professional decisions, providing support that is respectful to them*
- *needs-based to recognise the varied circumstances that individuals may experience, seeking to meet the underlying needs, not just the crisis symptoms*

- *holistic to provide integrated support that helps the individual and their households, with Authorities considering the wide range of services and actions they have access to*
- *encompass a no wrong door approach to connect individuals to the right service and support through warm referrals, regardless of their initial point of contact*
- *trauma informed: Authorities should adopt a Trauma Informed Approach when working with people and families in crisis, considering the six principles of [trauma-informed practice](#)”*

Crisis Payments should prevent the occurrence or escalation of a financial crisis and contribute to increased financial resilience for those supported. By offering timely, needs-based assistance to those with low incomes facing financial shocks, linked closely to other strands of the Crisis and Resilience Fund enabling access to services, this should reduce the risk of future crisis need.

- When administering CP, the Council will take a broad view considering:
- The whole circumstances of an applicant
- All the options available to them
- How the Council can use CP to help the applicant overcome any barriers and
- Refer applicants to appropriate employment, welfare, budgeting, financial and housing advice.

Decision makers will consider whether there are simple resilience services which can be offered alongside the Crisis Payments award, such as identifying another state benefit which they may be entitled to or basic budgeting support.

Eligibility

To receive a Crisis Payment the applicant must:

1. Be 16 years or over and
2. Live in Exeter City Council’s area as their main residence and
3. Demonstrate that they are on a low income and facing an unexpected financial shock and need financial crisis support and/or that financial resilience (wraparound) support would be beneficial *or* be identified from existing data sets as meeting this eligibility criteria

“Low income” for this scheme means household income at or below the level that would give eligibility to the relevant means tested benefit as may apply. An income that is not significantly above this level can be considered where there are exceptional circumstances that justify considering this as low income in a particular case. This could include where a customer has unavoidably high essential costs such as visiting a child receiving treatment in a hospital out of the area.

Exeter City Council will be making Crisis Payment awards under Section 1 of the Localism Act 2011. They therefore count as public funds and customers with No Recourse to Public Funds will accordingly not be eligible for a payment.

Purpose of awards

The Crisis Payment scheme is intended to meet occasional or short-term needs arising from a financial shock. They cannot provide an alternative source of regular income. Awards can be made to prevent or alleviate harm to the customer or their household through a lack of access to essential goods or services. A Crisis Payment may be made to support the customer with the costs of:

- food
- water including for drinking, washing, cooking, as well as for sanitary purposes and sewerage
- period and hygiene products such as soap and toothpaste
- energy for any form of fuel that is used for the purpose of domestic heating, cooking or lighting, including oil or portable gas cylinders
- clothing including uniform, warm winter clothing and shoes
- essential furniture and appliances such as beds and bedding, washing machines, window coverings and carpets, fridge-freezers and ovens
- essential transport-related costs such as repairing a car, buying a bicycle or bus pass or paying for fuel
- digital and connectivity essentials such as broadband or phone bills

Support with housing costs will normally be considered first through the District's Housing Payments scheme. Where a homeowner is having difficulty with their mortgage payments, they should contact their lender as soon as possible to discuss their circumstances as lenders will have a set procedure to assist. Households in crisis with mortgage arrears could still receive support from the CaRF, either through Crisis Payments or access to Resilience Services.

Claiming a Crisis Payment

Crisis Payments must be as accessible as possible to enable those most in need of support to access the scheme. Support can be requested from the Benefits and Welfare team through any channel (telephone, face to face, email, in writing etc.) by the applicant or anyone acting on their behalf (family member, landlord, support worker etc.)

An online application form will be made available to claim a Crisis Payment. Customers who find it difficult to interact online will be supported to make their claim. Applications and referrals for payment through trusted third-party organisations who are working with the applicant are encouraged so the customer does not have to tell their story twice.

The Benefits and Welfare team may request evidence in support of an application and may need to verify any information or evidence provided as part of or in support of an application.

Details of the application process will be published on the Crisis and Resilience Fund pages of Exeter City Council's website. They can also be obtained by calling or visiting the Council offices and will be advertised through appropriate channels.

Deciding a Crisis Payment application

The Benefits and Welfare team will retain full discretion when deciding whether to make an award, the amount and fulfilment method of any award. Decisions will be made in compliance with the DWP Crisis and Resilience Fund guidance and the Grant Funding agreement with Devon County Council.

Guidance on the Crisis Payments scheme is published by DWP on gov.uk and can be found at [this link](#) in the online version of this document.

When making their decision the Benefits and Welfare team will adopt a person-centred and needs-based approach to the application. They will consider:

- The customer's view of their crisis
- Their individual and household circumstances
- The customer's preferences for support
- Their underlying needs and factors contributing to the crisis
- The most appropriate Resilience Services for addressing underlying needs
- the shortfall between Housing Benefit / Universal Credit and the rent liability
- the steps taken by the applicant to reduce their rent liability
- the medical circumstances (including ill health and disabilities) of the applicant, their partner and any dependants and any other occupants of the applicant's home
- the income and expenditure of the applicant, their partner and any dependants or other occupants of the applicant's home
- any savings or capital held by the applicant or their family
- the level of indebtedness of the applicant and their family
- the exceptional nature of the applicant and their family's circumstances
- the length of time they have lived in the property

- the possible impact on the Council and other public authorities of not making such an award, e.g. the pressure on priority homeless accommodation
- previous awards and any conditions placed on the award or advice given
- any other circumstances and information that the officer considers relevant in a particular case

The decision maker may consider it appropriate to meet with the applicant to help achieve full understanding of their circumstances. This could be at the applicant's home or council offices by agreement. Applicants may be asked to provide details of their income and outgoings to assess the extent of their financial hardship.

Repeat applications

Support will be provided based on evidence of need. Repeat awards will not usually be considered for the same crisis or where a customer has not taken steps recommended following earlier application/s. Support with replacement of furniture and white goods will only be given once in a 12-month period unless exceptional circumstances apply.

Further work and referrals to other agencies will be discussed with the recipient and repeat awards may be conditional on having further financial resilience (wraparound) support (such as being referred to Citizens Advice Devon and undertaking a full financial assessment and/or benefits check) to help the applicant move to a more sustainable financial footing.

Method of payment

The Benefits and Welfare team will decide the most appropriate way to fulfil an award based upon the circumstances of each case. CaRF guidance encourages a cash-first approach to awards, and this will be the starting point for decisions. Alternatives to cash could include provision of in-kind support (goods) and vouchers.

Cash awards include the provision of physical or electronic codes which can be redeemed for cash at specified locations through delivery partners. Full instructions for redeeming vouchers or codes will be provided alongside the award notification.

Decision and payment timescales

Whenever possible, Crisis Payments will be made within 48 hours from the point where an application has been assessed with all the required information being received to support the application. Decisions will be made as soon as practicable, with priority given to cases of urgent need.

Details of local emergency support provision will be published alongside CRF information for times when the CP is not available (outside regular office hours, during times of high demand etc).

Notification of a decision

The Benefits and Welfare team will inform the applicant of the outcome of their application as soon as is reasonably practical. This decision may be notified by email if included in the application. Where the application is unsuccessful, the decision maker will set out the reasons why this decision was made and explain the right of review.

Where the application is successful, the decision maker will advise:

- the amount of CP awarded
- how, when and to whom the award will be paid
- details of any referrals for resilience / wraparound services

Unsuccessful applications

If a claim for Crisis Payments is not successful, other elements of support under CRF will be considered.

The applicant may also be directed to Resilience Services, whether offered under the CRF scheme or not, to receive support intended to increase the applicant's financial resilience and reduce their chances of needing crisis support in future.

The right to seek a review

Crisis Payments are not subject to a statutory appeals process. The Benefits and Welfare team will operate the following principles when dealing with a review request following a refusal to award CP, a decision to award a reduced amount of CP or a decision that there has been an overpayment of CP.

- An applicant (or someone acting on their behalf) who disagrees with the CP decision may request a review. This request should be made in writing, including by email, to the Benefits and Welfare team within one calendar month of the decision about the CP.
- A different officer within the Benefits and Welfare team will review the case. The officer will review all the evidence held, seeking further information if needed and will make a decision within 14 days of the request or as soon as practicable thereafter.
- The outcome of the review will be notified to the applicant in writing, setting out the reasons for their decision.
- The decision made by the reviewing officer will be final.
- In exceptional circumstances only, any of the above time periods for review may be extended by the officer. In deciding to extend, they will take into account any delay in seeking independent advice that was outside the control of the applicant.

Resilience Services

Awards of Crisis Payments should, wherever appropriate, be linked to Resilience Services to improve customers' ability to cope with future events. Wraparound financial resilience services provided to an applicant, either directly or through a third-party organisation, will need to meet one or more of the following **outcomes**:

- Increased savings
- Reduction in priority debt
- Reduced need for emergency food parcels
- Reduced experiences of material deprivation
- Maximising individual's income
- Decreased repeat crisis support applications
- Increased quality and accessible advice

Resilience services will not be restricted to those who receive a crisis payment.

Fraud

Failure by the prospective recipient to disclose a material fact or to make a false application or provide false information will be treated as a fraudulent act. Where fraud has been detected the recipient/applicant will be refused any further assistance and where appropriate, the case may be referred for prosecution.

Data

For the purposes of this scheme Exeter City Council will use available data sources to verify information provided in the application. This includes: Council Tax records to verify residence; Council Tax Support, Housing Benefit and DWP Benefits data records to verify household and income; previous applications to verify claim information and other discretionary support payments made.

Data will be held on Exeter City Council's digital platform and will be protected using up-to-date technical and organisational security measures

Data will be used to:

- Determine eligibility for this HSF one-off support payment
- Make contact about decisions or updates related to that financial support payment
- Issue the voucher letter to an eligible recipient

Where necessary to deliver the payment, names and contact details including addresses of eligible households will be shared with external organisations (including Post Office Ltd, Cash Perks & Blackhawk Network) who are delivering awards on behalf of Exeter City Council.

Data may be shared within the organisation and with partners to redirect an applicant to other support that may be available. External partners include:

- Exeter Community Energy
- Department for Work & Pensions
- Age Concern
- Exeter Citizens Advice
- Exeter Foodbank

Data may also be shared within the organisation or with other Government agencies in order to prevent and/or detect fraudulent activity. Subject to a legal gateway, information may also be shared for the prevention of fraud and criminal activity with (list not exhaustive):

- The police
- Immigration service, absconder services and/or UK Border Agency
- Health and social care organisations
- Other local authorities

Personal data will not be kept longer than necessary in line with data retention schedules.

Monitoring and Reporting

Exeter City Council is required to complete the standard Management Information (MI) reporting template agreed with Devon County Council to record the amount provided or paid to vulnerable households under the remit of this grant scheme.

Funding model

Allocation of funds from Devon County Council will be made in line with the conditions of the Grant Funding Agreement for the scheme. Regular reporting of spending under this scheme will be provided to DCC to allow effective monitoring across the county.

Ongoing Policy Review

The Crisis and Resilience Fund has been established at pace in to replace the Household Support Fund from April 2026. The CRF is a three-year funding scheme. Devon County Council and the district councils deploying the fund will keep the

scheme under regular review. It is likely that scheme design will change due to learnings through the scheme funding period.

If it appears that the allocated funding for any strand of the CRF will not be fully spent, then changes will be implemented to ensure the maximum support possible can be delivered. This could involve redirecting funding from one stream or delivery partner to another. Any changes to the Exeter City Council Crisis Payments scheme will preserve the principles outlined in this document. Changes to the scheme will be published on our website at www.exeter.gov.uk/crf

Scheme of Delegation

This policy has been agreed by the Strategic Director for Corporate Resources in consultation with the Leader of the Council and Portfolio Holder for Housing, Homelessness Prevention & Customer Services under authority delegated by the full Council.

Any changes to this policy will be agreed by the Strategic Director for Corporate Resources in consultation with the Leader of the Council and Portfolio Holder for Housing, Homelessness Prevention & Customer Services.

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Equality Impact Assessment (EqIA)

Please refer to the [Equality Impact Assessments \(EQIAs\)](#) form for details on how to complete.

The aim of an equality impact assessment is to consider the equality implications of any decision (e.g. new or revised policy, process, project, function, or service) on different groups of people including employees and customers. This document helps to evaluate whether the decision may inadvertently disadvantage groups of people and identify ways to avoid discrimination and proactively advance equality.

1. Details of the proposal

Name of the proposal:	Crisis and Resilience Fund Housing Payments policy
Version number:	1
Does this proposal impact on people?	Choose an item: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Explain your answer whether 'yes' or 'no'	Scheme will provide direct financial support to low-income residents needing additional support with housing costs.
Is this a new or existing policy/project/service?	Choose an item: <input checked="" type="checkbox"/> New <input type="checkbox"/> Existing
Person responsible for the proposal:	Chris Buckman, Benefits & Welfare Lead
Person responsible for the EqIA (if different to above)	Chris Buckman
Proposal start date:	01/04/2026
When will this proposal be implemented?	01/04/2026
Briefly describe the aims and objectives of the proposal	From April 2026 the existing Discretionary Housing Payments (DHP) scheme is being replaced by the Crisis and Resilience Fund Housing Payments. This policy outlines how the new scheme will operate.

What are the anticipated outcomes of the proposal?	A safe and legal scheme which allows the current housing support offered through DHP to continue.
Who is likely to be affected by the proposal?	You can select multiple options: <input type="checkbox"/> Staff <input checked="" type="checkbox"/> Service users <input type="checkbox"/> Wider community
How are they likely to be affected?	Low-income households who need welfare benefits to afford their rent may still have a shortfall in their housing costs. This scheme will take over from DHP in topping up support to protect tenancies, prevent homelessness and reduce debt burden. Being a flexible and discretionary fund, Housing Payments can make finer distinctions than can be achieved through legislation governing statutory entitlements. By identifying those who suffer relative disadvantage because of their protected characteristics, HP awards should aim to minimise or remove that disadvantage.
Is this proposal going to be approved by SMB, Executive or Council?	Select: <input type="checkbox"/> SMB <input type="checkbox"/> Executive <input checked="" type="checkbox"/> Council
When is the proposal going to SMB, Executive or Council?	07/04/2026

3. [Consultation & Engagement](#)

You will nearly always need to involve and consult with stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal. This should include the individuals/groups who are affected by your proposal. Any proposal for consultation or engagement must be done via the [Consultation and Engagement Form](#).

<p>How are you communicating with the individuals/teams who are affected by your proposal?</p> <p>You can select multiple options:</p> <input type="checkbox"/> Social media <input type="checkbox"/> Focus groups <input checked="" type="checkbox"/> Website

- Mail drop
- Via community group
- Other (please describe): This policy broadly continues the policy operating for several years for Discretionary Housing Payments. Due to the time available to implement a new scheme, Department for Work and Pensions are allowing a two-year window in which existing DHP schemes can continue in a largely unchanged way. The policy has therefore not been extensively changed, just brought up to date to reflect Crisis and Resilience Fund Guidance. From April 2028 more fundamental changes to the Housing Payments may be proposed when the funding arrangement will change. In the intervening time we will be working with internal and external partners and service users to consider how Housing Payments support will be delivered within the overall Crisis and Resilience Fund scheme.

4. Impacts on People

How will the proposed change affect people with protected characteristics? Make sure that you assess the impact based on evidence.

- Who will benefit, who won't, who can access, who can't access, who is at an advantage, who is at a disadvantage?
- What evidence has been used for this assessment? For example, employee diversity data, national statistics, customer survey, feedback etc. [Sources of equality data](#) are available on Sharepoint. (Please don't include any information that risks identifying people such as names, or the diversity data, if less than six people).

Note: You can copy and paste more rows underneath each protected characteristic if there is more than one impact

How will this proposal affect people with protected characteristics?	Identify Impact:	Why will it have this effect? Use the evidence collated, any engagement or consultation to inform your thinking and record it here. Have you identified any gaps in evidence, if so, what are the gaps? Does this need to be incorporated in the action plan?
Age	Positive (Is an improvement)	Housing Payments allow for additional help to be given where welfare rules impose restrictions on households with protected characteristics. This can include where a young person is entitled to less help with their rent due to the application of Local Housing Allowance shared room rate. Universal Credit and Housing Benefit rules allow for limited, tightly defined, exceptions to the restriction.

How will this proposal affect people with protected characteristics?	Identify Impact:	Why will it have this effect?
		Use the evidence collated, any engagement or consultation to inform your thinking and record it here. Have you identified any gaps in evidence, if so, what are the gaps? Does this need to be incorporated in the action plan?
Disability: including sensory, mobility, mental health, neurodiversity, long term ill health	Positive (Is an improvement)	Housing Payments allow for additional help to be given where welfare rules impose restrictions on households with protected characteristics. This can include where a customer's household includes a person with a disability which places them at a disadvantage but does not entitle them to a statutory protection under the benefit rules. Universal Credit and Housing Benefit rules allow for limited, tightly defined, exceptions to certain rent restriction rules. Housing Payments can reduce disadvantage by taking account of all a customer's circumstances and awarding extra help in a broader range of cases.
Gender reassignment	Positive (Is an improvement)	In any case where a customer's accommodation is unsuitable due to their protected characteristic, for example harassment from neighbours, HP can be used to help applicants move to more suitable accommodation. It can also be used to support applicants in more expensive accommodation that is particularly suitable due to needs arising from their protected characteristic.
Marriage and Civil partnership (work related only)	No Impact	
Pregnancy & Maternity	Positive (Is an improvement)	Where applicants are expecting a child which will alter their bedroom requirement, HP can cover a rent shortfall in advance of the birth, allowing the applicant to move and settle before the baby arrives.
Race: including ethnic origin, nationality/national origin	Positive (Is an improvement)	In any case where a customer's accommodation is unsuitable due to their protected characteristic, for example harassment from neighbours, HP can be used to help applicants move to more suitable accommodation. It can also be used to support applicants in more expensive accommodation that is particularly suitable due to needs arising from their protected characteristic.
Religion or Belief	Positive (Is an improvement)	In any case where a customer's accommodation is unsuitable due to their protected characteristic, for example harassment from neighbours, HP can be used to help applicants move to more suitable

How will this proposal affect people with protected characteristics?	Identify Impact:	Why will it have this effect? Use the evidence collated, any engagement or consultation to inform your thinking and record it here. Have you identified any gaps in evidence, if so, what are the gaps? Does this need to be incorporated in the action plan?
		accommodation. It can also be used to support applicants in more expensive accommodation that is particularly suitable due to needs arising from their protected characteristic.
Sex	Positive (Is an improvement)	In any case where a customer's accommodation is unsuitable due to their protected characteristic, for example harassment from neighbours, HP can be used to help applicants move to more suitable accommodation. It can also be used to support applicants in more expensive accommodation that is particularly suitable due to needs arising from their protected characteristic.
Sexual Orientation	Positive (Is an improvement)	In any case where a customer's accommodation is unsuitable due to their protected characteristic, for example harassment from neighbours, HP can be used to help applicants move to more suitable accommodation. It can also be used to support applicants in more expensive accommodation that is particularly suitable due to needs arising from their protected characteristic.
Intersectionality: Could this proposal have an impact on people who have a combination or intersection of two or more characteristics?	Positive (Is an improvement)	As a flexible and discretionary fund, Housing Payments can make finer distinctions than can be achieved through legislation governing statutory entitlements. That includes the ability to consider all a customer's characteristics which taken together could put them at a greater disadvantage under statutory benefit rules.

7. Outcome of Assessment

Select one of the following options:	Tick the relevant box
No barriers identified, proceed with proposed change.	<input checked="" type="checkbox"/>
Adjust the proposal/policy to remove barriers identified by the EqIA.	<input type="checkbox"/>
Continue with the proposal/policy despite potential for adverse impacts.	<input type="checkbox"/>

Stop the proposal/policy as there are adverse impacts that cannot be prevented/mitigated or justified.	<input type="checkbox"/>
<p>Please explain why the option has been chosen: Adopting the proposed policy will allow discretionary housing support to continue to be paid once the DHP scheme ends in April 2026. It retains maximum discretion for decision makers to provide help in a wide range of circumstances. Operating Housing Payments as part of the wider Crisis and Resilience Fund will allow customers to receive support, including financial and advice services, in cases where they are not eligible to a Housing Payment or they require more support than available through Housing Payments alone. Integrating the administration of Housing Payments and Crisis Payments in this way will help customers who have difficulty in accessing Council services by ensuring “no wrong door” for their approach and reducing the times they have to tell their story.</p>	

8. Action Plan

Considering the impacts, you have identified above, please detail any actions you will need take to remove barriers, eliminate negative impacts or maximise opportunities. (Add more rows if required). If an action is to meet the needs of a particular protected group please specify this. These actions should be included in your Service Plan.

Action(s) to be taken.	Expected Outcomes	Responsible Person	Timescale	Progress	Complete

9. Monitoring

How will you monitor the impact of your proposed change once it has been implemented? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective and your approach is still appropriate. Include the timescale for review in your action plan above.

The CRF introduces a suite of new monitoring and performance measures. This data will be reviewed regularly through the running of the scheme to ensure the objectives of the funding are being met. The operation of the wider CRF across Devon will be kept under regular review and delivery will be flexible to respond to learnings or changes in the pattern of demand.

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Equality Impact Assessment (EqIA)

Please refer to the [Equality Impact Assessments \(EQIAs\)](#) form for details on how to complete.

The aim of an equality impact assessment is to consider the equality implications of any decision (e.g. new or revised policy, process, project, function, or service) on different groups of people including employees and customers. This document helps to evaluate whether the decision may inadvertently disadvantage groups of people and identify ways to avoid discrimination and proactively advance equality.

1. Details of the proposal

Name of the proposal:	Crisis and Resilience Fund Crisis Payments policy
Version number:	1
Does this proposal impact on people?	Choose an item: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Explain your answer whether 'yes' or 'no'	Scheme will provide direct financial support to low-income residents needing additional support following a crisis event.
Is this a new or existing policy/project/service?	Choose an item: <input checked="" type="checkbox"/> New <input type="checkbox"/> Existing
Person responsible for the proposal:	Chris Buckman, Benefits & Welfare Lead
Person responsible for the EqIA (if different to above)	Chris Buckman
Proposal start date:	01/04/2026
When will this proposal be implemented?	01/04/2026
Briefly describe the aims and objectives of the proposal	From April 2026 the Crisis and Resilience Fund is being launched which includes a strand for Crisis Payments. Exeter City Council will be funded through Devon County Council to deliver a local scheme of Crisis Payments and the

	policy outlines how the new scheme will operate locally. Although subject to different conditions, this fund effectively replaces the Household Support Fund.
What are the anticipated outcomes of the proposal?	A safe and legal scheme which provides support to Exeter's low income households at time of crisis and supports the aims of the CRF scheme.
Who is likely to be affected by the proposal?	You can select multiple options: <input type="checkbox"/> Staff <input checked="" type="checkbox"/> Service users <input type="checkbox"/> Wider community
How are they likely to be affected?	Low-income households who experience a financial shock will be able to request a Crisis Payment which can help with a wide range of essential costs. Payments are linked to Resilience Services to increase customer's ability to withstand future crises.
Is this proposal going to be approved by SMB, Executive or Council?	Select: <input type="checkbox"/> SMB <input type="checkbox"/> Executive <input checked="" type="checkbox"/> Council
When is the proposal going to SMB, Executive or Council?	07/04/2026

3. Consultation & Engagement

You will nearly always need to involve and consult with stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal. This should include the individuals/groups who are affected by your proposal. Any proposal for consultation or engagement must be done via the [Consultation and Engagement Form](#).

<p>How are you communicating with the individuals/teams who are affected by your proposal?</p> <p>You can select multiple options:</p> <input checked="" type="checkbox"/> Social media <input type="checkbox"/> Focus groups <input checked="" type="checkbox"/> Website <input type="checkbox"/> Mail drop
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- Via community group
- Other (please describe): VCS are involved in the design and delivery of the CRF programme through the Devon County Council led Review & Refine Partnership Board. ECC officers have been meeting with representatives of key VCS partners in the city during the initial design process and this engagement will continue.

4. Impacts on People

How will the proposed change affect people with protected characteristics? Make sure that you assess the impact based on evidence.

- Who will benefit, who won't, who can access, who can't access, who is at an advantage, who is at a disadvantage?
- What evidence has been used for this assessment? For example, employee diversity data, national statistics, customer survey, feedback etc. [Sources of equality data](#) are available on Sharepoint. (Please don't include any information that risks identifying people such as names, or the diversity data, if less than six people).

Note: You can copy and paste more rows underneath each protected characteristic if there is more than one impact

How will this proposal affect people with protected characteristics?	Identify Impact:	Why will it have this effect? Use the evidence collated, any engagement or consultation to inform your thinking and record it here. Have you identified any gaps in evidence, if so, what are the gaps? Does this need to be incorporated in the action plan?
Age	Positive (Is an improvement)	Customers of any age can be eligible for Crisis Payments and wider CRF support. Experience from earlier schemes shows that older customers are less likely to make a claim from application-based schemes. It will therefore be part of the scheme that low-income households containing pension age customers are specifically targeted to increase awareness and helped to access available support. Likewise, young care leavers are less likely to claim and have been identified as a priority group by Devon County Council. This group will also be targeted to increase awareness and take up. Low-income households including a child received a significant amount of help through the predecessor Household Support Fund. DCC used funds to provide financial support in school holidays to families entitled to Free School Meals. They were also targeted for direct payments as part of ECC's

How will this proposal affect people with protected characteristics?	Identify Impact:	Why will it have this effect? Use the evidence collated, any engagement or consultation to inform your thinking and record it here. Have you identified any gaps in evidence, if so, what are the gaps? Does this need to be incorporated in the action plan?
		HSF schemes. This support is not part of CRF Crisis Payments, although those households will be eligible for a payment and resilience services if they experience a crisis event.
Disability: including sensory, mobility, mental health, neurodiversity, long term ill health	Positive (Is an improvement)	Low-income households including a disabled person will be eligible for a Crisis Payment. It is possible that such households are at a higher risk of suffering a crisis and being less able to manage when they do. The needs-based and person-centred approach of CRF allows for a broad view of the customer's situation to be considered. Some disabilities may make it harder for a customer to access support through an application process. The scheme will offer supported applications by phone and face to face where this is the most suitable route. Warm referrals and applications through third-party organisations will also be encouraged. This will help maximise accessibility.
Gender reassignment	Positive (Is an improvement)	The broad eligibility and person-centred approach of Crisis Payments and the wider CRF allow more of a customer's situation to be considered. Where a customer's gender reassignment status makes them more susceptible to a crisis or affects their ability to resolve it themselves, the CRF will be able to recognise and respond to those needs.
Marriage and Civil partnership (work related only)	No Impact	
Pregnancy & Maternity	Positive (Is an improvement)	Where applicants are expecting a child which makes them more susceptible to a crisis or affects their ability to resolve it themselves, elements of the CRF including Crisis Payments will be able to recognise and respond to those needs.
Race: including ethnic origin, nationality/national origin	Positive (Is an improvement)	In any case where a customer's situation is worsened due to their protected characteristic, CP can be used to help applicants with additional support (financial and practical) to help them resolve issues and become more resilient in future.

How will this proposal affect people with protected characteristics?	Identify Impact:	Why will it have this effect? Use the evidence collated, any engagement or consultation to inform your thinking and record it here. Have you identified any gaps in evidence, if so, what are the gaps? Does this need to be incorporated in the action plan?
		The Crisis and Resilience Fund is considered as public funds and as such is generally not available to support refugees. Agencies with a statutory support role such as Children’s Services may be able to access other streams of the CRF to provide these customers with support.
Religion or Belief	Positive (Is an improvement)	The broad eligibility and person-centred approach of Crisis Payments and the wider CRF allow more of a customer’s situation to be considered. Where a customer’s religion or belief makes them more susceptible to a crisis or affects their ability to resolve it themselves, the CRF will be able to recognise and respond to those needs.
Sex	Positive (Is an improvement)	The broad eligibility and person-centred approach of Crisis Payments and the wider CRF allow more of a customer’s situation to be considered. Where a customer’s sex makes them more susceptible to a crisis or affects their ability to resolve it themselves, the CRF will be able to recognise and respond to those needs.
Sexual Orientation	Positive (Is an improvement)	The broad eligibility and person-centred approach of Crisis Payments and the wider CRF allow more of a customer’s situation to be considered. Where a customer’s sexual orientation makes them more susceptible to a crisis or affects their ability to resolve it themselves, the CRF will be able to recognise and respond to those needs.
Intersectionality: Could this proposal have an impact on people who have a combination or intersection of two or more characteristics?	Positive (Is an improvement)	As a flexible and discretionary fund, Crisis Payments can make finer distinctions than can be achieved through legislation governing statutory entitlements. That includes the ability to consider all a customer’s characteristics which taken together could put them at a greater disadvantage under statutory benefit rules.

7. Outcome of Assessment

Select one of the following options:	Tick the relevant box
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No barriers identified, proceed with proposed change.	<input checked="" type="checkbox"/>
Adjust the proposal/policy to remove barriers identified by the EqIA.	<input type="checkbox"/>
Continue with the proposal/policy despite potential for adverse impacts.	<input type="checkbox"/>
Stop the proposal/policy as there are adverse impacts that cannot be prevented/mitigated or justified.	<input type="checkbox"/>
<p>Please explain why the option has been chosen:</p> <p>The Household Support Fund scheme, running from 2021 to 2026, provided help to low-income households finding it difficult to manage the high cost of living. The CRF Crisis Payments replaces this scheme but explicitly excludes ongoing income top-up from eligibility. Instead, it targets households experiencing a crisis event. Given the different focus of this scheme, it is likely that some customers will lose out on support that they would have received under earlier HSF schemes.</p> <p>The Crisis Payment scheme will allow for a local system of financial support for low-income families experiencing a financial crisis. Crisis Payments have broad eligibility criteria, recognising that crisis events can affect anyone at any time. Support provision will also be needs-based and person-centred, allowing for maximum flexibility to recognise customers' unique circumstances. Integrating the Crisis Payments scheme administration with CRF Housing Payments reduces the burden on vulnerable customers having to repeatedly tell their story to different teams. Adopting a warm referral approach to linked Resilience Services enhances the no-wrong door approach and is intended to ensure real benefit will accrue to those seeking crisis support.</p> <p>It is impossible to forecast which low-income households will experience a crisis event making them eligible for a payment. Some of these households are likely to receive more support than they would have under the HSF scheme. It is therefore not possible to say with any confidence which households will gain and which will lose from this scheme by comparison to the predecessor. However, looking solely at the new scheme, it has been designed to be as open as possible to recognise the relative disadvantages that certain protected characteristics can cause. All groups should therefore be advantaged by the new scheme by comparison to the status quo.</p>	

8. Action Plan

Considering the impacts, you have identified above, please detail any actions you will need take to remove barriers, eliminate negative impacts or maximise opportunities. (Add more rows if required). If an action is to meet the needs of a particular protected group please specify this. These actions should be included in your Service Plan.

Action(s) to be taken.	Expected Outcomes	Responsible Person	Timescale	Progress	Complete

9. Monitoring

How will you monitor the impact of your proposed change once it has been implemented? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective and your approach is still appropriate. Include the timescale for review in your action plan above.

The CRF introduces a suite of new monitoring and performance measures. This data will be reviewed regularly through the running of the scheme to ensure the objectives of the funding are being met. The operation of the wider CRF across Devon will be kept under regular review and delivery will be flexible to respond to learnings or changes in the pattern of demand.

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REPORT TO EXECUTIVE

Date of Meeting: 17th March 2026

REPORT TO COUNCIL

Date of Meeting: 7th April 2026

Report of: Chief Executive

Title: Corporate Complaints Policy

Is this a Key Decision?

No

Is this an Executive or Council Function?

Council

1. What is the report about?

1.1 This report seeks Executive approval for the revised Corporate Complaints Policy, (Appendix A), which provides the Council's single, consistent framework for handling all non-housing complaints. The policy has been updated to ensure compliance with the Local Government & Social Care Ombudsman (LGSCO) Complaint Handling Code, (Appendix B), which will be used in LGSCO reviews from April 2026, and to deliver greater alignment with the Council's Housing Complaints Policy, (Appendix C), which is governed by the Housing Ombudsman's statutory Complaint Handling Code.

1.2 The new Corporate Complaints Policy introduces clearer standards, strengthened governance, consistent definitions, improved accessibility, and fully aligned response times and processes across service areas wherever appropriate. The update also ensures the policy reflects current best practice, supports organisational learning, and improves accountability.

2. Recommendations:

2.1 That the Executive recommend to Council approval of the revised Corporate Complaints Policy.

3. Reasons for the recommendation:

3.1 LGSCO Code Compliance: The Code mandates clear, fair, accessible and timely complaint handling. The new policy responds to the updated guidance, to meet its recommendations in relation to timescales, annual self-assessment, senior oversight and performance reporting.

3.2 Alignment with the Housing Complaints Policy: Housing Services already operate under a statutory Ombudsman Code. Aligning corporate processes with these standards improves consistency for customers, simplifies staff training, and ensures clearer pathways for residents whose complaints cross both housing and corporate service areas.

3.3 Clearer definitions & scope: The new policy adopts a unified definition of a complaint (“expression of dissatisfaction, however made”) and clarifies the difference between service requests and complaints—bringing the corporate process in line with Housing Services.

3.4 Improved accessibility & reasonable adjustments: The revised policy explicitly permits complaints via any channel, records agreed reasonable adjustments and ensures that individuals with additional needs can fully engage with the process.

3.5 Strengthened governance: The policy establishes oversight roles, including a Member Responsible for Corporate Complaints, consistent with both Ombudsman frameworks.

3.6 Consistency & learning: Annual data publication, quarterly review, dashboards, and a cross-service complaints group will standardise learning and support continuous improvement.

4. What are the resource implications including non-financial resources:

4.1 No additional staffing resources are required. The revised process will be delivered within existing structures in Customers & Communities, with support from responsible officers across the Council. Some officer time will be required for: updated training; annual LGSCO self-assessment; production of quarterly and annual performance reporting; and operation of the cross-council complaints group. These activities form part of normal service responsibilities.

5. Section 151 Officer comments:

5.1 There are no financial implications contained in this report.

6. What are the legal aspects?

6.1 The revised Corporate Complaints Policy ensures compliance with the Local Government & Social Care Ombudsman Complaint Handling Code and statutory requirements for signposting residents to the relevant Ombudsman (LGSCO or Housing Ombudsman). It also reflects the Monitoring Officer’s duty to report upheld LGSCO findings in accordance with Section 5/5A of the Local Government & Housing Act 1989.

6.2 The Housing Ombudsman’s Complaint Handling Code is a statutory code from 1 April 2024 for social landlords, creating a legal duty on the Ombudsman to monitor compliance and on landlords to self-assess and publish annual performance. The LGSCO’s Complaint Handling Code applies to local authorities as best practice guidance and does not have the same statutory footing, but authorities are expected to comply and self-assess annually; the LGSCO may take compliance with the code into account when determining maladministration.

7. Monitoring Officer’s comments:

7.1 As Members will note, the purpose of the new proposed policy is to provide a single consistent framework in order to deal with all non-housing complaints and in compliance with the Local Government and Social Care Ombudsman’s Complaint Handling Code.

8. Equality Act 2010 (The Act)

8.1 In recommending this proposal potential impact has been identified on people with protected characteristics as determined by the Act and an Equality Impact Assessment has been included in the background papers for Member's attention, (Appendix D).

9. Carbon Footprint (Environmental) Implications:

9.1 No direct carbon/environmental impacts arising from the recommendations.

10. Report details:

10.1 The revised policy ensures full alignment with the LGSCO Complaint Handling Code of Guidance in the following ways:

- adoption of a clear, Code-compliant two-stage process with revised timescales
- strengthened governance and clearly defined responsibilities, including formalising member responsibility for Corporate Complaints
- clearer requirements for response content, covering findings, remedy, learning, and the tracking and reporting of actions and performance metrics
- establishment of a cross-council complaints learning and improvement group to support organisational learning
- remedies guidance and consistent differentiation between service requests and complaints
- enhanced transparency through stronger reporting, including annual self-assessment and annual publication.

10.2 Whilst adhering to the LGSCO code of guidance the policy also provides greater alignment with Housing policy:

- consistent definitions ("expression of dissatisfaction, however made")
- aligned Stage 1 and Stage 2 response times (10 + 10 days at Stage 1; 20 + 20 days at Stage 2)
- consistent approach to early resolution
- clear escalation pathways
- coordinated approach for mixed housing/corporate complaints.

11. How does the decision contribute to the Council's Corporate Plan?

11.1 The policy supports customer excellence, transparency, accountability, and continuous improvement. It strengthens resident trust, improves service consistency, and ensures that feedback is used to improve outcomes.

12. What risks are there and how can they be reduced?

12.1 Non-compliance with the LGSCO Code presents a higher risk of Ombudsman findings of maladministration, inconsistent standards across services, reputational damage, reduced learning and poorer customer experience. The revised policy directly addresses compliance, standardisation, governance, and oversight.

13. Are there any other options?

13.1 The alternative is to retain the existing corporate complaints policy. This is not recommended as it would leave the Council misaligned with current Ombudsman guidance, limit improvements in consistency, and expose the organisation to avoidable risk.

Chief Executive, Bindu Arjoon

Author: Stephen Clayton, Head of Service Customers and Communities

Local Government (Access to Information) Act 1972 (as amended)

Background papers used in compiling this report:-

None

List of Appendices:

- Appendix A: Corporate Complaints Policy
- Appendix B: Housing Complaints Policy
- Appendix C: LGSCO Code of Guidance
- Appendix D: EQIA

CORPORATE COMPLAINTS POLICY

Author	Stephen Clayton
Owner	Head of Service – Customers and Communities
Created	10th February 2026
Review Period	2 Years
Status of FOI	Open
EQIA Conducted	Yes
SMB Approval	Yes
This Policy Document can be made available in large print and other formats such as printed on yellow paper, taped, Braille etc. as requested	

1. Policy Statement

1.1 Exeter City Council is committed to delivering high-quality, responsive, and accountable public services. This Corporate Complaints Policy sets out how complaints are managed across all Council services not covered by the Housing Ombudsman and provides the overarching framework for handling complaints in line with the Local Government and Social Care Ombudsman (LGSCO) Complaint Handling Code. It ensures that complaints are handled in a consistent, fair, and transparent way across all relevant service areas.

1.2 This policy aims to:

- Provide a clear and accessible process for making complaints.
- Ensure complaints are handled fairly, promptly, and effectively.
- Promote learning from complaints to improve services.
- Comply with statutory codes and best practice guidance.
- Embed accountability and governance through defined roles and responsibilities.

2. Policy Scope

- 2.1 This policy applies to all complaints about Council services, within the scope of the LGSCO code of guidance, including those delivered by contractors or partners. Where services are delivered by contractors or partners, the Council remains accountable for complaint handling.
- 2.2 Where possible, (e.g. timelines, principles etc.), this policy provides greater alignment with the Housing Complaints Policy.
- 2.3 This policy excludes:
- matters with separate statutory/corporate processes (e.g., planning appeals, statutory reviews of homelessness decisions etc.). Where a statutory complaints or appeals process exists, we will signpost to the correct route and avoid duplicate handling under this policy.
 - Complaints about councillor conduct (handled under the Members' Code of Conduct).
 - Employment-related complaints (handled via HR procedures).
 - Member enquiries, where members are not acting on behalf of a complainant or in a personal capacity.
- 2.4 Where a complaint includes both corporate and housing issues, we will coordinate a single, coherent response where practicable and explain which Ombudsman has jurisdiction at the end of our process.

3. Principles

- 3.1 In line with the aims of this policy, the core principles for handling complaints are:
- 3.2 Accessibility – Whilst the online form is the main method for registering a complaint, we will accept complaints through any channel, including in person and by telephone. Where a complaint is made verbally, we will record it and confirm the details in writing if requested. We will make reasonable adjustments for disabled people and others who need support to access the process, including accepting representatives or advocates, providing information in alternative formats, and offering support to complete forms. Any agreed adjustment will be recorded on the case file and reviewed as the complaint progresses
- 3.3 Fairness & Respect – The Council will handle all complaints with fairness and respect, ensuring that every investigation is impartial, that any response or remedy is proportionate to the issues raised, and that all communication with complainants is courteous, clear, and empathetic.

- 3.4 Timeliness – The Council will respond to complaints within clear, published service standards. Where more time is genuinely needed due to the complexity of a case, an extension will only be agreed with the complainant, recorded with a clear reason, and accompanied by a new confirmed due date.
- 3.5 Transparency & Learning – The Council is committed to being open about how complaints are handled. We will publish annual performance information, including insights from complaints, and use trends, data, and learning to strengthen services and prevent issues from recurring.
- 3.6 Accountability – The Council will maintain clear roles and responsibilities for complaint handling, supported by strong managerial and political oversight. This includes appointing a designated Member Responsible for Corporate Complaints to ensure effective scrutiny and promote a positive complaints culture.

4. Definitions

- 4.1 Complaint: An expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by the Council or its representatives, regardless of whether the word ‘complaint’ is used.
- 4.2 Complainants may make a complaint if they feel we have:
- done something wrong
 - behaved unfairly or impolitely
 - not carried out a service to an agreed standard
 - not responded to their request for a service within our stated timescale
- 4.3 Service Request: A request for a service or action (e.g., reporting a missed bin or repair). These are not complaints unless there is a failure in delivery, in line with 4.2.
- 4.4 Housing Complaint: A complaint related to housing services, governed by the Housing Ombudsman Code.

5. Exclusions

- 5.1 Complaints may be excluded if:
- 5.2 The issue occurred over 12 months ago and there is no good reason for the delay (unless discretion is applied).
- 5.3 The matter is, or becomes, subject to legal proceedings or a more appropriate right of appeal (court/tribunal).
- 5.4 The matter has already been considered under this policy or by the LGSCO
- 5.5 The complaint is vexatious/abusive or repetitive without new evidence (managed under the Unacceptable Behaviour Policy).

5.6 If excluded, we will explain the reason and signpost the appropriate route.

6. Complaints Handling Process

6.1 An online complaint form is provided. However, any correspondence, through any channel, which meets the definition of a complaint, as outlined in sections 4.1 and 4.2, will be treated as such.

6.2 Where appropriate, the council will seek to achieve early and proportionate resolution of Stage 1 complaints, ensuring issues are addressed quickly and fairly. Where a complaint can be resolved swiftly without a full investigation, we will do so and record the outcome, learning, and any remedy provided. Early resolution will not reduce the quality of our response or the complainant's right to escalate.

6.3 Where we are unable to resolve concerns at an early stage, and further investigation is required, the following procedure will apply:

6.4 Stage One – Initial Response:

- Acknowledgement within five working days.
- Response within ten working days of the acknowledgment, extendable by a maximum of ten working days, unless there is good reason to extend further. Any extension will be clearly communicated and explained to the individual.
- Investigated by the relevant Head of Service or delegated officer.

6.5 A Stage One response will address all points raised in the complaint and will confirm:

- The complaint stage
- A summary of issues raised
- The decision on the complaint
- The findings and reasons for any decisions made
- The details of any remedy offered to put things right
- Details of any outstanding actions
- details of how to escalate the matter to stage two if they are not satisfied with the outcome

6.6 Stage Two – Escalated Review

If all or part of the complaint is not resolved to the individual's satisfaction at stage 1 then the complaint may progress to stage 2, in accordance with the following:

- Reviewed by a senior officer not involved in Stage One.
- Response within twenty working days of the acknowledgement, extendable by a maximum of twenty days, unless there is good reason to extend further. Any extension will be clearly communicated and explained to the individual.
- Investigated by the relevant Director or delegated senior officer.
- Requests will only be declined where they meet this policy's exclusions, (as defined in Section 5 of this policy), and any refusal will include an explanation and signposting to the Ombudsman.

6.7 A Stage Two response will address all points raised in the complaint and will confirm:

- The complaint stage
- A summary of the issues raised
- The decision on the complaint
- The findings and reasons for any decisions made
- The details of any remedy offered to put things right
- Details of any outstanding action
- Details of how to escalate the matter to the Ombudsman if you are dissatisfied with the outcome, with full details of how to contact them.

6.8 Where fault is found, we will apply proportionate remedies that seek to put the individual back in the position they would have been in but for the fault, or otherwise provide a fair outcome. Remedies may include an apology, explanation, practical action, financial redress, and/or service improvements. We will track the completion of agreed remedies and confirm to the complainant when fulfilled.

6.9 Escalation to Ombudsman: If unresolved, or if policy timelines not met, complainants will be provided with the Ombudsman's contact details:

Local Government & Social Care Ombudsman (LGSCO)
 Phone: 0300 061 0614
 Postal Address: PO Box 4771, Coventry, CV4 0E:
 Website: <https://www.lgo.org.uk>

6.10 For Housing Complaints covered by the Housing Ombudsman code of guidance the contact details are:

Housing Ombudsman Service (HOS)
 Phone: 0300 111 3000
 Postal Address: PO Box 1484, Unit D, Preston, PR2 0ET

Email (general enquiries): info@housing-ombudsman.org.uk

Website: <https://www.housing-ombudsman.org.uk>

7. Monitoring and Reporting

- 7.1 Annual self-assessment against the LGSCO Code of Guidance to Audit and Governance Committee
- 7.2 Quarterly reporting to Senior Management Board
- 7.3 Publication of complaints data and learning outcomes.
- 7.4 Monitoring Officer oversight of governance-related complaints and systemic risks.
- 7.5 Performance dashboards to track resolution times, escalation rates, and service-level trends.
- 7.6 Complaints performance will also be discussed at regular cross service complaints review meetings.

8. Policy Review

- 8.1 This policy will be reviewed in response to changes in legislation, Ombudsman guidance, or organisational priorities
- 8.2 Reviews will be led by the Head of Service, Customers and Communities and in consultation with the Monitoring Officer and relevant Heads of Service.

9. Roles and Responsibilities

- 9.1 A Member Responsible for Corporate Complaints will be appointed for complaints covered by this policy. In accordance with the LGOSC Code of Guidance their responsibilities will include:
 - Provide democratic oversight of the complaints process
 - Scrutinise performance and learning, including trends, timeliness, quality of responses, and service improvements
 - Promote a positive complaints culture, treating complaints as valuable feedback
 - Ensure transparency and accountability, with clear reporting to Members and the public
- 9.2 Head of Service – Customers and Communities

- Overseeing the complaints process and ensuring consistency across departments.
- Lead the Corporate Complaints Team responsible for ensuring that the handling of Corporate Complaints is in accordance with this policy and the LGSCO code of guidance
- Monitoring compliance with statutory guidance and internal standards.
- Coordinating responses to complex or cross-cutting complaints.
- Ensure effective communication with the LGSCO on escalated cases, acting as the primary link officer
- Producing quarterly and annual reports on complaint trends, performance, and learning.
- Supporting staff training and development in complaint handling.
- Ensuring that learning from complaints is captured and used to improve services.

9.3 Heads of Service, or delegated officers, are responsible for the investigation of complaints at Stage One. They ensure that complaints are investigated thoroughly and resolved promptly. Key responsibilities include:

- Leading investigations into complaints within their service area.
- Providing clear, evidence-based responses to complainants.
- Identifying service failures and recommending appropriate remedies.
- Ensuring complaints, responses and learning are logged with the Complaints team in Customers and Communities.
- Contributing to service improvement through analysis of complaint themes.
- Supporting staff in understanding and applying the complaints process.

9.4 Directors, or delegated Senior Officers, are responsible for conducting Stage Two reviews. They ensure impartiality and thoroughness in resolving complaints that have not been satisfactorily addressed at Stage One. Key responsibilities include:

- Reviewing all documentation and correspondence related to the complaint.
- Engaging with the complainant to understand unresolved concerns.
- Providing a final internal decision with clear reasoning and outcomes.
- Identifying any governance, policy, or procedural issues.
- Ensuring that Stage Two responses meet quality and timeliness standards.
- Reporting findings to the Complaints Officer and relevant leadership teams.
- Supporting organisational learning and improvement through case reviews.

9.5 The Monitoring Officer plays a critical governance role in the complaints process, ensuring legal compliance and ethical standards. Their involvement is essential in cases involving potential maladministration, member conduct, or governance

concerns. It will be the investigating officer, in the first instance, who will raise these issues with the monitoring officer.

Key responsibilities include:

- Reviewing complaints that raise legal, ethical, or governance issues.
- Advising on complaints involving elected members or breaches of the Code of Conduct.
- Liaising with relevant stakeholders on member-related complaints.
- Ensuring that complaints with corporate governance implications are escalated appropriately.

9.6 When the Local Government and Social Care Ombudsman find fault in any upheld complaint, the Council's Monitoring Officer will report this to elected Members in accordance with the statutory duty under Section 5/5A of the Local Government and Housing Act 1989. This duty may be discharged through the annual reporting process, or through a case-specific report where the Ombudsman's findings have wider implications.

9.7 All staff have a role in supporting a positive complaints culture. They are expected to engage constructively with feedback and contribute to service improvement. Key responsibilities include:

- Responding to complaints professionally and empathetically.
- Understanding the difference between service requests and complaints.
- Referring formal complaints to the Customer and Communities Complaints team.
- Participating in training and development on complaint handling.
- Supporting the resolution of concerns and complaints at the earliest opportunity.
- Contributing to learning and improvement through feedback and reflection.
- Promoting transparency and accountability in service delivery.

10. Unacceptable Behaviour

10.1 The Council recognises that some complaints may be persistent or abusive in nature. To manage such cases, the Council may apply its Unreasonable Behaviour Policy. This may include:

- Limiting contact to specific channels or times.
- Refusing to investigate repetitive complaints without new evidence.
- Escalating concerns to legal or safeguarding teams if necessary.
- Any decision to apply restrictions will be approved by a senior officer and communicated clearly to the complainant.

11. Complaints Learning and Improvement Group

11.1 The Council will establish a Corporate Complaints Group comprising representatives from each service area. This group will:

- Share best practices and ensure consistency in complaint handling.
- Review complex or cross-cutting complaints.
- Promote organisational learning and service improvement.
- Support the Head of Service - Customers and Communities in policy review and training initiatives.

12. Engagement

12.1 Exeter City Council is committed to engaging with residents, service users, and complainants in all aspects of complaints management. This includes gathering feedback on the complaints process, outcomes, and service delivery to ensure continuous improvement. The Council will actively engage with stakeholders to inform policy updates, improve transparency, and enhance the overall effectiveness of complaint handling. Engagement activities may include surveys, focus groups, and direct outreach to ensure that the voices of service users are heard and reflected in service improvements.

13. Publication of Self-Assessment Outcomes

13.1 The Council will publish the results of its annual self-assessment against the LGSCO and Housing Ombudsman Codes. This will include:

- Areas of compliance and improvement.
- Actions taken to address gaps.
- Performance trends and learning outcomes.

The published reports will be available via the Council's website.

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Local Government &
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OMBUDSMAN



Complaint Handling Code

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Contents

Introduction	3
The Local Government and Social Care Ombudsman's powers and approach	4
The Complaint Handling Code	
1. Definition of a service request and complaint	5
2. Exclusions	6
3. Accessibility and awareness	7
4. Complaint handling resources	8
5. The complaint handling process	9
6. Complaints stages	10
Stage 1	10
Stage 2	11
7. Putting things right	12
8. Performance reporting and self-assessment	13
9. Scrutiny & oversight: continuous learning and improvement	14
Appendix A: Self-assessment	15

Introduction

Good complaint handling requires effective procedures and well-trained staff alongside a positive complaints culture that enables those procedures to achieve maximum impact. This code sets out what an organisation should do procedurally to handle complaints.

Organisations should embrace complaints through increased transparency, accessibility, and complaint handling governance. Demonstrating that individuals are at the heart of its service delivery and good complaint handling is central to that.

Some organisations see complaints as a form of negative feedback. However, there are many benefits to be gained from having an effective and efficient complaints process:

- > Good complaint handling promotes a positive relationship between an organisation and service users.
- > Complaints allow an issue to be resolved before it becomes worse. Those issues not resolved promptly can take significant resource and time to remedy.
- > Involvement in complaint resolution develops staff ownership, decision-making and engagement.
- > Complaints provide senior staff with essential insight into day-to-day operations, allowing them to assess effectiveness and drive a positive complaint handling culture.
- > Data collected about complaints can be analysed and used to inform key business decisions to drive improvement in service provision.

The Complaint Handling Code ('the Code'), sets out a process for organisations that will allow them to respond to complaints effectively and fairly. The purpose of the Code is to enable organisations to resolve complaints raised by individuals promptly, and to use the data and learning from complaints to drive service improvements. It will also help to create a

positive complaint handling culture amongst staff and individuals.

The Code will act as a guide for individuals setting out what they may expect from an organisation when they make a complaint. Organisations should seek feedback from individuals in relation to their complaint handling as part of the drive to encourage a positive complaint and learning culture.

Organisations should have a single policy for dealing with complaints covered by the Code.

The principles, process and timescales in this Code are aligned with the Complaint Handling Code issued by the Housing Ombudsman. This means that organisations who fall under the jurisdiction of both Ombudsmen should be able to provide a co-ordinated complaint handling process across services covered by both Codes.

The Local Government and Social Care Ombudsman's powers and approach

The Code is issued under the Local Government and Social Care Ombudsman's powers to provide "guidance about good administrative practice" to organisations under section 23(12A) of the Local Government Act 1974. For the Local Government and Social Care Ombudsman, this Code constitutes important advice and guidance to councils, rather than instructions.

We have issued the Code for local councils in England. Other organisations in the Ombudsman's jurisdiction may find the Code helpful in setting out good practice.

We can recommend an organisation takes action to improve services or provide a personal remedy where it finds fault causing injustice to an individual or group of individuals. Unlike the Housing Ombudsman, we have no specific responsibility for monitoring compliance with the Code in addition to our role investigating complaints of maladministration and service failure.

Using the Code

We expect local councils to carefully consider the Code when developing policies and procedures. Where an organisation decides that it will depart from the Code, it should ensure local decision-making processes have been properly followed.

We may make a finding of maladministration where local councils' policies and procedures depart from the Code without sufficient explanation. We may also make a finding of maladministration where a local council, without good reason, does not meet the standards in the Code when responding to an individual complaint.

Where an organisation is unable to comply with its policies and procedures when dealing with an individual complaint, the individual should be provided with a suitable explanation and signposted to the Ombudsman.

The Code should be considered along with other guidance issued by the Local Government and Social Care Ombudsman.

The Code does not replace any existing statutory complaint processes such as The Children Act 1989 Representations Procedure (England) Regulations 2006 or Local Authority Social Services and National Health Service Complaints (England) Regulations 2009.

The Complaint Handling Code

1. Definition of a service request and complaint

- 1.1 Effective complaint handling enables individuals to be heard and understood. The starting point for this is a shared understanding of what constitutes a service request and what constitutes a complaint. In most cases organisations should be able to put things right through normal service delivery processes.
- 1.2 A service request may be defined as:
'a request that the organisation provides or improves a service, fixes a problem or reconsiders a decision.'
- 1.3 This provides organisations with opportunities to resolve matters to an individual's satisfaction before they become a complaint.
- 1.4 A complaint may be defined as:
'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual or group of individuals.'
- 1.5 An individual should not have to use the word 'complaint' for it to be treated as such. A complaint that is submitted via a third party or representative should still be handled in line with the organisation's complaints policy.
- 1.6 Organisations should recognise the difference between a service request and a complaint. This should be set out in their complaints policy.
- 1.7 Service requests are not complaints but may contain expressions of dissatisfaction. Organisations should have the opportunity to deal with a service request before a complaint is made. A complaint may be raised when the individual expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. An organisation should not stop its efforts to address the service request if the individual complains.
- 1.8 Service requests should be recorded, monitored and reviewed regularly.

2. Exclusions

- 2.1 An organisation should accept a complaint unless there is a valid reason not to do so. If the organisation decides not to accept a complaint, it should be able to evidence its reasoning. Each complaint should be considered on its own merits.
- 2.2 Organisations should accept complaints referred to them within 12 months of the issue occurring, or the individual becoming aware of the issue. Organisations should consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.
- 2.3 A complaints policy should set out the circumstances in which a matter might not be considered or escalated. Organisations should ensure that these are reasonable, and should not deny individuals access to redress.
- 2.4 If an organisation decides not to accept a complaint, an explanation should be provided to the individual setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman.
- 2.5 Organisations should not take a blanket approach to excluding complaints; they should consider the individual circumstances of each complaint.

3. Accessibility and awareness

- 3.1 Organisations should make it easy for individuals to complain by providing different channels through which they can make a complaint. Organisations must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of individuals who may need to access the complaints process.
- 3.2 Individuals should be able to raise their complaints in any way and with any member of staff. All staff should be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the organisation.
- 3.3 High volumes of complaints should not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that individuals are unable to complain.
- 3.4 Organisations should make their complaint policy available in a clear and accessible format for all individuals. This should detail the process, what will happen at each stage, and the timeframes for responding. The policy should also be published on the organisation's website.
- 3.5 The policy should explain how the organisation will publicise details of the complaints policy, including information about the Ombudsman and this Code.
- 3.6 Organisations should give individuals the opportunity to have a suitable representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the organisation.
- 3.7 Organisations should provide individuals with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.
- 3.8 Where an organisation asks for feedback about its services through a survey, it should provide details of how individuals can complain so they can pursue any dissatisfaction if they so wish.

4. Complaint handling resources

- 4.1 Organisations should have designated, sufficient resource assigned to take responsibility for complaint handling, including liaison with the relevant Ombudsman and ensuring complaints are reported to the governing body (or equivalent).
- 4.2 Anyone responding to a complaint should have access to staff at all levels to facilitate the prompt resolution of complaints. They should also have the authority and autonomy to act to resolve disputes promptly and fairly.
- 4.3 Organisations are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff should be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and resourced accordingly

5. The complaint handling process

- 5.1 Organisations should have a single policy for dealing with complaints covered by the Code.
- 5.2 The early and local resolution of issues between organisations and individuals is key to effective complaint handling. Organisations should not have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.
- 5.3 When an individual expresses dissatisfaction that could meet the criteria for a complaint as set out in section 1 of the Code, they should be given the opportunity to make a complaint. Organisations should recognise that individuals may be reluctant to raise complaints out of fear it may impact services they receive in future.
- 5.4 The person responding to the complaint should:
- clarify with the individual any aspects of the complaint they are unclear about;
 - deal with complaints on their merits, act independently, and have an open mind;
 - give the individual a fair chance to set out their position;
 - take measures to address any actual or perceived conflict of interest; and
 - consider all relevant information and evidence carefully.
- 5.5 Where a response to a complaint will fall outside the timescales set out in this Code the organisation should inform the individual of when the response will be provided and the reason(s) for the delay.
- 5.6 Organisations must make reasonable adjustments for individuals where appropriate under the Equality Act 2010.
- Organisations should keep a record of any reasonable adjustments agreed. Any agreed reasonable adjustments should be kept under active review.
- 5.7 Organisations should not refuse to escalate a complaint through all stages of the complaints procedure unless there are valid reasons to do so. Organisations should clearly set out these reasons, and they should align with the approach to exclusions set out in section 2 of the Code.
- 5.8 A full record should be kept of the complaint, and the outcomes at each stage. This should include the original complaint and the date received, all correspondence with the individual, correspondence with other parties, and any relevant supporting documentation such as reports. This should be retained in line with the organisation's data retention policies.
- 5.9 Organisations should have systems in place to ensure that a complaint can be remedied at any stage of its complaints process. Organisations should ensure that appropriate remedies can be provided at any stage of the complaints process without the need for escalation to stage 2 or the Ombudsman.
- 5.10 Organisations should have policies and procedures in place for managing unacceptable behaviour from individuals and/or their representatives. Organisations should be able to evidence reasons for putting any restrictions in place and should keep an individual's restrictions under regular review.
- 5.11 Any restrictions placed on an individual's contact due to unacceptable behaviour should be proportionate and demonstrate regard for the provisions of the Equality Act 2010.

6. Complaints stages

Stage 1

- 6.1 Organisations should have processes in place to consider which complaints can be responded to as early as possible, and which require further consideration. Organisations should consider factors such as the complexity of the complaint and whether the individual is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the individual.
- 6.2 Complaints should be acknowledged, and logged at stage 1 of the complaints procedure **within five working days of the complaint being received**.
- 6.3 Organisations should provide a full response to stage 1 complaints **within 10 working days** of the complaint being acknowledged.
- 6.4 Organisations should decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform individuals of the expected timescale for response. Any extension should be no more than 10 working days without good reason, and the reason(s) should be clearly explained to the individual.
- 6.5 When an organisation informs an individual about an extension to these timescales, they should be provided with the details of the relevant Ombudsman.
- 6.6 A complaint response should be provided to the individual when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions should still be tracked and actioned promptly, with appropriate updates provided to the individual.
- 6.7 Organisations should address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate. Organisations should be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.
- 6.8 At the conclusion of stage 1 organisations should provide details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.
- 6.9 Where individuals raise additional complaints during stage 1, these should be incorporated into the stage 1 response if they are related, and the stage 1 response has not been provided. Where the stage 1 response has been provided, the new issues are unrelated to the issues already being considered, or it would unreasonably delay the response, the new issues should be logged as a new complaint.
- 6.10 Organisations should have systems in place to ensure that a complaint can be remedied at any stage of its complaints process. Individuals should not have to escalate a complaint in order to get an appropriate remedy.

Stage 2

- 6.11 If all or part of the complaint is not resolved to the individual's satisfaction at stage 1, it should be progressed to stage 2 of the organisation's procedure. Stage 2 is the organisation's final response..
- 6.12 Requests for stage 2 should be acknowledged and logged at stage 2 of the complaints procedure within **five working days of the escalation request being received**. Within the acknowledgement, organisations should set out their understanding of any outstanding issues and the outcomes the individual is seeking. If any aspect of the complaint is unclear, the individual should be asked for clarification.
- 6.13 Individuals should not be required to explain their reasons for requesting a stage 2 consideration. Organisations should make reasonable efforts to understand why an individual remains unhappy as part of its stage 2 response.
- 6.14 The person considering the complaint at stage 2 should not be the same person that considered the complaint at stage 1.
- 6.15 Organisations should issue a final response to the stage 2 **within 20 working days** of the complaint being acknowledged.
- 6.16 Organisations should decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform individuals of the expected timescale for response. Any extension should be no more than 20 working days without good reason, and the reason(s) should be clearly explained to the individual.
- 6.17 When an organisation informs an individual about an extension to these timescales they should be provided with the details of the relevant Ombudsman.
- 6.18 Organisations should confirm the following in writing to the individual at the completion of stage 2 in clear, plain language:
- the complaint stage;
 - the organisation's understanding of the complaint;
 - the decision on the complaint;
 - the reasons for any decisions made;
 - the details of any remedy offered to put things right;
 - details of any outstanding actions; and
 - details of how to escalate the matter to the Ombudsman if the individual remains dissatisfied.
- 6.19 Stage 2 should be the organisation's final response and should involve all suitable staff members needed to issue such a response.
- 6.20 A process with more than two stages will make the complaint process unduly long and delay access to the relevant Ombudsman. A process with a single stage means the organisation may lack the ability to check its response before an individual comes to the Ombudsman.
- 6.21 Where an organisation's complaint response is handled by a third party (e.g. a contractor) or independent adjudicator at any stage, it should form part of the two stage complaints process set out in this Code. Individuals should not be expected to go through two complaints processes.
- 6.22 Organisations are responsible for ensuring that any third parties handle complaints in line with the Code.

7. Putting things right

- 7.1 Where something has gone wrong an organisation should acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:
- > Apologising;
 - > Acknowledging where things have gone wrong;
 - > Providing an explanation, assistance or reasons;
 - > Taking action if there has been delay;
 - > Reconsidering or changing a decision;
 - > Amending a record or adding a correction or addendum;
 - > Providing a financial remedy;
 - > Changing policies, procedures or practices.
- 7.2 Any remedy offered should reflect the impact on the individual as a result of any fault identified.
- 7.3 The remedy offer should clearly set out what will happen and by when, in agreement with the individual where appropriate. Any remedy proposed should be followed through to completion.
- 7.4 If a proposed remedy cannot be delivered, the individual should be informed of the reasons for this, provided with details of any alternative remedy and reminded of their right to complain to the Ombudsman,
- 7.5 Organisations should take account of the good practice guides issued by the Ombudsman when deciding on appropriate remedies.

8. Performance reporting and self-assessment

- 8.1 Organisations should produce an annual complaints performance and service improvement report for scrutiny and challenge, which should include:
- a. an annual self-assessment against this Code to ensure its complaint handling policy remains in line with its requirements.
 - b. a qualitative and quantitative analysis of the organisation's complaint handling performance. This should also include a summary of the types of complaints the organisation has refused to accept;
 - c. any findings of non-compliance with this Code;
 - d. the service improvements made as a result of the learning from complaints;
 - e. the annual letter about the organisation's performance from the Ombudsman; and
 - f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the organisation.
- 8.2 The annual complaints performance and service improvement report should be reported through the organisation's governance arrangements and published on the section of its website relating to complaints. The response to the report from the relevant governance arrangement should be published alongside this.
- 8.3 Organisations should also carry out a self-assessment following a significant restructure, merger and/or change in procedures.

9. Scrutiny & oversight: continuous learning and improvement

- 9.1 Organisations should look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.
- 9.2 A positive complaint handling culture is important to the effectiveness with which organisations resolve disputes. Organisations should use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.
- 9.3 Accountability and transparency are also integral to a positive organisational culture. Organisations should report back on wider learning and improvements from complaints to stakeholders, such as citizens' panels, staff and relevant committees.
- 9.4 The organisation should appoint a suitably senior person to oversee its complaint handling performance. This person should assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.
- 9.5 In addition to this, organisations should assign lead responsibility for complaints in governance arrangements to support a positive complaint handling culture. We refer to this as the 'Member Responsible for Complaints' (the Member). This role could be carried out by an individual or committee depending on the governance arrangements in place.
- 9.6 The Member should receive regular information on complaints that provides insight on the organisation's complaint handling performance. The Member should have access to suitable information and staff to perform this role and report on their findings.
- 9.7 As a minimum, the Member should receive:
 - a. regular updates on the volume, categories, and outcomes of complaints, alongside complaint handling performance
 - b. regular reviews of issues and trends arising from complaint handling; and
 - c. the annual complaints performance and service improvement report.
- 9.8 Organisations should have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:
 - > have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;
 - > take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and
 - > act within the professional standards for engaging with complaints as set by any relevant professional body.

Appendix A: Self-assessment

A self-assessment should be completed and shared with the organisation's governance arrangements as part of the complaints performance and service improvement report.

Evidence should show how the organisation follows the Code and its own policies. It should also set out how well it is performing and provide information about service improvements which have been implemented following complaints.

For example, this could include records of quality assurance checks on complaint responses, exclusions and feedback from relevant staff. If the failure to meet an expectation only relates to one service area or department this should be made clear.

When completing the self-assessment, organisations should not focus on the number of complaints received. Recording a high number of complaints may be an indication that the organisation welcomes complaints and that individuals are able to access the complaints process easily. Organisations should focus on timescales for responding to complaints and complaint outcomes.

A suggested self-assessment format is included here, but organisations may adopt their own version to meet local needs and reporting requirements.

Example: Self-assessment against the requirements of the Code

Code section	Action	Do we follow the code Yes/No	Explanations and Commentary
1: Definition of a service request and complaint	We recognise the difference between a service request and a complaint and these are defined in our policies and procedures.		
2: Exclusions	Our complaints policy sets out circumstances where we would not consider a complaint. These are reasonable and do not deny individuals access to redress.		
3: Accessibility and awareness	We provide different channels through which individuals can make complaints. These are accessible and we are able to make reasonable adjustments where necessary.		
4: Complaint handling resources	We have designated, sufficient resource assigned to take responsibility for complaint handling. Complaints are viewed as a core service and resourced accordingly.		

Code section	Action	Do we follow the code Yes/No	Explanations and Commentary
5: The complaint handling process	We have a single policy for dealing with complaints covered by the Code and individuals are given the option of raising a complaint where they express dissatisfaction that meets the definition of the complaint in our policy.		
6: Complaints stages (Stage 1)	We process stage 1 complaints in line with timescales and processes set out in the Code.		
6: Complaints stages (Stage 2)	We process stage 2 complaints in line with timescales and processes set out in the Code.		
7: Putting things right	When something has gone wrong we take action to put things right.		
8: Performance reporting and self-assessment	We produce an annual complaints performance and service improvement report for scrutiny and challenge which includes a self-assessment against the Code.		
9: Scrutiny & Oversight	We have appropriate senior leadership and governance oversight of the complaints process and performance.		

Local Government and Social Care Ombudsman

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Exeter
City Council



Council Housing
& Development Services

Exeter City Council Housing Services

Housing Complaints Policy

2025-2030

1. Introduction	3
2. Statutory/Regulatory requirements	3
3. Policy aims and objectives	3
4. Definitions	4
i. Service Request.....	4
ii. Complaint.....	4
5. Processing Complaints	6
i. Stage One.....	6
Examples of actions to be taken at Stage One:	7
ii. Stage Two.....	7
Actions to be taken at Stage Two	8
6. The Housing Ombudsman Service	8
7. Exclusions.....	8
8. Written responses.....	9
9. When a complaint is closed	9
10. Use of discretion	9
11. Complaints made in a vexatious manner.....	9
Our Response to such complaints:.....	10
12. Legal Obligations.....	10
13. Compensation and redress policy.....	10
13. Equality and diversity.....	10
14. Representation and support agencies	11
15. Monitoring Complaints	11
16. Learning from Complaints.....	11
17. Self-Assessment	11
18. Confidentiality.....	12
19. Storing Information.....	12
20. Increasing awareness of this Policy	12
References:	12
Appendix A.....	13
Appendix B	14
The Member Responsible for Complaints (MRC)	14
Responsibilities - Governing Body Assurance	14
Responsibilities - Complaint Handling Code	15
Responsibilities - Learning	15

1. Introduction

- 1.1 Following The Social Housing (Regulation) Act 2023 The Housing Ombudsman issued a Complaint Handling Code which is statutory from 1st April 2024. This code was introduced to enable 'a positive complaints culture across the social housing sector'.¹
- 1.2 The Housing Ombudsman has a statutory duty to monitor compliance with the Code; as part of this, landlords are expected to have a Housing Complaints Policy.
- 1.3 This policy has been updated to reflect new guidelines issued by the Housing Ombudsman and following their review of the policy and the recommendations provided therein
- 1.4 This is Exeter City Council's Housing Complaints Policy

2. Statutory/Regulatory requirements

2.1 This Policy has been produced in line with legislation including:

- Localism Act 2011,
 - Housing Act 1996 (schedule 2),
 - General Data Protection Act 2018,
 - Equality Act 2010,
- 2.2 It also incorporates guidance from the Housing Ombudsman Service and meets the requirements of the Consumer Standards where appropriate i.e. The Tenant Involvement and Empowerment Standard.

Note: We have referred to residents throughout this document-this includes both tenants and leaseholders who occupy former Council owned homes.

3. Policy aims and objectives

- 3.1 At Exeter City Council we aim to provide an excellent standard of service to our residents; but acknowledge that on occasions we don't always get it right and residents may be dissatisfied and wish to complain.
- 3.2 When a resident contacts us with a complaint, it is treated as an opportunity to find ways to learn and improve the service. We will ensure that action is taken promptly to initiate an investigation.
- 3.3 We value that communication, and we will spend time and effort investigating to see where we can prevent similar complaints arising in the future; if we're doing something wrong, we need to put it right.

- 3.4 We have commitment and culture to make service improvements and learn from mistakes made. Monthly internal meetings are held where complaints received are discussed. This is an opportunity to share ideas and consider what we can learn from the situation so that procedures can be amended, practices reviewed and services improved. (See also the Monitoring of Complaints section below.)
- 3.5 It is Exeter City Council's aim to resolve complaints in a timely fashion and be open and accountable to our residents being outcome focused. Our policy is based on the Housing Ombudsman's Dispute Resolution Principles of: Being Fair, Putting Things Right and Learning from Outcomes.
- 3.6 We will treat all our residents in a fair manner, taking into account their needs and possible vulnerabilities.
- 3.7 We have set up a tenant led Complaints & Performance Group who meet on a quarterly basis to review our performance data and how the complaints service is operated. This group will help our service to identify any areas for improvement from a tenant's point of view. Feedback is provided in our Annual Report and in our in-house magazine to tenants, 'InSight', which is published twice a year.
- 3.8 Each year we will assess our service against the Housing Ombudsman's Complaint Handling Code and we will also produce an Annual Complaints Performance & Service Improvement Report; These will be brought to the Council Housing & Development Advisory Board (CHADAB), to the Complaints & Performance Group and ultimately published on our website.
- 3.9 Exeter City Council has appointed one of its Councillors to be the 'Member Responsible for Complaints'. See Appendix B

4 Definitions

- 4.1 The recognition of the difference between a formal complaint and a service request is important. The following indicates our definitions of both terms:

- i. [Service Request](#)

- 4.2 A service request can come from a tenant or someone who might have visited their home. For example, reporting a repair issue or reporting anti-social behaviour-these will be logged and forwarded to the relevant department for action.
- 4.3 Service requests can become formal complaints when, for example a repair has been logged, the resident has been in contact, but no action has been taken; the resident advises the issue has been raised previously with an officer and not actioned or the resident wishes to make a formal complaint straight away.

- ii. [Complaint](#)

- 4.4 Exeter City Council follows the Housing Ombudsman's definition of a complaint *'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'*
- 4.5 A resident does not have to use the word 'complaint' for it to be treated as such and that any residents that express dissatisfaction are given a choice to make a complaint.
- 4.6 Complaints need to be brought to our attention within 12 months of when the issue was first noticed. We will not normally consider a complaint made after that time.
- 4.7 Residents can follow the information on our website², making a formal complaint if they consider that we have:
- done something wrong
 - behaved unfairly or impolitely
 - not carried out a service to an agreed standard
 - not responded to their request for a service within our stated timescale
- 4.8 Residents can make a complaint in a number of different ways. Anyone can make a complaint on the resident's behalf, if they unable to do so. They will need signed authorisation from the resident.
- 4.9 Complaints can be made in writing by email, (we have a dedicated in-box for complaints), letter, via the Housing Complaints form accessible from our website, the telephone, during a visit by one of our officers or at one of our Housing Surgeries.
- 4.10 Complaints can also be made via social media (including our Housing Services Facebook page³), if this method is used it will be handled through our normal processes (outside of the social media platform itself).
- 4.11 Councillors can put forward complaints made directly to them by residents, these will be acknowledged and progressed in accordance with this policy.
- 4.12 If we understand that a resident is dissatisfied with our response to a service request, we will ensure that this is treated as a complaint and will inform the resident of this.
- 4.13 It will be made clear to the resident that making a complaint will not prevent, stall or impact on actions needed to resolve their original request made.

5. Processing Complaints

- 5.1 Exeter City Council has a team within Housing services dedicated to the processing of any complaint received from one of our tenants or leaseholders.
- 5.2 This team follow a strict process to ensure that the Housing Ombudsman's Code of Conduct is adhered to at all times.
- 5.3 The team will ensure that the investigation into any complaint that is made about the conduct or attitude of staff will be conducted by someone who is independent of the situation to avoid bias. There is a distinction between a complaint about alleged misconduct of a member of staff that would normally be handled under an HR procedure, and what is effectively a service complaint directed at an individual member of staff that can be handled under this complaints procedure.
- 5.4 Any correspondence will be in line with the guidance issued by the Housing Ombudsman (see Appendix A)

There are two stages to our complaints process.

i. Stage One

- 5.5 The specialist team take the initial complaint or enquiry and log it on our Housing database system.
- 5.6 If it is unclear about any aspect of the complaint, a member of the complaints team will contact the resident to ensure we have a clear understanding of the nature of the complaint.
- 5.7 The complaint is acknowledged, defined and logged within 5 working days of receipt and the resident is provided with a response deadline. This is often done much sooner than this.
- 5.8 The acknowledgement will set out our understanding of the complaint and the outcomes the resident is seeking; it will also detail which aspects that we are and are not responsible for.
- 5.9 The complaint is allocated to an investigating officer within 5 working days of receipt, who will investigate and provide a full response within 10 working days of the complaint being acknowledged.
- 5.10 This may be extended by 10 working days if the investigation is complex, but we will always contact the resident to explain the reasons behind this and the Housing Ombudsman's contact details will be provided to the resident. Responses will be made within this extended deadline unless there are exceptional circumstances.
- 5.11 Where additional investigation time would take the complaint outside of the extension period, e.g. beyond the extended deadline date, an agreement will be made by both parties

- 5.12 Where agreement over an extension period cannot be reached, we will provide the Housing Ombudsman's contact details so the resident can contact them directly.
- 5.13 The team provide advice to the officers on their proposed responses and can arrange (with the agreement of the resident) for short extensions to the response times-this is always within guidance provided by the Housing Ombudsman.
- 5.14 The complaint response will be sent when the answer is known, or by the deadline provided and will not wait until any outstanding actions required to address the issue are completed. Any outstanding actions will be detailed in the response. This applies at Stage One and Stage Two of our complaints process.
- 5.15 If the resident raises additional complaints, these can be incorporated into the Stage One response if this has not already been sent. If, however the Stage One response has been sent or the issues raised are unrelated to the original complaint, or it would cause an unreasonable delay to the response then this will be logged as a new complaint.

Examples of actions to be taken at Stage One:

- i. The housing officer or surveyor contacts the complainant and they are happy with the outcome
- ii. A repair is completed and the resident is satisfied with the work & workmanship
- iii. Financial compensation is offered to recompense for any inconvenience or distress caused

ii. Stage Two

- 5.16 A complaint can be escalated to Stage two once it has completed Stage One of the Complaints process. We will make every effort to try to understand why the resident is unhappy with their response.
- 5.17 The request to escalate a complaint to Stage Two complaint will be acknowledged, defined and logged within 5 working days of receipt and the resident is provided with a response deadline.
- 5.18 We will not refuse a reasonable request to escalate a complaint to Stage Two of our process, unless for example legal proceedings have commenced.
- 5.19 If the resident remains dissatisfied after the Stage One investigation, they can request an escalation where a new senior officer will conduct an independent review. The request must be made within 3 months of the conclusion of the Stage One complaint. The Stage Two review will be completed within 20 working days and a final response will be sent to the resident.
- 5.20 This timescale may be extended by 10 working days if the investigation is complex-with the agreement of the resident, but we would always contact the resident to explain the reasons behind this and the Housing Ombudsman's contact details will be provided to the resident. A response will be provided within the additional 10-day extended deadline unless there are exceptional circumstances.

- 5.21 Where agreement over an extension period cannot be reached, we will provide the Housing Ombudsman's contact details so the resident can contact them directly.
- 5.22 Residents cannot add additional elements to their complaint at stage 2. These will need to be investigated as separate complaint at stage 1.

Actions to be taken at Stage Two

- i. The issue is resolved with the agreement of the resident and to the resident's satisfaction.
 - ii. Compensation, agreed by the resident is offered and accepted
 - iii. Any financial compensation offered is in line with guidance from the Housing Ombudsman.
- 5.23 The complaint response will be sent when the answer is known, or by the deadline provided and will not wait until any outstanding actions required to address the issue are completed. Any outstanding actions will be detailed in the response.

6. The Housing Ombudsman Service

- 6.1 If the complaint remains unresolved at the end of our complaints process the resident has the following options available:
- I. They can use the Housing Ombudsman's Early Resolution Service. This is an alternative process to formal investigation where they will work with the resident and us to resolve the dispute as fairly and quickly as possible
 - II. The resident can refer their complaint to the Housing Ombudsman to be formally investigated.

7. Exclusions

- 7.1 We reserve the right to refuse a complaint; if this is the case, a detailed explanation will be provided to the resident, setting out the reasons why the matter is not suitable for the complaints process and the right to take the decision to the Housing Ombudsman
- 7.2 We will use the following exclusions:
- if it is determined to be a service request e.g., a repair or enquiry
 - If more than 12 months has elapsed since the issue arose-we will use our discretion over this and will consider each complaint individually
 - It duplicates another complaint already made or in process
 - Legal proceedings have commenced. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.
 - If there is an accident or incident – this will be handed over to the Housing Compliance team for their expertise
 - There is a Housing Disrepair Protocol in progress

- The complaint is made in a vexatious manner (see below).

8. Written responses

- 8.1 We will ensure that all written responses are clearly referenced to show the stage that the complaint has reached. Templates are used that provide clear and direct guidance to residents on how to escalate a complaint to the next stage of our procedure if they remain dissatisfied. See also Appendix A
- 8.2 Complainants are asked to be clear about why they disagree with a decision and what more they want the Council to do to put it right.

9. When a complaint is closed

- 9.1 We have the discretion to close complaints early with details of what circumstances this would apply. Examples of when a complaint would be closed:
- The investigation is complete and a response has been sent to the resident
 - After sending a response and attempting to make contact to discuss it, there is no further contact from the complainant after 90 days
 - When a resolution is agreed and we have committed to deliver an action

10. Use of discretion

- 10.1 Exeter City Council reserves the right to use discretion when applying this policy and may deal with a complaint differently where individual circumstances merit it. Any discretion needs to be applied fairly and appropriately and that complaints should be progressed as far as possible to maximise the opportunity to resolve a dispute.

11. Complaints made in a vexatious manner

- 11.1 Examples of these are listed below:
- i. Complaints which are obsessive, harassing, abusive or repetitive
 - ii. Insistence on pursuing non-meritorious complaints and/or unrealistic, unreasonable outcomes
 - iii. Insistence on pursuing what may be meritorious complaints in an unreasonable manner
 - iv. Complaints which are designed to cause disruption or annoyance
 - v. Demands for redress which lack any serious purpose or value.

This list is not exhaustive:

11.2 Exeter City Council takes each complaint seriously and will always raise genuine issues and concerns for its residents. However, we will follow our internal processes when dealing with complaints made in a vexatious manner.

11.3 *Our Response to such complaints:*

- We will refer to the Council's Unacceptable Behaviour Policy
- Understand the complainant's perspective
- Collate all the facts before categorising as vexatious
- Explore and understand each situation fully
- Take each complaint seriously to avoid missing key information or genuine issues through being complacent
- We will be open and transparent
- We will continue to engage with the complainant
- We will be consistent
- Review the case regularly

11.4 When a resident demonstrates persistent and vexatious behaviour, we invoke our 'Acceptable Behaviour Contract' which manages communication in line with the Unacceptable Customer Behaviour Policy.

12. Legal Obligations

12.1 Where key issue of a complaint relates to the parties' legal obligations, we will clearly set out the legal obligations of all parties concerned.

13. Compensation and redress policy

13.1 Exeter City Council has a number of options available to put things right when there has been a service failure.

Some of the options available are:

- i. Offering rent-free weeks
- ii. Supplying shopping or decoration vouchers
- iii. Offering financial compensation

The level of compensation offered will be in line with the Housing Ombudsman Compensation Policy – Guidance for landlords

13. Equality and diversity

- 13.1 Exeter City Council already has an Equality and Diversity Policy⁴ and is committed to be fair, accountable and transparent and to promote equality of opportunity to ensure that all residents are treated fairly.
- 13.2 We recognise that many of our residents may have vulnerabilities so as each complaint is considered individually reasonable adjustments will be made as and when required.

14. Representation and support agencies

- 14.1 Residents are free at any time to seek the support and advice from other organisations or agencies. We will signpost our residents to these.

15. Monitoring Complaints

- 15.1 We recognise the need to monitor our complaints, both in terms of ensuring that deadlines are met, but also to determine the type of complaints we receive, trends and in which service area they relate to. Housing Managers take responsibility for complaints within their service area. Detailed timelines are produced for each complaint and these are communicated to the managers on a weekly basis so that they in turn can monitor their teams for timely responses.
- 15.2 A detailed database is held for complaints so that these can be closely monitored and areas for improvement acknowledged and proposals for solutions agreed.
- 15.3 A detailed spreadsheet with key performance indicators including complaints statistics is produced which is discussed at monthly Operational Management Team meetings.

16. Learning from Complaints

- 16.1 A new Complaints Clinic has been established where lead investigating officers can discuss cases and identify service improvements.
- 16.2 Staff training is provided at away days and for individuals or teams so that they are fully aware of the complaint process and service delivery expectations.

17. Self-Assessment

- 17.1 As part of our ongoing commitment to enhance and improve our Complaints process, we complete annually the Housing Ombudsman Self-Assessment Form and Service Improvement Plan. Once completed, these are scrutinised by our Complaints and Performance Group and CHADAB before being published on our website.

18. Confidentiality

- 18.1 Exeter City Council Housing Services complies with the collection, storage, access to, provision and disclosure of data in accordance with the Data Protection Act 2018.

19. Storing Information

- 19.1 Complaints files are confidential and are kept secure on 'OPEN Housing' the Department's database software system.
- 19.2 In line with the Retention & Disposal Policy, Ombudsman complaint files are destroyed after 6 years and all other complaint files after 3 years. This applies to electronic information as well as hard copy files.
- 19.3 We reserve the right to retain complaint information on a resident's service file because the information is relevant to the resident's relationship with the Council. This will only be considered if holding this information will not cause the complainant any undue damage or distress. However, where there is no continued need for that information, the file or information will be deleted at the same time as the complaint file. Any concerns will be raised with the Council's Data Protection lead.

20. Increasing awareness of this Policy

- 20.1 This Housing Complaints Policy will be publicised in the following ways:

- The Exeter City Council Website
- Tenant Annual Report
- InSight magazine
- Social Media₃
- Leaflets distributed by officers
- Housing Drop-In Surgeries
- Housing Complaints Stage One & Two responses
- Posters in communal spaces and Customer First (public facing service)

References:

1. <https://www.housing-ombudsman.org.uk/wp-content/uploads/2024/02/01.-Complaint-Handling-Code-09.02.24.pdf>
2. <https://exeter.gov.uk/housing/information-for-council-tenants/tenants-advice-and-information/housing-complaints-and-feedback/>
3. <https://www.facebook.com/ECCHousing>
4. [Equality and Diversity Policy September 2020 \(exeter.gov.uk\)](#)
5. [Compensation policy - Housing Ombudsman \(housing-ombudsman.org.uk\)](#)

Appendix A

Responding to Complaints

[Responding to a complaint - Housing Ombudsman \(housing-ombudsman.org.uk\)](https://www.housing-ombudsman.org.uk)

Language and tone - be open, use plain English, avoid jargon and show empathy.

Labelling - clearly label each response, for example, Stage 1, Stage 2 or your 'final' response.

Respond to the original complaint and dissatisfaction - respond to all elements of the original complaint plus any that you may have later agreed to include in the formal complaint. Set out why the complainant was dissatisfied with the previous response.

Findings and conclusions - set out your findings and conclusions on each issue referencing any evidence on which those findings are made.

Policy and law - refer to any relevant policy, procedure, legislation or good practice when explaining a decision.

Apology and explanation - acknowledge and apologise for any mistake or service failure and provide an explanation of what went wrong.

Outcome - consider the outcome the complainant is looking for and how you might be able to provide this or go some way towards providing it.

Timescales and actions - give details and timescales for any actions you plan to take, for example, inspections or repairs.

Redress - give details of any redress offered, for example, compensation, discretionary repairs or decorations, or other actions.

Learning - explain what you have learnt from the complaint and what changes or improvements will be made as a result.

Signposting - signpost the complainant to other sources of advice or support, such as Citizens' Advice, the Leasehold Advisory Service (LEASE), Shelter, Age UK, Local Government and Social Care Ombudsman (LGSCO).

Appendix B

The Member Responsible for Complaints (MRC)

The MRC's responsibilities include ensuring that our complaint handling promotes service improvement for residents and learning and business improvement for the City Council.

The role of the MRC is to champion a positive complaint handling culture and build effective relationships with complaints teams, residents, its audit and risk committees as well wider teams and the Housing Ombudsman Service.

The MRC should be looking to seek assurances from the complaints team and where appropriate the operational teams that complaints are being managed, change is happening and that residents are being heard through the process.

The role is described in detail on the Housing Ombudsman's Service website-a precis is provided below:

Responsibilities - Governing Body Assurance

1. To promote a culture of openness and transparency where complaints made by residents are seen as form of insight into the how the organisation is managed. To provide assurance that systems are in place to capture learning from complaints and that the Council Housing & Development Advisory Board (CHADAB) is engaged with this. To ensure senior level ownership of learning and accountability stemming from complaints.
2. To provide assurance to CHADAB, through engagement with operational teams, that complaints are valued as an opportunity to learn, to give an early warning of ineffective processes, policies, or behaviours, to identify areas for improvement and to improve awareness and accessibility; and how this is happening across the Council .
3. To engage with the chair of the Audit and Governance Committee, to discuss any risks emerging from complaints and any recommendations for improvement in service areas which may be relevant to internal audit's activities.
4. To engage in, oversee, and ratify the annual self-assessment against the Complaint Handling Code, providing assurance that an accurate self-assessment is produced and published each year. This may include engaging residents in the self-assessment exercise.

5. To alert CHADAB of any concerns they have about the handling of complaints, the substantive issues giving rise to complaints, or the outcome of an individual complaint.
6. To ensure CHADAB understands its responsibilities to deliver a positive complaint handling culture and that complaints are given the status they deserve within the senior leadership's work.

Responsibilities - Complaint Handling Code

7. To review the communication of the Housing Services through its complaints to ensure it is empathetic, effective, and appropriate.
8. To gain assurance of the organisation's timely compliance with Housing Ombudsman evidence requirements and orders promoting a Council wide culture that demonstrates the learning and the changes to services that are provided for residents.
9. To promote a culture where every employee supports effective complaint handling, where complaint handlers have the authority and respect within the Council to help put things right when they go wrong. This should also extend to where we use contractors and other service providers. To have a visible presence that is organisation wide and has access to individual staff members to be able to 'test' that proactive complaint handling is embedded across all staff.
10. To gain assurance following the self-assessment, that the complaints team has the resources available to fulfil its obligations.
11. To receive regular updates on the volume, categories, and outcome of complaints, alongside complaint handling performance and take an inquisitorial approach when reviewing this information. The aim is to ensure that information presented to the governing body, provides sufficient assurance of a well-managed and customer focused complaints handling culture.

Responsibilities - Learning

12. To commission from the executive a self-assessment against Housing Ombudsman Spotlight reports and future good practice and facilitate a discussion with the CHADAB on how Housing Services can learn and improve from its recommendations. This should include consideration of relevant policies and procedures.
13. To require intelligence provided by the Housing Ombudsman is used to develop and improve services, gaining assurance that recommendations are actioned and, where necessary, reviewing policies, procedures and approaches to service delivery following Ombudsman reports.
14. To encourage a culture of effective cross-organisational and cross-department learning where operational teams collaborate with each other to produce improved service delivery.

15. To encourage a culture where senior management regularly review issues and trends arising from complaint handling with themes or trends being assessed and reported to CHADAB, which identify potential systemic issues, serious risks or policies and procedures that require revision. To gain assurance that where revision or change is required, this is followed through and communicated to CHADAB and that residents are central to any change.

Equality Impact Assessment (EqIA)

Please refer to the [Equality Impact Assessments \(EQIAs\)](#) form for details on how to complete.

The aim of an equality impact assessment is to consider the equality implications of any decision (e.g. new or revised policy, process, project, function, or service) on different groups of people including employees and customers. This document helps to evaluate whether the decision may inadvertently disadvantage groups of people and identify ways to avoid discrimination and proactively advance equality.

1. Details of the proposal

Name of the proposal:	Corporate Complaints Policy (Revised 2026)
Version number:	1
Does this proposal impact on people?	Choose an item: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Explain your answer whether 'yes' or 'no'	The policy affects access and inclusion, including digital exclusion considerations, with regards to corporate complaints
Is this a new or existing policy/project/service?	Choose an item: <input type="checkbox"/> New <input checked="" type="checkbox"/> Existing
Person responsible for the proposal:	Stephen Clayton
Person responsible for the EqIA (if different to above)	
Proposal start date:	08/04/2026
When will this proposal be implemented?	08/04/2026
Briefly describe the aims and objectives of the proposal	Ensure LGSCO compliance, accessibility, governance, fairer inclusive complaint handling, greater alignment with Housing Policy

What are the anticipated outcomes of the proposal?	As above
Who is likely to be affected by the proposal?	You can select multiple options: <input type="checkbox"/> Staff <input checked="" type="checkbox"/> Service users <input type="checkbox"/> Wider community
How are they likely to be affected?	Clarity around access and addressing barriers for digitally excluded.
Is this proposal going to be approved by SMB, Executive or Council?	Select: <input type="checkbox"/> SMB <input type="checkbox"/> Executive <input checked="" type="checkbox"/> Council
When is the proposal going to SMB, Executive or Council?	17/03/2026

3. Consultation & Engagement

You will nearly always need to involve and consult with stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal. This should include the individuals/groups who are affected by your proposal. Any proposal for consultation or engagement must be done via the [Consultation and Engagement Form](#).

<p>How are you communicating with the individuals/teams who are affected by your proposal?</p> <p>You can select multiple options:</p> <input checked="" type="checkbox"/> Social media <input checked="" type="checkbox"/> Focus groups – once agreed <input checked="" type="checkbox"/> Website <input type="checkbox"/> Mail drop <input type="checkbox"/> Via community group <input type="checkbox"/> Other (please describe):
--

4. Impacts on People

How will the proposed change affect people with protected characteristics? Make sure that you assess the impact based on evidence.

- Who will benefit, who won't, who can access, who can't access, who is at an advantage, who is at a disadvantage?
- What evidence has been used for this assessment? For example, employee diversity data, national statistics, customer survey, feedback etc. [Sources of equality data](#) are available on Sharepoint. (Please don't include any information that risks identifying people such as names, or the diversity data, if less than six people).

Note: You can copy and paste more rows underneath each protected characteristic if there is more than one impact

How will this proposal affect people with protected characteristics?	Identify Impact:	Why will it have this effect? Use the evidence collated, any engagement or consultation to inform your thinking and record it here. Have you identified any gaps in evidence, if so, what are the gaps? Does this need to be incorporated in the action plan?
Age	Positive (Is an improvement)	According to research commissioned by the Council 9.9% of older residents lack internet; The policy's explicit acceptance of complaints made " <i>however made</i> " (phone/post/in-person) and reasonable adjustments reduces these barriers.
Disability: including sensory, mobility, mental health, neurodiversity, long term ill health	Positive (Is an improvement)	Disability is a core driver of digital exclusion, with NHS reporting that 69% of those lacking digital skills are disabled. The policy's commitments—reasonable adjustments, multiple channels, permitted advocates, and alternative formats—address these barriers directly.
Gender reassignment	No Impact	No evidence of disproportionate digital exclusion or policy barrier.
Marriage and Civil partnership (work related only)	Choose an item.	No evidence of disproportionate digital exclusion or policy barrier.

How will this proposal affect people with protected characteristics?	Identify Impact:	Why will it have this effect? Use the evidence collated, any engagement or consultation to inform your thinking and record it here. Have you identified any gaps in evidence, if so, what are the gaps? Does this need to be incorporated in the action plan?
Pregnancy & Maternity	Positive (Is an improvement)	Flexible channels (phone, assisted, written) support those with restricted mobility or limited time capacity due to childcare responsibilities.
Race: including ethnic origin, nationality/national origin	Positive (Is an improvement)	Language barriers may impact using websites and completing online forms, resulting in reliance on face-to-face or phone-based communication The policy addresses this by: <ul style="list-style-type: none"> • Allowing all channels • Supporting advocates • Improving written clarity • Offering reasonable adjustments and multilingual formats if requested
Religion or Belief	No Impact	No evidence of disproportionate impact.
Sex	No Impact	No evidence of disproportionate impact.
Sexual Orientation	No Impact	No evidence of disproportionate impact.
Intersectionality: Could this proposal have an impact on people who have a combination or intersection of two or more characteristics?	Positive (Is an improvement)	National research finds digital exclusion is concentrated where multiple disadvantages overlap : <ul style="list-style-type: none"> • poverty • housing insecurity • disability • ethnicity • low educational attainment (LGA)

How will this proposal affect people with protected characteristics?	Identify Impact:	Why will it have this effect? Use the evidence collated, any engagement or consultation to inform your thinking and record it here. Have you identified any gaps in evidence, if so, what are the gaps? Does this need to be incorporated in the action plan?
		The policy's emphasis on flexible channels and adjustments mitigates combined digital and social barriers.

7. Outcome of Assessment

Select one of the following options:	Tick the relevant box
No barriers identified, proceed with proposed change.	<input checked="" type="checkbox"/>
Adjust the proposal/policy to remove barriers identified by the EqIA.	<input type="checkbox"/>
Continue with the proposal/policy despite potential for adverse impacts.	<input type="checkbox"/>
Stop the proposal/policy as there are adverse impacts that cannot be prevented/mitigated or justified.	<input type="checkbox"/>
<p>Please explain why the option has been chosen:</p> <p>The policy provides clarity for groups facing digital exclusion, meets equalities legal duties and LGSCO guidance around accessibility, and aligns with evidence in the digital exclusion research.</p>	

8. Action Plan

Considering the impacts, you have identified above, please detail any actions you will need take to remove barriers, eliminate negative impacts or maximise opportunities. (Add more rows if required). If an action is to meet the needs of a particular protected group please specify this. These actions should be included in your Service Plan.

Action(s) to be taken.	Expected Outcomes	Responsible Person	Timescale	Progress	Complete
Ensure non-digital complaints routes are clearly promoted alongside online form	Mitigates exclusion for 10–15% digitally excluded residents	Head of Service – Customers & Communities	April 2026		
Record all reasonable adjustments and support needs on case files	Supports disabled and digitally excluded residents	Customer Experience Manager	April 2026		
Develop internal guidance and training for staff on supporting residents with low digital skills and inclusive communication	Ensures equity and consistency	Head of Service – Customers & Communities	Q3 2026		

9. Monitoring

How will you monitor the impact of your proposed change once it has been implemented? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective and your approach is still appropriate. Include the timescale for review in your action plan above.

- Tracking complaints by access channel
- Monitoring uptake of reasonable adjustments
- Review of equalities patterns logged in complaints data
- Annual EqIA refresh aligned with LGSCO self-assessment

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REPORT TO EXECUTIVE

Date of Meeting: 17 March 2026

Report of: Strategic Director - People and Community

Title: Gender Pay Gap Report

Is this a Key Decision?

No

Is this an Executive or Council Function?

Executive

1. What is the report about?

1.1 The Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017 require local authorities which employ over 250 or more employees to produce gender pay gap information relating to employees. The specific requirements are set out in the Regulations which compares the difference in pay between females and males.

1.2 The Act requires that an authority must report on the following information: (see Appendix 1)

- their mean gender pay;
- their median gender pay gap;
- their mean bonus gender pay gap;
- their median bonus gender pay gap;
- their proportion of males receiving a bonus payment;
- their proportion of females receiving a bonus payment; and
- their proportion of males and females in each quartile pay band.

1.3 Calculations:

- Mean average involves adding up all of the numbers and dividing the result by how many numbers were in the list.
- Median average involves listing all of the numbers in numerical order. The median is the middle figure.

1.4 Exeter City Council does not operate any bonus schemes.

1.5 The relevant or snapshot date is the key date on which the calculations must be made. The relevant date is 31st March 2025. It is also the date from which an employer has a year to publish their gender pay report.

2. Recommendations:

2.1 That Executive note:

(1) the following findings:

For enquiries please contact: democratic.services@exeter.gov.uk

- the average rate of pay for females remains higher than males across the Council;
- the mean average difference has increased since last year from 5.07% to 6.68%;
- the median average difference has decreased since last year from 14.03% to 11.85%; and
- there are nearly 3 times more males in the lower quartile of earnings than females.

(2) that the Council will publish its Gender Pay Gap Report on the Exeter City Council website and on the national database on gov.uk.

(3) that this report will be reviewed annually to track the relationship between both female and male earnings.

3. Reasons for the recommendation:

3.1 The Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017 require local authorities which employ over 250 or more employees to produce gender pay gap information relating to employees. The specific requirements are set out in the Regulations which compares the difference in pay between females and males

4. What are the resource implications including non-financial resources:

4.1 There are no new resource implications created as a result of the revisions to the Gender Pay Gap Report.

5. Section 151 Officer comments:

5.1 There are no financial implic

6. What are the legal aspects?

6.1 The Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017 require local authorities which employ over 250 or more employees to produce gender pay gap information relating to employees. The specific requirements are set out in the Regulations which compares the difference in pay between females and males.

7. Monitoring Officer's comments:

7.1 The Monitoring Officer has no additional comments.

8. Equality Act 2010 (The Act)

8.1 In recommending this proposal no potential impact has been identified on people with protected characteristics as determined by the Act because, although not directly connected to the gender pay gap the principles of equal pay are integral to this report and applied consistently within the pay and reward frameworks adopted by Exeter City Council. The definition of Equal Pay is:

- like work where the woman and the man are doing the same job;
- work rated as equivalent where the 2 jobs are different but have been evaluated by the employer's job evaluation scheme at the same level/grade; and
- work of equal value where the jobs are different but an argument is made that both jobs should be regarded as being of equal value or worth.

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9. Carbon Footprint (Environmental) Implications:

9.1 No direct carbon/environmental impacts arising from the recommendations.

10. Report details:

10.1 The relevant date for the Gender Pay Gap Report is 31st March 2025. The results of the report need to be published before 30th March 2026.

11. How does the decision contribute to the Council's Corporate Plan?

11.1 The attached statement supports a well-run Council and our compliance with statute.

12. What risks are there and how can they be reduced?

12.1 There are no new implications arising from the recommendations.

13. Are there any other options?

13.1 None.

Strategic Director – People and Community, Jo Yelland

Author: Lydia Wilson, Head of Service - HR, Workforce Planning & OD

Local Government (Access to Information) Act 1972 (as amended)

Background papers used in compiling this report:

None

List of Appendices:

- Gender Pay Gap Report 2025

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Exeter City Council

Gender Pay Gap Report 2025

1. Gender Pay Report (31st March 2025)

Results (hourly rates to 2 decimal places)

Mean Female Pay	£18.64
Mean Male Pay	£17.47
Mean Gender Pay Gap	-6.68%

Median Female Pay	£17.42
Median Male Pay	£15.57
Median Gender Pay Gap	-11.85%

Mean Female Bonus Pay	£0.00
Mean Male Bonus Pay	£0.00
Mean Gender Pay Gap	0.0%

Median Female Bonus Pay	£0.00
Median Male Pay	£0.00
Median Gender Pay Gap	0.0%

Number of Females receiving Bonus Pay	0
Number of Males receiving Bonus Pay	0
Proportion of Females receiving Bonus Pay	0.0%
Proportion of Males receiving Bonus Pay	0.0%

Quartile	Female	Male
Lower	27.37%	72.63%
Lower Middle	45.79%	54.21%
Upper Middle	62.30%	37.70%
Upper	46.81%	53.19%

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