



A meeting of the **CORPORATE GOVERNANCE COMMITTEE** will be held in **CIVIC SUITE (LANCASTER/STIRLING ROOMS), PATHFINDER HOUSE, ST MARY'S STREET, HUNTINGDON, CAMBS, PE29 3TN** on **WEDNESDAY, 9 JULY 2025** at **7:00 PM** and you are requested to attend for the transaction of the following business:-

## **AGENDA**

### **APOLOGIES**

#### **1. MINUTES (Pages 5 - 8)**

To approve as a correct record the Minutes of the meeting of the Committee held on 18 June 2025.

**Contact Officer: Democratic Services - (01480) 388169**

#### **2. MEMBERS' INTERESTS**

To receive from Members declarations as to disclosable pecuniary, other registerable and non-registerable interests in relation to any Agenda item. See Notes below.

**Contact Officer: Democratic Services - (01480) 388169**

#### **3. UPDATE ON CODE OF CONDUCT AND REGISTER OF DISCLOSABLE PECUNIARY INTERESTS (Pages 9 - 16)**

To receive a report providing details of the current level of returns by Town and Parish Councillors and by District Councillors, and a breakdown of the adoption by Town and Parish Councils of Codes of Conduct.

**Contact Officer: S Rees(01480) 388738  
A Roberts (01480) 388015**

#### **4. GLATTON AND CONINGTON COMMUNITY GOVERNANCE REVIEW (Pages 17 - 52)**

To receive a report providing an update on the Community Governance Review (CGR) of Glatton and Conington parishes following public consultation.

**Contact Officer: L Jablonska  
(01480) 388004**

#### **5. ANTI-FRAUD, BRIBERY AND CORRUPTION STRATEGY (Pages 53 - 66)**

To receive a report presenting and seeking the endorsement of an updated Anti-Fraud, Bribery and Corruption Strategy

**Contact Officer: Contact Officer: K Kelly  
(01480) 388151**

**6. ANNUAL REVIEW OF FRAUD INVESTIGATION ACTIVITY (Pages 67 - 84)**

To receive a report which provided a summary of the activity undertaken by the Council's Corporate Fraud Team in 2024/2025.

**Contact Officer: K Kelly (01480) 388151  
P Bicknell (01480) 388194**

**7. INTERNAL AUDIT ACTIONS UPDATE (Pages 85 - 90)**

To receive a report summarising the progress in implementing management actions arising from final internal audit reports.

**Contact Officer: S Jones (01480) 388214  
D Harris 01223 455715**

**8. CORPORATE RISK REGISTER (Pages 91 - 100)**

To receive a report providing an update on the Corporate Risk Register.

**Contact Officer: S Jones  
(01480) 388214**

**9. INTERNAL AUDIT UPDATE REPORT (Pages 101 - 120)**

To receive a report setting out a summary of the work undertaken by the Internal Audit Service since the Committee last met in June 2025.

**Contact Officer: S Jones (01480) 388214  
D Harris 01223 455715**

**10. CORPORATE GOVERNANCE COMMITTEE PROGRESS REPORT (Pages 121 - 122)**

To receive the Corporate Governance Committee Progress Report.

**Contact Officer: Democratic Services - (01480) 388169**

1 day of July 2025

***Michelle Sacks***

Chief Executive and Head of Paid Service

## **Disclosable Pecuniary Interests and other Registerable and Non-Registerable Interests.**

Further information on [Disclosable Pecuniary Interests and other Registerable and Non-Registerable Interests](#) is available in the Council's Constitution

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The District Council also permits filming, recording and the taking of photographs at its meetings that are open to the public. Arrangements for these activities should operate in accordance with [guidelines](#) agreed by the Council.

**Please contact Democratic Services, Tel: (01480) 388169 / email: [Democratic.Services@huntingdonshire.gov.uk](mailto:Democratic.Services@huntingdonshire.gov.uk) if you have a general query on any Agenda Item, wish to tender your apologies for absence from the meeting, or would like information on any decision taken by the Committee/Panel.**

Specific enquiries with regard to items on the Agenda should be directed towards the Contact Officer.

Members of the public are welcome to attend this meeting as observers except during consideration of confidential or exempt items of business.

Agenda and enclosures can be viewed on the [District Council's website](#).

### **Emergency Procedure**

In the event of the fire alarm being sounded and on the instruction of the Meeting Administrator, all attendees are requested to vacate the building via the closest emergency exit.

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## HUNTINGDONSHIRE DISTRICT COUNCIL

MINUTES of the meeting of the CORPORATE GOVERNANCE COMMITTEE held in CIVIC SUITE (LANCASTER/STIRLING ROOMS), PATHFINDER HOUSE, ST MARY'S STREET, HUNTINGDON, CAMBS, PE29 3TN on Wednesday, 18 June 2025.

PRESENT: Councillor M J Burke – Chair.

Councillors J A Gray, P J Hodgson-Jones, A R Jennings, D J Shaw, I P Taylor and P Webb.

APOLOGIES An apology for absence from the meeting was submitted on behalf of Councillor N Wells.

### **4. MINUTES**

The Minutes of the meetings of the Committee held on 25 March 2025 and 15 May 2025 were approved as a correct record and signed by the Chair.

### **5. MEMBERS' INTERESTS**

No declarations were received.

### **6. UNAUDITED STATEMENT OF ACCOUNTS 2024/25**

The Committee received a report (a copy of which is appended in the Minute Book) completing the processes for publishing the Council's unaudited Statement of Accounts for 2024/25.

In setting out the report, the Corporate Director – Finance & Resources thanked the Finance Team and colleague service managers for their hard work in achieving this position. The required timetable had been met and that was a tribute to their efforts.

In response to a question regarding the term “largely consistent” which was used in the report, she clarified that it was used purely in case anything arose which the Council needed to do better. There was not anything significant that was not in line with governance requirements and in broad terms the Council complied with code of conduct regulations, but this term was used just in case there was anything that did come up.

In response to a question regarding the remit of the Risk and Controls Group and who was on it, she would come back to the Committee with more details. As the Council did not have its own risk officer, the Group had not met as frequently, however there was an advert for the role of a Risk Control Officer who, when appointed, would then reinvigorate that work being done by the Group.

Whereupon, it was

RESOLVED

- A. to consider and approve the Annual Governance Statement (Appendix 1);
- B. to consider and approve the unaudited Statement of Accounts for 2024/25 (Appendix 2); and
- C. to consider and approve the Notice of Publication (Appendix 3).

**7. EXTERNAL AUDITOR'S ANNUAL PLANNING REPORT FOR 2024/25**

The Committee received a report (a copy of which is appended in the Minute Book) which presented the External Auditor's Annual Planning Report for 2024/25.

Ms C Mellons, the Council's Audit Partner set out the report, making particular reference to the executive summary section that detailed the rebuilding of assurance, and that guidance was awaited from the national audit officer around the rebuilding of assurance around reserves. This guidance had now been released so as a firm Ernst and Young LLP were working through that.

The Corporate Director – Finance & Resources explained that an Interim Procurement Manager was in place until September 2025, and a permanent role was about to go out. The team had already recently secured 2 new Procurement Officers, and the admin supporting the team had increased so there was an increase in the roles of the Procurement area, which would be further enhanced by the appointment of a permanent Manager.

Mr D Harris, Partner, RSM UK further clarified that there was a Procurement Audit in the 2025/26 Internal Audit Programme.

Whereupon, it was

RESOLVED

to comment and note the External Auditor's Annual Planning Report set out at Appendix 1.

**8. INTERNAL AUDIT UPDATE REPORT**

The Committee received a report (a copy of which is appended in the Minute Book) which set out a summary of the work undertaken by the Internal Audit Service since the Committee last met in March 2025.

Mr D Harris, Partner, RSM UK set out the report and commented that at the time of the publication of the papers, Cyber Essentials readiness was a draft; this had since been finalised which completed the programme of work that was brought to the Committee in the February and March meetings, which was positive.

The Chair thanked the team for their work.

In response to a question concerning the Commercial Estates Report which was listed in the papers as “Limited Assurance”, the Chief Executive clarified that every single report identifying weakness was taken very seriously. Furthermore, some of the proposed areas for internal audit were proposed by herself and the Corporate Director – Finance & Resources because of the seriousness which they took around the internal audit function, and she wanted to give this strong assurance to the Committee.

The Corporate Director – Finance & Resources also commented regarding the Commercial Estates Report and explained that a slightly revised approach was presented to the Corporate Leadership Team as to how to segment some of this work, particularly with regard to rent reviews, so there had been immediate steps taken to add some strategic resource. Recruitment had closed in the previous week which shortlisted for a further Estates Officer, and alternatives were being looked at to ensure the Council was maximising assets and making sure we were about all of our properties, not only to support the valuation work but also preparations for LGR, where it was essential that the Council was clear about the state of its properties and rent reviews. It was clear that the Council needed to make the most of its assets, and that this work was done with appropriate diligence.

In response to a request from the Committee, the Corporate Director – Finance & Resources and Mr D Harris, Partner, RSM UK would reflect on how to include more detail in the reports, rather than a summary of them.

In response to a question from Councillor Gray, the Chief Executive clarified that the Internal Governance Board meetings were formally Minuted and an action log reviewed in terms of actions arising, so that due diligence was followed and there was an evidence based structure in case any issues did arise.

Whereupon, it was

RESOLVED

to comment and note the update on work undertaken by Internal Audit in the period from March 2025 to June 2025.

## **9. DRAFT ANNUAL INTERNAL AUDIT REPORT 2024/25**

The Committee received a report (a copy of which is appended in the Minute Book) which set out the draft Annual internal audit report for 2024/25, based on the professional judgement of the partner from RSM acting in the capacity of Head of Internal Audit.

In response to a question from Councillor Gray as to whether reassurance could be given that the recommended actions with regards to the One Leisure Pool Operations have been dealt with, the Chief Executive would provide a written response to the Committee with further details.

Whereupon, it was

RESOLVED

to note, comment and accept the draft Annual internal audit report for 2024/25.

**10. CORPORATE GOVERNANCE COMMITTEE PROGRESS REPORT**

The Committee received and noted a report (a copy of which is appended in the Minute Book) on progress of actions in response to any decisions taken at previous meetings.

In response to a question from Councillor Gray, the Chief Executive commented that under the current Government timescales, HDC would be fully operational until 1 April 2028, so if there were any elements in the Constitution that needed to be addressed, they would be addressed. This was important in delivering good governance and effective decision making. She agreed with the suggestion that if things did need to be done before 2028, the pace could be picked up with regards to the Working Group. Furthermore, the new Monitoring Officer would be all over this as part of their role.

Chair

**Public**  
**Key Decision - No**

## HUNTINGDONSHIRE DISTRICT COUNCIL

<b>Title/Subject Matter:</b>	Update on Code of Conduct and Register of Disclosable Pecuniary Interests
<b>Meeting/Date:</b>	Corporate Governance Committee – 9th July 2025
<b>Executive Portfolio:</b>	Councillor J Harvey, Executive Councillor for Governance and Democratic Services
<b>Report by:</b>	Elections and Democratic Services Manager
<b>Ward(s) affected:</b>	All Wards

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### **Executive Summary:**

The Monitoring Officer has a duty to establish and maintain a register of Disclosable Pecuniary Interests (DPIs). This report provides the Committee with details of the current level of returns by Town and Parish Councillors and by District Councillors. It also contains a breakdown of the adoption by Town and Parish Councils of Codes of Conduct.

### **Recommendation:**

The Committee is

### **RECOMMENDED**

to consider and comment on the report.

## **1. PURPOSE OF THE REPORT**

- 1.1 Chapter 7 of the Localism Act 2011 requires the Monitoring Officer to establish and maintain a register of disclosable pecuniary or other interests of Members of the District Council. In addition, the District Council is responsible for maintaining the Register for Town and Parish Councils. The register is open for inspection at the District Council's offices and published on the District Council's website. Where a Town or Parish Council has a website, the District Council is required to provide that Council with the information necessary to enable it to publish their current register on its own website. Information in respect of the Disclosable Pecuniary Interests (DPIs) for each Town and Parish Council is presented in Appendix 1.
- 1.2 Each Town and Parish Council also has a duty to adopt a Code of Conduct. All Town and Parish Councils were requested to advise the Monitoring Officer when their Council had adopted a new code and to confirm whether it was identical to that adopted and promoted by the District Council or alternatively the version produced by the National Association of Local Councils (NALC) or any other.

## **2. WHY IS THIS REPORT NECESSARY/BACKGROUND**

- 2.1 The Committee is responsible for maintaining high standards of conduct by Members of the District and Town and Parish Councils, for monitoring the operation of the Code of Conduct and for considering the outcome of investigations in the event of breaches of the Code. The District Council has a duty to maintain and publish the Registers of Pecuniary Interests of the District and Town and Parish Councils. Those Members who fail to comply with the 2011 Act are guilty of an offence and liable to a maximum fine of £5,000 and disqualification for up to five years.
- 2.2 This report describes the current position in relation to both matters.

## **3. ANALYSIS**

- 3.1 All DPI forms that have been received have been published. Any changes made have also been published.
- 3.2 Of 71 Town and Parish Councils, 30 have had their full register published on the District Council's website, while 41 Parishes have published their register with vacancies. 3 of the 71 councils currently have a DPI form outstanding.
- 3.3 In terms of individual Councillors, out of 652 positions, there are 564 councillors appointed and 88 vacancies. Of the 564 councillors appointed, 560 have a DPI form registered, and 4 councillors (from 3 councils) currently having an outstanding DPI form. The up-to-date position on each Council is noted in Appendix 1. It is unlikely that there will ever be a complete return at any one time because of the ever-changing Parish Council membership.

- 3.2 All District Councillors' DPI forms are uploaded onto the Council's website.

#### **4. KEY IMPACTS / RISKS**

- 4.1 The Democratic Services Team regularly requests updates from those Parish Councils where DPIs are outstanding. Similarly, incomplete or inaccurate forms are returned to Parish Councils with a request to revise and return. All Parish Councils are asked twice a year to verify details held by the District Council regarding DPIs and the Code of Conduct adopted by each Parish Council.

#### **5. WHAT ACTIONS WILL BE TAKEN/TIMETABLE FOR IMPLEMENTATION**

- 5.1 Parish Clerks are regularly reminded by email to submit DPI forms as soon as possible following any changes.

#### **6. LINK TO THE CORPORATE PLAN, STRATEGIC PRIORITIES AND/OR CORPORATE OBJECTIVES**

- 6.1 This aligns with Priority 3: Doing our core work well as set out in the Corporate Plan 2023 to 2028, ensuring that we are delivering good quality, high value-for-money services with good control and compliance with statutory obligations. By ensuring that DPIs are published, the Council is supporting local accountability and transparency in decision making which contributes to the objective to develop stronger and more resilient communities to enable people to help themselves.

#### **7. LEGAL IMPLICATIONS**

- 7.1 There is no legal obligation upon a Town or Parish Council to notify the Monitoring Officer that it has adopted a Code of Conduct. Records indicate, however, that all Town and Parish Councils have adopted a Code. Of 71 Town and Parish Councils, 17 have adopted one based on that adopted by the District Council. 47 have adopted the Local Government Association Model Code, 5 Councils have opted for the Code promoted by NALC, and two have adopted their own version of the Code. The up-to-date position on each Council is noted in Appendix 2.

#### **8. REASONS FOR THE RECOMMENDED DECISIONS**

- 8.1 The Committee take a role in maintaining high standards of conduct by elected Members and monitoring the Code of Conduct.

#### **9. LIST OF APPENDICES INCLUDED**

Appendix 1 - Town and Parish Councils Disclosable Pecuniary Interests (DPI) forms.

Appendix 2 - Town and Parish Council New Standards Regime and Code of Conduct.

## **10. BACKGROUND PAPERS**

None.

### **CONTACT OFFICER**

Name/Job Title: Simon Rees – Member Development and Support Officer  
Tel No: 01480 388738  
Email: [Simon.Rees@huntingdonshire.gov.uk](mailto:Simon.Rees@huntingdonshire.gov.uk)

### Town and Parish Councils' Disclosable Pecuniary Interests (DPI) forms

No	Town/Parish Council	No of Councillors	DPIs Received	Current Vacancies	DPIs Outstanding
1	Abbots Ripton	6	3	1	2
2	Abbotsley	7	7	0	0
3	Alconbury	11	11	0	0
4	Alconbury Weston	7	3	4	0
5	Alwalton	5	5	0	0
6	Barham & Woolley	5	5	0	0
7	Bluntisham	11	11	0	0
8	Brampton	15	15	0	0
9	Brington & Molesworth	5	5	0	0
10	Broughton	7	7	0	0
11	Buckden & Diddington	15	13	2	0
12	Buckworth	5	4	1	0
13	Bury	9	8	1	0
14	Bythorn & Keyston	5	5	0	0
15	Catworth	7	2	5	0
16	Colne	9	9	0	0
17	Conington	5	5	0	0
18	Earith	11	11	0	0
19	Easton	5	5	0	0
20	Ellington	7	7	0	0
21	Elton	9	8	1	0
22	Farcet	11	6	5	0
23	Fenstanton	13	9	4	0
24	Folksworth & Washingley	9	9	0	0
25	Glatton	5	4	1	0
26	Godmanchester	17	14	3	0
27	Grafham	7	7	0	0
28	Great Gidding & Little Gidding	7	4	3	0
29	Great Gransden	9	9	0	0
30	Great Paxton	9	9	0	0
31	Great Staughton	9	9	0	0
32	Hail Weston	7	6	1	0
33	Hemingford Abbots	7	5	2	0
34	Hemingford Grey	13	9	4	0
35	Hilton	9	9	0	0
36	Holme	9	9	0	0
37	Holywell-cum-Needlingworth	13	11	2	0
38	Houghton & Wyton	9	7	2	0
39	Huntingdon	19	18	1	0
40	Kimbolton & Stonely	11	10	1	0
41	Kings Ripton	5	4	1	0
42	Leighton Bromswold	7	5	2	0

## Appendix 1

43	Little Paxton	15	12	3	0
44	Offord Cluny & Offord Darcy	11	6	4	1
45	Old Hurst	7	5	2	0
46	Old Weston	7	5	2	0
47	Perry	9	8	1	0
48	Pidley-cum-Fenton	7	7	0	0
49	Ramsey	17	17	0	0
50	Sawtry	15	15	0	0
51	Sibson-cum-Stibbington	7	7	0	0
52	Somersham	15	10	5	0
53	Southoe & Midloe	7	4	2	1
54	Spaldwick	7	6	1	0
55	St Ives	17	17	0	0
56	St Neots	21	21	0	0
57	Stilton	11	9	2	0
58	Stow Longa	5	3	2	0
59	The Stukeleys	9	8	1	0
60	Tilbrook	5	5	0	0
61	Toseland	5	3	2	0
62	Upton & Coppingford	5	5	0	0
63	Upwood & The Raveleys	9	8	1	0
64	Warboys	15	14	1	0
65	Waresley-cum-Tetworth	5	3	2	0
66	Wistow	7	5	2	0
67	Woodhurst	7	5	2	0
68	Woodwalton	5	1	4	0
69	Wyton on the Hill	7	6	1	0
70	Yaxley	17	17	0	0
71	Yelling	7	6	1	0

	<b>Totals</b>	<b>652</b>	<b>560</b>	<b>88</b>	<b>4</b>
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## Town and Parish Council New Standards Regime and Code of Conduct

No	Town/Parish Council	HDC Code	NALC Code	LGA Model Code	Own Code
1	Abbots Ripton			X	
2	Abbotsley			X	
3	Alconbury	X			
4	Alconbury Weston		X		
5	Alwalton			X	
6	Barham & Woolley	X			
7	Bluntisham			X	
8	Brampton			X	
9	Brington & Molesworth			X	
10	Broughton			X	
11	Buckden			X	
12	Buckworth	X			
13	Bury			X	
14	Bythorn & Keyston	X			
15	Catworth			X	
16	Colne				X
17	Conington			X	
18	Earith			X	
19	Easton	X			
20	Ellington			X	
21	Elton			X	
22	Farcet			X	
23	Fenstanton			X	
24	Folksworth & Washingley		X		
25	Glatton			X	
26	Godmanchester			X	
27	Grafham	X			
28	Great & Little Gidding	X			
29	Great Gransden				X
30	Great Paxton			X	
31	Great Staughton			X	
32	Hail Weston			X	
33	Hemingford Abbots			X	
34	Hemingford Grey			X	
35	Hilton			X	
36	Holme			X	
37	Holywell cum Needingworth			X	
38	Houghton & Wyton			X	
39	Huntingdon	X			
40	Kimbolton & Stonely	X			
41	Kings Ripton	X			
42	Leighton Bromswold	X			
43	Little Paxton			X	
44	Offord Cluny & Offord Darcy			X	

## Appendix 2

45	Old Hurst			X	
46	Old Weston			X	
47	Perry			X	
48	Pidley cum Fenton			X	
49	Ramsey	X			
50	Sawtry			X	
51	Sibson cum Stibbington	X			
52	Somersham			X	
53	Southoe & Midloe			X	
54	Spaldwick			X	
55	St Ives			X	
56	St Neots			X	
57	Stilton			X	
58	Stow Longa	X			
59	The Stukeleys			X	
60	Tilbrook			X	
61	Toseland			X	
62	Upton & Coppingford	X			
63	Upwood & The Raveleys			X	
64	Warboys	X			
65	Waresley cum Tetworth		X		
66	Wistow			X	
67	Woodhurst		X		
68	Woodwalton		X		
69	Wyton on the Hill	X			
70	Yaxley			X	
71	Yelling			X	
	<b>Totals</b>	<b>17</b>	<b>5</b>	<b>47</b>	<b>2</b>

**Public**  
**Key Decision – No**

## **HUNTINGDONSHIRE DISTRICT COUNCIL**

<b>Title/Subject Matter:</b>	Community Governance Review – Glatton and Conington Parishes Consultation Response
<b>Meeting/Date:</b>	Corporate Governance Committee – 9th July 2025
<b>Executive Portfolio:</b>	Councillor J Harvey – Executive Councillor for Governance and Democratic Services
<b>Report by:</b>	Elections and Democratic Services Manager
<b>Ward affected:</b>	Stilton, Folksworth & Washingley

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### **Executive Summary:**

The purpose of this report is to update Members on the Community Governance Review (CGR) of Glatton and Conington parishes following public consultation.

The report sets out the outcome of the consultation with responses received and further guidance on the CGR process in order to assist the Committee in determining a way forward for final decision.

### **Recommendation(s):**

The Committee is

### **RECOMMENDED**

to consider the request to amend the parish boundaries of Glatton and Conington and to decide (and provide reasons) to either –

- (a) recommend to the Council the drafting of a Reorganisation of Community Governance Order for the amendment of the parish boundaries between the parishes of Glatton and Conington; or
- (b) decline to recommend to the Council the drafting of a Reorganisation of Community Governance Order for the amendment of the parish boundaries between the parishes of Glatton and Conington.

## **1. PURPOSE OF THE REPORT**

- 1.1 The purpose of this report is to consider the outcome of the consultation exercise undertaken as part of the Community Governance Review (CGR) following the request received from Glatton Parish Council to review the parish boundary between Glatton and Conington parishes.
- 1.2 The Committee is requested to determine whether to proceed with making recommendations for amendments to the parish boundaries or whether to make no changes to the existing parish boundaries. The Committee should provide reasons for taking their decision.

## **2. BACKGROUND**

- 2.1 The Local Government and Public Involvement in Health Act 2007 (“the 2007 Act”) provides for a Principal Council to conduct a review of the community governance arrangements for the whole or part of its area for the purpose of considering whether or not to make changes to parish boundaries or size and/or the creation of new parishes; and the review of the electoral arrangements for new and/or existing parishes.
- 2.2 On 17th April 2024 a request was received from Glatton Parish Council following a resolution at a meeting of the Parish Council on 1st March 2024 for Huntingdonshire District Council to review the parish boundary between Glatton and Conington.
- 2.3 The Committee at their meeting on 25th September 2024 declined to instigate a CGR and requested that Glatton Parish Council either seeks to reach an agreement with Conington Parish Council and/or submit a petition to the Council with the requisite number of signatories from the area expressing support for the proposed boundary change. This was as a result of the response provided by Conington Parish Council stating that it “preferred to respect the historical boundaries and maintain the status quo”.
- 2.4 A valid community governance petition was submitted by Glatton Parish Council on 12th November 2024. A principal council is under a duty to carry out a CGR if it receives a valid petition. The petition set out that the review was to consider the alteration of boundaries of existing parishes of Glatton and Conington.
- 2.5 The Terms of Reference of the CGR were approved at the meeting of the Committee on 29th January 2025 and were published on 3rd February 2025. The maps set out in the Terms of Reference detailing the proposals are attached for completeness at Appendices A and B.

## **3. CONSULTATION**

- 3.1 Public consultation opened on 3rd February 2025 and details were published on the District Council’s website with an e-form for submission of comments, also shared directly with Glatton and Conington parishes and they were encouraged to publicise the review locally.

- 3.2 The consultation was open for submissions for a period of eight weeks and closed on 31st March 2025. In total, 82 responses were received, with a split of 53 for and 29 against the proposal to amend the boundaries. The responses have been anonymised and summarised in the Appendices C and D attached.
- 3.3 The Council is required to ensure that community governance within the area under review will be reflective of the identities and interests of the community in that area and effective and convenient. In doing so, a CGR is required to take account of –
- The impact of community governance arrangements on community cohesion; and
  - The size, population and boundaries of a local community or parish.
- 3.4 The impact on community cohesion is linked specifically to the identities and interests of local communities. The Guidance states that *“In many cases a boundary change between existing parishes, or parishes and unparished areas, rather than the creation of an entirely new parish, will be sufficient to ensure that parish arrangements reflect local identities and facilitate effective and convenient local government”*. It also provides an opportunity to put in place strong boundaries and remove anomalous boundaries.

#### **4. KEY IMPACTS**

- 4.1 Undertaking a CGR gives residents the opportunity to engage with local democracy and help determine parish boundaries. The Council has the power to amend parish boundaries. Any changes to parish boundaries as a result of a Council decision will come into effect at the next scheduled Parish elections in May 2026.

#### **5. WHAT ACTIONS WILL BE TAKEN**

- 5.1 Members are requested to consider the responses received to the public consultation exercise and determine whether or not it wishes to recommend to Council changes to the parish boundaries and reasons for their recommendations.

#### **6. LINK TO THE CORPORATE PLAN, STRATEGIC PRIORITIES AND/OR CORPORATE OBJECTIVES**

[\*\(See Corporate Plan\)\*](#)

- 6.1 The undertaking of a Community Governance Review aligns with Priority 2: Creating a better Huntingdonshire for future generations set out in the Corporate Plan 2023 to 2028.

#### **7. LEGAL IMPLICATIONS**

- 7.1 The Council has power under Section 82 of the Local Government and Public Involvement in Health Act 2007 to conduct CGRs. A CGR must be

conducted in accordance with the requirements set out in Chapter 3 of Part 4 of the Local Government and Public Involvement in Health Act 2007 (as amended) and guidance issued by the Secretary of State under Section 100(4) of the 2007 Act. These requirements are highlighted in section 3 of this report.

## **8. RESOURCE IMPLICATIONS**

- 8.1 There are no significant resource implications arising from this report.

## **9. REASONS FOR THE RECOMMENDED DECISIONS**

- 9.1 There is a requirement to keep community governance under review to ensure that it is reflective of the identities and interests of the community in that area and is effective and convenient.
- 9.2 The Committee is required to consider the outcome to the public consultation exercise of the Community Governance Review of Glatton and Conington parish boundaries and based upon the responses received, and taking into account the legislation and guidance, whether it wishes to proceed to recommend to Council or not the amendment of the parish boundaries.

## **10. LIST OF APPENDICES INCLUDED**

Appendix A – Glatton Boundary  
Appendix B – Conington Boundary  
Appendix C – Responses from public consultation for proposals  
Appendix D – Responses from public consultation against proposals

## **11. BACKGROUND PAPERS**

[Local Government and Public Involvement in Health Act 2007](#)  
[Communities and Local Government - Guidance on community governance reviews](#)

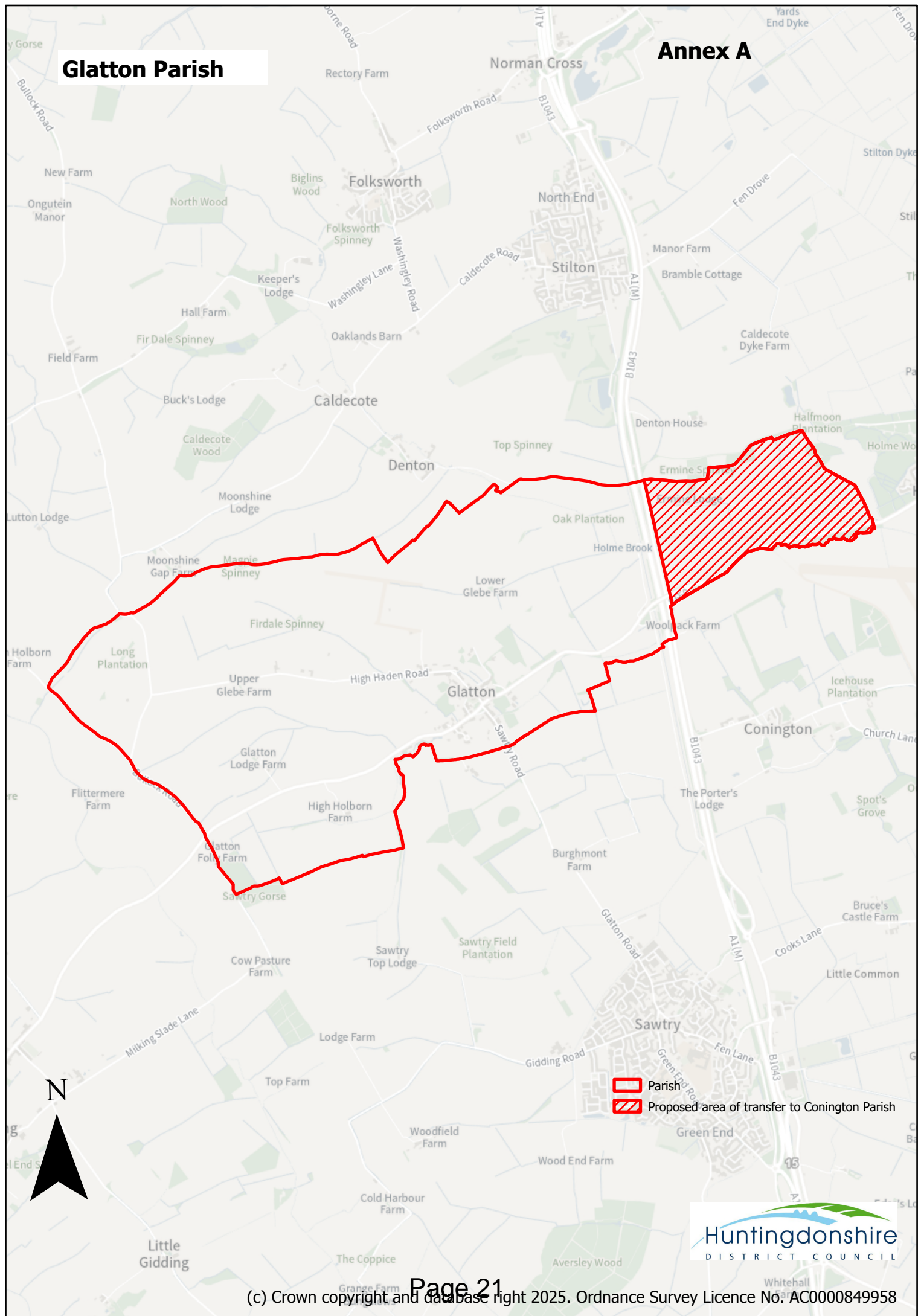
Report and Minutes of the Corporate Governance Committee – 25th September 2024 and 29th January 2025

### **CONTACT OFFICER**

Name/Job Title: Lisa Jablonska, Elections and Democratic Services Manager  
Tel No: (01480) 388004  
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# Glatton Parish

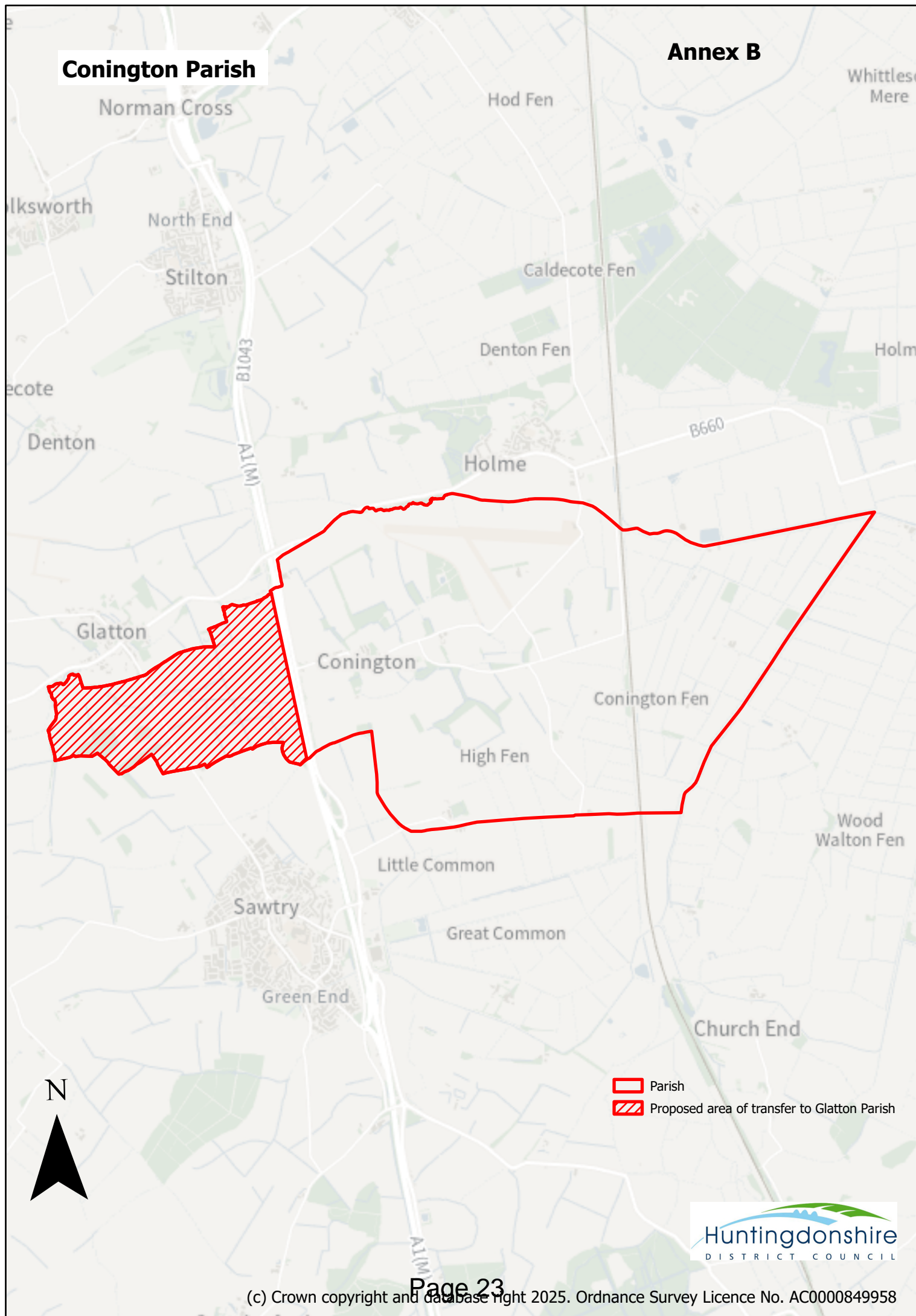
## Annex A



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# Conington Parish

## Annex B



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## ANNEX D - RESPONSES AGAINST GLATTON & CONINGTON PROPOSALS

RESPONDENT	ADDRESS	COMMENTS
Miss D	Resident of Conington	I strongly object to the proposed boundary changes. As a resident of Conington for over 30 years, I have built my life and raised my son in this village. I do not support any changes to Conington's boundaries, nor do I want to see Roundhill transferred to a neighbouring parish. These changes are unnecessary and unwelcome. I urge decision-makers to reconsider. Thank you
Mr V	Resident of Conington	What a waste of public funds this proposal seems to be. The time, energy and financial cost of having the boundaries changed would be better spent on local initiatives that could improve the lives of both Glatton and Conington communities. The boundaries have been in place for hundreds of years, and like many other parishes up and down the country, are occasionally dissected by roads, railways and water courses. I sincerely hope common sense prevails and this whimsical notion is put to bed.

Mr R	Resident of Conington	As a Conington parishioners I would like to keep the boundaries of our parish the same as they are now and have been for hundreds of years. Glatton has no right to change them. I have every faith in our parish chairperson and members to doing a good job of running our parish and all matters that arise.
Mr P	Resident of Conington	With regards the suggested boundary change I have no objections unless the review process is going to cost money. Whilst the change would look aesthetically pleasing on a map I cannot see any benefits to Conington parish. Glatton parish may consider itself in a stronger position regarding development along the Sawtry to Glatton road but the government's plans to cut red tape will negate this advantage and therefore I believe it will not be a cost effective exercise.
Mrs B	Resident of Conington	Please leave as is, no need to waste time or money in making a change.
MR D	Resident of Conington	I formally object to any proposed changes to the parish boundaries in the area where I have lived since 2008. Conington's ancient boundaries have remained unchanged for over 1,000 years, preserving the village's rich history and natural beauty. These boundaries are an essential part of our heritage, and

		<p>there is no justifiable reason to alter them now.</p> <p>As a small community with limited amenities, we already share resources with our neighbouring parishes. Our historical boundaries are one of the few defining aspects of Conington, and they should be safeguarded.</p> <p>Conington Round Hill is important due to its historical and archaeological significance. As a prominent landscape feature, it holds cultural value and may have ancient origins, contributing to the rich heritage of the area.</p> <p>Governance and Land Swap Concerns- It has come to our attention that Glatton Parish wishes to alter our ancient boundaries due to concerns over potential future development. However, Conington Parish Council, along with its residents, has no plans to develop or modify the land within our boundaries. This area is one of natural beauty, historical significance, and archaeological importance, and we take great care and pride in preserving it. Conington Parish Council currently maintains these boundaries and ensures the needs of all parishioners are met. A land swap would offer no benefits to either Conington or Glatton and would</p>
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		<p>only serve to disrupt the historical integrity of our parish.</p> <p>Division by the A1(M) Is Not Justification for Boundary Changes.</p> <p>The presence of the A1(M) dividing the parish is not a valid reason to alter Conington's ancient boundaries. The road does not prevent the community from maintaining or enjoying the natural beauty of the area.</p> <p>Moreover, 23 other parishes in Cambridgeshire are also divided by historic roads, with 19 of them still retaining parish land on both sides. There is no logical reason why Conington's boundaries should be changed due to the existence of an established roadway, especially when similar cases across the county have preserved their historical integrity.</p> <p>Cost Concerns- The financial burden on the public purse would be significant, and in my opinion, it would be a complete waste of public resources to alter something that residents do not wish to change.</p> <p>These funds could—and should—be allocated to far more important and urgent projects within Cambridgeshire. I do not believe this expenditure can be justified.</p>
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		I strongly urge you to reconsider any changes that would impact the heritage and character of Conington.
Mr H	Resident of Glatton	I have lived in Glatton all my life I see no reason why the parish boundary now needs to be changed, there is no benefit to this being changed and I imagine this entails quite a lot of costs at a time when budgets are tight, councils are looking to save money. In the grand scheme of things, I don't see this as being one of the most important things that needs changing. I believe this is a historic parish boundary established over 1000 years ago. As for the argument that Conington Parrish's divided by the A1M does this mean that all parishes divided by motorways should have their boundaries changed, this makes no sense at all, my point is this all-costs money and I believe this money could be spent more wisely on important issues like homelessness, children in poverty, fly tipping transport etc.
Mr W	Resident of Glatton	I believe implementing this would be a waste of time and resources especially when there is so much review of councils currently taking place. These boundaries have been in place for a thousand years and has caused little issue.

Mrs O	Resident of Glatton	<p>A poll has been held this week of all Conington residents using WhatsApp. Out of 25 responses, 24 were in favour of NOT changing the boundary, and 1 was in favour of a change.</p> <p>The Parish Council ventures to suggest that this is representative of the views of the full population (approx 100 households) and that there is no appetite for disturbing the status quo.</p>
Mr S	Resident of Conington	<p>I live in the parish of Conington and had members of Glatton PC on my doorstep regarding this change, I told them that I agree with Conington PC and want no changes to our boundaries because the boundary belongs to us, not Glatton and I hope you aren't forced into an unpopular change.</p>
Mr A	Resident of Conington	<p>I do not agree to any changes. It should stay as it is.</p>
Mr & Mrs S	Resident of Conington	<p>My wife and I are totally opposed to the proposal from Glatton P.C to review and revise the boundaries of the two Parishes. There is no good reason to waste time and money on a change at present and upset and changes the historical boundaries. Should there in the future be a need to oppose developments having historic boundaries, could well be a useful feature if undisturbed.</p>

Mrs H	Resident of Conington	I feel it is a waste of money and a total waste of time.
Mrs O on behalf of Conington Parish Council:	Resident of Conington	<p>Conington Parish Council:  The Parish Council feels very strongly that this review is unnecessary and is a diversion of HDC costs and time to no benefit. Only a few households are affected and the costs and expense to be incurred are entirely out of proportion. The Council would strongly petition Huntingdon District Council to conclude that no change should be made to the boundaries.</p> <p>The area south of Glatton has been in Conington Parish for hundreds of years. The area which Glatton PC has suggested exchanging, east of the A1M and north of the B660, near Ermine Lodge Farm, does not relate to Conington any more than it does to Glatton and it is pointless to change the boundary there. Conington PC would like to continue to respect the historical boundary and the ancient connection with Conington Round Hill (within the area specified) and not change this.</p> <p>One could argue that boundary changes for Parishes that straddle the A1M (23 parishes in Cambs) should be considered but this, if it were to become a project, should be done as a wholesale exercise during or after the current Reorganisation</p>

		<p>and not by picking off small areas like this on the whim of one Parish.</p> <p>As so few properties are affected by the proposal it cannot be seen as beneficial to the majority of the general public to change the boundaries and the Parish Council would implore you to conclude this review, changing nothing, and concentrate on more pressing matters.</p>
Mrs B	Resident of Conington	<p>I was born in Conington 75 years ago and have been here since. I do not want the parish boundaries to change. The land in question has history dating back hundreds of years, which is Conington's history, not Glatton's.</p> <p>Also, I strongly object to the costs that would be involved in a change of boundaries.</p>
Mrs L	Resident of Conington	<p>I don't see any advantage in changing an historical boundary established around 1000 years ago.</p> <p>Council taxes are already increasing - why create extra unnecessary expenditure?</p>
Mr E	Resident of Conington	<p>I would like to object to the changing of the Conington Parish Council Boundary as proposed in the Community Governance Review, I can see no benefit to Conington Parish from this change and do wonder what Glatton Parish are trying to gain,</p>

		<p>I understand that the existing boundary has been in place for about 1000 years. I have lived in Conington Parish on the side of the A1 all my life and do not consider the A1 to be a boundary,</p> <p>In fact now that there is a flyover on the B660 over the A1, the A1 is less of a boundary now than it was in the past. I can only wonder why anyone would think that this process is a good way of spending rate payers money and councillors time when there are so many other issues that need attention!</p>
Mrs C	Resident of Conington	<p>I have lived in Conington since 1981 and I am writing to express my objection to the change in Parish boundaries that Glatton Parish Council are seeking. These boundaries were established some 1,000 years ago; Conington Parish and its church are actually mentioned in the Domesday Book. The land to the south of Glatton, incorporating Conington Roundhill is part of the history of Conington Parish and this historical value should be respected and kept as part of Conington itself.</p> <p>Many parishes in the county have land either side of the A1 Motorway, so the existence of this road is clearly no reason to alter boundaries.</p>

		<p>I fail to understand why Glatton Parish Council are so keen to bring about this change in boundaries as I cannot see how it would be of benefit to either parish, or their residents.</p> <p>A change in boundaries is absolutely bound to involve costs, which ultimately come from peoples Council Tax. This money would surely be better spent on other projects that would actually be of benefit to residents of both parishes.</p>
Mr B	Resident of Conington	<p>This must not go ahead.</p> <p>Conington Parish was established around 1000 years ago and there is no reason to change it.</p> <p>19 of the 23 parishes which traverse the historic Great North Road retain land either side of the A1(M) so Conington and Glatton are not and have never been unique in this regard.</p> <p>Spending even more resources on this matter is an unjustified waste of taxpayer funds and any change to boundaries will drive even more costs for HDC and all taxpayers within the district.</p> <p>So, to reiterate, I believe that the boundaries should remain where they are. No change is required nor necessary, and this should not be priority for HDC and their limited resources.</p>

Mr B	Resident of Conington	I am a Conington resident and am totally against redrawing the parish boundaries to suit the residents of Glatton.
Mr H	Resident of Conington	I don't think that the boundaries should be changed.
Mrs R	Resident of Conington	Seems to be a completely unnecessary cost and works for very little/no gain. Not sure exactly why Glatton think this would be beneficial to anyone. Why change if it is not broken?
Miss C	Resident of Conington	I do not agree with the proposed boundary change. I feel this is an unnecessary waste of taxpayers' money and an insult to assume that Conington PC would want to destroy the rural area.
Mr H	Resident of Conington	I am completely opposed to the proposed changes to Conington Parish boundaries.
Mrs C	Resident of Conington	The boundary was established 100 years ago and should remain as it is.
Mrs F	Resident of Conington	I see no good reason to change the current boundaries. The money it would cost will be much better spent on providing community services not unnecessary bureaucracy.
Dr B	Resident of Conington	I feel that the proposal to change the historic boundaries of Glatton and Conington is without merit.

		There is nothing to be gained by it and the money and time which would be spent on it could be better used on projects which would benefit the community.
Mr W	Resident of Conington	<p>I wish to reject strongly to the proposed changes to the Conington and Glatton Parish boundaries.</p> <p>I am a resident of Conington and (i) have never at any time been asked to either complete, comment, or even seen the petition that was raised, handled and submitted by Glatton Parish Council last year,</p> <p>(ii) consider this is a huge waste of Huntingdonshire District Council's meagre resources at a time of extremely difficult funding cuts, (iii) ignores 940 years of history for this parish whose boundaries stem from the Domesday book, long before the A1(M) was in place, and (iv) amounts to blatant gerrymandering of parish boundaries to include land and resident addresses who had previously been administered well by Conington (increased litter picking and local bin placement) and substitute with mainly farmland near Holme. As a Conington resident, I object strongly to this proposal, and urge HDC to save a</p>

		significant amount of money by rejecting this (wholly self-centred) parish boundary application immediately.
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Mr H	Resident of Conington	<p>Questions.</p> <ol style="list-style-type: none"> <li>1. Who owns the land to the south of Glatton?</li> <li>2. Who on Glatton PC proposed the transfer of land?</li> <li>3. What links do two these persons have?</li> <li>4. Have these people been approached by persons or businesses showing an interest in the land, to buy or develop in some way?</li> </ol> <p>I personally feel this whole proposal is needless, and is likely to be costing too much time and money to implement. Surely any money spent by the district council on this matter could be better spent, say on fixing the numerous potholes in the local villages.</p>
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## ANNEX C - RESPONSES FOR GLATTON & CONINGTON PROPOSALS

RESPONDENT	ADDRESS	COMMENTS
Mr A	Resident of Glatton	Very sensible decision to align to the A1 as boundaries.
Mr R	Resident of Glatton	I fully support the proposed changes. In my opinion it makes common sense to use the A1(M) as the boundary between Conington and Glatton now. This will allow residents to make decisions as to what happens to areas of their community directly adjacent to them.
Mr M	Resident of Glatton	As a resident of Glatton, I fully support the proposed adjustment of the parish boundary. This change will better reflect the natural connections within our community and ensure more effective local representation. Aligning the boundary with the community's identity will improve communication, decision-making, and service delivery. I believe this proposal is in the best interest of Glatton and I encourage its approval.
Mrs M	Resident of Glatton	It makes sense to change the boundary as it will make it easier to do any business involving the village and upkeep.

Mr M	Resident of Glatton	I am in support of the parish boundary as outlined in the latest Glatton Parish council proposal. The proposed new boundary would be more congruous with the present-day layout of the roads.
Mrs P	Resident of Conington	Have looked at this in detail. I can't see how it is detrimental to Conington in any way. If it helps a neighbouring village and subsequent generations, then why not?
Mrs S	Resident of Glatton	I think it makes sense to revise the boundaries to reflect the physical barrier that is the A1M so that land east of the A1 is with Conington and land to the west is within Glatton.
Mr & Mrs A	Resident of Glatton	I agree with the change of boundary for Glatton village.
Mrs R	Resident of Glatton	I support the plan for the change of the Parish boundary. The current boundary makes no sense.
Mr B	Resident of Glatton	I support the proposed Parish boundary changes. It's a sensible proposal and will benefit both Parishes.
Mr K	Resident of Glatton	I support the Parish Council's petition.
Mr W	Resident of Glatton	I wish to support the boundary change.
Mrs L	Resident of Glatton	I support the boundary change proposals for Glatton / Conington.

Mr J	Resident of Glatton	I approve of the proposed changes; they seem very logical and sensible.
Mr S	Resident of Glatton	The most sensible solution is to amend the boundaries in reflection of the physical barrier of the A1M.
Mrs W	Resident of Glatton	Support the new boundary proposal.
Mr F	Resident of Glatton	I wholly support the change of parish boundaries proposed as part of this Community Governance review. The area south of Glatton and West of the A1M is completely cut off from Conington and sits far more closely within the interests of the Glatton community.
Mrs G	Resident of Glatton	A common-sense approach.
Mr & Mrs S	Resident of Glatton	It is a good idea to change the boundary of our Parish. It makes sense and we would be able to look after our village much better.
Mrs B	Resident of Glatton	Hopefully common sense will prevail, and the boundaries will be repositioned to those illustrated on the plan.
Mr S	Resident of Glatton	It's about time that the boundaries are changed. It's been a long time coming and it makes sense that this should happen.
Mr S	Resident of Glatton	It makes sense for the boundaries to change. It should have been done years ago.
Mr A	Resident of Glatton	I fully support the proposed Parish boundary change.

Mrs A	Resident of Glatton	I agree with the proposal for change of boundary between the villages of Conington and Glatton.
Mr G	Resident of Glatton	I support the proposed changes to the parish boundaries. The proposed new boundaries are far more logical as, at present, the A1M motorway represents a clear physical barrier dividing both Glatton and Conington parishes. When the original boundaries were drawn there was no physical barrier as A1M did not exist and it would be sensible to update the boundaries to reflect the current situation.
Mr K	Resident of Glatton	I fully support the proposed boundary change.
Mrs J	Resident of Glatton	This makes perfect sense to change the Parish Boundary as marked.
Mr J	Resident of Glatton	Makes perfect sense. The exchange of areas sits well, especially given the natural divide of the A1. It's always seemed odd why the land just to south of Glatton is in Conington's boundary.
Mrs P	Resident of Glatton	I feel the boundary change should go ahead so land directly next to and in direct sight of residents in Glatton are directly involved in any developments. Conington village cannot see this land and any proposed developments would not be in the resident's direct sight due to the development of the 8-lane A1 motorway. Equally Glatton's current boundary includes land on the other side

		<p>of the A1 and service road so 10 lanes of traffic away and out of sight. Logically it makes sense for Conington to have this boundary and therefore the notification of any proposed development as it would be in their sight.</p> <p>Common sense needs to prevail with the proposed boundary change.</p>
Mrs C	Resident of Glatton	I agree with the proposed changes to the boundaries.
Mr J	Resident of Glatton	I support the change to the village boundaries for Glatton.
Mr W	Resident of Glatton	I fully support the need for a Community Governance Review and welcome the opportunity to amend the Parish Boundary between Glatton and Conington.
Mr G	Resident of Glatton	<p>The current parish boundaries are outdated. They result in present day fragmented communities, both geographically and for electoral purposes.</p> <p>The proposed boundary changes will remedy this for the benefit of all who live in the affected areas.</p>
Mrs P	Resident of Glatton	<p>The land on the 'Glatton side' of the A1 should be under the Glatton parish, and the land on the 'Conington side' of the A1 should be under the Conington parish due to the direct connection each side has. It should be considered reasonable and logical for each parish to have 'control'/ a say over the land on their respective side</p>

		of the A1 due to direct impact on the parish and those within the parish.
Mr P	Resident of Glatton	<p>I fully support the revision of the parish boundary's the current boundary was drawn before the A1 became a motorway and there is no direct access anymore for Conington Parish to enter area to the west of the A1M. Also the care and consideration of the area by Conington means litter and issues are not of interest to their parishioners. The exchange of boundaries to sit either side of the A1M is not only logical but also ensures the care and future of the areas closest to each village are under the care of each Parish. As part of the local and neighbourhood plans the area in directly next to Glatton village entrance can be influenced for things such as speed reductions, litter and future development impacting the village on the west of the A1M.</p> <p>Whereas the land to the east of the A1M should be under the care of Conington Village.</p>
Mrs F	Resident of Glatton	<p>The proposed boundary change would be eminently sensible to any neutral bystander. The part of the Conington Parish which it is proposed to become part of the Glatton Parish lies between Glatton and Sawtry. It is separated from Conington by the A1(M). Residents of</p>

		<p>Conington cannot access what is currently part of their parish without going through either Glatton or Sawtry. Vice versa the same situation applies for the part of Glatton Parish which would become part of Conington. The current situation is totally archaic and makes no sense at all following the construction of the motorway.</p>
Mrs W	Resident of Glatton	I wish to support the boundary change
Mrs S	Resident of Glatton	<p>I have the full support for the Glatton and Conington governance review. Glatton has seen many changes in the past 30 years. The continuing development of Sawtry has dramatically impacted the amount of traffic passing through the village which has a detrimental effect to the village feel. To safeguard the historic buildings and surrounding countryside in Glatton, the restructuring of the parish boundaries alongside the Glatton neighbourhood plan has the residents of Glatton full support. As seen with the neighbourhood planning village consultations and petition for boundary changes. Going forward this will help with the ownership of the environmental assets, flood plains, drainage ditches which have a huge effect for the village particularly in the past 10 years.</p>

		<p>The road from Sawtry to Glatton is a narrow country road with no footpath this hopefully could be developed with a new structure of the parish boundaries</p> <p>Increasing the wellbeing and leisure activities of the new residents Sawtry and Glatton of the already planned housing on this road the safety of the residents from Sawtry and Glatton who would be able to enjoy the countryside making this route more accessible to use. Cyclists and running clubs already use this road and improved safety would encourage more leisure activities, linking the two villages. Without the proposed Glatton parish boundary changes could help to deliver this.</p> <p>Glatton parish council are in as better position to safeguard its parish and parishioners with sustainable environmental and new infrastructure if given this opportunity to change the boundary.</p> <p>Looking at maps it makes logical sense that Glatton looks after the environment around Glatton and Conington look after Conington. The development of the A1 as it stands now split Conington parish boundary and it makes no logical sense for Conington to oversee Glatton's</p>
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		environment. The proposed exchange of land boundaries either side of the A1 has my full support.
Mr S	Resident of Glatton	I support the change in parish governance. These boundaries were drawn a long time ago and do not reflect the current geography of the area. Changing the boundaries would allow both areas to better consider what areas they want to divert their attention too and allow parishes to serve their communities better.
Mrs M	Resident of Glatton	The new boundary lay out makes much more sense and is a positive step in creating the village of Glatton an even better place to live.
Mr M	Resident of Glatton	I think this is a great idea and makes sense for the village which saw overwhelming support from over 90% of Glatton Parishioners who signed in support. The review is a significant step forward in the efforts to achieve the boundary change that has been requested and ensure our community's needs are better represented and served.
Mr S	Resident of Glatton	I support the proposed change of boundaries as they will allow both Parishes to represent the interests of the closest affected electorate.

Mrs P	Resident of Glatton	The current boundaries don't make sense. It would be more beneficial to have the A1 as a natural separator.
Mr P	Resident of Glatton	<p>This submission by Glatton Parish Council highlights the necessity of making the A1(M)— which was established after the initial boundary delineations—as the boundary between the two Parishes.</p> <p>According to Huntingdonshire District Council's own terms of reference: 'The Council will endeavour to select boundaries that are likely to remain easily identifiable and considers that parishes should reflect distinctive and recognisable communities of interest, with their own sense of identity. The feeling of local community and the wishes of local inhabitants are primary considerations in this Review.'</p> <p>Establishing the A1(M) as the boundary is both identifiable and practical. Residents directly affected by the proposed boundary change have expressed their support by signing the petition.</p> <p>Currently, the existing boundaries contradict the terms of reference since Conington land and properties to the West of the A1(M) are inaccessible without traversing Sawtry or Glatton.</p> <p>While I acknowledge the long history of both Parishes, with mentions in the</p>

		Domesday Book, certain historical aspects regarding the Parish boundaries are perplexing. For example, the timber sourced from Roundhill Woods, currently within the Parish of Conington, was used to name the 4 HMS Glatton warships, one of which was commanded by the infamous Captain William Bligh.
Mr C	Resident of Glatton	I approve of the proposed boundary change.
Mrs W	Resident of Glatton	I fully support the proposed boundary changes. The new boundaries make so much more sense, taking into account the vastly altered road network.
Mrs J	Resident of Glatton	It looks as though the A1 has created a natural boundary between Glatton and Conington. The parcels that are proposed to be changed would put land that is directly connected to the village within the parishes' control. Homes that connect directly to the new parcel would have comfort in knowing that they and their parish would be able to have their best interests covered.
Mrs G	Resident of Glatton	This is a natural progression following the upgrade of the A1M and the obvious separation from Holme/Conington.
Mr W	Resident of Glatton	A rational change that corrects historical irregularities, puts Glatton precisely at its heart and helps keep democratic processes local.

Mr B	Resident of Glatton	The proposed change makes perfect sense giving Glatton Parish Council much more control of decisions affecting water courses management of brooks that flow into and through Glatton Village and the road, verge and footpath infrastructure and management of roads leading to/from Glatton Village. This is about to become increasingly important with the imminent commencement of Sawtry's development along "Glatton Road" and its embedded primary school and with long-term aspirations to provide a cycle path/ footpath to access to it safely by Glatton's residents of all ages. The pack provided by Glatton PC is comprehensive and the rationale for the change is difficult to argue against from a logical and safety perspective! A change in the boundary not only allows better management but gives Glatton a solid platform to formulate a good quality Neighbourhood Plan to secure its future for future generations.
Mr W	Resident of Glatton	I agree with the change of boundaries proposed by Glatton Parish community.
Mr D	Resident of Glatton	I would like to wholeheartedly support the review and change of parish boundaries as proposed in this review. Given the existence of the A1 and the absolute divide that that imposes between our

		parishes, the proposals make perfect sense.
Mr H	Resident of Glatton	It would make sense to keep our borders closer, and to allow the village to decide how we expand, having borders across the other side of the A1 does not fit (in my opinion)

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**Public/Confidential(Part2)\***  
**Key Decision – No**

\* Delete as applicable

## HUNTINGDONSHIRE DISTRICT COUNCIL

**Title/Subject Matter:** Anti-Fraud, Bribery and Corruption Strategy

**Meeting/Date:** Corporate Governance Committee – 9th July 2025

**Executive Portfolio:** Resident Services and Corporate Performance  
(S. Ferguson)  
Governance and Democratic Services (J. Harvey)

**Report by:** K Kelly – Revenues and Benefits Manager

**Wards affected:** All

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### Executive Summary:

Fraud, bribery and corruption poses a significant threat to public services, diverting vital resources away from those in need and exposing Local Authorities to financial and reputational harm.

This report introduces a revised Anti-Fraud, Bribery and Corruption Strategy which has been refreshed to take account of updated best practice in fraud prevention and legislative changes, including the introduction of the failure to prevent fraud offence. This new offence, effective from 1<sup>st</sup> September 2025, seeks to hold large organisations to account if they benefit from fraud, and is intended to encourage organisations to build a strong anti-fraud culture.

The Strategy sets out how the Council will strengthen its approach to fraud, bribery and corruption, and details a plan of activities to be undertaken over the coming months to ensure that the Council has robust preventive measures in place.

### Recommendation(s):

The Corporate Governance Committee is

### RECOMMENDED

To approve the Anti-Fraud, Bribery and Corruption Strategy 2025-2028 and associated action plan.

## **1. PURPOSE OF THE REPORT**

- 1.1 The purpose of the report is to present and seek endorsement of an updated Anti-Fraud, Bribery and Corruption Strategy.
- 1.2 The strategy has been developed in response to recent changes in legislation, specifically the “failure to prevent fraud” offence which comes into force on 1<sup>st</sup> September 2025, alongside updated national guidance on counter-fraud best practice.

## **2. BACKGROUND**

- 2.1 Fraud, bribery and corruption presents a significant and evolving threat to Local Government. The Council manages substantial public resources to support its communities through the provision of vital services, which can make it a target for those intending to commit fraud.
- 2.2 When fraud occurs it diverts funds away from their intended purpose, undermining service delivery and public trust. It is therefore important that the Council periodically reviews and updates its’ approach to tackling this risk, ensuring that the organisation has a good understanding of the functions most at risk of fraud, and implements robust mitigations and controls to reduce the likelihood of occurrence.
- 2.3 Since the adoption of the previous strategy, there have been two main changes which require incorporation into an updated strategy.
  - The *Fighting Fraud and Corruption Locally Strategy*, a national framework for counter-fraud activity in local government, was updated in 2020. It emphasises the importance of strong governance, preventative action, risk-based controls and collaborative approaches.
  - The Economic Crime and Corporate Transparency Act 2023 has introduced a new “failure to prevent fraud” offence, which comes into force from 1<sup>st</sup> September 2025. The offence is intended to hold large organisations to account where a fraud is committed with the intention of benefiting the organisation or its clients.
- 2.4 In view of these developments, a review of existing arrangements has identified a need for a revised and more robust strategy that aligns with legal requirements and builds on identified best practice.

## **3. ANALYSIS**

- 3.1 The Anti-Fraud, Bribery and Corruption Strategy 2025-2028, found in APPENIDIX A, has been developed in line with best practice and legislative requirements to ensure that the Council has controls in place to protect itself from the threats presented by fraud, bribery and corruption.

- 3.2 The Strategy has also been updated to take account of the new failure to prevent fraud offence. Under the offence, an organisation may become criminally liable where an employee or other “associated person” commits a fraud *which is intended to benefit the organisation*.
- 3.3 It does not need to be demonstrated that directors or senior managers ordered or knew about the fraud in order to become liable, and neither does the intention to benefit the organisation need to be the primary motivation. Instead the offence focusses on organisations that do not have reasonable prevention procedures in place, for where such procedures are able to be evidenced, the organisation may have a valid defence.
- 3.4 The revised Strategy sets out the Council’s approach to the threat of fraud, bribery and corruption, and sets out how the organisation:
- Fosters a strong, zero-tolerance culture, with appropriate governance and oversight of counter-fraud activities.
  - Aligns with statutory obligations under the new failure to prevent fraud offence, with a focus on establishing and evidencing reasonable fraud prevention procedures.
  - Adopts a risk-based approach to prevention, acknowledging the risks of fraud, bribery and corruption in each service area to enable appropriate controls and mitigations to be implemented.
  - Defines roles and responsibilities for stakeholders, clarifying the roles of service managers and their teams, Internal Audit, and the Corporate Fraud Team to ensure that everyone understands the part they play protecting the organisation against such threats.
  - Will increase awareness, providing regular training to all employees alongside the development of a communications plan ensuring that anti-fraud related policies are effectively communicated
  - Provides reporting mechanisms to encourage early identification and action where fraud, bribery or corruption is suspected.
- 3.5 The Council already has a good counter-fraud culture, along with a team dedicated to the prevention, detection and investigation of Fraud. While many of the recommended protective measures are already in place, further steps to strengthen the organisational approach have been identified as part of the strategy review. These are detailed within the action plan which can be found on pages 9 and 10 of the Strategy.

#### **4. KEY IMPACTS / RISKS**

- 4.1 The Anti-Fraud, Bribery and Corruption Strategy and action plan brings together a suite of controls within the Council to help reduce the likelihood and impact of fraud.
- 4.2 The key impacts of adopting the strategy are as follows:

<u>Compliance</u>	Implementation of the Strategy will support the council's legal compliance under the new fraud offence
<u>Reputation</u>	Demonstrating a proactive approach to the risk presented by fraud, bribery and corruption enhances public confidence and protects the Council's reputation
<u>Financial</u>	Effective prevention and early detection reduces the risk of financial loss and protects vital services
<u>Culture</u>	The strategy supports an organisational culture of integrity, accountability and zero tolerance to fraud

- 4.3 Failure to adopt and implement the Strategy could leave the Council vulnerable to fraud and reduce the deterrent effect. Non-compliance with the failure to prevent fraud offence could result in legal action, financial penalties and reputational damage. Implementation of the Strategy and action plan will be overseen by the Section 151 Officer to ensure that actions are delivered in a timely manner.

## **5. WHAT ACTIONS WILL BE TAKEN/TIMETABLE FOR IMPLEMENTATION**

- 5.1 An Anti-Fraud, Bribery and Corruption Strategy Action Plan is detailed within the Strategy Appendix A. This plan sets out the activities to be undertaken to ensure that the Council's approach to the prevention, detection and investigation of fraud, bribery and corruption is effective.

## **6. LINK TO THE CORPORATE PLAN, STRATEGIC PRIORITIES AND/OR CORPORATE OBJECTIVES**

[\*\(See Corporate Plan\)\*](#)

- 6.1 The approval of a refreshed Anti-Fraud, Bribery and Corruption Strategy will directly support the Council's priority of "Doing our Core Work Well".
- 6.2 Ensuring that adequate controls are in place for the prevention, detection and investigation of fraud, bribery and corruption is a key element of delivering good quality, high value for money services with good control and compliance with statutory obligations, whilst also protecting resources to support the delivery of vital services to our communities.

## **7. LEGAL IMPLICATIONS**

- 7.1 The Council has a statutory duty to make arrangements for the proper administration of its financial affairs, and this strategy supports that duty.
- 7.2 The failure to prevent fraud offence has implications for the Council should
- a) a fraud occur which was intended to benefit the organisation, or where a fraudster's primary motive was to benefit themselves but their actions also benefitted the organisation; and

b) it is unable to evidence that reasonable prevention procedures were in place.

- 7.3 The adoption of a formal Strategy and associated action plan will ensure the Council can demonstrate that it has reasonable prevention procedures in place.

## **8. REASONS FOR THE RECOMMENDED DECISIONS**

- 8.1 The refreshed strategy takes account of best practice guidance and legislative changes. Adoption of this strategy sets out the organisational intent, establishing a clear, proactive and structured approach for identifying, preventing and responding to fraud, ensuring that the Council protects resources, maintains public trust and ensures integrity and accountability.

## **9. LIST OF APPENDICES INCLUDED**

Appendix A – Anti-Fraud, Bribery and Corruption Strategy and Appendices

## **10. BACKGROUND PAPERS**

[Offence of 'failure to prevent fraud' introduced by ECCTA - GOV.UK](#)

[FFCL - Strategy for the 2020s.pdf](#)

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# NEWS RELEASE

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MAY 2025

## **Sawtry resident prosecuted for fraudulently claiming Ukrainian host payments**

Huntingdonshire District Council has successfully prosecuted a Sawtry resident for fraudulently claiming thousands of pounds intended to support Ukrainian guests under the Homes for Ukraine scheme.

Mihaela Lungu applied to the Homes for Ukraine scheme in 2022, expressing her willingness to host a Ukrainian family who had lost their home due to the war. Her application was approved and she welcomed the family into her home in June 2022. However, by July 2022, the family had moved on from her address.

Despite their departure, Mrs Lungu continued to claim host payments from the council and falsely maintained that the family was still living with her. Over an 18-month period, from July 2022 to January 2024, she received £8,900 in payments to which she was not entitled.

Following a thorough investigation by the council, it was determined that the Ukrainian family was no longer living at the property and the matter was referred to the courts.

Mrs Lungu appeared at Peterborough Magistrates' Court on 13th May 2025, where she pleaded guilty to an offence under the Fraud Act 2006. The Magistrates described the offence as a very serious fraud, noting that a substantial amount of money had been obtained dishonestly and that the offence crossed the custody threshold. Taking into account her guilty plea and cooperation, she was sentenced to 20 weeks imprisonment, suspended for 18 months. She was also ordered to repay the £8,900 in full, pay costs of £1,000 and a £100 victim surcharge.

Cllr Stephen Ferguson, Executive Councillor for Resident Services and Corporate Performance at Huntingdonshire District Council, said: "This case demonstrates the importance of safeguarding public funds and ensuring that support reaches those for whom it is genuinely intended. The Homes for Ukraine scheme has shown the very best of Huntingdonshire, with many residents opening their homes and their hearts to those fleeing unimaginable hardship. The overwhelming majority of hosts have acted with compassion and integrity, and their support has made a hugely positive impact on the lives of Ukrainian families.

"It is deeply regrettable when someone takes advantage of that goodwill, but we remain committed to protecting the integrity of this important scheme. We will take firm action against any abuse of the system."

ENDS

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**HUNTINGDONSHIRE DISTRICT COUNCIL**  
**COVERT INVESTIGATION POLICY**  
**ON THE ACQUISITION OF COMMUNICATIONS DATA,**  
**USE OF COVERT SURVEILLANCE**  
**AND COVERT HUMAN INTELLIGENCE SOURCES**  
*(REGULATION OF INVESTIGATORY POWERS ACT 2000 &  
INVESTIGATORY POWERS ACT 2016)*

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**Version History**

Version number	Date	Author	Reason for New Version
0.1	02/2025	ITS/PB	Update to format and legislative references

## **Policy Statement**

Officers and employees of (and contractors working on behalf of) Huntingdonshire District Council may, in the course of their investigatory, regulatory and enforcement duties, need to make observations of persons in a covert manner, to use a Covert Human Intelligence Source or to acquire Communications Data. These techniques may be needed whether the subject of the investigation is a member of the public, the owner of a business or a Council employee.

By its very nature, this sort of action is potentially intrusive and so it is extremely important that there is a very strict control on what is appropriate and that, where such action is needed, it is properly regulated in order to comply with Legislation and to protect the individual's rights of privacy.

Privacy is a right, but in any democratic society, it is not an absolute right. The right to a private and family life, as set out in the European Convention on Human Rights, must be balanced with the right of other citizens to live safely and freely, which is the most basic function that every citizen looks to the state to perform.

Drawing on the principles set out in the Regulation of Investigatory Powers Act 2000, the Investigatory Powers Act 2016 and the Data Protection Act 1998, this policy sets out the Council's approach to Covert Surveillance, the use of Covert Human Intelligence Sources and the acquisition of Communications Data.

The policy also sets out Members' oversight of this area, adopts a set of procedures and appoints appropriate officers to ensure that these areas are properly controlled and regulated.

### 1. Policy

- 1.1 All Covert Surveillance, the use of a Covert Human Intelligence Source (CHIS) also known as an informant, and the acquisition of Communications Data by those working for or on behalf of this Council (investigators) will be carried out in accordance with this policy and the associated procedure (the Covert Investigation Procedure).
- 1.2 Any officer or employee who deliberately or recklessly breaches this policy may be considered to have committed an act of gross misconduct and in those circumstances would be subject to the relevant disciplinary procedures. Elected Members are bound by a Code of Conduct and as such any breaches of this policy may lead to further investigation under this Code.
- 1.3 In so far as the Regulation of Investigatory Powers Act (RIPA) allows, Covert Surveillance and the use of a CHIS will always be subject to the RIPA application process. This does NOT affect monitoring activities where the actions undertaken do not amount to covert surveillance. Where officers wish to undertake covert surveillance or use informants but where RIPA is not applicable, a similar process of considering the proportionality and necessity of any such activities must be carried out before the activities are undertaken and approval gained from a RIPA authorising officer. When gathering information online, officers are instructed to consider at what point their actions go beyond the scope of open-source enquiries and meet the criteria for covert investigations. In these instances it will be necessary to obtain the relevant RIPA authorisations.
- 1.4 When acquiring Communications Data, officers are instructed to use the process set out in the Investigatory Powers Act (IPA) and the associated Communications Data Code of Practice, unless they are doing so with the consent of the data subject. DPA requests and other powers may NOT be used to seek the disclosure of Communications Data. Communications data may only be obtained using IPA powers for the applicable crime purpose. It should be noted that the guidance in the statutory code of practice takes precedence over any contrary content of a public authority's internal advice or guidance.

### 2. Appointments

- 2.1 The Chief Executive of Huntingdonshire District Council is the *Senior Responsible Officer (SRO)* for RIPA purposes.
- 2.2 The Corporate Fraud Manager is the *RIPA Co-Ordinator (RC)*, who will monitor the use of covert techniques within the Council (whether using the RIPA or non-RIPA processes) and report to members on the activities the policy covers.
- 2.3 Only those appointed by this policy as Authorising Officers (AOs) may authorise covert surveillance, the use of informants and approve applications for the acquisition of communications data.
- 2.4 Service Managers and Team Leaders who meet the training criteria will be designated as AOs, subject to a maximum number of six at any given time. The RC will maintain a list of all these designations as part of the RIPA / IPA Procedures.
- 2.5 The RC will appoint such persons as they may from time to time see fit to be *Single Points of Contact (SPOC)* (or to make such other arrangements as they deem appropriate) for the purposes of acquiring communications data using RIPA.
- 2.6 In order for the Council's RIPA authorisations to take effect, they must be approved by a Magistrate. All those who may need to apply to a Magistrate to appear for that purpose for the Council must be authorised to do so by the Head of Shared Legal Practice. The RC will maintain a list of all these designations as part of the RIPA Procedures.

### 3. Oversight and Reporting

- 3.1 The RC shall report to the Corporate Governance Committee on the use of RIPA and IPA regulated activity by officers of the Council annually. The report must not contain any information that identifies specific persons or operations but must be clear about the nature of the operations carried out and the product obtained.
- 3.2 Alongside this report, the RC / SRO will report details of any 'Non-RIPA' surveillance undertaken or informants used in precisely the same fashion.
- 3.3 Elected Members shall have oversight of the Council's policy which will be reviewed annually, unless changes are required sooner.
- 3.4 The role of Elected Members in this process is to, with reference to the update reports, satisfy themselves that the Council's policy is robust and that it is being followed by all officers involved in this area. Although it is elected members who are accountable to the public for council actions, it is essential that there should be no possibility of political interference in law enforcement operations.

### 4. RIPA / IPA Procedures

- 4.1 The RC will create a set of procedures that provide instruction and guidance for the use of surveillance and informants, and the acquisition of communications data ensuring that they continue to be both lawful and examples of best practice.
- 4.2 The reference to 'maintain and update' in this section includes the duty to remove AOs from the list if they cease to be employed in a relevant role or if they no longer satisfy the requirements to be an AO, and the right to add names to that list so long as they satisfy the policy and regulatory requirements.
- 4.3 If a change is required in order to comply with this part, the RC is authorised to make that change without prior approval from any person, however the RC must report any changes made under this section to members during the annual oversight of the policy.
- 4.4 Relevant managers are required to ensure that their staff understand that covert investigation techniques may only be used in accordance with this policy and the associated procedures.

### 5. Training

- 5.1 In accordance with this Code of Practice, AOs **must** receive full training in the use of their powers. They must be assessed at the end of the training, to ensure competence, and must undertake refresher training at least every two years. Training will be arranged by the RC. Designated officers who do not meet the required standard, or who exceed the training intervals, are prohibited from authorising applications until they have met the requirements of this paragraph. AOs must have an awareness of appropriate investigative techniques, Data Protection and Human Rights Legislation.
- 5.2 Those officers who carry out surveillance work must be adequately trained prior to any surveillance being undertaken. Appropriate training will be undertaken to ensure that AOs and staff conducting relevant investigations are fully aware of the legislative framework.

### 6. Exceptions, Notes and Complaints

- 6.1 CCTV cameras operated by the Council are not covered by this policy, unless they are used in a way that constitutes covert surveillance; only under those circumstances must the provisions of this policy and the RIPA Procedures be followed.
- 6.2 Interception of communications, if it is done as part of normal business practice, does not fall into the definition of acquisition of communications data. This includes but is not limited to opening of post for distribution, logging of telephone calls for the purpose of cost allocation, reimbursement, benchmarking, logging emails and internet access for non-work use.
- 6.3 Complaints regarding the application of this policy can be made via the Council's Complaints Procedure. However, the detail of an operation, or indeed its existence, must not be disclosed as part of a complaint investigation. This does not mean that the complaint will not be investigated, but rather that the result of any investigation would be entirely confidential and not disclosed to the complainant.

### 7. Duty to Comply

- 7.1 All those mentioned in this policy are reminded that deliberately or recklessly failing to comply with this policy (or to follow the procedures and processes created in accordance with this policy) may amount to misconduct and could result in disciplinary action. .

**Note: The procedures issued under point 4 are confidential and must not be shared outside the council. For more information, please contact the Corporate Fraud Manager**

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**Public**

**Key Decision – No**

\* Delete as applicable

## HUNTINGDONSHIRE DISTRICT COUNCIL

<b>Title/Subject Matter:</b>	Review of Fraud Investigation Activity 2024/25
<b>Meeting/Date:</b>	Corporate Governance Committee– 9 <sup>th</sup> July 2025
<b>Executive Portfolio:</b>	Resident Services and Corporate Performance (S. Ferguson)
<b>Report by:</b>	Katie Kelly – Revenues and Benefits Manager
<b>Ward(s) affected:</b>	All

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### **Executive Summary:**

The Council's Anti-Fraud and Corruption Strategy sets out a requirement that a report shall be submitted on an annual basis to the Corporate Governance Committee detailing the work that has been undertaken by the Corporate Fraud Team.

The following report details activity undertaken by the team to prevent and detect Fraud throughout the financial year 2024/25

### **Recommendation(s):**

The Corporate Governance Committee is invited to comment on the content of this report.

## **1. PURPOSE OF THE REPORT**

- 1.1 This report provides a summary of the activity undertaken by the Council's Corporate Fraud Team in 2024/2025.

## **2. WHY IS THIS REPORT NECESSARY/BACKGROUND**

- 2.1 All public bodies have a duty to protect the public purse, and proactive efforts to prevent and detect fraud are key to reducing the risk of financial loss.
- 2.2 The Council's Anti-Fraud and Corruption Strategy sets out the organisational response to the threat of fraud. It requires that an annual report be provided to the Corporate Governance Committee detailing the work that has been undertaken by the Corporate Fraud Team, to provide assurance of a robust and effective counter-fraud function.

## **3. WORK UNDERTAKEN 2024/25**

- 3.1 The Corporate Fraud Team undertakes a mix of proactive and reactive work in its efforts to prevent, detect and investigate fraudulent activity. The team also works closely with other stakeholders such as the Department of Work and Pensions (DWP), local Housing Associations and counter-fraud colleagues from other Local Authorities, ensuring a collaborative approach across multiple agencies.
- 3.2 The main areas of focus for the team through 2024/25 have been:
- Reviewing output from the National Fraud Initiative (NFI)
  - Investigating ad-hoc referrals coming into the team from both internal and external sources
  - Pro-active reviews of Council Tax Single Person Discount, undertaken in line with the Cambridgeshire Fraud Initiative
  - Strengthening the organisational approach in the use of surveillance under The Regulation of Investigation Powers Act (RIPA)

### National Fraud Initiative (NFI)

- 3.3 The National Fraud Initiative, or NFI, is national data-matching exercise between both public and private sector bodies to prevent and detect fraud. The Council is required to provide a range of datasets to enable periodic data matching, the results of which are then investigated by each Authority to identify where fraud and / or error exists.
- 3.4 Data matching exercises are conducted bi-annually, with results being received in January 2023 and again in January 2025.

- 3.5 The matching covers a wide range of datasets including Council Tax, Housing Benefit, Payroll, Electoral Register, Housing waiting lists, Taxi licencing and Creditors.
- 3.6 The matches returned to the Council for review highlight anomalies in the data for further investigation. The total number of cases to be reviewed from the current exercise is 12,367. Given the volumes involved, reviewing all of the cases is an ongoing piece of work for the team.

#### Ad-Hoc referrals

- 3.4 The Council receives referrals from members of the public, external organisations, elected members and internal teams throughout the year. Referrals into the team are an incredibly useful source of intelligence, and details of how to make a referral to the fraud team are included on all Council Tax bills. There is also a dedicated page on the Council's website to enable any suspicion of fraud to be reported quickly and easily.
- 3.5 In 2024/25, the team received 60 online referrals, with a further 36 cases being referred to the team from within the Council. These numbers are similar to those received in previous years and demonstrates a good awareness of fraud reporting and due diligence both from within the organisation, and by members of the public.

#### Cambridgeshire Fraud Initiative (CFI)

- 3.5 Since 2023, the Council embarked on a new initiative working closely with colleagues from the other Cambridgeshire District Councils alongside Cambridgeshire County Council, in a combined effort to detect fraud and error in the Council Tax system.
- 3.6 Cambridgeshire County Council provides funding for a post in each of the five District Councils in Cambridgeshire, and also funds software used to review of Council Tax single person discounts which is enhanced with data from credit reference agencies. This data detects where there may be more than one adult residing in a property where a single person discount is in place, with these results then being passed to the team for investigation.

#### Regulation of Investigatory Powers Act (RIPA) – Use of Surveillance

- 3.8 Local Authorities are permitted to gather information covertly to support their investigation and enforcement activities. These investigatory powers can only be used for specific purposes, such as the detection or prevention of a serious crime, and the Council can only undertake covert surveillance under RIPA if the proposed activity is authorised by one of the Council's Authorising Officers and subsequently approved by the Magistrates' Court.
- 3.7 It is a requirement of the Covert Surveillance (RIPA) policy that a report is made annually to the Corporate Governance Committee detailing any activity undertaken in line with the policy for the relevant period. Previously these powers have been used where cameras have been required in the

investigation of fly tipping, for example. In 2024/25, there has been no relevant use of these powers to report.

- 3.10 As part of the governance arrangements for the use of surveillance under RIPA, the Council is subject to periodic inspections by the Investigatory Powers Commissioner's Office (IPCO). An inspection was carried out on 20th June 2024, and the outcome report was brought to the Corporate Governance Committee on 25<sup>th</sup> September 2024.
- 3.12 Since then, training has provided to officers who are involved in either investigations, where the use of RIPA might be a consideration, or to those officers charged with the authorisation of such applications
- 3.13 The Corporate Leadership Team have also received training, with the Chief Executive receiving a more detailed briefing for she also holds the position of Senior Responsible Officer, responsible to ensure that the Authority conducts its RIPA-related activities in accordance with legislative requirements.
- 3.14 The Council's policy regarding the use of RIPA has been refreshed, and in addition to updating references to the relevant Codes of Practice as recommended by the inspection, the opportunity has also been taken to update the look and feel of the policy, separating the policy from procedure.
- 3.15 This distinction reduces confusion for stakeholders and improves organisational understanding of expectations. It also provides for the procedures to be managed closer to operational teams, whilst still allowing appropriate governance over the policy itself. As the procedures in relation to RIPA are confidential, separating the two elements improves transparency, for the policy element can now be shared publicly.
- 3.16 The Portfolio Holder for Resident Services and Corporate Performance was briefed on the changes on 22<sup>nd</sup> May 2025, and the updated policy document can be found in APPENDIX A. All actions arising from the inspection have now been completed.

#### **4. KEY IMPACTS / RISKS**

- 4.1. An effective counter-fraud team has a significant positive impact on both the Council's financial integrity and public trust. By identifying, investigating and preventing fraudulent activities, the team safeguards public funds required to deliver vital services to residents.
- 4.2 The key financial benefits arising from the work undertaken by the Corporate Fraud Team in 2024/25 are as follows:

Investigation Type	Cases Proven	Value £
Council Tax Discounts (including Single Person Discount)	52	103,506
CFI Project	92	133,455
Benefits (Local Council Tax Support, Housing Benefit and Discretionary Housing Payment)	12	64,374
Housing / Tenancy Fraud	5	-
Other (see 4.5-4.8)	1	10,000
Total Value		311,308
Total NFI cases processed		1,119

- 4.2 The value of savings achieved is calculated using a recognised methodology set out by the National Fraud Initiative. This approach allows not only for the capture of actual savings, but also provides for a projection of future savings derived as a result of action taken.
- 4.3 Where there is no straightforward way to determine an exact value derived, such as Tenancy Fraud, a nationally agreed formula suggests the overall value to be in the region of £42k per property, after consideration of factors such as the duration for which fraudulent activity may have continued undetected, the legal costs of recovering a property and an estimate of the annual cost of temporary accommodation.
- 4.4 As Huntingdonshire District Council are not the owners of housing stock the NFI calculation methodology has not been used as a measure of success in this instance. However, by supporting social housing providers with investigatory work, 3 homes were able to be recovered in 2024/25, increasing the availability of accommodation to those in need. Another successful investigation resulted in an application for homelessness being denied, and in one further case the property was unable to be recovered due to the individual circumstances, despite the fraud being proven.
- 4.5 There was one case of fraud was proven that does not fall to be within the main categories of work. This case related to the Homes for Ukraine scheme, where a local resident applied to host a Ukrainian family who had fled their home country due to war.
- 4.7 Following a referral from the team that administered the scheme, an investigation found that despite the family leaving the UK a month after their arrival, the resident maintained that the family were residing with her and had continued to collect host payments from the scheme.
- 4.8 Whilst the investigatory work was completed in 2024/25, the case did not appear before the Magistrate's Court until May this year, where the defendant was found guilty of fraud and given a suspended sentence, alongside an order to repay the full sums obtained by the deception, plus costs. Further details can be found in the press release in APPENDIX B.

**5. LINK TO THE CORPORATE PLAN, STRATEGIC PRIORITIES AND/OR CORPORATE OBJECTIVES**

*(See Corporate Plan)*

- 5.1 Every penny of income lost to fraud is money that cannot be spent on services for our communities. By ensuring that the organisation maintains a robust approach to the prevention and detection of fraud, the work of the Corporate Fraud Team links to all three priorities of the Council.

- 1) Improve the quality of life for local people.  
It is important to note that the repercussions of fraud can be more than just financial. Through the course of their work the team encounters a range of issues faced by residents and are proactive in making referrals for appropriate support.
- 2) Create a better Huntingdonshire for future generations.  
By working closely with housing providers to investigate allegations of tenancy fraud, more social housing stock is available to those in genuine need.
- 3) Doing our core work well.  
A robust approach to preventing and detecting fraud ensures that the risk of financial loss is minimised, supporting the delivery of good quality, high value-for-money services with good control and compliance with statutory obligations.

**6. REASONS FOR THE RECOMMENDED DECISIONS**

- 6.1 The Anti-Fraud and Corruption Strategy sets out a requirement for an annual report to be submitted to the Corporate Governance Committee on the work of the Corporate Fraud Team during the previous financial year.

**7. Background Papers**

APPENDIX A – RIPA policy  
APPENDIX B – Press Release

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# ANTI-FRAUD, BRIBERY & CORRUPTION STRATEGY

## 2025 -2028

### Document History

Version & Date Reviewed	Revised By	Description	Date Approved
0.1	PB / KK	Revision of previous strategy to acknowledge recent legislation changes and agree action plan.	

## **Anti-Fraud, Bribery and Corruption – Chief Executive’s Statement**

This Anti-Fraud Strategy is an essential component of our Corporate Plan priority of *doing our core work well* - delivering good quality, high value-for-money services with good control and compliance with statutory obligations.

Huntingdonshire District Council fully recognises its responsibility for protecting the public purse and making the best use of public money and assets. An essential aspect of this is the prevention, detection and investigation of fraud, bribery and corruption which we are dedicated to undertaking.

Fraud against local government is more widespread than just a financial threat. It undermines the trust our communities place in us and diverts vital resources away from the services people rely on. The threat of fraud is evolving, and the Council is committed to continuously reviewing and improving its resilience to these risks and other forms of financial irregularity or error. This helps to protect the public purse from specific threats and associated harm that the Council may be exposed to.

The Council will not tolerate fraud, bribery or corruption committed by any party, whether that is by service users, employees, members, suppliers, contractors, or partners. We are committed to supporting everyone to raise concerns safely, and will take adequate steps to investigate allegations and, where appropriate, pursue sanctions.

This strategy sets out the Council’s approach to preventing, detecting and responding to the risk of fraud, bribery and corruption, alongside planned actions over the short to medium-term to further build resilience, underpinned by strong governance and effective internal controls.

An effective anti-fraud culture is vital to the organisation but is dependent on the vigilance, integrity and shared responsibility of every officer, elected member, stakeholder and supplier. Embedding this strategy into our every-day work will help us to mitigate the risk of fraud, bribery and corruption, protecting the vital services that our communities depend on.



Michelle Sacks

Chief Executive, June 2025

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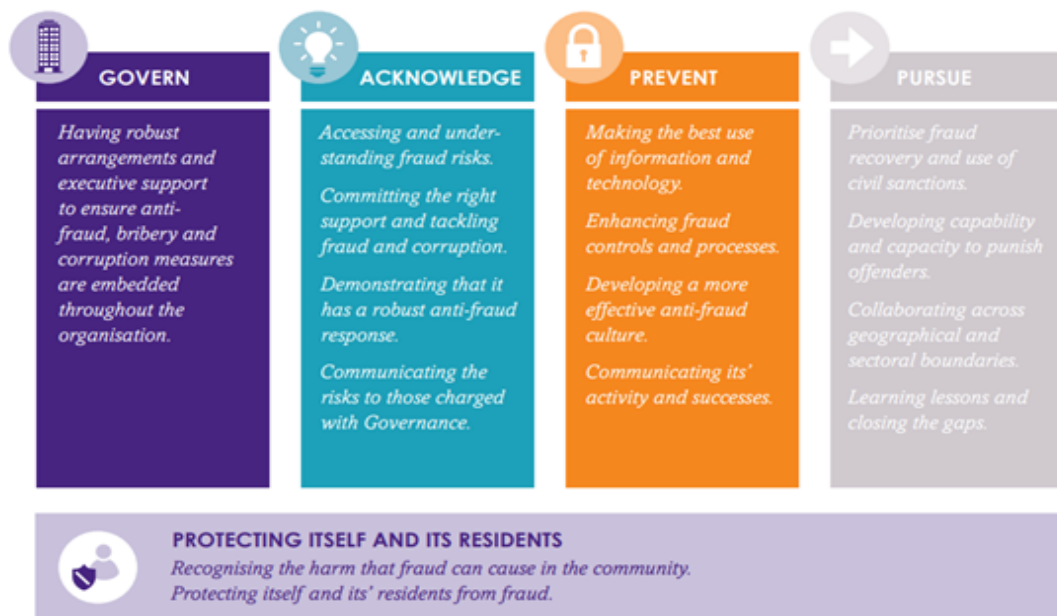
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## 1. INTRODUCTION

- 1.1 Fraud is an evolving pressure on public sector organisations, with those engaged in fraudulent activity seeking out new opportunities to exploit system weaknesses. It is the Council's duty to ensure that the risk of fraud is understood, proportionate preventative measures put in place, and appropriate action taken against those who commit fraud.
- 1.2 Fraud diverts resources away from essential services and can erode public confidence. Tackling fraud is crucial to maintaining public trust, ensuring the efficient use of taxpayer funds, and safeguarding vital public services. The Council will not tolerate any form of fraud or corruption either from external sources, or from within.
- 1.3 Taking action to prevent and detect fraud fully supports the Council's corporate priorities of:
- Improving quality of life for local people
  - Creating a better Huntingdonshire for future generations
  - Delivering good quality, high value-for-money services, with good control and compliance with statutory obligation
- 1.4 The Council's approach to effectively managing the risk of fraud and corruption against the Authority is set out within this strategy, which has been developed with reference to with the principles outlined in the *Fighting Fraud and Corruption Locally Strategy 2020*, an approach developed by local authorities and counter-fraud experts and supported by CIPFA, which are as follows:



- 1.5 This strategy forms part of a wider group of interrelated policies and procedures that support anti-fraud and corruption activity. These include the Whistleblowing policy, Sanctions Policy, Employee Handbook, Code of Conduct for Members, financial regulations and procurement procedures.
- 1.6 The strategy applies to the following stakeholders:
- Employees, including agency staff and volunteers, Elected Members and any other persons that provides services for or on behalf of the Council;
  - The Council's shared services;
  - All Council suppliers, contractors and consultants; and
  - All Council service users, residents and businesses.
- 1.6 By taking pro-active approach to addressing fraud and corruption, the Council strengthens its financial integrity and supports good governance.

## 2. DEFINITIONS AND LEGAL POSITION

### FRAUD

- 2.1 Fraud can be broadly described as, someone acting dishonestly with the intention of making a gain for themselves or another or inflicting a loss (or a risk of loss) on another.
- 2.2 Examples of fraud include, but are not limited to the following offences within this strategy:
- False Accounting (Theft Act 1968, s.17)
  - False statements by company directors (Theft Act 1968, s.19)
  - Fraud by false representation (Fraud Act 2006, s.2)
  - Fraud by failing to disclose information (Fraud Act 2006, s.3)
  - Fraud by abuse of position (Fraud Act 2006, s.4)
  - Participation in a Fraudulent Business (Fraud Act 2006, s.9)
  - Obtaining services dishonestly (Fraud Act 2006, s.11)
  - Fraudulent Trading (Companies Act 2006, s.993)
  - Cheating the public revenues (Common law)
  - Or aiding, abetting, counselling or procuring the commission of one of the above offences

### BRIBERY

- 2.3 The Bribery Act 2010 came into force in the UK on 1 July 2011. All associated persons need to be aware of their obligations under this Act, which sets out offences of accepting and giving bribes. This applies to both individuals and the Council corporately.
- 2.4 The Bribery Act creates the following offences:

- “Active bribery” - promising or giving a financial or other advantage;
  - “Passive bribery” - agreeing to receive, or accepting an advantage, financial or otherwise;
  - Bribery of foreign public officials; and
  - The failure of commercial organisations to prevent bribery by an associated person (corporate offence).
- 2.5 The penalty under the Bribery Act is an unlimited fine and/or imprisonment up to a maximum of 10 years.
- 2.6 In addition, the Act also creates the Corporate Offence of “failing to prevent bribery on behalf of a commercial organisation” (corporate liability). To protect itself against the corporate offence, the Act requires organisations to have “adequate procedures in place to prevent bribery”.
- 2.7 This strategy, alongside the Council’s Codes of Conduct (Employees and Members) and the Council’s Confidential Reporting Procedure (Whistleblowing) are designed to meet that requirement.

## CORRUPTION

- 2.8 Corruption is the deliberate misuse of position for the offering, giving, soliciting, or acceptance of an inducement or reward, or showing any favour or disfavour, which may influence any person to act improperly. It is primarily an offence under the Bribery Act 2010, although there are other related offences under the Prevention of Corruption Act 1906.

## FAILURE TO PREVENT FRAUD: ECONOMIC CRIME AND CORPORATE TRANSPARENCY ACT 2023

- 2.9 The failure to prevent fraud offence has arisen from The Economic Crime and Corporate Transparency Act 2023 and is intended to hold large organisations to account if they profit from fraud committed by their employees/ associated persons. The offence comes into force on 1<sup>st</sup> September 2025.
- 2.10 Huntingdonshire District Council falls within the scope of the legislation as a large company. A “large organisation” is defined in section 201 as meeting two or three out of the following criteria:
- More than 250 employees
  - More than £36 million turnover
  - More than £18 million in total assets.
- 2.11 This legislation brings fraud in line with the requirements of the Bribery Act 2010 by introducing a Corporate Offence which holds organisations to account for fraud committed by employees, agents, subsidiaries or other “associated persons” who provide services for or on behalf of the organisation, where the fraud ***was committed with the intention of***

***benefiting the organisation or their clients.***

- 2.12 An employee, an agent or a subsidiary of the relevant body is automatically an “associated person” for the purposes of this offence. A person who provides services for or on behalf of the relevant body is also an associated person while they are providing those services.
- 2.13 Companies within the Council’s supply chain are not associated persons unless they are providing services for or on behalf of the Council. These include
- an employee of a council subsidiary company, regardless of being considered a ‘large organisation’; or
  - a sole contractor/employee of a contracted business delivering a service on behalf or for the council (for example, transportation, leisure and recreation, and outreach services).
- 2.14 The term “providing services” does not include providing goods or services to the Council. Thus, persons providing services to the Council (for example, commercial cleaning, valuers, accountants or engineers) are not acting “for or on behalf” of the Council and so would not be associated persons for the purposes of the offence.
- 2.15 The intention to benefit the organisation does not have to be the sole or main motivation for the fraud. The offence can apply where a fraudster’s primary motivation was to benefit themselves, but where their actions will also benefit the organisation. It does not need to be demonstrated that the organisation’s senior managers or directors ordered or knew about the fraud for there to be liability.
- 2.16 If convicted, the organisation would receive a fine, the amount of which would be determined by the courts in line with sentencing guidelines.
- 2.17 The Council has a defence if it has reasonable procedures in place to prevent fraud, or, if it can demonstrate to the satisfaction of the court that it was not reasonable in all the circumstances to expect it to have any prevention procedures in place. “Reasonable procedures” are set out within the guidance to mean:
- Top-Level Commitment
  - Risk Assessment
  - Proportionate, risk-based prevention procedures
  - Due diligence
  - Communication (including training)
  - Monitoring and review
- 2.18 Further information regarding the Council’s planned activities to evidence these procedures is detailed in Appendix A.

### 3. ROLES AND RESPONSIBILITIES

- 3.1 Whilst the Council has a Corporate Fraud Team tasked with undertaking counter-fraud activities and investigations, the responsibility to be alert to the risk of fraud and to take reasonable preventative measures requires a “whole organisation” approach, as demonstrated below.

MITIGATE	EVALUATE	INVESTIGATE
<ul style="list-style-type: none"><li>• Managers and teams should identify fraud risks to their services and apply appropriate controls.</li><li>• Details of identified risk and mitigations should be recorded on the Council's risk management system</li></ul>	<ul style="list-style-type: none"><li>• Internal Audit will evaluate the effectiveness of controls, and provide assurance on the adequacy of the Councils anti-fraud and corruption arrangements, working closely with the Corporate Fraud Team as required</li></ul>	<ul style="list-style-type: none"><li>• The Corporate Fraud Team will investigate all cases of suspected fraud, whilst also undertaking pro-active fraud detection activities</li></ul>

- 3.2 As with any risk faced by the council, it is the responsibility of managers and officers to ensure that the risk of fraud is adequately considered. In making this assessment it is important to consider the opportunities for where fraud, bribery or corruption could occur, as well as reviewing any actual incidences of fraud that may have occurred in the past. Once the fraud risk has been evaluated, appropriate action should be taken to mitigate those risks on an ongoing basis.
- 3.3 It is particularly important to revisit this assessment of risk where any changes in operations or business environment arise, for these may impact on the opportunity or likelihood of fraud, bribery or corruption occurring.
- 3.4 Good governance procedures are a strong safeguard against fraud and corruption. Adequate supervision, recruitment and selection, scrutiny and healthy scepticism should not be viewed as distrust but as good management practice, shaping attitudes and creating an environment opposed to fraudulent activity.

- 3.5 Whilst all stakeholders in scope have a part to play in reducing the risk of fraud, Elected Members, the Corporate Leadership Team, and the wider management team are ideally positioned to set the tone of the organisation in fostering a culture of high ethical standards and integrity.

#### 4. STRATEGIC OBJECTIVES

- 4.1 This strategy aims to embed good practice in counter fraud into all areas of the Council, limiting the opportunity for instances of fraud or corruption across the organisation, providing assurance to Elected Members and Senior Managers that the Council's exposure to fraud risk is minimised.
- 4.2 The objectives of this strategy are to:
- Ensure all staff are aware of their responsibilities to prevent fraud, bribery and corruption by communicating the Council's approach to countering the risks
  - Reinforce the Council's "zero tolerance" culture across the whole organisation from the top down
  - Raise awareness to limit the opportunity for fraud, bribery and corruption via effective preventative measures, minimising the risk of financial loss and reputational damage
- 4.3 In support of these strategic objectives, an action plan has been developed, and this is detailed in Appendix A. It should be noted that further actions may arise from the activities planned, with areas of focus being aligned to outputs from the risk assessment work. An overview of the Investigative procedure is provided in Appendix B.

#### 5. EMBEDDING THE STRATEGY

- 5.1 Information on the Council's approach to combating fraud, bribery & corruption and the related procedures will be regularly communicated with all council staff. Clear lines of communication are available for staff and residents to ensure there are no barriers to raising concerns about fraud, bribery or corruption. These include:
- Dedicated report fraud telephone hotline;
  - A fraud reporting form available to members of staff and members of the public via the Council's website and internally on the intranet;
  - Anti-Money Laundering reporting with clear guidance for staff on when to report; and
  - Fraud Awareness e-Learning package – required for all new employees and annually for existing employees.
- 5.2 All officers are required to report suspected fraud, corruption and/or money laundering under all circumstances. Failure to do so may be considered a

breach of the staff Code of Conduct and could lead to action under the Council's Disciplinary Procedure.

## APPENDIX A - Anti-Fraud, Bribery and Corruption Strategy Action Plan

Theme 1 (Fighting Fraud and Corruption Locally)	Theme 2 (Failure to Prevent Fraud / Bribery Offences)	Activity	Evidenced by:	Responsibility / Lead	Target date
Protect	Top-Level Commitment	Take steps to protect the Council and the public funds it administers from risks relating to fraud and corruption	The adoption of an Anti-Fraud, Bribery and Corruption Strategy	Corporate Leadership Team, Corporate Governance Committee	September 2025
Govern	Top-Level Commitment	Communicate the Council's commitment to the prevention and detection of fraud, supporting a culture where fraud is not tolerated	The adoption of an Anti-Fraud, Bribery and Corruption Strategy	Corporate Leadership Team, Corporate Governance Committee	September 2025
	Top-Level Commitment		Report counter-fraud activity and any instances of fraud or corruption to the Corporate Governance Committee on an annual basis	Corporate Fraud Team	BAU - July each year
	Communication		Commitment to providing regular awareness training to all employees	Corporate Fraud Team	September 2025
Acknowledge	Risk Assessment	Identify and assess all potential risks of fraud and corruption	Entries in the risk management system	All Managers	December 2025
Prevent	Proportionate risk-based prevention procedures	Implement proportionate prevention procedures where fraud risks are identified	Internal Audit reviews of service controls	S.151 officer	BAU –periodic audits
	Proportionate risk-based prevention procedures	Undertake an assessment of the Council's response against the checklist in the Fighting Fraud and Corruption Locally Strategy 2020	Record of assessment and any resulting actions	Corporate Fraud Team	December 2025

<b>Theme 1 (Fighting Fraud and Corruption Locally)</b>	<b>Theme 2 (Failure to Prevent Fraud / Bribery Offences)</b>	<b>Activity</b>	<b>Evidenced by:</b>	<b>Responsibility</b>	<b>Target date</b>
Prevent	Proportionate risk-based prevention procedures	Ensure that procedures for conducting employee and third-party due diligence are sufficiently robust, and in accordance with the guidance on the failure to prevent fraud / bribery offences	Procedures on intranet	HR, Procurement	March 2026
	Proportionate risk-based prevention procedures	Make the best use of data and technology to identify and tackle fraud	Full participation in the National Fraud Initiative (NFI) and Cambridgeshire Counter-Fraud Initiative (CFI)	Corporate Fraud Team	BAU - ongoing
	Proportionate risk-based prevention procedures	Ensure all anti-fraud, bribery and corruption related policies are sufficiently robust and subject to periodic review	Creation of a Policy Review Schedule, policy updates, Internal Audit Assurance	S.151 officer	Schedule December 2025, updates thereafter
	Communication	Ensure that all anti-fraud, bribery and corruption related policies are effectively communicated	Ensure all officers have access via the Council's intranet, and develop regular communications plan	Corporate Fraud Team	September 2025
Pursue	Monitoring and Review	Prioritise the recovery of financial losses as a result of fraud, and use of criminal and civil sanctions where appropriate	Sanctions Policy	Corporate Fraud Team	BAU - ongoing
	Monitoring and Review	Ensure effective working relationships with external agencies such as the Department of Work and Pensions (DWP), Police and Housing Associations	Report counter-fraud activity and any instances of fraud or corruption to the Corporate Governance Committee on an annual basis	Corporate Fraud Team	BAU - July each year
	Monitoring and Review	Learn lessons from identified fraud, bribery and corruption to eliminate control weaknesses going forward	Internal Audit reviews of service controls	S.151 officer	BAU - ongoing

## **APPENDIX B – Investigative Overview**

1. The Council has a principle of zero tolerance to fraud and corruption. Everyone shall be dealt with equally and without favour.
2. Specific policies or procedures that deal with the issues of disclosure, investigation and prosecution shall be maintained and reviewed periodically to ensure they reflect current best practice and legislative requirements, including the Regulation of Investigatory Powers Act 2000, Prevention of Social Housing Fraud Act 2013, Proceeds of Crime Act 2002, the Bribery Act 2010 and Money Laundering Regulations 2017.
3. Investigations into possible fraud and corrupt practices will be undertaken by the Corporate Fraud Team, who for investigatory purposes will have the right of access to all Members and employees and any information held by the Council. Members and employees will be required to co-operate fully with any investigation and appropriate disciplinary action will be taken if it is found that this is not the case.
4. Irrespective of who is involved, all matters of significant fraud, bribery or corruption identified or perpetrated against the Council, will be referred to the Police or any other regulatory body authorised to investigate such matters. The decision as to whether a matter is significant shall be determined by either the S151 Officer or the Monitoring Officer. The Chair of the Corporate Governance Committee will also be informed of all matters of significant fraud, bribery and corruption.
5. If an employee has been involved in perpetrating a fraudulent or corrupt act, they shall be subject to the Council's disciplinary procedure. Where the allegation of an offence is proven then appropriate action shall be taken as set out in the disciplinary procedures.
6. If an employee has been involved in a significant fraud or corruption (see 5.4 above) the Council may continue to undertake disciplinary action against them, irrespective of any decision reached as to whether or not there is to be a criminal prosecution.
7. The Council will always aim to recover (from the perpetrators or its insurers) all losses that it sustains as a result of fraud, bribery and corruption as well as the consideration of criminal or civil proceedings where appropriate.
8. The decision to publicise outcomes will consider the following criteria:
  - Interests of the Council;
  - Interests of Huntingdonshire residents; and
  - Deterrent value to others.

**Public**  
**Key Decision – No**

## HUNTINGDONSHIRE DISTRICT COUNCIL

**Title/Subject Matter:** Internal Audit Actions – update report

**Meeting/Date:** Corporate Governance Committee  
9 July 2025

**Executive Portfolio:** Executive Councillor for Governance &  
Democratic Services  
Cllr Jo Harvey

**Report by:** Corporate Director – Finance and Resources  
(On behalf of Corporate Leadership Team)

**Wards affected:** All

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### **Executive Summary:**

This report summarises the progress in implementing management actions arising from final internal audit reports. Implementation of the actions are the responsibility of the relevant managers with oversight from Corporate Leadership Team.

### **Recommendation:**

The Committee is

### **RECOMMENDED**

To comment on and note the current position regarding actions arising from internal audit reports.

## 1. PURPOSE OF THE REPORT

- 1.1 This report sets out the current position with respect to implementation of actions arising from Internal audit reports.

## 2. WHY IS THIS REPORT NECESSARY/BACKGROUND

- 1.1 This report summarises the position regarding open actions arising from final internal audits.

## 3. ANALYSIS OF OPEN ACTIONS

- 1.2 Appendix 1 sets out all the actions that remain open from final internal audit reports.

- 1.3 There are four actions that have been redated from the original target date.

Action ref	Audit	Original Date	Revised Date	Action Summary	Update
1754	Operations – Vehicle Maintenance Processes	31 Jan 2025	30 Sep 2025	To create full training records	Work is in progress and the full records for each staff member's training will be completed by revised date
3371	Code of Procurement 24.25	28 Apr 2025	30 Sep 2025	Revised Code of Procurement	First draft prepared to be reviewed with newly appointed Monitoring Officer
3375	Code of Procurement 24.25	31 May 2025	30 Nov 2025	Regular review of contracts	To be implemented now more resource in available in the team
3381	Key Financial Controls 24.25	31 Mar 2025	01 Sep 2025	Reconciliation of Debtors has a technical issue which has been raised with supplier	S151 Officer to escalate with Senior representatives at TechOne

- 1.4 The 33 remaining actions that are not yet due are summarised below by audit and by priority.

<b>Audit Area</b>	<b>High</b>	<b>Medium</b>	<b>Low</b>	<b>Total</b>
Commercial Estates Rent Review Processes and Invoicing	2	2		4
Cyber Essentials Assessment	2	6	2	10
Home and Hybrid Working	2	9	3	14
Recruitment and Retention	1	3	1	5
<b>Grand Total</b>	<b>7</b>	<b>20</b>	<b>6</b>	<b>33</b>

#### **4. KEY IMPACTS / RISKS**

- 1.5 Each monthly meeting of CLT that reviews governance matters, now receives a report of any actions overdue for implementation and those due in the coming three months. CLT can ensure that action to ensure that actions are implemented or that the date is revised with good reason.

#### **5. LINK TO THE CORPORATE PLAN, STRATEGIC PRIORITIES AND/OR CORPORATE OBJECTIVES**

- 1.6 Corporate Priority 3 – Doing our core work well.

#### **6. RESOURCE IMPLICATIONS**

- 1.7 There are no additional resource requirements arising from this paper.

#### **7. REASONS FOR THE RECOMMENDED DECISIONS**

- 1.8 This report advises the Committee of the proposed action that SLT will agree with Internal Audit which is operational. It is reported to the committee that for assurance and oversight.

#### **8. LIST OF APPENDICES INCLUDED**

None

#### **9. BACKGROUND PAPERS**

None

## **CONTACT OFFICER**

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All Outstanding Actions



Generated Date		01 Jul 2025 12:06
Action Criteria		
	Project	Internal Audit
	Audit	2025/26, Recruitment and Retention, 2024/25, Code of Procurement Audit 24.25, Committee Governance Structure 24.25, Home and Hybrid Working 24.25, Commercial Estates Rent Review Processes and Invoicing 24.25, One Leisure Pool Operation Records 24.25, Key Financial Controls 24.25, Green bin implementation & transfer to BAU operations 24/25, Operations Vehicle Maintenance 24.25, Budgetary Control and Management 24.25, Cyber Essentials Assessment

auditors@huntsdc.gov.uk							
Reference	Action Title	Action Owner	Original Target	Revised Target	Latest Update Description	Update Date	Priority Level
1754	Operations – Vehicle Maintenance Processes 24.25 Action 3	Audit Team	31 Jan 2025	30 Sep 2025	Work is in progress	01 Jul 2025	Medium
3371	Code of Procurement 24.25 Action 1	Audit Team	28 Apr 2025	30 Sep 2025	First draft prepared to be reviewed with newly appointed Monitoring Officer	01 Jul 2025	Medium
3375	Code of Procurement 24.25 Action 5	Audit Team	31 May 2025	30 Nov 2025	To be implemented now more resource in available in the team	01 Jul 2025	High
3381	Key Financial Controls 24.25 - 2	Audit Team	31 Mar 2025	01 Sep 2025	S151 Officer to raise with TechOne	01 Jul 2025	High
3511	Home and Hybrid Working Internal Audit 24.25 - 1	Audit Team	31 Mar 2026	31 Mar 2026			High
3512	Home and Hybrid Working Internal Audit 24.25 - 2	Audit Team	31 Mar 2026	31 Mar 2026			High
3513	Home and Hybrid Working Internal Audit 24.25 - 3	Audit Team	31 Jul 2025	31 Jul 2025	An audit tracking request was made. JFDI	16 May 2025	Medium
3514	Home and Hybrid Working Internal Audit 24.25 - 4/1	Audit Team	31 Dec 2025	31 Dec 2025			Medium
3515	Home and Hybrid Working Internal Audit 24.25 - 4/2	Audit Team	31 Aug 2025	31 Aug 2025			Medium
3516	Home and Hybrid Working Internal Audit 24.25 - 5	Audit Team	31 Dec 2025	31 Dec 2025			Medium
3518	Home and Hybrid Working Internal Audit 24.25 - 7	Audit Team	30 Sep 2025	30 Sep 2025			Medium
3519	Home and Hybrid Working Internal Audit 24.25 - 8	Audit Team	31 Mar 2026	31 Mar 2026			Medium
3520	Home and Hybrid Working Internal Audit 24.25 - 9	Audit Team	31 Mar 2026	31 Mar 2026	Action due date not agreed as depending on action 3517	07 May 2025	Medium
3521	Home and Hybrid Working Internal Audit 24.25 - 10	Audit Team	31 Jul 2025	31 Jul 2025			Medium
3522	Home and Hybrid Working Internal Audit 24.25 - 11	Audit Team	30 Sep 2025	30 Sep 2025			Low
3523	Home and Hybrid Working Internal Audit 24.25 - 12	Audit Team	30 Sep 2025	30 Sep 2025			Low
3524	Home and Hybrid Working Internal Audit 24.25 - 13	Audit Team	30 Sep 2025	30 Sep 2025			Low
3545	Commercial Estates Rent Review Processes and Invoicing 24.25 - 1	Audit Team	30 Sep 2025	30 Sep 2025			High
3546	Commercial Estates Rent Review Processes and Invoicing 24.25 - 2	Audit Team	30 Sep 2025	30 Sep 2025			High
3547	Commercial Estates Rent Review Processes and Invoicing 24.25 - 3	Audit Team	30 Sep 2025	30 Sep 2025			Medium
3548	Commercial Estates Rent Review Processes and Invoicing 24.25 - 4	Audit Team	30 Sep 2025	30 Sep 2025			Medium
3692	Home and Hybrid Working Internal Audit 24.25 - 6	Audit Team	31 Mar 2026	31 Mar 2026	Incorrect date shown	19 Jun 2025	Medium
3694	Cyber Essentials Assessment - 1	Audit Team	31 Dec 2025	31 Dec 2025			Low
3695	Cyber Essentials Assessment - 2	Audit Team	31 Dec 2025	31 Dec 2025			Low
3696	Cyber Essentials Assessment - 3	Audit Team	30 Apr 2026	30 Apr 2026			Medium
3697	Cyber Essentials Assessment - 4	Audit Team	30 Apr 2026	30 Apr 2026			Medium
3698	Cyber Essentials Assessment - 5	Audit Team	30 Apr 2026	30 Apr 2026			Medium
3699	Cyber Essentials Assessment - 6	Audit Team	31 Jul 2025	31 Jul 2025			Medium
3700	Cyber Essentials Assessment - 7	Audit Team	31 Dec 2025	31 Dec 2025			Medium
3701	Cyber Essentials Assessment - 8	Audit Team	31 Dec 2025	31 Dec 2025			Medium
3702	Cyber Essentials Assessment - 9	Audit Team	30 Apr 2026	30 Apr 2026			High
3703	Cyber Essentials Assessment - 10	Audit Team	30 Apr 2026	30 Apr 2026			High
3704	Recruitment and Retention - 1	Audit Team	31 Jul 2025	31 Jul 2025			High
3705	Recruitment and Retention - 2	Audit Team	31 Oct 2025	31 Oct 2025			Medium
3709	Recruitment and Retention - 6	Audit Team	31 Dec 2025	31 Dec 2025			Medium
3710	Recruitment and Retention - 7	Audit Team	31 Dec 2025	31 Dec 2025			Low
3711	Recruitment and Retention - 8	Audit Team	31 Oct 2025	31 Oct 2025			Medium

**Public**  
**Key Decision – No**

## **HUNTINGDONSHIRE DISTRICT COUNCIL**

**Title/Subject Matter:** Corporate Risk Register

**Meeting/Date:** Corporate Governance Committee  
15 July 2025

**Executive Portfolio:** Executive Councillor for Governance &  
Democratic Services  
Cllr Jo Harvey

**Report by:** Corporate Director – Finance and Resources

**Wards affected:** All

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### **Executive Summary:**

This report provides an update on the Corporate Risk Register, presents a heat map relating to the current residual risk scores and a summary report. It provides the Committee with the opportunity to comment on and offer challenge to the Corporate Leadership Team as part of the active management of risks.

The Committee is

### **RECOMMENDED**

To comment on the reports in the appendices and progress with risk management.

## **1. PURPOSE OF THE REPORT**

- 1.1 This report informs the Committee of the approach and work undertaken on the Corporate Risk Register including the latest heat maps relating to the corporate risks.

## **2. WHY IS THIS REPORT NECESSARY**

- 2.1 Effective Risk Management is a critical part of the organisation's governance. The Risk Register identifies those areas where the Council should take action to mitigate its exposure and informs the annual plan for Internal Audit.
- 2.2 Presenting the Risk Register to each meeting of the Committee is an integral part of the overall governance process as set out in the Council's Risk Management Strategy

## **3. CURRENT RISK REGISTER**

- 3.1 At the meeting of this Committee held in March 2025, there was a request that Corporate Leadership Team particularly review the wording of the following two risks:

- 3.1.1 Risk Corp0011 relating to Climate Change

- 3.1.2 Risk Corp0019 relating to Local Government Reorganisation (LGR)

- 3.2 The risk relating to the implications of Climate Change has been revised to add in the wording set out below in italics.

Failure to ensure that the Council responds effectively to its environmental obligations (both legislative and policy); undertakes its activities whilst ensure environment compliance where appropriate; and effectively responds to the climate change challenge *in so far as it relates to the Councils policies and obligations to the District.*

- 3.3 In respect of the risk relating to LGR the likelihood of this occurring was challenged based on the single line narrative. The narrative description sets out that the risk relates to the failure to plan effectively. Wider narratives have been included the appendix to this paper.
- 3.4 Further work is progressing with each Head of Service to take a similar approach to identify that the operational risk registers facilitated by RSM as part of the risk support work.
- 3.5 Control actions are being added to each of the corporate risks which will be reviewed by the Risk Officer once they are appointed. Recruitment closed on 30 June and at the time of writing this paper, shortlisting was in progress.

#### **4. KEY IMPACTS**

- 4.1 An up-to-date corporate risk register enables the organisation to ensure it is focusing on the key risks and that the work of internal audit is informed by the register. The corporate risk register ensures that internal audit activity can give sound assurance and adds value to the organisation and its corporate governance.

#### **5. WHAT ACTIONS WILL BE TAKEN/TIMETABLE FOR IMPLEMENTATION**

- 5.1 The next steps are for corporate risk owners to review further actions associated with those risks, with appropriate target dates.
- 5.2 Further work will be undertaken with Heads of Service to do the same exercise relating to each service area / function in order to develop service and function risks, scores, maps and actions.

#### **6. LINK TO THE CORPORATE PLAN, STRATEGIC PRIORITIES AND/OR CORPORATE OBJECTIVES**

- 6.1 Ensuring we are a customer focused and service led Council – to become more business-like and efficient in the way we deliver services. Effective management of corporate risks is a demonstration of this approach.

#### **7. RESOURCE IMPLICATIONS**

- 7.1 RSM are providing capacity and facilitation to support this activity and during the first quarter of 2025/26, the Corporate Director will assess the resource requirements for this activity and the use of the Risk & Controls Officer post.

#### **8. LIST OF APPENDICES INCLUDED**

Appendix 1 – Corporate Risk Summary

Appendix 2 - Heat Maps

#### **CONTACT OFFICER**

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Risk Register						
Prefix	Risk Title	Risk Description	Risk Owner	Inherent Priority	Residual Priority	Target Priority
CORP0001	Cyber	Successful / serious cyber security attack on the Council	Corporate Director (Finance and Resources) Section 151 Officer	Very High (5:4=20)	High (5:2=10)	High (5:2=10)
CORP0002	Service Quality	Unable to maintain and build quality and consistency in service provision by the Council	Corporate Director (People)	Very High (4:4=16)	High (3:3=9)	High (3:3=9)
CORP0003	Political	Unable to effectively respond to changes in political priorities and policies	Chief Executive	High (3:4=12)	Medium (3:2=6)	Medium (3:2=6)
CORP0004	Financial	Failure to preserve Council's financial position	Corporate Director (Finance and Resources) Section 151 Officer	Very High (4:4=16)	Medium (3:1=3)	Medium (3:1=3)
CORP0005	Governance	Governance failure	Chief Executive	High (4:3=12)	Medium (3:2=6)	Medium (3:2=6)
CORP0006	Resilience	Inability to effectively respond to a major disruption / critical event	Corporate Director (People)	High (4:3=12)	High (3:3=9)	Medium (3:2=6)
CORP0007	Health & Safety	Serious health, safety, and well-being failure by the Council	Chief Executive	Very High (5:3=15)	High (5:2=10)	High (5:2=10)
CORP0008	Regulatory	Unable to meet requirements of new regulations and legislation affecting the Council	Chief Executive	Very High (4:4=16)	High (3:3=9)	Medium (3:2=6)
CORP0009	Fraud	Significant fraud/ theft successfully committed against the Council	Corporate Director (Finance and Resources) Section 151 Officer	High (4:3=12)	Medium (3:2=6)	Low (2:2=4)
CORP0010	Data Protection	Major confidentiality breach on the part of the Council.	Corporate Director (Finance and Resources) Section 151 Officer	Very High (4:4=16)	High (4:2=8)	Medium (3:2=6)
CORP0011	Environmental	Failure to ensure that the Council responds effectively to its environmental obligations (both legislative and policy); undertakes its activities whilst ensure environment compliance where appropriate; and effectively responds to the climate change challenge in so far as it relates to the Councils policies and obligations to the District.	Corporate Director (Place)	High (4:3=12)	High (4:2=8)	High (4:2=8)
CORP0012	Staffing	Failure to recruit, develop, support and retain high quality / calibre staff across all Council services.	Chief Executive	Very High (4:4=16)	High (3:3=9)	Low (2:2=4)
CORP0013	Partnerships / Collaboration	Not maintaining and developing fruitful partnerships and collaborations	Chief Executive	Very High (4:4=16)	Medium (3:2=6)	Medium (3:2=6)
CORP0014	Stakeholder Engagement	Not effectively engaging with our key external stakeholders	Chief Executive	Very High (4:4=16)	Medium (3:2=6)	Medium (3:2=6)
CORP0015	Housing and Infrastructure	Failing to effectively plan for and manage the current and future housing demands and infrastructure development - resulting in a barrier to growth and investment, or detrimental impact on communities.	Corporate Director (Place)	Very High (4:4=16)	High (4:2=8)	High (4:2=8)
CORP0016	Transformation	The Council fails to manage its transformation strategy (including digital)	Corporate Director (People)	Very High (4:4=16)	High (3:3=9)	High (3:3=9)
CORP0017	Safeguarding	Failure to ensure there are robust systems in place to address safeguarding and prevent duty concerns	Chief Executive	High (4:3=12)	High (3:3=9)	Medium (3:2=6)
CORP0018	Equality, Diversity and Inclusion	The Council fails to support and embed its equality, diversity and inclusion ethos.	Chief Executive	High (4:3=12)	Medium (2:3=6)	Low (2:2=4)
CORP0019	Local Government Reorganisation (LGR)	Failure to effectively plan for Local Government Reorganisation (LGR)	Chief Executive	Very High (4:5=20)	High (3:4=12)	High (3:3=9)

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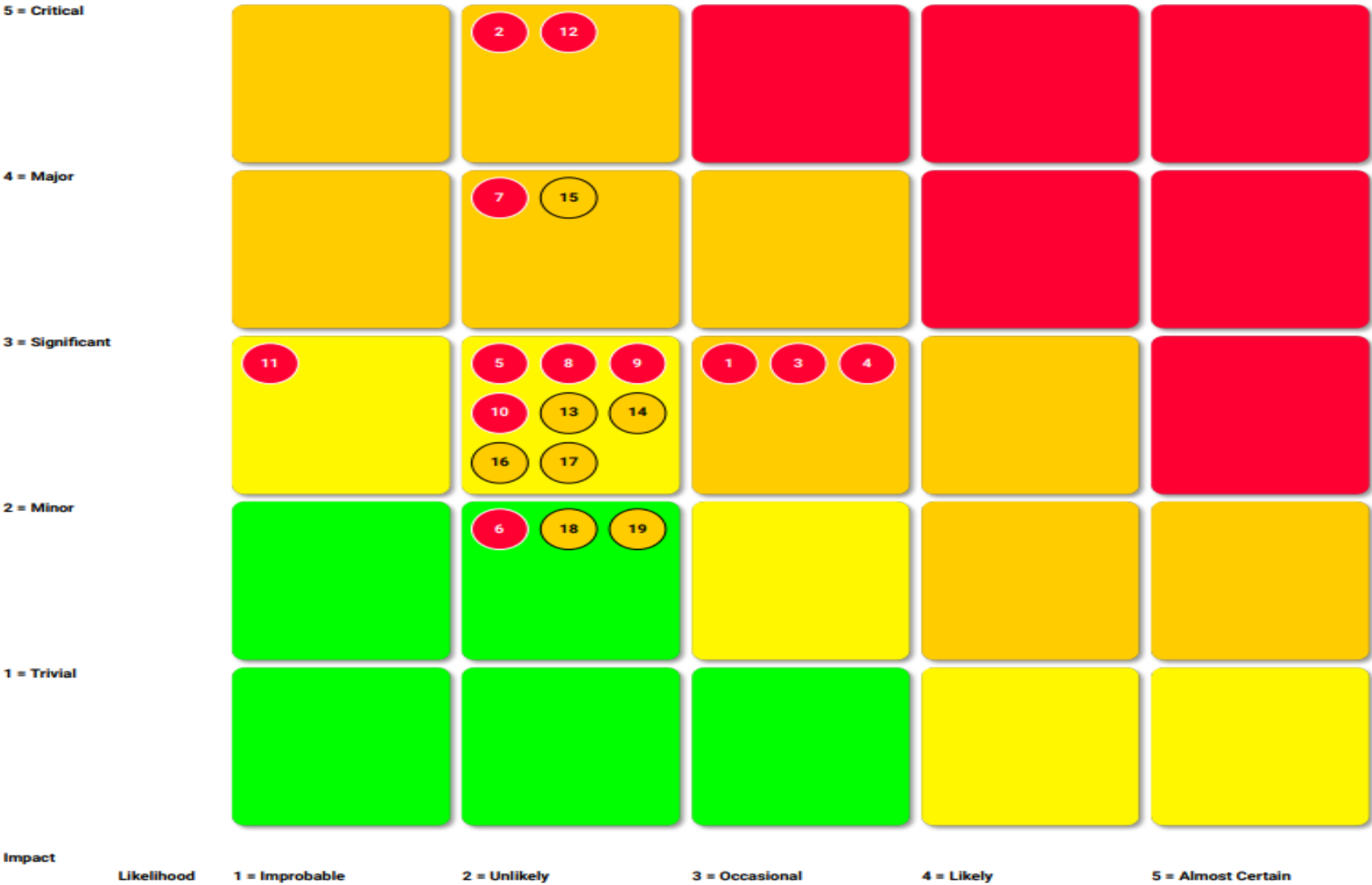
INHERENT RISKS – HEAT MAP



RESIDUAL RISKS – HEAT MAP



TARGET RISKS – HEAT MAP



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**Public**  
**Key Decision – No**

## HUNTINGDONSHIRE DISTRICT COUNCIL

**Title/Subject Matter:** Internal Audit Update Report

**Meeting/Date:** Corporate Governance Committee  
9 July 2025

**Executive Portfolio:** Executive Councillor for Governance &  
Democratic Services  
Cllr Jo Harvey

**Report by:** Internal Audit Manager – Dan Harris (RSM)  
(Corporate Director – Finance and Resources)

**Wards affected:** All

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### **Executive Summary:**

This report sets out a summary of the work undertaken by the Internal Audit Service since the Committee last met in June 2025. RSM have prepared the update which will be presented by them.

### **Recommendation:**

The Committee is

### **RECOMMENDED**

to comment on and note the update on work undertaken by Internal Audit up to end of June 2025.

## **1. PURPOSE OF THE REPORT**

- 1.1 This report gives the Committee an update of the work of the Internal Audit Service since the last meeting.

## **2. BACKGROUND**

- 1.1 The activities of the Internal Audit team are pivotal to the organisation's governance and control processes. The findings of audit reviews demonstrate compliance with controls and processes or identify where improvements need to be made. This is an inherent element of Priority 3 of the Corporate Plan (2023-2028) which is about 'doing our core work well' through 'delivering good quality, high value-for-money services with good control and compliance with statutory obligations'.
- 1.2 RSM will, in the capacity of Head of Internal Audit be at the meeting to present the update on the work that had been carried out.
- 1.3 Given that the work relating to Cyber Risk and the controls associated with keeping the Council's systems secure need to remain confidential, the detail for that audit is restricted under Paragraph 3 of Schedule 12A of the Local Government Act 1972.

## **3. LEGAL IMPLICATIONS**

- 3.1 None

## **4. RESOURCE IMPLICATIONS**

- 4.1 No additional resource requirements arise from this report.

## **5. LIST OF APPENDICES INCLUDED**

Appendix 1 – Internal Update Report from RSM LLP

Appendix 2 – Confidential update on Cyber Essentials audit

## **CONTACT OFFICER**

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## HUNTINGDONSHIRE DISTRICT COUNCIL

### Internal Audit Progress Report

Corporate Governance Committee – 9 July 2025

This report is solely for the use of the persons to whom it is addressed.

To the fullest extent permitted by law, RSM UK Risk Assurance Services LLP will accept no responsibility or liability in respect of this report to any other party.



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## KEY MESSAGES

The internal audit plan for 2025/26 was approved by the Corporate Governance Committee (CGC) on 25 March 2025. This report provides an update on progress against that plan and summarises the results of the work completed by to date.



**2024/25 Internal Audit Plan** - Since the last CGC meeting in June 2025, we have finalised the following internal audit report from 2024/25:

- **Cyber Essentials Assessment (Advisory) – Part 2 Only**

This completes the Internal Audit Plan for 2024/25. A summary of the outcome of this review is included at in the Part 2 paper.

**2025/26 Internal Audit Plan** - Since the last CGC meeting in June 2025, we have finalised the following internal audit report from 2025/26:

- **Human Resources – Recruitment and Retention (Partial Assurance)**

A summary of the outcome of this review, are included in this report at Section 1.1 below

The following reports are currently at **draft** report stage:

- Capital Programme
- Data Quality and Performance Management **[to note]**

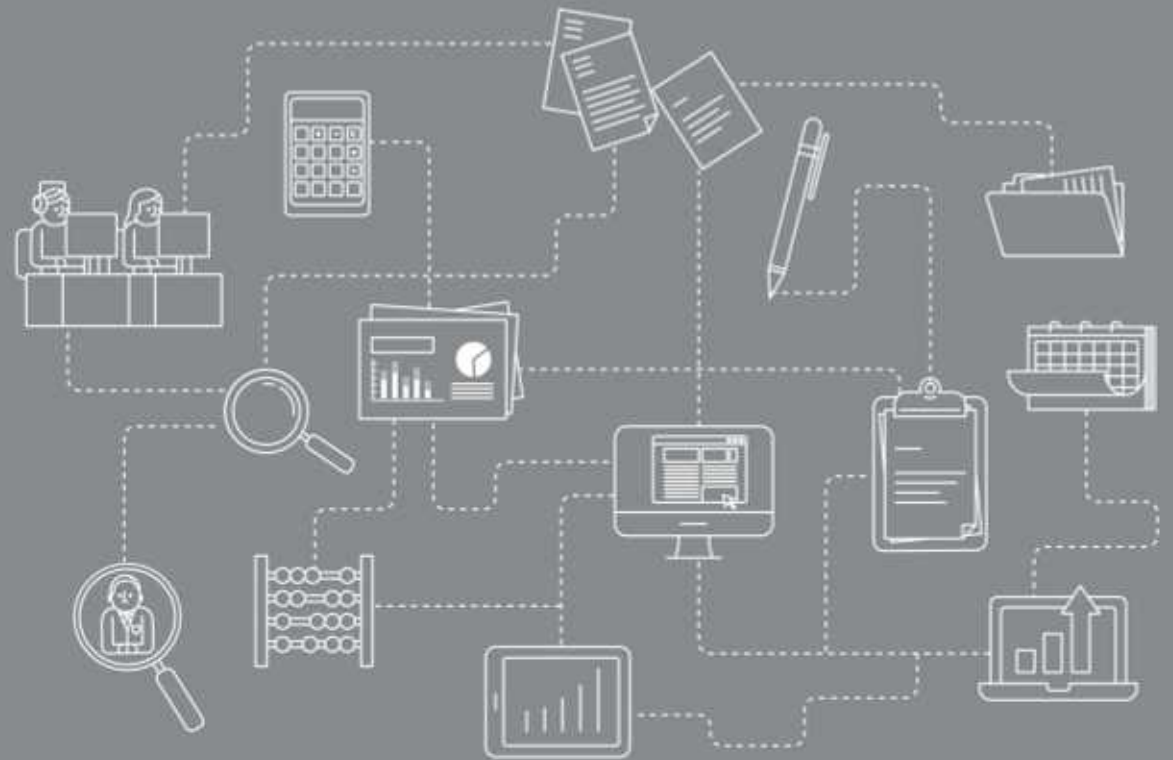


Details of the progress made and scheduling of the 2025/26 internal audit plan are included at Appendix A. **[To note]**

# Final Reports

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# 01



# 1. FINAL REPORTS

## 1.1 Summary of the key issues arising from the final reports being presented to this Committee

This section summarises the reports that have been finalised since the last meeting.

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Assignment	Opinion issued	Actions agreed		
		L	M	H
Human Resources – Recruitment and Retention 2025/26:				
<p>Our review identified areas of control design weaknesses and are areas of non-compliance in regards to the management of recruitment and retention, which have resulted in the agreement of one high, five medium and one low priority management actions. Areas of poor control design included the Council not having a Retention Policy in place. Contracts signed by new starters were not signed and dated. Recruitment KPIs such as offer acceptance rate were not collated or reported on.</p> <p>The Recruitment and Selection Policy was significantly out of date (last reviewed in 2014), which resulted in the policy document being misaligned to the Recruitment Process Guide for Hiring Managers. Through sample testing, we noted that Interview Assessment Forms and Shortlisting Matrices were not always completed and retained.</p> <p>We did, however, confirm some well designed controls in place regarding recruitment and retention. Sample testing of the recruitment process confirmed that all individuals had Vacancy Authorisation Forms (VAF) completed and approved, job descriptions posted which reconciled to the VAF, completed application forms and CVs, pre-employment checks correctly completed in line with the Post Information spreadsheet and contracts of employment were retained. Our review also confirmed that controls were being developed to implement training for Hiring Managers on the recruitment process and retention initiatives to reduce employee turnover.</p>				
	Partial Assurance	1	6	1
<b>Extract of Executive Summary:</b> <b>We identified the following weakness which have led to the agreement of one high priority management action:</b> <b>Policies and Procedures</b> - The Recruitment and Selection Policy had not been reviewed, updated or approved by either the Management Team or a Committee since November 2014, and did not align to the Recruitment Process Guide for Hiring Managers. There is a risk of staff following out of date practices, non-compliance with legislation and inconsistent approaches to recruitment and retention. (1 x High) <b>Responsible Owner:</b> Sam Sanderson <b>Date:</b> 31 July 2025				

# Appendices

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## APPENDIX A: PROGRESS AGAINST THE INTERNAL AUDIT PLAN 2025/26

	Assignment	Status / Opinion issued / Start date	Actions agreed			Target CGC	Actual CGC meeting
			H	M	L		
1	Human Resources – Recruitment and Retention	Final Report – <b>Partial Assurance</b>	1	6	1	July 2025	July 2025
2	Payroll	Fieldwork in progress				September 2025	
3	Capital Expenditure	Draft report issued 27 June 2025				September 2025	
4	Data Quality and Performance Management	Draft report issued 27 June 2025				September 2025	
5	Transformation	Fieldwork in progress, debrief held				September 2025	
6	Contract Management	Fieldwork in progress, debrief held				September 2025	
	Council Tax	Fieldwork in progress				September 2025	
	Housing Benefits	Fieldwork in progress				September 2025	
	Procurement	Fieldwork in progress				March 2026 (now Nov 2025)	
10	Complaints and Compliments	July 2025 – planning				Sept / Nov 2025	
11	Capacity Planning	August 2025 – planning				November 2025	
12	Business Rates	August 2025 – planning				March 2026 (now Nov 2025)	
13	Creditors	September 2025 – planning				Nov 2025 / Jan 2026	
14	General Ledger	October 2025 – planning				January 2026	
15	Risk Management	Novemebr 2025 - planning				January 2026	
16	Disabled Facility Grant (DFG) Verification	TBC – planning				TBC	
17	Artificial Intelligence (AI)	November 2025 – planning				March 2026	
18	Market Towns Programme	December 2025 – planning				March 2026	
19	Workforce Development Strategy	December 2025 – planning				March 2026	

Assignment		Status / Opinion issued / Start date	Actions agreed			Target CGC	Actual CGC meeting
			H	M	L		
20	Follow Ups	Dec 2025 / Mar 2026 – planning				March 2026 / June 2026	
21	Effectiveness of CDIO Role	January 2026 – planning				Mar / Jun 2026	
22	Democratic Services	January 2026 – planning				June 2026	
23	GDPR (Advisory)	February 2026 – planning				June 2026	

# APPENDIX C: OTHER MATTERS

Detailed below are the changes to the 2025/26 internal audit plan since the previous meeting of the CGC in March 2025:

Note	Auditable area	Reason for change
	The Risk Management review is now scheduled for Q3 at the request of the S151 Officer, with the Complaints and Compliments audit being brought forward into Q2 in response to this request.	

Detailed below are the changes to the 2025/26 internal audit plan previously reported to the CGC:

Note	Auditable area	Reason for change
	We have commenced the scheduling process for the 2025/26 internal audits and there have been some minor changes to timing of reviews. This includes Risk Management moved to Q2, Capital Expenditure moved to Q1, Data Quality and Performance Reporting moved to Q1 and Workforce Development Strategy has moved to commence in Q3. The DFG Grant Verification timing is under review and being scheduled.	

## FOR FURTHER INFORMATION CONTACT



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The matters raised in this report are only those which came to our attention during the course of our review and are not necessarily a comprehensive statement of all the weaknesses that exist or all improvements that might be made. Actions for improvements should be assessed by you for their full impact. This report, or our work, should not be taken as a substitute for management's responsibilities for the application of sound commercial practices. We emphasise that the responsibility for a sound system of internal controls rests with management and our work should not be relied upon to identify all strengths and weaknesses that may exist. Neither should our work be relied upon to identify all circumstances of fraud and irregularity should there be any.

Our report is prepared solely for the confidential use of Huntingdonshire District Council, and solely for the purposes set out herein. This report should not therefore be regarded as suitable to be used or relied on by any other party wishing to acquire any rights from RSM UK Risk Assurance Services LLP for any purpose or in any context. Any third party which obtains access to this report or a copy and chooses to rely on it (or any part of it) will do so at its own risk. To the fullest extent permitted by law, RSM UK Risk Assurance Services LLP will accept no responsibility or liability in respect of this report to any other party and shall not be liable for any loss, damage or expense of whatsoever nature which is caused by any person's reliance on representations in this report.

This report is released to you on the basis that it shall not be copied, referred to or disclosed, in whole or in part (save as otherwise permitted by agreed written terms), without our prior written consent.

We have no responsibility to update this report for events and circumstances occurring after the date of this report.

RSM UK Risk Assurance Services LLP is a limited liability partnership registered in England and Wales no. OC389499 at 6th floor, 25 Farringdon Street, London EC4A 4AB.

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

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## CORPORATE GOVERNANCE COMMITTEE PROGRESS REPORT

Committee	Decisions	Date for Action	Action Taken	Officer Responsible	Delete from future list
29/01/2025	<b>Internal Audit Peer Review Challenge Actions – Update</b>  To receive a further update on actions at the next Committee meeting.	25/03/2025	This work will be taken forward by the new Monitoring Officer, as the Head of Service, once they have taken up post.	Corporate Director – Finance & Resources	No
N/A	<b>Constitution Review Working Group</b>  Constitution Review Working Group appointed at Annual Council on 15 May 2025.	N/A	The Working Group met on 26 June 2025 and considered further the Council Procedure Rules, initial discussions on an updated Officers Scheme of Delegation and Substitutes Policy. A further meeting is scheduled for 4 September 2025 to consider these in more detail.	Elections & Democratic Services Manager	No
18/06/25	<b>Internal Audit Update Report</b>  Suggestion was made to discuss how to include more detail in the reports.		More detail has been provided in the report for July's meeting.	Corporate Director – Finance & Resources / Head of Internal Audit	Yes

**CORPORATE GOVERNANCE COMMITTEE PROGRESS REPORT**