

27 August 2026

CABINET – 8 SEPTEMBER 2026

A meeting of Cabinet will be held at 6.00pm on Tuesday 8 September 2026 in the Council Chamber at the Town Hall, Rugby.

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

Dan Green
Chief Executive

A G E N D A PART 1 – PUBLIC BUSINESS

1. Minutes – to approve the minutes of the extraordinary meeting held on 3 August 2026.
2. Apologies.

To receive apologies for absence from the meeting.
3. Declarations of Interest.

To receive declarations of –

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

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

(c) non-registrable interests as defined by the Council's Code of Conduct for Councillors.

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

Notice of questions from the public should be delivered in writing or by e-mail to the Chief Executive at least three clear working days prior to the meeting (no later than Wednesday 2 September 2026).

5. Matters referred from Scrutiny Committee or Full Council.

Growth and Investment Portfolio

6. Town Centre Wayfinding Project.
7. Town Centre Regeneration update.

Partnerships, Health and Wellbeing Portfolio

Nothing to report to this meeting.

People, Resources and Governance Portfolio

Nothing to report to this meeting.

Communities, Housing and Safety Portfolio

8. Demonstrating Compliance with the Requirements of the Housing Ombudsman Service 2025/26.
9. Regulator of Social Housing - Service Improvement Plan.
10. Impact of Voluntary and Community Sector Support 2025/26.
11. Councillor Grants Scheme 2026/27 – Delegation of Authority to determine individual awards.
12. Future Hosting Arrangements for the Home Environment Assessment and Response Team (HEART).
13. Private Sector Housing Enforcement and Civil Penalties Policies: Renters' Rights Act 2025 Implementation.

Environment and Climate Portfolio

Nothing to report to this meeting.

Customer and Digital Portfolio

Nothing to report to this meeting.

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

Nothing to report to this meeting.

PART 2 – EXEMPT INFORMATION

There is no business involving exempt information to be considered.

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

The Reports of Officers are attached.

Membership of Cabinet:

Councillors Robinson (Chair), C Edwards, S Edwards, McKenzie, I Mistry, O'Rourke,

Pimm and Roodhouse.

CALL-IN PROCEDURES

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

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

AGENDA MANAGEMENT SHEET

Report Title:	Town Centre Wayfinding Project
Name of Committee:	Cabinet
Date of Meeting:	8 September 2026
Report Director:	Strategic Director - Place Nicola Smith
Portfolio:	Growth & Investment
Ward Relevance:	All
Prior Consultation:	Finance and Performance, Procurement, Town Centre Programme Board, Town Centre Regeneration Working Group, Health & Safety, Street Cleaning
Contact Officer:	Ella Casey, Principal Planning Officer (Town Centre Regeneration)
Public or Private:	Public
Report Subject to Call-In:	No
Report En-Bloc:	No
Key Decision:	Yes
Corporate Priorities:	This report relates to the following priority(ies): ☒ A Healthier Rugby – To support people to live healthier, longer, and more independent lives. ☒ A Thriving Rugby – To deliver a thriving economy which brings Borough-wide investment and regenerates Rugby Town Centre. ☐ A Greener Rugby – To protect the environment and ensure the Borough adapts to climate change. ☒ A Fairer Rugby – To reduce inequalities and improve housing across the Borough. Corporate Strategy 2025-2035 ☐ This report does not specifically relate to any Council priorities but reporting financial performance is a key way of demonstrating the success of delivering the Corporate Strategy.
Summary:	The report seeks approval for the allocation of a supplementary budget from the Town Centre Strategy Reserve to implement new wayfinding signs throughout the town centre.

Local Government Reorganisation Implications:	The timeline for the delivery of the project will be completed before a new unitary authority is in place. As the wayfinding system is based on the Place Brand for Rugby which stakeholders have taken forward over the last 6 months to create an identity the change in governance would not impact the signs. The 10-year replacement period will be built into any contract and can be drawn down upon as and when required to ensure future consistency within the wayfinding system however a new authority could also choose not to use this option in the future.
Financial Implications:	The financial implications are set out within sections 5 & 6 of this report, detailing the use of the Town Centre Strategy Reserve.
Risk Management/Health and Safety Implications:	A dedicated strategic risk register is in place for each strand of the Corporate Strategy. Use of reserves is a key action towards delivering on the corporate strategy priorities.
Environmental Implications:	Environmental implications are set out in Appendix 3.
Legal Implications:	None arising directly from this report.
Equality and Diversity:	Equality and Diversity implications are set out in Appendix 2.
Options:	<u>Option 1:</u> Agree to the spend and recommendations as set out in the report. <u>Option 2:</u> Not agree the spend and recommendations as set out in the report.
Recommendation:	IT BE RECOMMENDED TO COUNCIL THAT – (1) A supplementary General Fund budget of £0.120m (revenue) be approved to fund a new wayfinding system, to be financed from the Town Centre Strategy Reserve; and (2) A supplementary General Fund budget of £0.275m (capital) be approved and added to the capital programme for 2026/27 to fund a new wayfinding system, to be financed from the Town Centre Strategy Reserve.

**Reasons for
Recommendation:**

To ensure that the quality wayfinding in the town centre is improved, attracting visitors to dwell in the town centre, building civic pride and improving the quality of places as outlined in the Council's Corporate Strategy and Annual Delivery Plan 2026-2027.

Cabinet - 8 September 2026

Town Centre Wayfinding Project

Public Report of the Strategic Director for Place

Recommendation

IT BE RECOMMENDED TO COUNCIL THAT

- 1) A supplementary General Fund budget of £0.120m (revenue) be approved to fund a new wayfinding system, to be financed from the Town Centre Strategy Reserve; and
- 2) A supplementary General Fund budget of £0.275m (capital) be approved and added to the capital programme for 2026/27 to fund a new wayfinding system, to be financed from the Town Centre Strategy Reserve.

1. EXECUTIVE SUMMARY

- 1.1. The purpose of this report is to seek Council approval for a supplementary budget of £0.395m (capital and revenue as detailed within table 1) from the Town Centre Strategy Reserve to deliver a comprehensive new wayfinding system across Rugby Town Centre. The proposed scheme forms a key component of the Public Realm Masterplan (2025) and supports the Council's wider ambitions to enhance the town centre environment, strengthen place identity, improve accessibility, and encourage increased visitor footfall and dwell time.
- 1.2. The Public Realm Masterplan identified deficiencies in the existing wayfinding provision and established a strategic approach to improving legibility and navigation throughout the town centre. Through the development of Projects 1 to 3 to RIBA Stage 3, a detailed wayfinding strategy (Appendix 1) has been prepared, including a hierarchy of information, design principles, sign family, sign locations and content. The proposed signage has been designed to complement Rugby's historic environment while supporting the Rugby Place Brand, creating a consistent and recognisable identity across the town centre.
- 1.3. Officers have considered whether to deliver selected elements of the wayfinding network or implement the complete system. It is concluded that a comprehensive town-wide approach will provide the greatest benefits by creating continuous pedestrian journeys, supporting businesses across the whole town centre, improving accessibility, strengthening civic identity, and ensuring a consistent visitor experience. As many design and project development costs would be incurred regardless of the number of signs

installed, delivering the entire system also represents better value for money.

- 1.4. The proposed wayfinding system is expected to improve navigation and connectivity, encourage greater exploration of the town centre, support local businesses through increased footfall, and contribute to the delivery of the Council's Corporate Strategy priorities, particularly those relating to a Thriving Rugby and a Fairer Rugby.
- 1.5. It is therefore recommended to Council that £0.120m of revenue and £0.275m of capital be created as a supplementary budget from the Town Centre Strategy Reserve and allocated to this project to enable the delivery of the comprehensive town centre wayfinding system.

2. INTRODUCTION

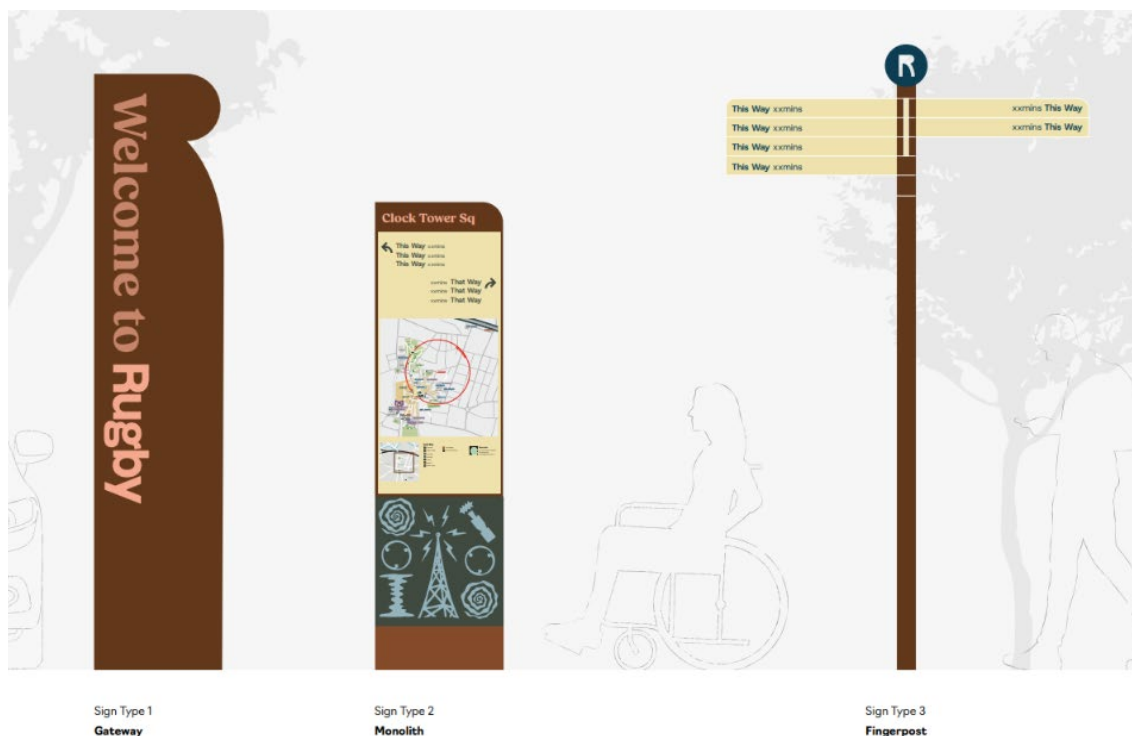
- 2.1. The purpose of this report is to update on the evolution of the wayfinding system design since the publication of the Public Realm Masterplan (2025) and through the detailed design stages (RIBA 3) of projects 1-3. Consideration of the next steps is given with a preferred option recommendation for implementation of the overall project.

3. BACKGROUND

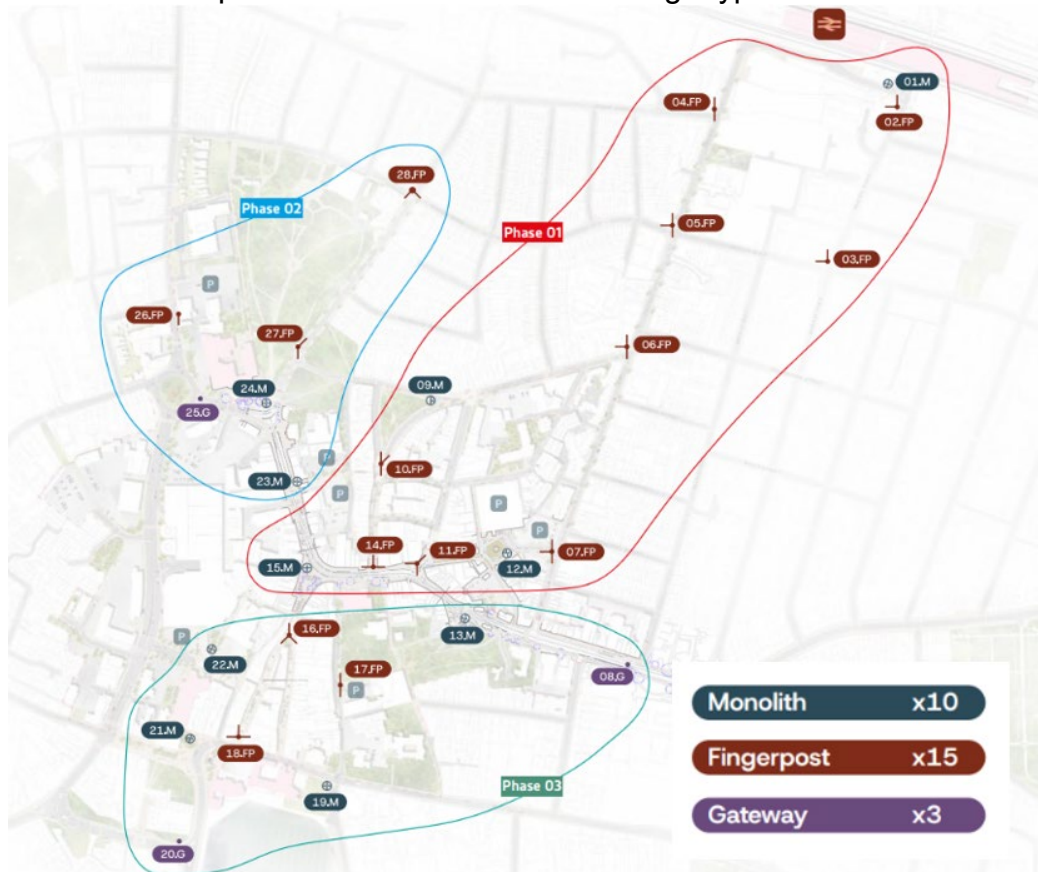
- 3.1. The Public Realm Masterplan (PRM) (2025) was produced by Planit on behalf of the Council. It sets out a clear vision for public realm within the town centre and identifies a range of gateways/arrival points, ways to connect existing communities and better places/spaces opportunities in the town centre.
- 3.2. As part of the PRM audit analysis work was undertaken to understand the wayfinding items which were currently in the town centre and where improvements were needed in order to improve connectivity for all. A legibility study was undertaken to inform a wayfinding strategy which included a suite of signs.
- 3.3. Through the development of the design work for Projects 1-3 within the PRM the following has been developed:
 - Information hierarchy
 - Design principles
 - Sign family
 - Proposed sign content
- 3.4. This information can be found within Appendix 1. It is proposed to remove existing signage and introduce a new system that better meets the wayfinding needs of both visitors and local residents. Sign locations have been determined based on the findings of the analysis work. The design has been developed to complement the conservation area and heritage assets within the town centre while also aligning with the Rugby Place Brand in order to create a cohesive and recognisable identity across the town centre.

4. WAYFINDING PROJECT OPTIONS

- 4.1. As set out within Appendix 1 the wayfinding sign family proposed is as below (colours are just examples to show how the family of signs would link together):



- 4.2. The Proposed Locations for the three sign types are as follows:



- 4.3. The decision could be made to put in place specific signs on the map above or to bring forward the whole system in its entirety. The map shows phasing in order to group specific locations for delivery.
- 4.4. The key benefits of taking the project forward in its entirety are as follows:
- Creates a continuous journey – isolated signs leave gaps in pedestrian confidence, often causing visitors to abandon their routes or turn back at the boundaries of unfamiliar areas. A whole system works like stepping stones, guiding users seamlessly from one location to another.
 - Supports all businesses – piecemeal signs will only point to certain locations and gaps in the current system have been identified. Comprehensive networks distribute foot traffic evenly, increasing dwell time and boosting overall local spending.
 - Builds a strong sense of place – a whole system unifies a town's design palette. Using consistent materials, colour schemes and branding throughout an entire town centre makes the area feel organised, safe and professional.
 - Improves accessibility – piecemeal signage often results in disjointed or missing information, leaving disabled users or those relying on accessible routes struggling to navigate. An overarching strategy ensures that tactile cues, clear fonts, and inclusive maps are standardised throughout a location.
- 4.5. In addition to the above the cost difference between bringing forward selected signs and an overall system would only differ in relation to the sign cost itself. The design and other related work would still be a cost for either option.
- 4.6. Based on the above it is therefore recommended that the wayfinding system is brought forward in its entirety so that the benefits identified are realised in full. The costs of the project would be as follows:

Table 1: Budget breakdown of Project

Budget Item	Revenue (£000m)	Capital (£000m)
Final Sign Family Design and technical drawings	0.04	
Planning Permission Fees	0.015	
Warwickshire County Council License Fees	0.045	
Warwickshire County Council Highways Technical Approvals	0.02	
Sign Production, Removal & Installation		0.275
TOTAL	0.120	0.275

- 4.7. Pre-market engagement has been undertaken to determine the budget costs above. In addition to the above budget for the scheme which is the topic of this approval the procurement process will include a 10-year replacement period which would be subject to additional costs if required. This would be reviewed annually through budget setting and is therefore not subject to approval at this stage as it is not known what signs may be required over this period.

- 4.8. The cost over a 10-year period would be dependent on the contractor appointed but also on the level of replacements required however it is estimated to be £200,000 over the period. It is envisaged that replacements would be for design elements mainly or where unexpected damage may be cause to a sign as the lifetime of the signs will be ensured to be long lasting through the procurement process.

5. TOWN CENTRE STRATEGY RESERVE

- 5.1. A £5 million Town Centre Strategy Reserve was approved at Council on 22 February 2023 to support the regeneration of the town. The opening balance of the Town Centre Strategy Reserve at 1 April 2026 was (£4.602m).
- 5.2. In February 2026 an additional £5m was agreed to be added to the Reserve therefore increasing the opening balance as of 1 April 2026 to (£8.286m). For 2026/27 there is also a Town Centre Budget which was approved as part of annual budget setting and is funded from the Reserve to assist in the delivery of the town centre work programme for 2026/27. Wayfinding was included within this budget however it is a key workstream within the town centre work programme.
- 5.3. £0.120m of revenue and £0.275m of capital is required as a supplementary budget from the Town Centre Strategy Reserve in order to implement a new wayfinding system across the town centre.

6. FINANCIAL IMPLICATIONS

- 6.1. The project can be funded in its entirety by a supplementary budget funded from the Town Centre Strategy Reserve. This reserve was created to fund key elements relating to town centre regeneration of which wayfinding is a workstream relating to the wider public realm improvements.
- 6.2. For accounting purposes, the project has been split into revenue £0.120m and capital £0.275m, as shown in Table 1.
- 6.3. As highlighted within section 4 there would be a 10-year replacement period out in place within the contract which would be subject to additional costs if required. This would be reviewed annually through budget setting and is therefore not subject to approval at this stage as it is not known what signs may be required over this period. The maximum amount over the 10-year period is estimated to be £200,000.

7. PROCUREMENT

- 7.1. Pre-market engagement has been undertaken in order to gain an understanding of what the overall project cost would be and this has been used to inform the costs in Table 1 which inform the recommendation of the report.
- 7.2. It was originally intended that exact costs would be gained through an open market procurement exercise in order to then gain approval for an exact cost

of the project. Procurement Officers advised this would not be possible due to the risk to the Council therefore an element of contingency has been added to some of the costs in table 1 where exact costs are not known.

- 7.3. If approved, an open market procurement exercise will be undertaken for this project.

8. CONCLUSION

- 8.1. It is recommended that the new wayfinding across the whole of the town centre is implemented in full rather than the optional piecemeal approach to ensure continuous navigation, create a unified local identity and drive footfall across the entire town centre.
- 8.2. It is therefore recommended to Council that £0.120m of revenue and £0.275m of capital be created as a supplementary budget from the Town Centre Strategy Reserve and allocated to this project.
- 8.3. This will instigate positive change within the town centre and help create an anchor for the Place Branding which is the basis for the design of the wayfinding signs. It will also ensure that the quality of the wayfinding system in the town centre is improved, attracting visitors to dwell in the town centre, building civic pride and improving the quality of places as outlined in the Council's Corporate Strategy and Annual Delivery Plan 2026-2027.

9. OPTIONS AVAILABLE

Option 1

Agree to the spend and recommendations as set out in the report

Option 2

Not agree the spend and recommendations as set out in the report

Name of Meeting: Cabinet

Date of Meeting: 8 September 2026

Subject Matter: Town Centre Wayfinding Project

Originating Department: Place

DO ANY BACKGROUND PAPERS APPLY ☒ **YES** ☐ **NO**

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink
	Public Realm Masterplan (2025) - https://www.rugby.gov.uk/documents/20124/6589483/Rugby-Public-Realm-Masterplan-Public.pdf/0bea332c-1f99-d800-7759-82cfa91ef38c?t=1743155921702
	Corporate Strategy 2025-2035 - https://www.rugby.gov.uk/w/corporate-strategy
	Rugby Town Centre Public Realm Priority Project Cabinet Report - https://www.rugby.gov.uk/documents/20124/62362152/PUBLIC+AGENDA+Cabinet+29+June+2026.pdf/29595f08-5787-865c-399b-51ccd252a51c?version=1.0&t=1781883898081

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

☐ Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A

RIBA 3 Design

Wayfinding & Signage

Client: Rugby Borough Council

Project: Rugby Town Centre Public Realm Priority

Project Date: March 2026

8 Wayfinding and Signage

Introduction	3
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Design Principles	13
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Introduction

This report outlines the design proposals for a new wayfinding system in Rugby town centre. The aim of the project is to improve connectivity across the town and help 'stitch' key destinations and routes together.

The proposals set out in this report have been informed by the issues identified in the audit and analysis work carried out in early 2025. The project proposes to remove the existing signage and introduce a new system that better meets the wayfinding needs of both visitors and local residents. Sign locations have been determined based on the findings of the analysis work.

The new sign designs have been developed to respond sensitively to the conservation area while also aligning with the newly developed town brand, helping to create a cohesive and recognisable identity across the town centre.

This document sets out the proposed information hierarchy, design principles, sign family, and proposed sign content.



8 Wayfinding and Signage

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Sign Information

Destinations

All destinations will need to be highlighted on signage but as we can't sign everything from everywhere, a hierarchy is applied to the list of destinations. By editing down the list based on priority helps to avoid visual clutter and any confusion.

All destinations will need to be on mapping, however high priority destinations and key arrival points such as the train station will need to be directed to on the signage.

Level 1 is for primary destinations and will be signed to from most places. Level 2 is for secondary destinations that are directed to more locally. Level 3 is then for other places of interest and facilities, this information will just be featured on mapping.

This approach means that information is given to the visitor progressively, only as they approach the destination.

Criteria for inclusion:

Retail

The retail area is highlighted in the mapping. Individual shops, restaurants and bars are not named as these spaces will frequently change

Parking

Council owned or major public car parking is shown on the mapping. This is highlighted with an icon and named to aid orientation.

Level 1

- Caldecott Park
- Library & Visitor Centre
- Leisure Centre
- Rugby Art Gallery & Museum
- Train Station
- Town Centre

Level 2

- Benn Hall
- Macready Theatre
- Market Place
- Regent Place
- Rugby School & Museum
- Rugby Theatre
- St Andrew's Gardens
- Web Ellis Rugby Football Museum

Level 3

- Art at the Alex
- Clock Tower
- Jubilee Gardens
- Percival Guildhouse
- Police Station
- Public Toilets
- Registry Office
- Rupert Brooke Statue
- Swan Centre
- Town Hall
- William Web Ellis Statue

Car Parks:

- Chestnut field
- Gas Street
- John Barford Car Park
- Little Church Street
- Newbold Road
- North Street Car Park
- Old Market Place / Railway Terrace
- Rugby Central
- Westway

Sign Information

Destinations

The plan here shows the destinations listed on the previous page plotted on a map.

A proposed map crop has been suggested based on the locations of these key destinations.

Level 1

Level 2

Level 3

Map Boundary



8 Wayfinding and Signage

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Design Principles

Typography

A place brand has recently been developed for Rugby. Fields and Host Grotesk are the chosen fonts for the brand.

Fields is a serif typeface so should be used sparingly in wayfinding.

Host Grotesk is a sans serif typeface which is clearer and more legible than Fields. It is recommended that this is the primary font used for wayfinding.

The font is available in various weights which will help establish a hierarchy in the information given.



Design Principles

Colour

The brand also sets out a colour palette. This has been developed from the Rugby Colour Palette project.

Each of the colours in the palette has been chosen to reflect an aspect of Rugby. This provides a good base for the wayfinding to build the place identity.



Design Principles

Icons

An icon palette has been developed for Rugby. The icons have been developed to have a hand drawn, illustrative look to them.

This is to reflect the principles set out in the brand of creating warm messaging and having a local craft feel.

Arrows

Arrows are a useful tool in wayfinding. The design shown here uses the expressive 'R' from the place brand as inspiration. The arrow has an exaggerated curve as per the 'R' in the brand.



Toilets



Baby Changing



Public Art



Museum



Theatre



Library



Tourist Information



Gallery



Bus Stops



Car Parks



Train Station



Walking Man



Up Left



Up Right



Up



Left



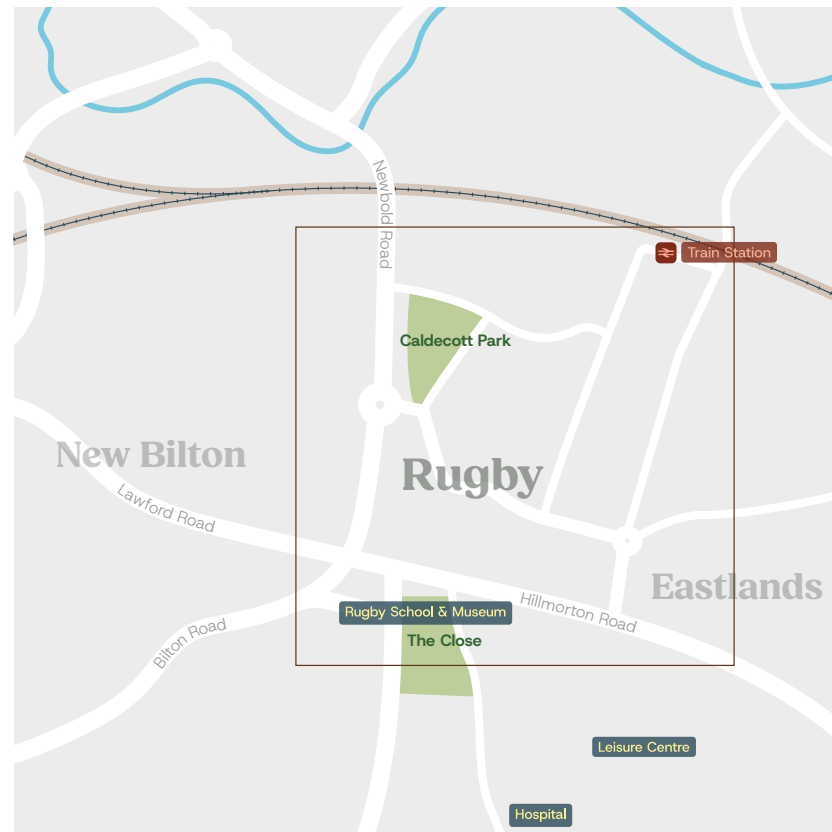
Right

Design Principles

Mapping

Mapping is an essential tool in navigation, providing the user with an easily recognisable visual representation of their immediate public realm environment helping to simplify route planning and encourage exploration.

This map is to be used on all map monolith signage. The map can also be used as a resource for other media such as trail maps, in brochures on online.



Wider Area Map



Detailed Town Map

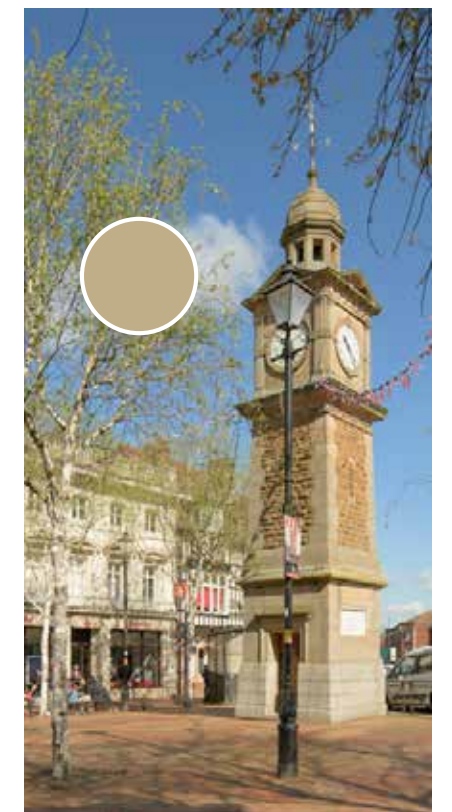
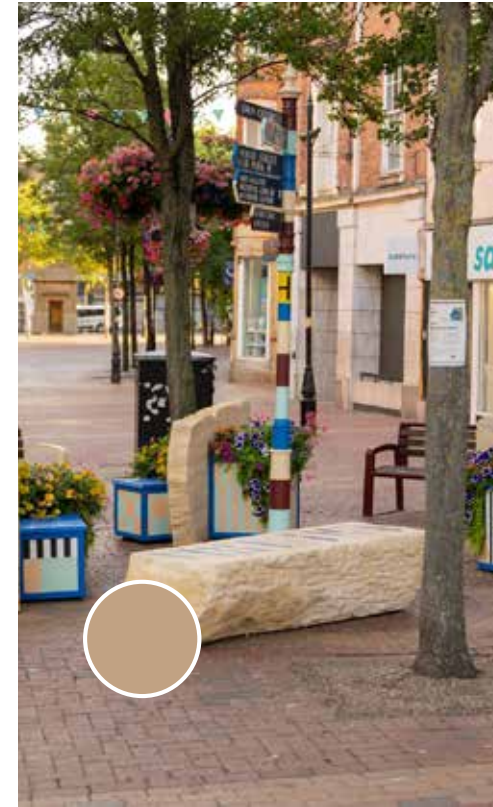
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Sign Family

Colour Study

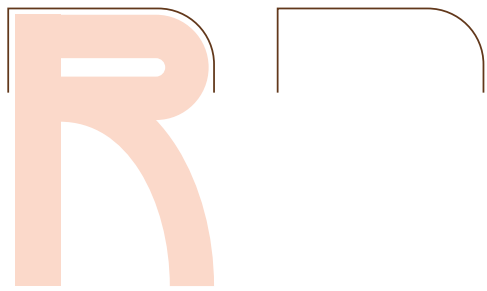
The aim of the project is to design signage that reflects Rugby's unique character and heritage.

The historic buildings, traditional materials and established streetscape of the town influence the choice of colours, materials and overall design style.

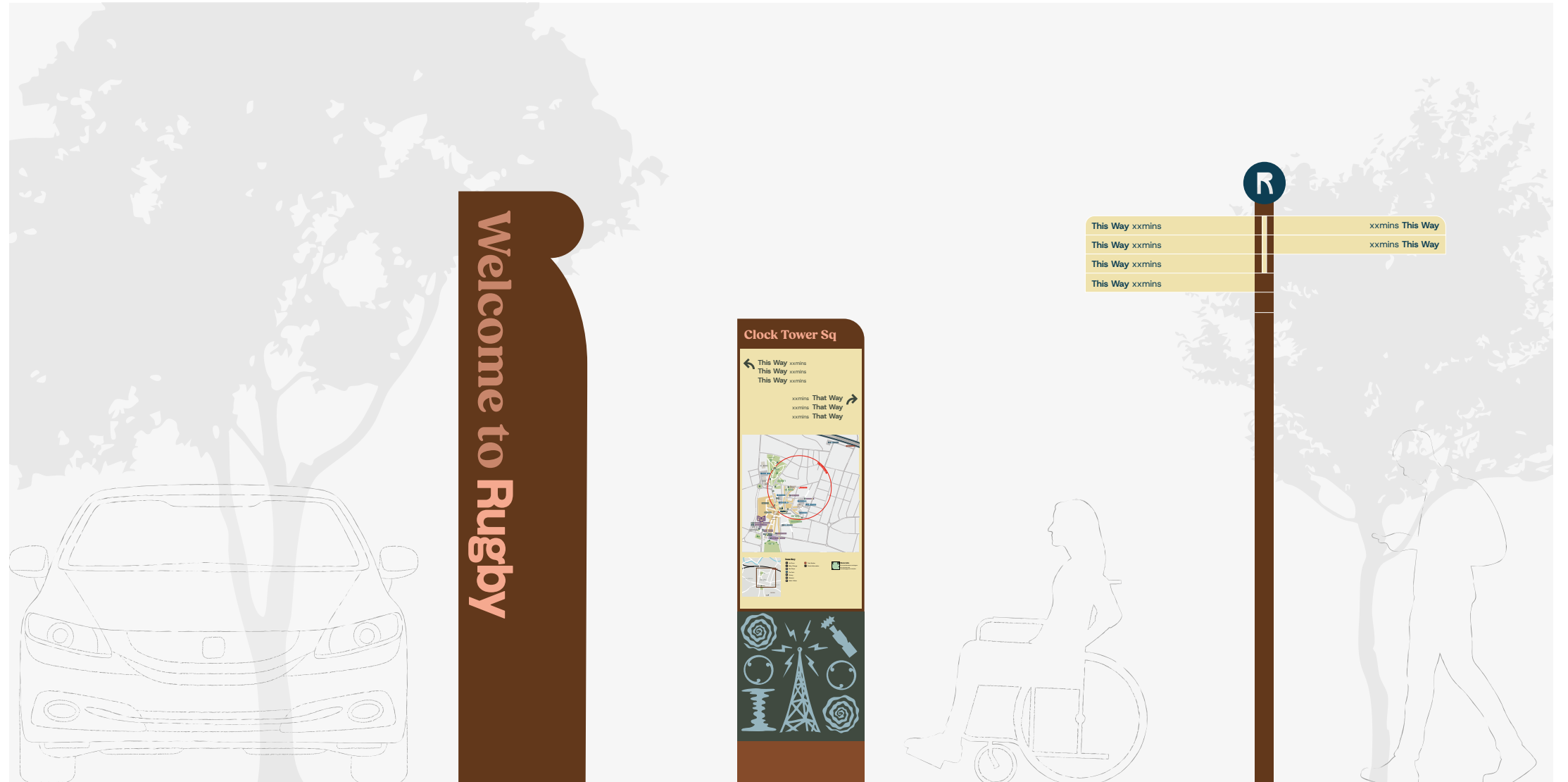


Sign Family

Shown here is the proposed sign family for Rugby. The identity of the town has been reinforced through the colours and sign form with a curved corner being a repeating motif across the family.



As Rugby contains a number of conservation areas, the signs have been designed to complement its historic character rather than compete with it.



Sign Type 1
Gateway

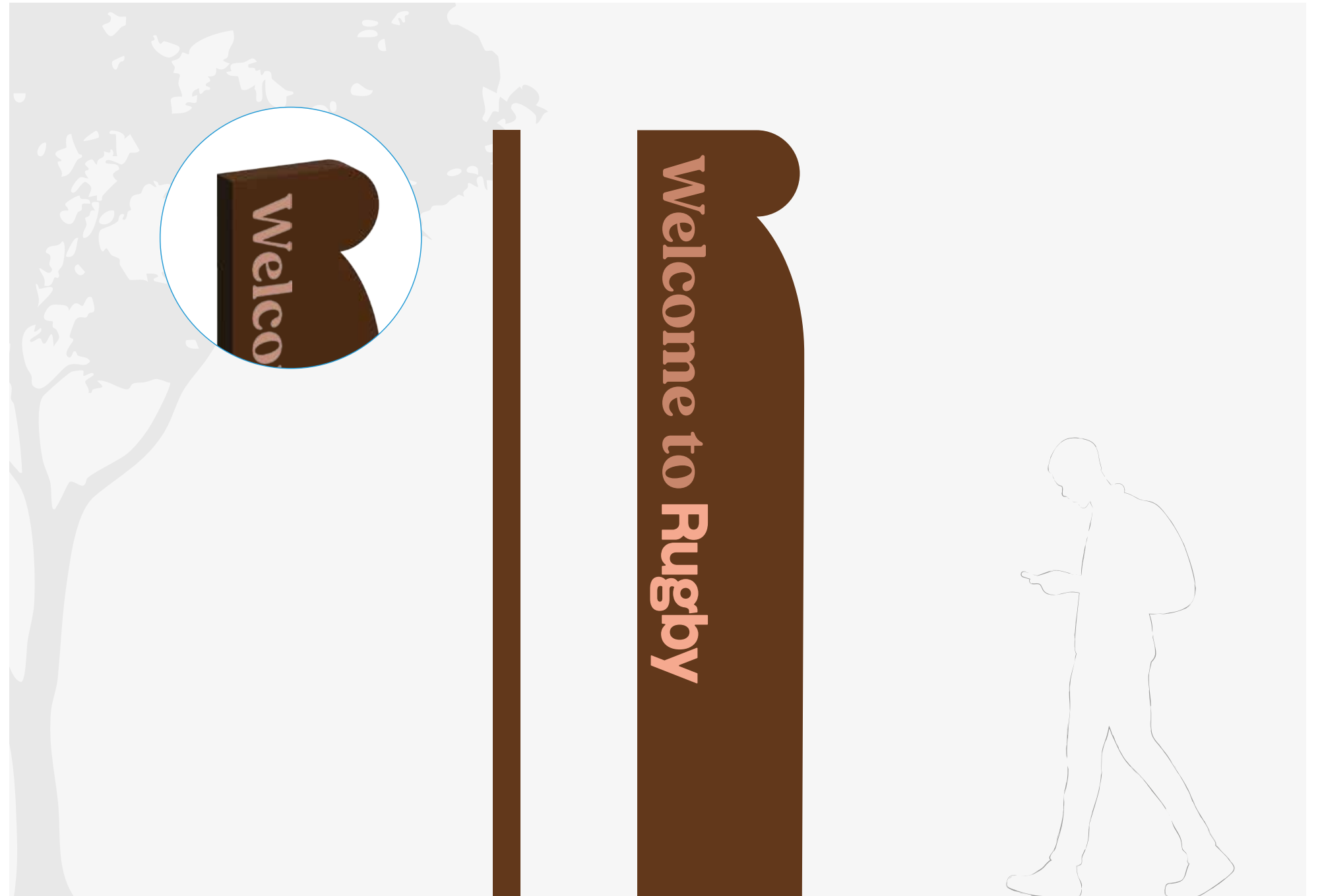
Sign Type 2
Monolith

Sign Type 3
Fingerpost

Sign Family

Gateway

Located on the approach roads in to Rugby, these signs will help to announce the arrival to the place and give visitors a warm welcome.



Sign Family

Monolith

Located at the key orientation points along the pedestrian routes, monoliths help to navigate the visitor to their destination with directional content and a heads up map.

- 1 **Identification** - street / area name to identify the location of the sign
- 2 **Direction** - Directing to key destinations with a supporting icon and where appropriate average walking times in minutes
- 3 **Orientation** - Heads up town and wider area map showing the spread of destinations.
- 4 **Base Panel** - Illustrations taken from the town brand to create a pattern that is unique to each location
- 5 **Interpretation** - Map to be replaced with interpretation in some locations

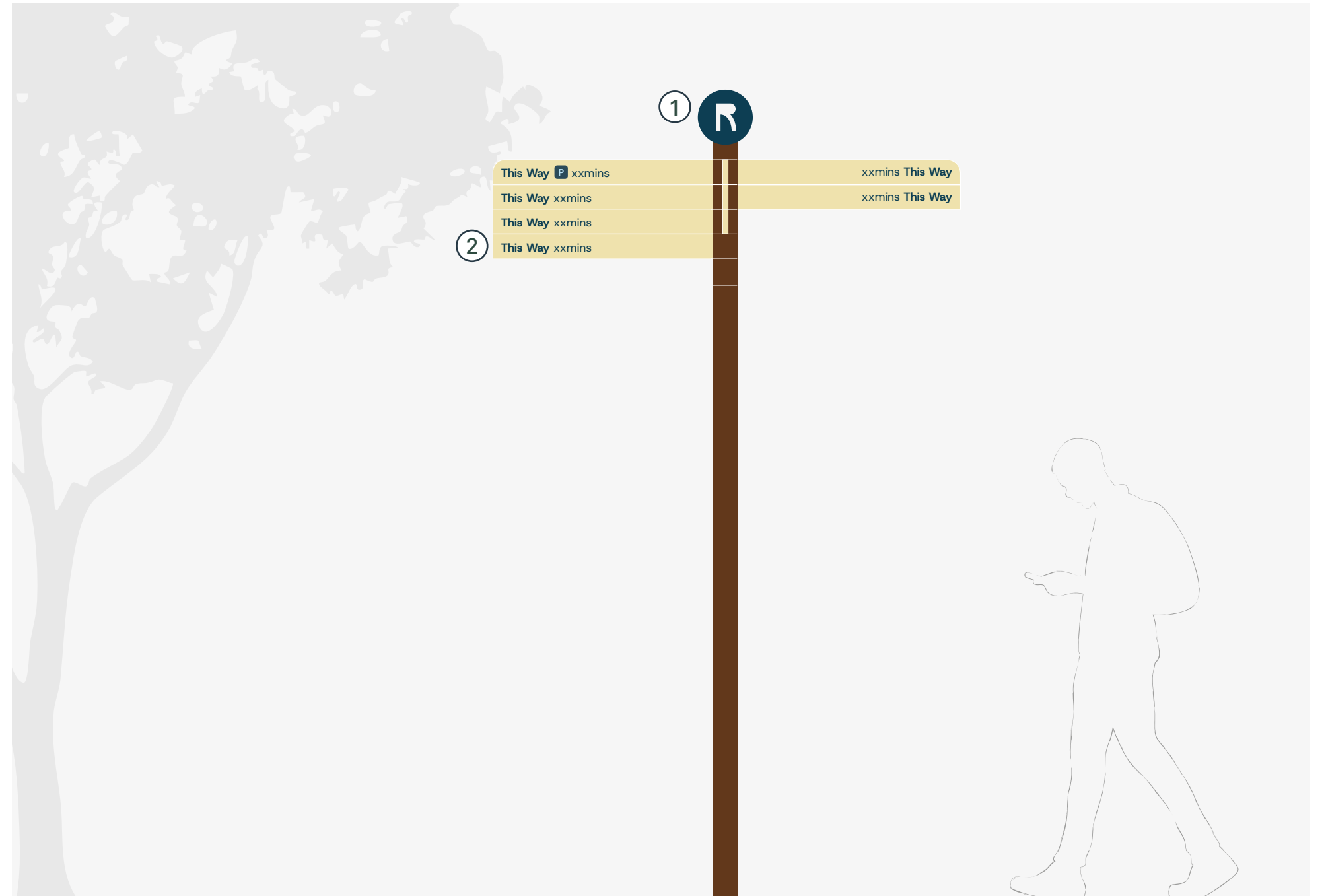


Sign Family

Fingerpost

Where a full map isn't needed or there isn't the space for a full monolith, a fingerpost helps to reinforce the route to a destination.

- ① **Identification** - Finial with fret cut 'R' detail to reflect the design of the gateway and monolith
- ② **Direction** - Directing to key destination with a supporting icon (eg. 'P' for car parks) and where appropriate average walking times in minutes



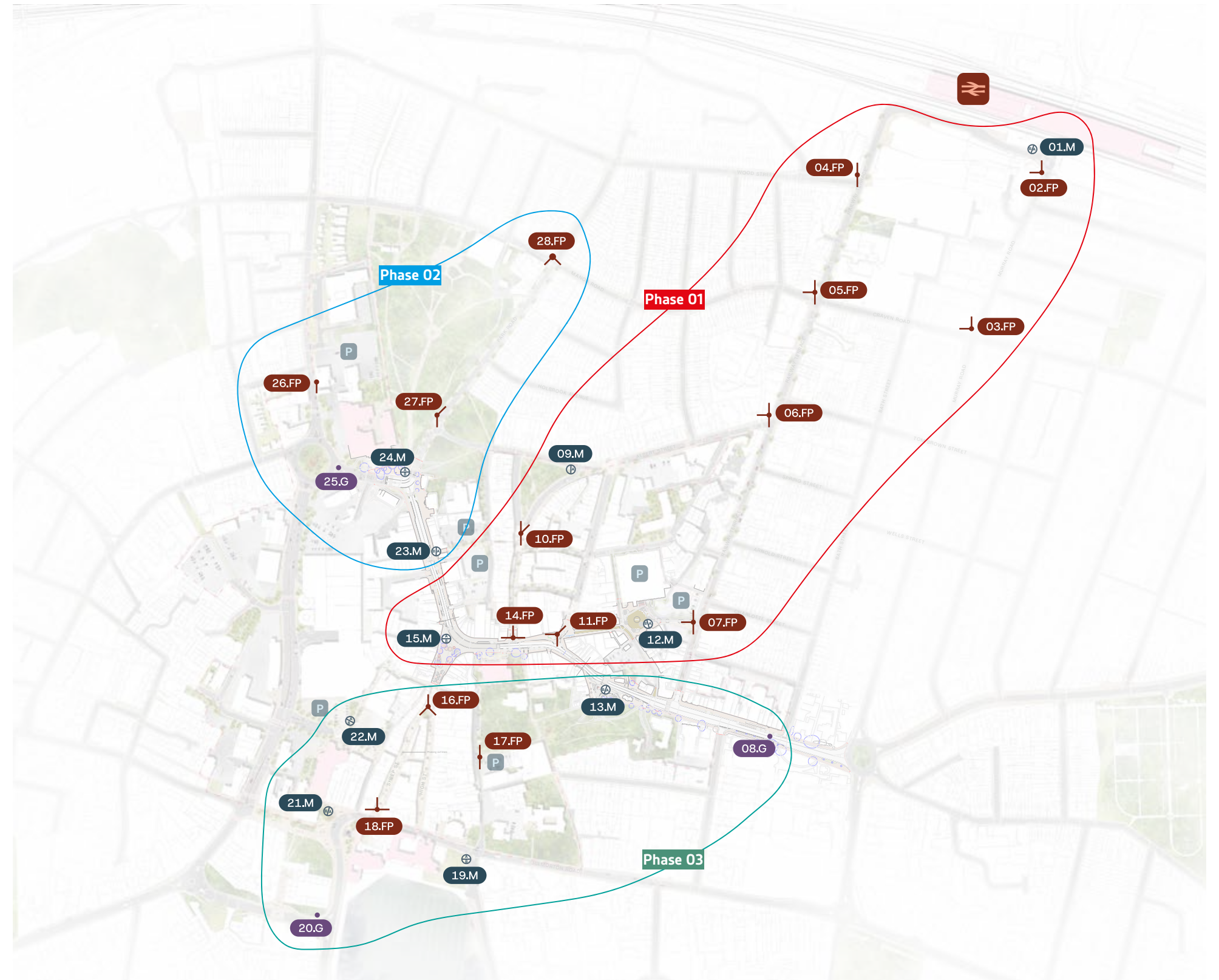
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Sign Locations

Shown here is the proposed location plan for new signs in Rugby. The aim of the scheme is to improve connectivity from the arrival points and stitch the town together.

If there are budget restraints, it is recommended that the project is delivered in phases. The proposed phase boundaries are shown on the plan here.

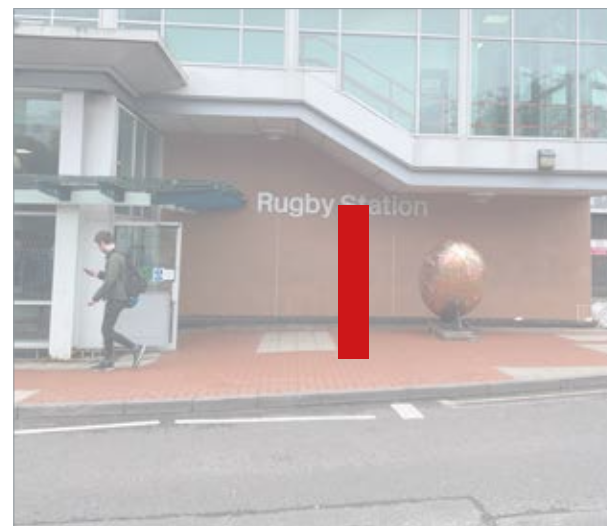
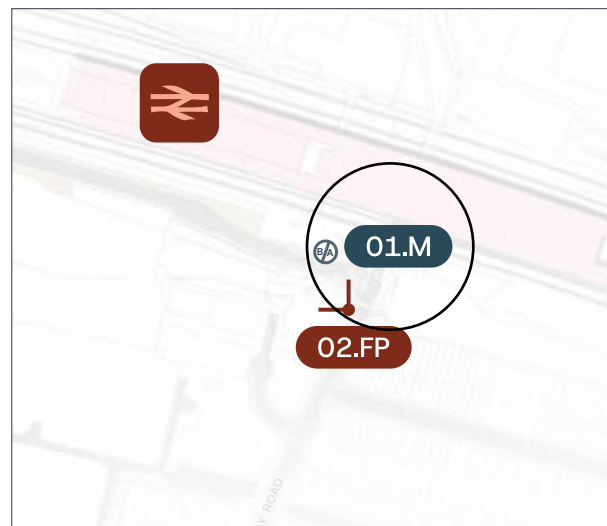
Monolith	x10
Fingerpost	x15
Gateway	x3



Sign Locations

Location 01.M

Sign Type Monolith



Header: Rugby

Side A

↑ Town Centre
Caldecott Park

Map: West

Header: Rugby

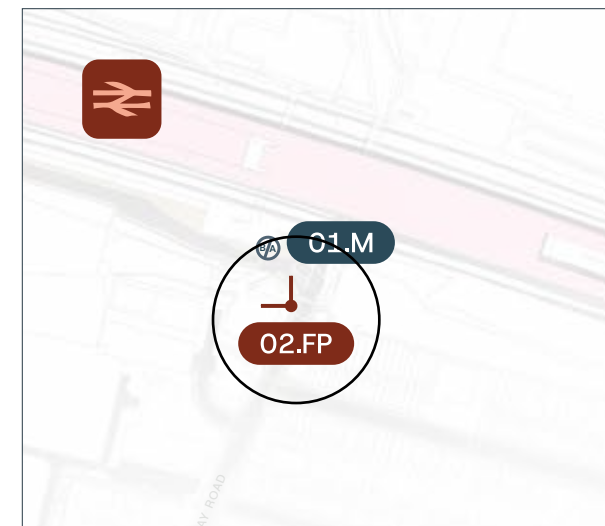
Side B

Town Centre →

Story: Rugby's Railway Heritage

Location 02.FP

Sign Type Fingerpost

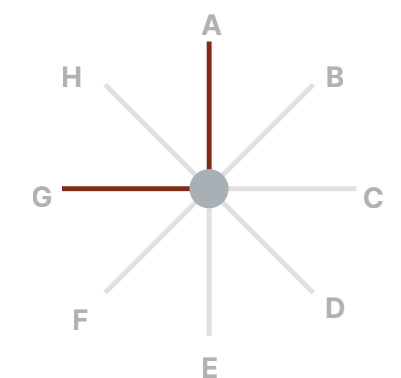


Direction A

Train Station

Direction G

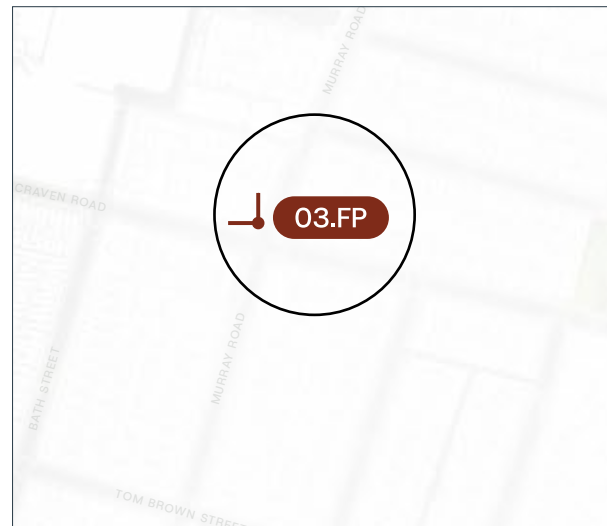
Town Centre
Caldecott Park



Sign Locations

Location 03.FP

Sign Type Fingerpost



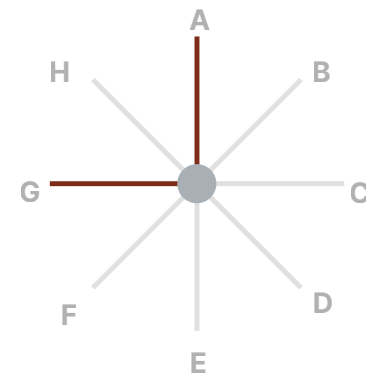
Direction A

Train Station

Direction G

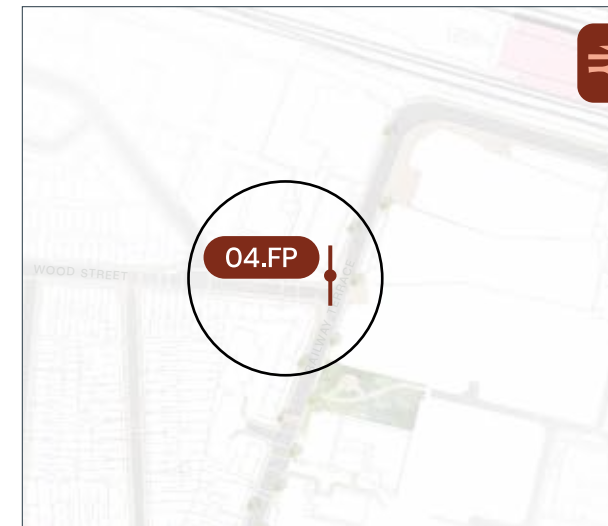
Town Centre

Caldecott Park



Location 04.FP

Sign Type Fingerpost



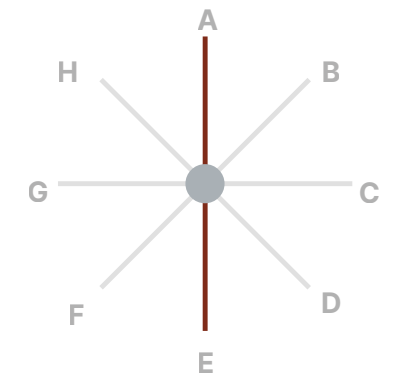
Direction A

Train Station

Direction E

Town Centre

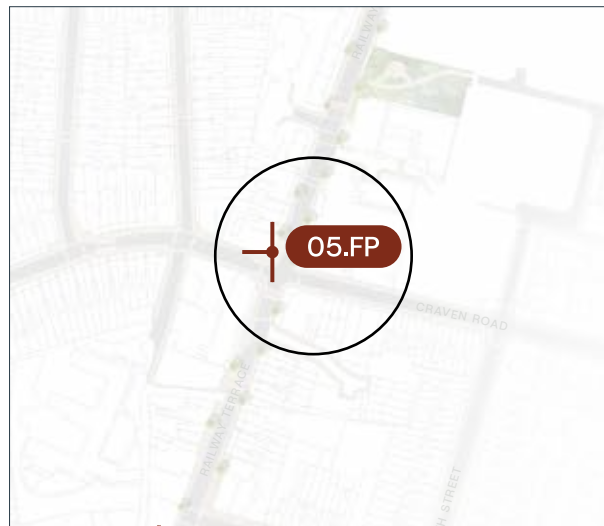
Caldecott Park



Sign Locations

Location 05.FP

Sign Type Fingerpost



Direction A

Train Station

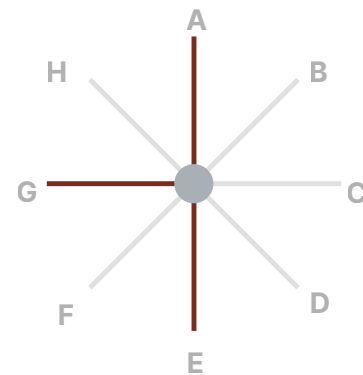
Direction E

St Andrew's Gardens

Direction G

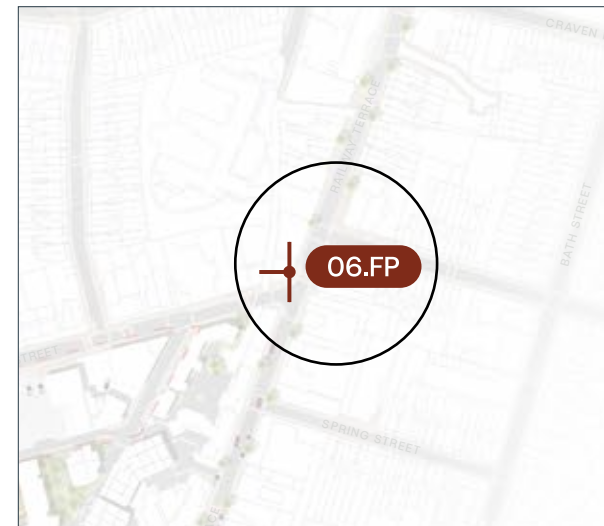
Town Centre

Caldecott Park



Location 06.FP

Sign Type Fingerpost



Direction A

Train Station

Direction E

St Andrew's Gardens

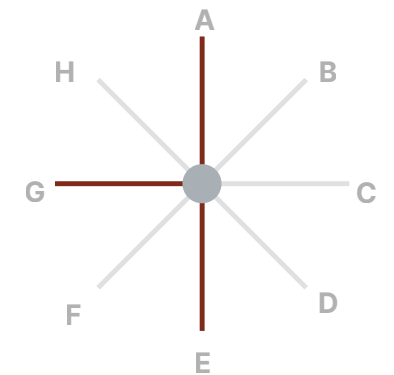
Direction G

Town Centre

Caldecott Park

Regent Place

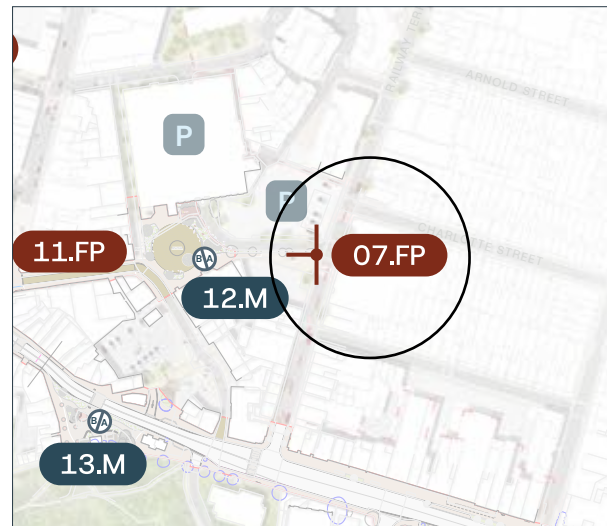
Rugby Theatre



Sign Locations

Location 07.FP

Sign Type Fingerpost



Direction A

Train Station

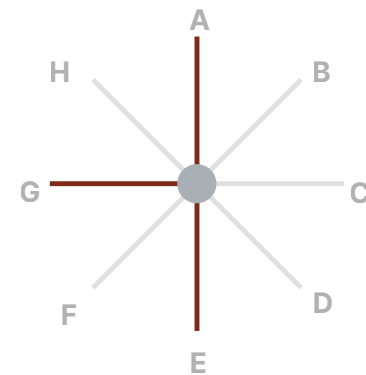
Direction E

St Andrew's Gardens

Direction G

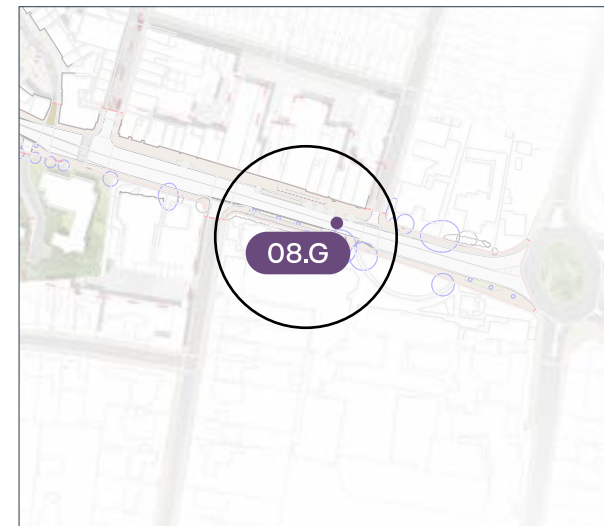
Town Centre

Market Place



Location 08.G

Sign Type Gateway

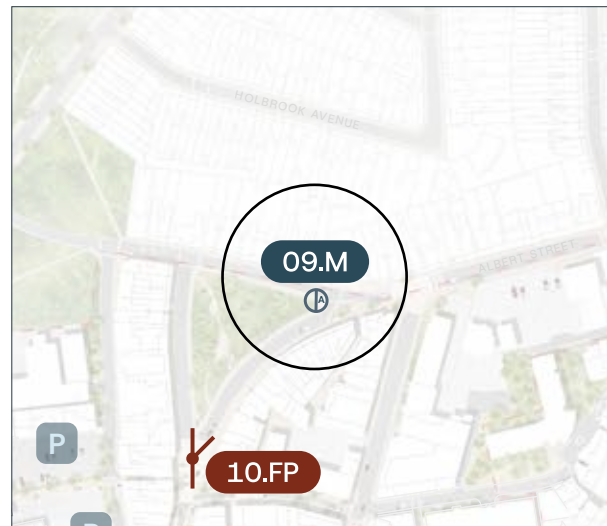


Welcome to Rugby

Sign Locations

Location 09.M

Sign Type Monolith



Header: Regent Place

Side A

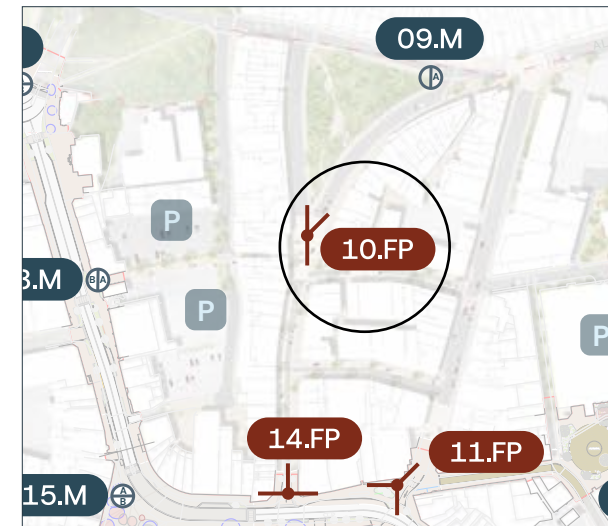
↑ Caldecott Park
Benn Hall

← Town Centre
Rugby Theatre

Map: West

Location 10.FP

Sign Type Fingerpost



Direction A

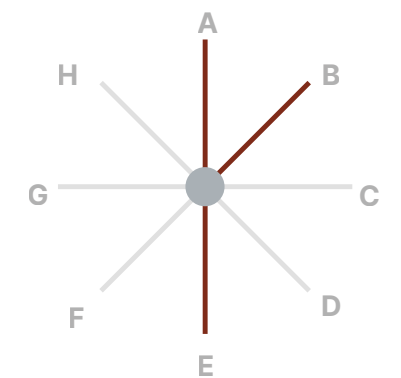
Regent Place
Caldecott Park
Benn Hall

Direction B

Train Station

Direction E

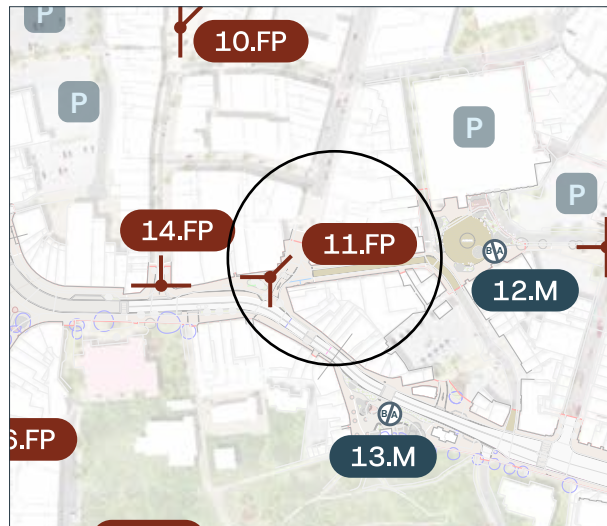
Market Place
Rugby Theatre



Sign Locations

Location 11.FP

Sign Type Fingerpost



Direction B

Train Station

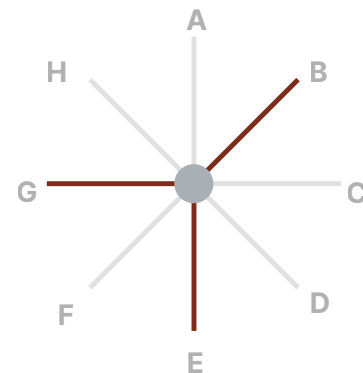
Direction E

St Andrew's Gardens

Direction G

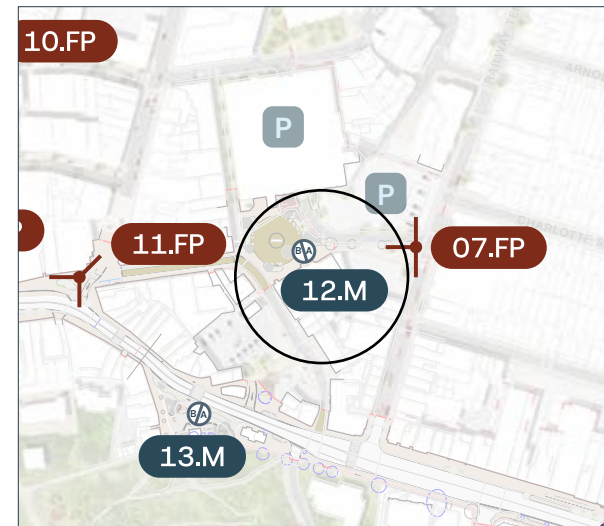
Market Place

Rugby Theatre



Location 12.M

Sign Type Monolith



Header: Old Market Place

Side A

↑ Market Place
Rugby Art Gallery & Museum
Library & Visitor Information

← St Andrew's Gardens

Map: West

Header: Old Market Place

Side B

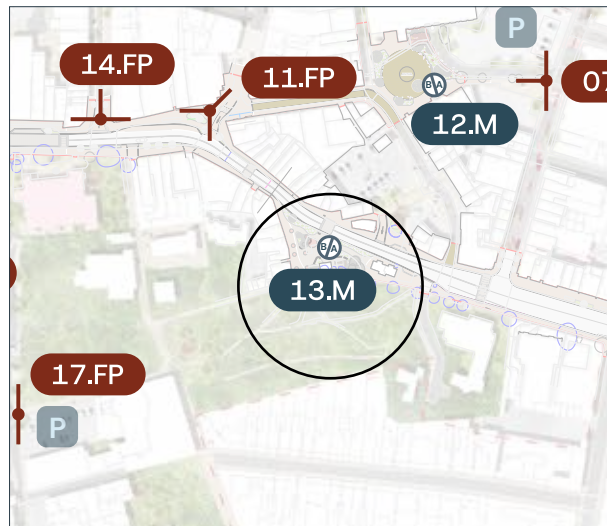
← Rugby Theatre
Train Station

Story: Frank Whittle

Sign Locations

Location 13.M

Sign Type Monolith



Header: The Pleasance

Side A

↑ Market Place
Rugby Art Gallery & Museum
Library & Visitor Information

← St Andrew's Gardens

Map: West

Header: The Pleasance

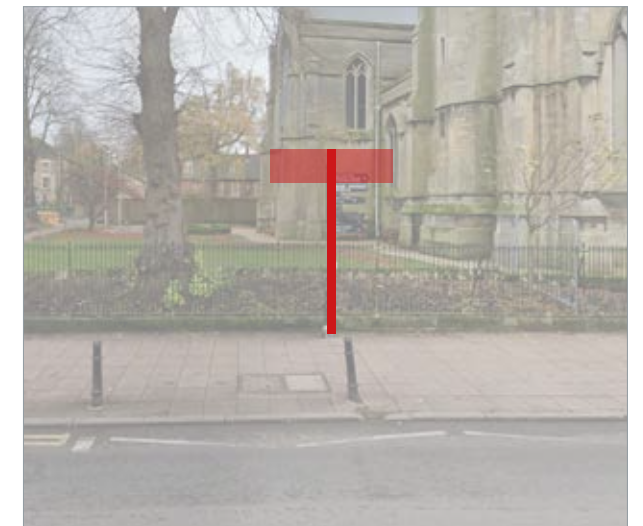
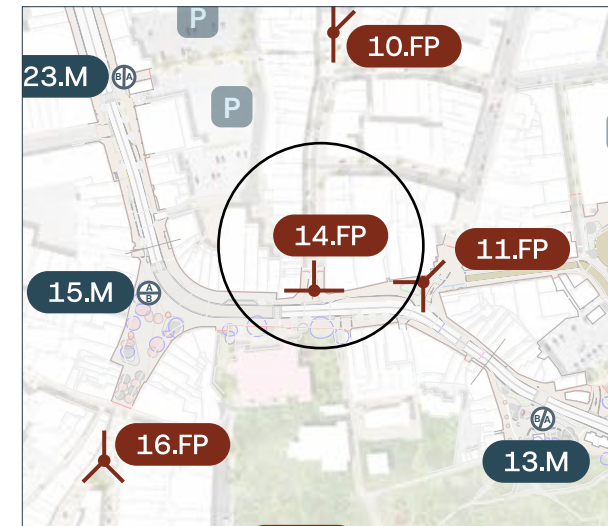
Side B

St Andrew's Gardens →

Map: East

Location 14.FP

Sign Type Fingerpost



Direction A

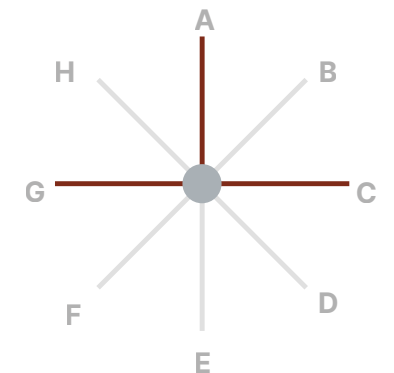
Regent Place
Caldecott Park
Train Station

Direction C

St Andrew's Gardens

Direction G

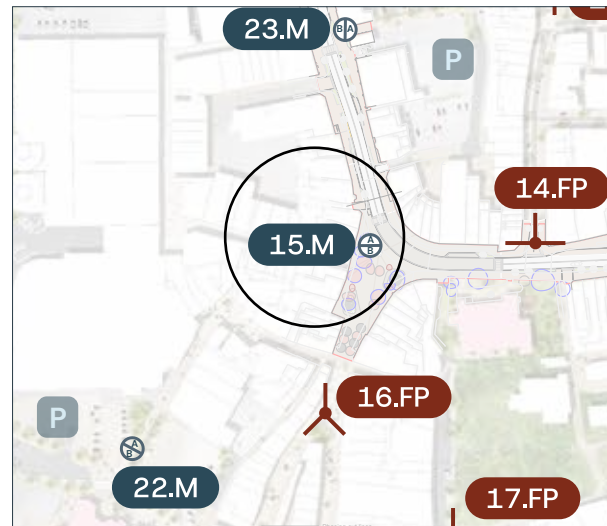
Market Place
Library & Visitor Centre
Rugby School
Rugby Art Gallery & Museum



Sign Locations

Location 15.M

Sign Type Monolith



Header: Clock Tower Square

Side A

↑ Rugby Art Gallery & Museum
Library & Visitor Information
Web Ellis Rugby Football Museum
Rugby School & Museum
Macready Theatre

Map: South

Header: Clock Tower Square

Side B

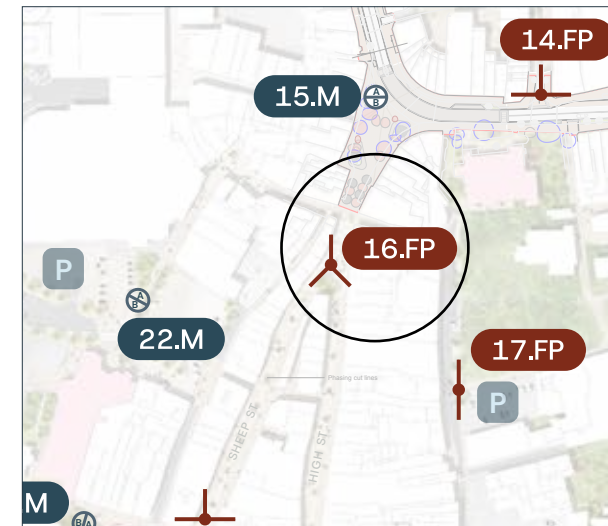
↑ Train Station
Benn Hall
Caldecott Park

St Andrew's Gardens →

Map: North

Location 16.FP

Sign Type Fingerpost



Direction A

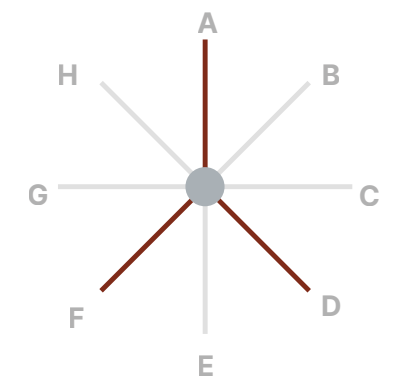
Rugby Theatre
Caldecott Park

Direction D

Rugby School & Museum

Direction F

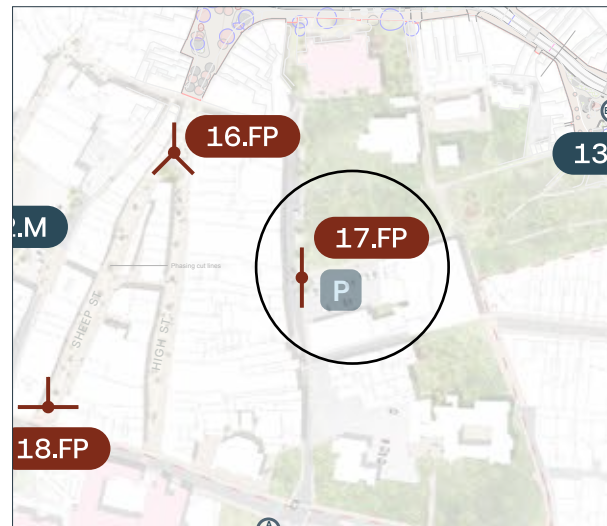
Rugby Art Gallery & Museum
Library & Visitor Centre
Web Ellis Rugby Football Museum



Sign Locations

Location 17.FP

Sign Type Fingerpost



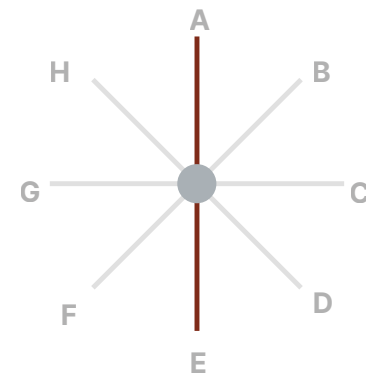
Direction A

Market Place

Direction E

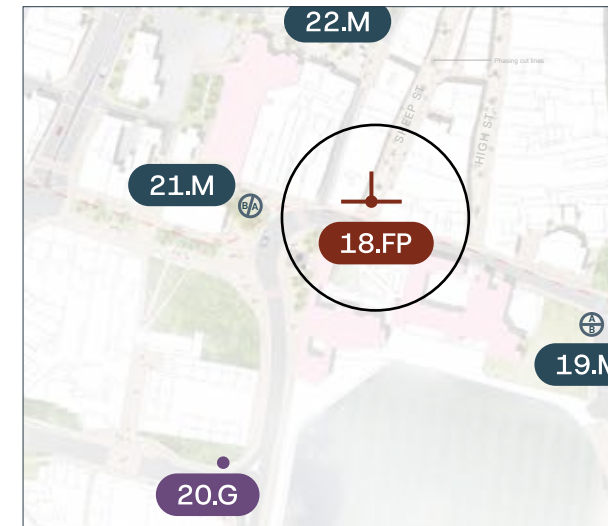
Macready Theatre

Rugby School & Museum



Location 18.FP

Sign Type Fingerpost



Direction A

Market Place

Direction C

Macready Theatre

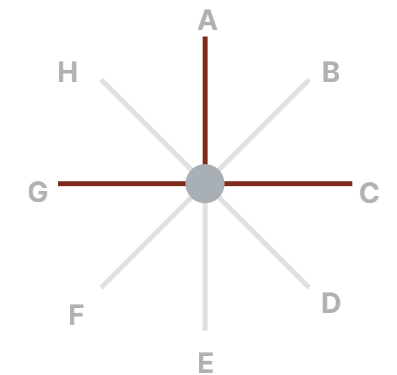
Rugby School & Museum

Direction G

Rugby Art Gallery & Museum

Library & Visitor Centre

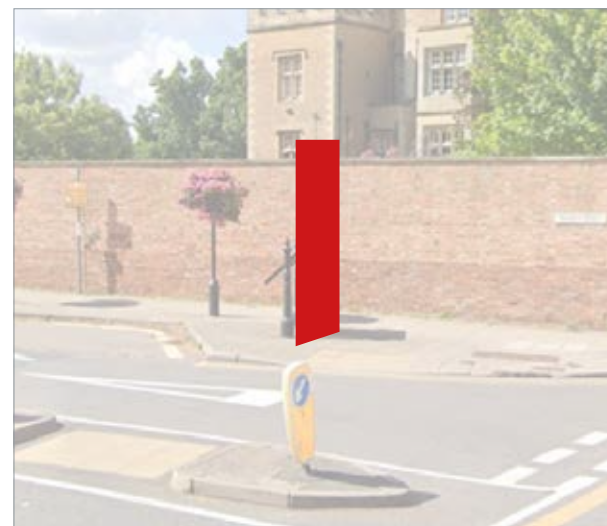
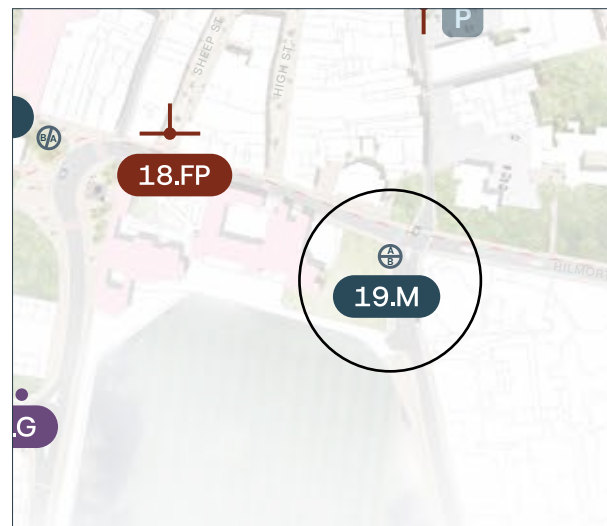
Web Ellis Rugby Football
Museum



Sign Locations

Location 19.M

Sign Type Monolith



Header: Barby Road

Side A

Map: South

Header: Barby Road

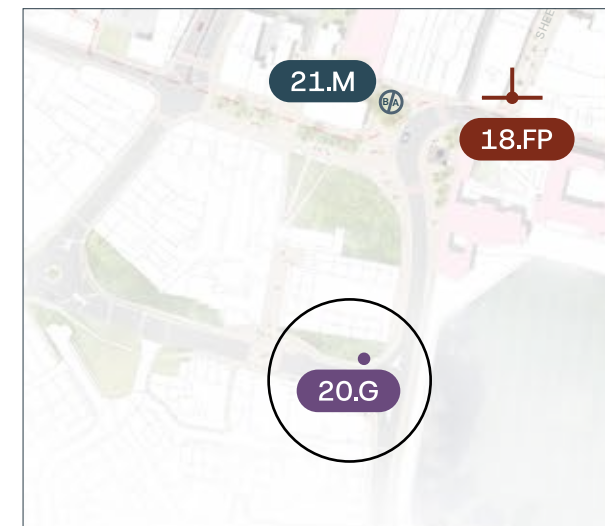
Side B

↑ Macready Theatre
Market Place
Town Centre

Map: North

Location 20.G

Sign Type Gateway

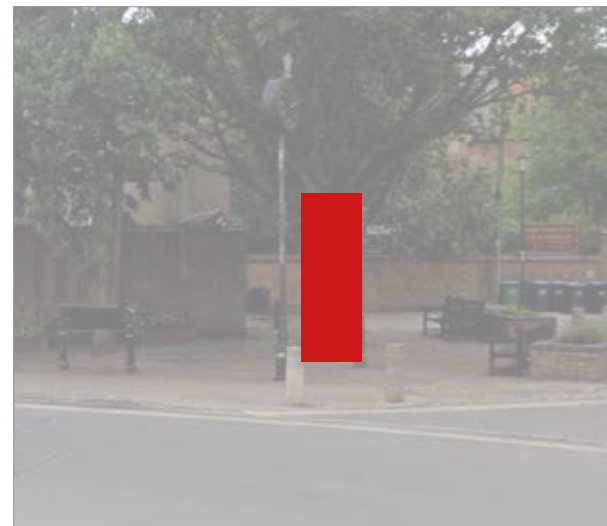
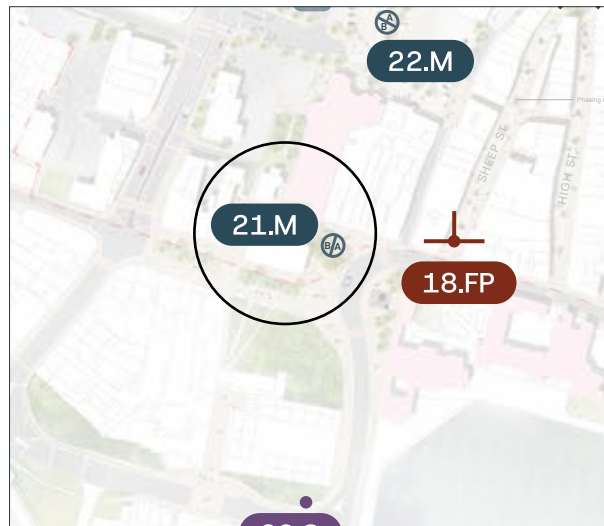


Welcome to Rugby

Sign Locations

Location 21.M

Sign Type Monolith



Header: Warwick Street

Side A

↑ Rugby Art Gallery & Museum
Library & Visitor Centre

Story: Gilbert, Statue and The School

Header: Warwick Street

Side B

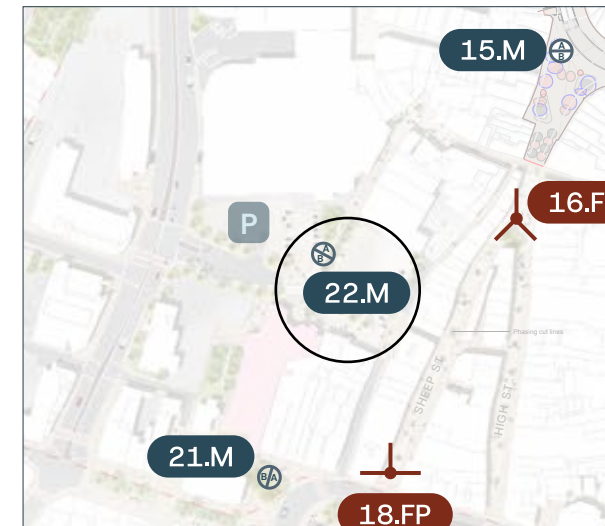
↑ Rugby School & Museum
Macready Theatre

← Town Centre
Market Place

Map: East

Location 22.M

Sign Type Monolith



Header: Chapel Street

Side A

↑ Rugby Art Gallery & Museum
Library & Visitor Centre

← Web Ellis Rugby Football Museum
Rugby School & Museum
Macready Theatre

Map: North

Header: Chapel Street

Side B

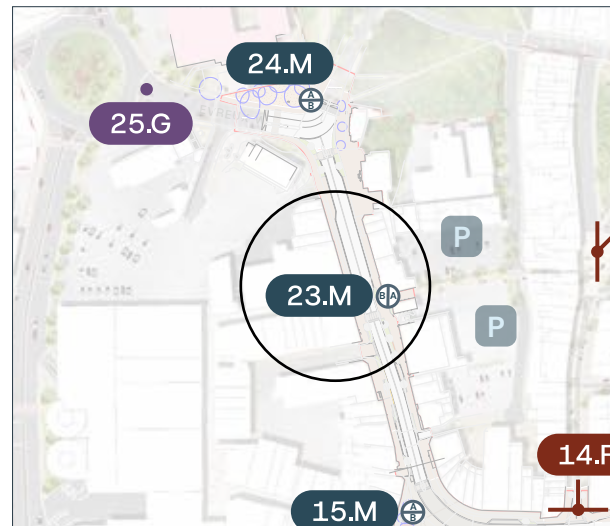
↑ Market Place
St Andrew's Gardens
Caldecott Park

Map: South

Sign Locations

Location 23.M

Sign Type Monolith



Header: North Street

Side A

← Market Place
Rugby Art Gallery & Museum
Library & Visitor Information

Caldecott Park →
Town Hall

Map: West

Header: North Street

Side B

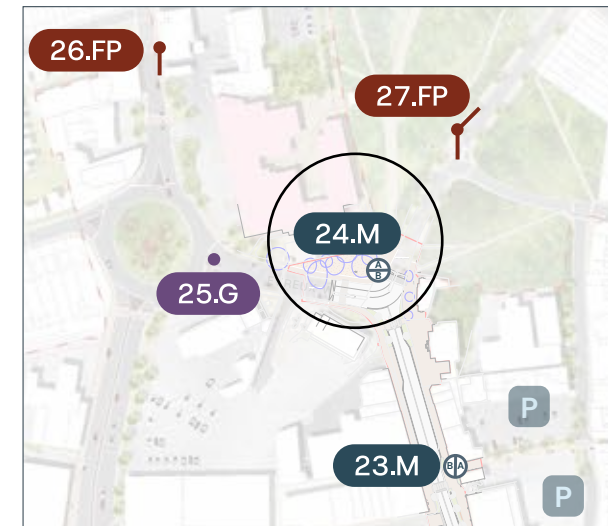
← Caldecott Park
Town Hall

Market Place →
Rugby Art Gallery & Museum
Library & Visitor Information

Map: East

Location 24.M

Sign Type Monolith



Header: Caldecott Park

Side A

↑ Caldecott Park

Jubilee Gardens →
Train Station

Story: Caldecott Park

Header: Caldecott Park

Side B

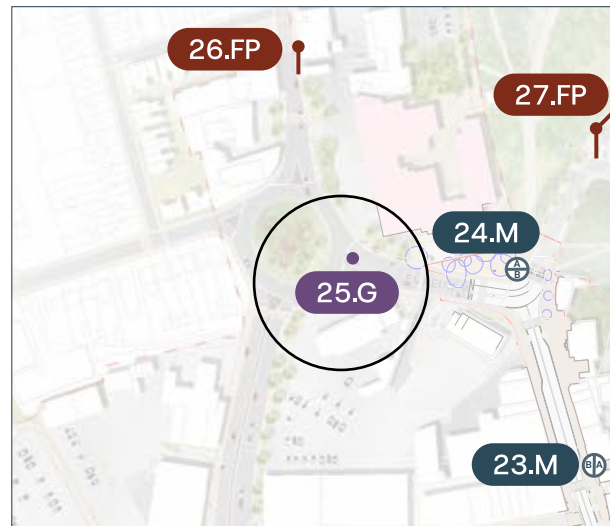
↑ Town Centre
Market Place
Rugby Art Gallery & Museum
Library & Visitor Information

Map: North

Sign Locations

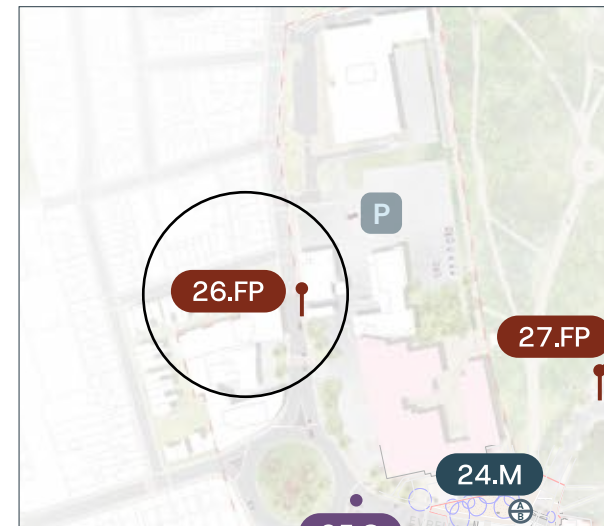
Location 25.G

Sign Type Gateway



Location 26.FP

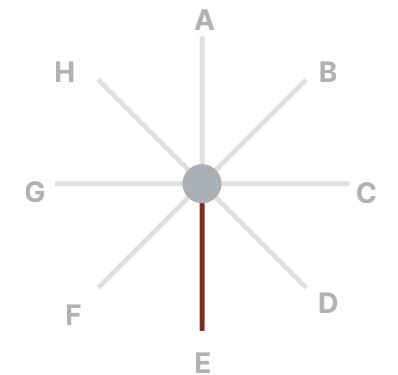
Sign Type Fingerpost



Direction E

Town Centre

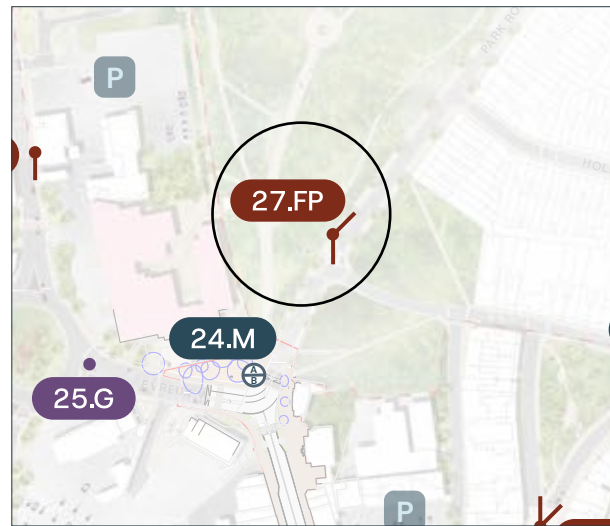
Caldecott Park



Sign Locations

Location 27.FP

Sign Type Fingerpost



Direction B

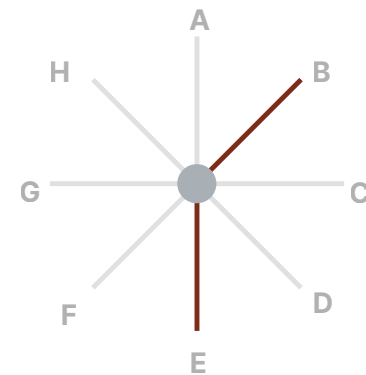
Train Station

Direction E

Town Centre

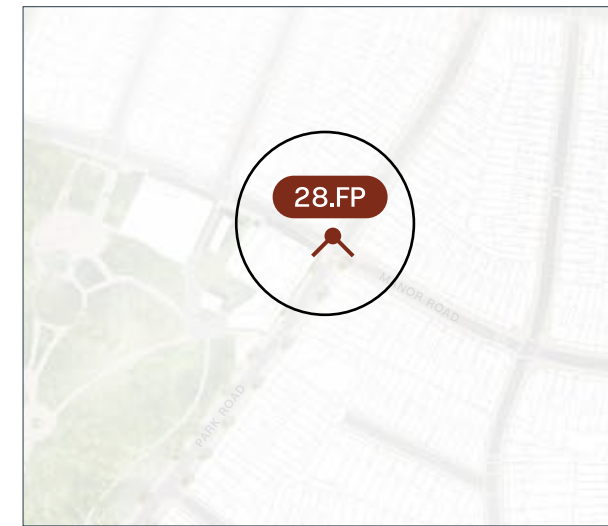
Regent Place

Benn Hall



Location 28.FP

Sign Type Fingerpost



Direction D

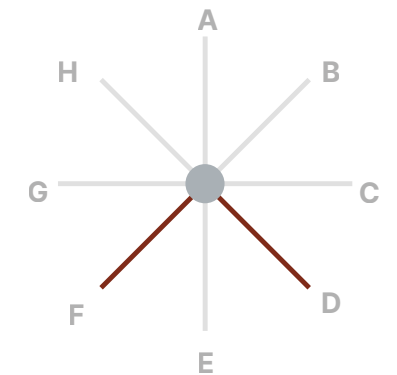
Train Station

Direction F

Town Centre

Caldecott Park

Benn Hall

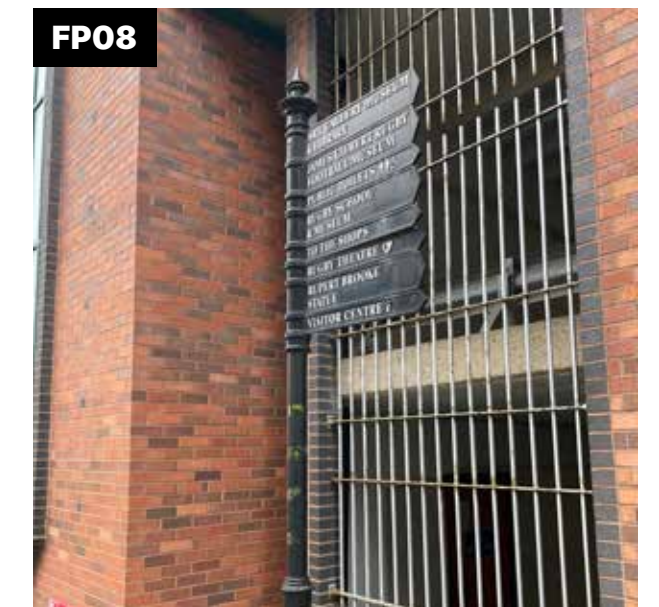
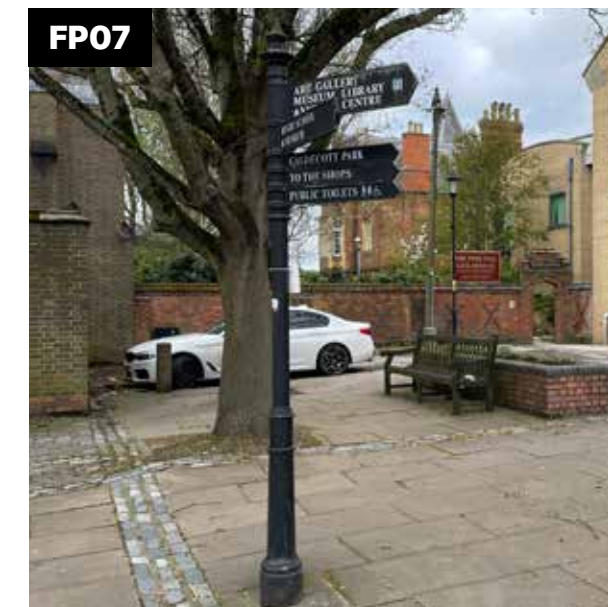


8 Wayfinding and Signage	
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Sign Information	7
Design Principles	13
Sign Family	23
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Removals



Removals



Removals

FP09



FP10



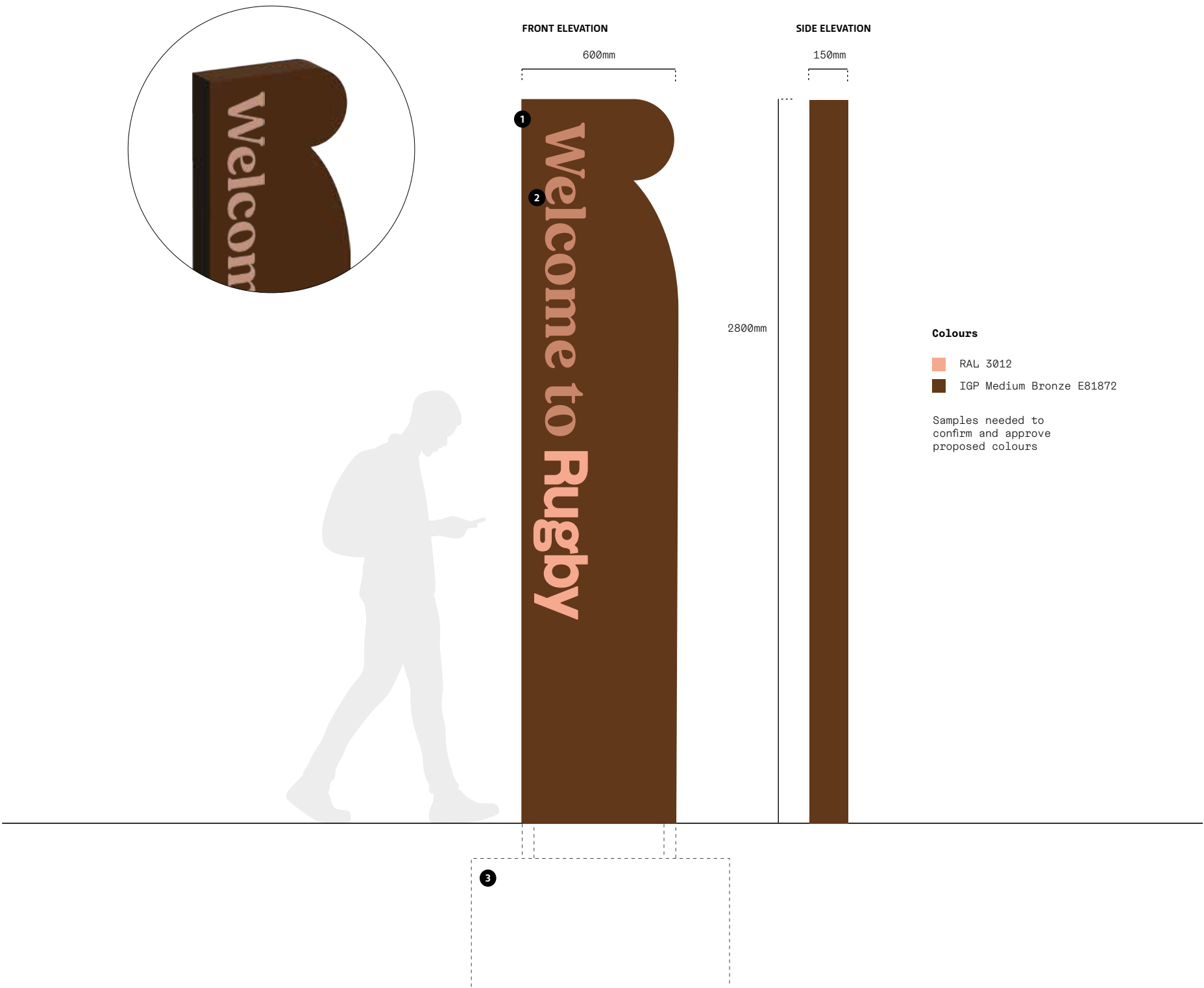
FP11



8 Wayfinding and Signage	
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Detailed Drawings

Gateway



PLACE MARQUE

Placemarque Ltd
127 Portland Street
Manchester
M1 4PZ

0161 241 3174
info@placemarque.com
www.placemarque.com

Job Number	398_2025
Project Manager	Hannah Southwell

DESIGN INTENT DRAWING	
Title	ST01_Gateway
Scale	1:10 @ A2

- 1 Sign Structure**
Aluminium folded and welded panel with powder coated finish. Sign to be powder coated in IGP Medium Bronze
- 2 Graphics**
Laser cut text area to be inlaid with 3mm aluminium laser cut letters. Letters to have powder coated finish in RAL 3012.
- 3 Foundations**
Sign to be bolted down to suitable foundations. Detail to be confirmed by manufacture

GENERAL NOTES

- This drawing is provided to exhibit design arrangement only
- Shop drawings supplied by the manufacturer and approved by Wayfinding Consultant and Client are to provide the final specification document for this sign
- Shop drawings to indicate fabrication and fastening methods approved by a qualified engineer
- Alternative construction that does not change the intended appearance of the sign will be considered but will require full client approval
- All sign content shown is for visualisation purposes only. All final content will be unique to it's location, approved artwork will be supplied to manufacturer by Wayfinding Consultant
- All dimensions are in millimetres - do not scale from this drawing
- Manufacturer to ensure stability and built ability aspects suitable to local ground conditions and wall structures

Detailed Drawings

Monolith



FRONT ELEVATION

SIDE ELEVATION



- Colours**
- RAL 3012
 - IGP Medium Bronze E81872

Samples needed to confirm and approve proposed colours

PLACE MARQUE

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127 Portland Street
Manchester
M1 4PZ

0161 241 3174
info@placemarque.com
www.placemarque.com

Job Number	398_2025
Project Manager	Hannah Southwell

DESIGN INTENT DRAWING	
Title	ST02_Map Monolith
Scale	1:10 @ A2

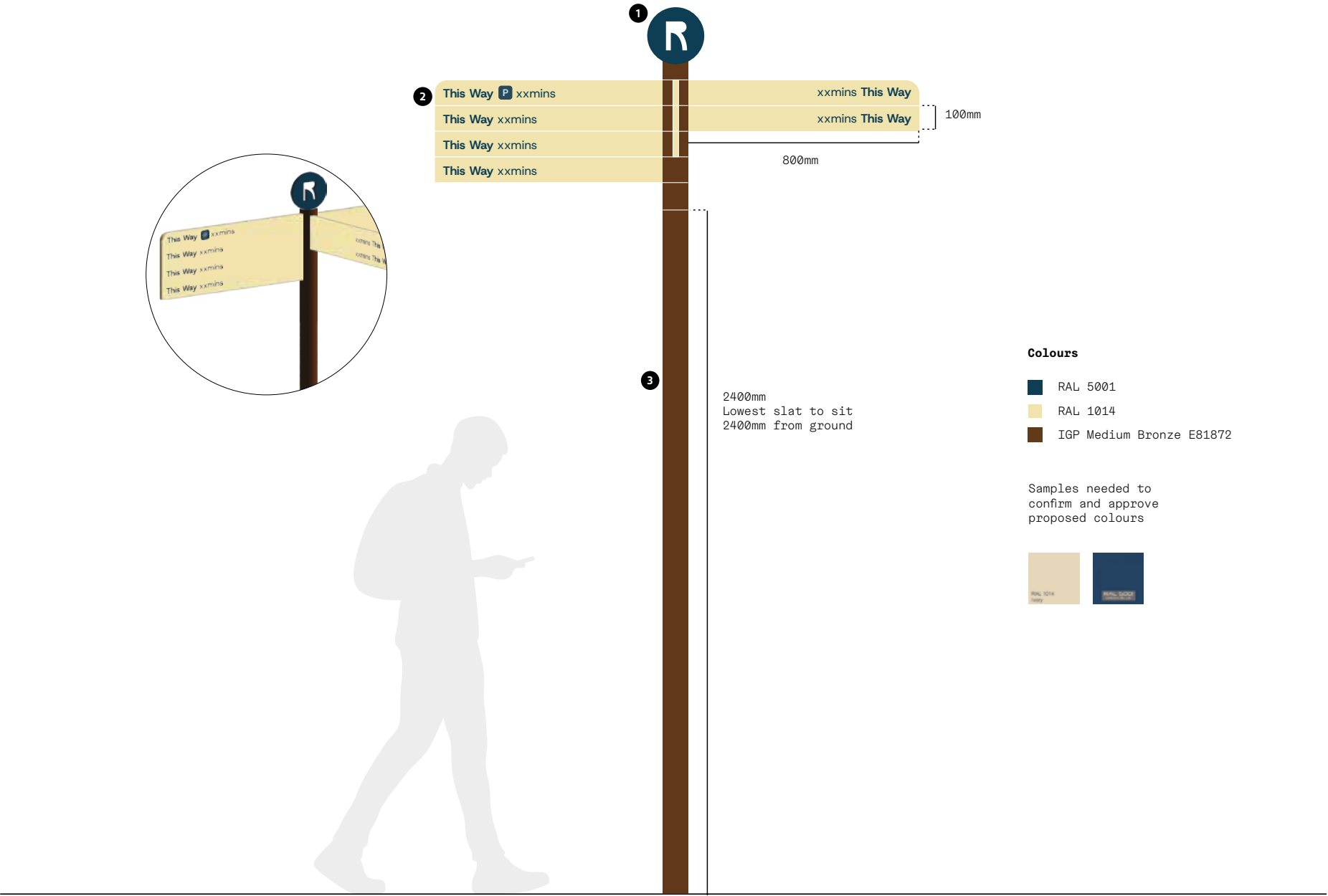
- 1 Sign Frame**
Internal steel frame support clad in 3mm aluminium and powder coated. Aluminium panels to be folded and welded to create curved corner. Sign to be powder coated in IGP Medium Bronze E81872.
- 2 Header Panel**
Masked and painted lettering
- 3 Glass Panel**
550mm x 1250mm
10mm low iron toughened glass panel with reverse applied vinyl print. Glass is inset in panel and sits flush with no face fixings. Panels to be secured to frame using anti tamper hidden internal support
- 4 Base Panel**
Base of sign to have a nova dura panel and kickplate area to be powder coated to match medium bronze.
- 5 Foundations**
Frame to be bolted down to suitable foundations. Detail to be confirmed by manufacture

GENERAL NOTES

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- Shop drawings to indicate fabrication and fastening methods approved by a qualified engineer
- Alternative construction that does not change the intended appearance of the sign will be considered but will require full client approval
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- All dimensions are in millimetres - do not scale from this drawing
- Manufacturer to ensure stability and built ability aspects suitable to local ground conditions and wall structures

Detailed Drawings

Fingerpost



PLACE
MARQUE

Placemarque Ltd
127 Portland Street
Manchester
M1 4PZ

0161 241 3174
info@placemarque.com
www.placemarque.com

Job Number	398_2025
Project Manager	Hannah Southwell

DESIGN INTENT DRAWING	
Title	ST01_Gateway
Scale	1:10 @ A2

- 1 Finial**
Top of post finished with a powder coated stainless steel finial with fret town logo detail. Finial to be powder coated in RAL 5001
- 2 Fingerslat**
800mm x 100mm x 25mm
Extruded aluminium finger to be powder coated in RAL 1014 with engraved and infill lettering. Slats to have radius top corners. Powder coated aluminium end caps to fingers.
- 3 Fingerpost**
Circular 110mm 316 stainless steel post with 5 tubular collars to the top with extruded aluminium fingers. Post to have powder coated finish in IGP Medium Bronze.

- GENERAL NOTES
- This drawing is provided to exhibit design arrangement only
 - Shop drawings supplied by the manufacturer and approved by Wayfinding Consultant and Client are to provide the final specification document for this sign
 - Shop drawings to indicate fabrication and fastening methods approved by a qualified engineer
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 - All dimensions are in millimetres - do not scale from this drawing
 - Manufacturer to ensure stability and built ability aspects suitable to local ground conditions and wall structures

Appendix 2

EQUALITY IMPACT ASSESSMENT (EqIA)

Town Centre Wayfinding

For Council on 23 Sep 2026

Approved by	Nicola Smith
Policy being assessed	Town Centre Wayfinding
Service Area	Growth & Investment
Name of Officer completing the assessment	Ella Casey
Other Officers involved	N/A
Date of this assessment	16 Jul 2026
Date of review	1 Dec 2027

<u>Stage 1 – Policy to be analysed</u>	
(1) Describe the main aims, objectives and purpose of the Policy?	The Town Centre Wayfinding Project seeks to improve navigation and accessibility throughout Rugby Town Centre through the installation of a coordinated wayfinding system. This will include directional signage, maps and information points. The project aims to: - Help residents and visitors navigate the town centre more easily. - Increase footfall and dwell time within the town centre. - Improve connections between key destinations, including transport hubs, retail areas, public spaces, heritage assets, cultural venues and community facilities. - Support economic growth by encouraging visitors to explore a wider area of the town centre. - Enhance the overall visitor experience and perception of Rugby Town Centre. - Ensure information is accessible and inclusive for all users.
(2) How does it fit with Rugby Borough Council's Corporate priorities and your service area priorities?	The project supports the Corporate Strategy objectives relating to: - A Thriving Rugby by encouraging greater footfall, supporting businesses and improving the visitor experience. - A Healthier Rugby by encouraging walking and active travel through clearer navigation and improved pedestrian confidence. - A Connected Rugby by improving movement between key destinations and transport links. The project supports would enact the Corporate Strategy by enhancing the town centre environment, supporting regeneration initiatives and creating a more welcoming destination for residents, workers and visitors.

(3) What are the expected outcomes you are hoping to achieve?	Expected outcomes include: - Improved ease of movement around the town centre. - Increased visitor confidence and satisfaction. - Better access to key services, attractions and facilities. - Increased footfall and dwell time. - Greater support for active travel and sustainable transport. - Improved accessibility for people with disabilities, older people and visitors unfamiliar with the town centre. - Enhanced perception of Rugby as a welcoming and accessible destination.
(4) Does or will the policy affect: • Customers • Employees • Wider community or groups	Wider Community or Groups, Employees, Customers Customers, employees and the wider community. The wayfinding system will be used by residents, businesses, workers, visitors and community groups. It will benefit anyone travelling through or spending time within Rugby Town Centre and is intended to improve accessibility and navigation for all users. Further consultation will be done with further consultation with disability forum groups as part of this project and the overall public realm design project for the town centre
(5) Will the policy involve substantial changes in resources?	No
(6) Is a full Equality Impact Assessment needed? If no, please give reason why.	Yes

(7) Please describe how the policy will meet the aims of the Equality Duty: a. Eliminate unlawful discrimination, harassment, victimisation and any other unlawful conduct prohibited by the act b. Advance equality of opportunity between people who share and people who do not share a relevant protected characteristic c. Foster good relations between people who share and people who do not share a relevant protected characteristic	The project will: - Promote equality of opportunity by improving access to information and navigation throughout the town centre. - Reduce barriers experienced by disabled people, older people and those unfamiliar with the area. - Support inclusive access to services, facilities and public spaces. - Encourage participation in town centre activities by a diverse range of residents and visitors. - Foster good relations through the creation of a welcoming and accessible town centre environment.
<u>Stage 2 – Evidence about user population and consultation</u>	



(1) What does the data tell you about the groups this policy impacts?	Rugby Borough has a diverse population across age, ethnicity, religion, disability and socioeconomic backgrounds. The town centre serves residents, workers and visitors from across the borough and wider region. Town centre users include: - Older people who may require clear and legible signage. - Disabled people including those with mobility, visual, hearing or cognitive impairments. - Families and young people using retail, leisure and community facilities. - Visitors unfamiliar with Rugby. - Individuals whose first language may not be English. Research and best practice demonstrate that clear wayfinding can improve accessibility, confidence and independence for people with a variety of needs. The project has the potential to reduce barriers to accessing services, businesses and public spaces by improving information, orientation and navigation. The signs will be designed with accessibility standards in mind.
Additional evidence can be found:	
(2) Have you consulted or involved those groups that are likely to be affected by the policy you want to implement? If yes, please state which groups were involved in the consultation and what were their views and how have their views influenced the policy? If you have not consulted or engaged with communities that are likely to be affected by the policy, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary	Yes Yes - Previous consultation undertaken as part of the Town Centre Public Realm Masterplan and wider regeneration projects identified a strong desire for: - Improved pedestrian experience. - Better connectivity through the town centre. - Easier navigation between destinations. - Improved accessibility for all users. - A more attractive and welcoming town centre environment. Further consultation with the disability forum groups as part of this project and the overall public realm design project for the town centre will be undertaken.

Stage 3 – Analysis of impact			
(1) <u>Protected Characteristics</u> From your data and consultations, are there any positive or negative impacts identified for any particular group? If left blank, this means that no impacts have been identified for this group.	Protected Characteristic	Nature of Impact Positive, Negative, Both	Explain why
	Age	Positive	Clearer navigation and legible signage can assist older people and younger users in accessing facilities and services independently.
	Disability	Positive	Inclusive design standards can improve accessibility for people with visual, mobility, hearing and cognitive impairments.
	Sex		
	Gender reassignment		
	Marriage/civil partnership		
	Pregnancy/maternity	Positive	Improved navigation may assist those travelling with pushchairs or young children.
	Race	Positive	Consistent and clear information can improve accessibility for visitors from diverse backgrounds and those unfamiliar with the town.

	Religion/belief	Positive	Improved navigation can assist access to places of worship and community facilities throughout the town centre.
	Sexual Orientation		
(2) <u>Cross cutting themes</u>	Description of impact	Nature of impact Positive, Negative, Both	Explain why
	Socio-economic e.g.: child poverty, income level, education level, working hours/occupation, family/social support, access to good nutrition	Positive	Improved wayfinding assists access to services, employment opportunities, community facilities and town centre amenities for all residents regardless of income level.
	Environmental e.g.: housing status, transport links, geography, access to services, air quality, noise pollution	Positive	The project supports walking and active travel by making routes easier to understand and navigate, reducing reliance on private vehicles.

(4) Are there any barriers to accessing the service? If yes, how can they be overcome?	Yes Potential barriers include: - Signage that is difficult to read due to size, colour contrast or positioning. - Information that is inaccessible to people with visual, cognitive or sensory impairments. - Physical obstructions affecting visibility or access. - Lack of consideration of inclusive design principles. These barriers can be overcome through: - Compliance with accessibility and inclusive design guidance. - Appropriate font sizes and colour contrast. - Use of accessible mapping and information formats. - Consultation with disability groups and accessibility specialists. - Careful siting of wayfinding infrastructure.
(5) What data will be collected to analyse impact? How will the data collected be used?	Town Centre Footfall Data, Business Feedback, Visitor Surveys and user feedback
(6) Complete this section if any adverse impacts were identified in 3.1. Outline any actions that will be taken to remove or mitigate the adverse impacts identified in 3.1 to ensure that no discrimination is taking place. If removing or mitigating the impact is not possible, you may in certain circumstances, justify the discrimination. If that is the case, please give evidence for why justifying is possible in this case.	
Stage 5 – Review not to be completed on initial assessment	

(1) What evidence of impact has been collected?	
Additional evidence can be found:	
(2) Were the impacts as expected from the original EqIA?	
(3) Will there be any changes made as a result of this review?	



Appendix 3
Climate Change and Environmental Impact Assessment
Town Centre Wayfinding Project

For Council on 23 Sep 2026

Approved by	Nicola Smith
Policy being assessed	Town Centre Wayfinding Project
Service Area	Growth & Investment
Is this a new or existing policy/service	New
Name of Officer completing the assessment	Ella Casey
Timeline for policy/service delivery	Design and Procurement 2026/27 with installation by March 2027
Climate Change and Environmental Impact Assessment Review Team	N/A
Date of this assessment	16 Jul 2026
Date of review	30 Apr 2027

Section 1: Summary of Policy/Service and Climate Change and Environmental Impacts

The Town Centre Wayfinding Project will provide a coordinated network of directional signs, maps and visitor information throughout the town centre. The project aims to improve legibility, encourage walking between key destinations, support visitors, increase dwell time and strengthen links between transport hubs, retail, cultural and community destinations. The project is expected to have an overall positive environmental impact by encouraging walking and reducing reliance on short car journeys within the town centre. Minor negative impacts may arise from the manufacture, transportation and installation of signage.

Section 2 – How will the Policy/Service impact RBC's greenhouse gas emissions

Scope 1 Emissions

Direct emissions from council owned resources, for example through boilers or vehicles.

Nature of impact	No Impact
Description of impact	The project does not require the ongoing use of council-owned vehicles, fuel combustion equipment or other direct emission sources. Installation activities will be undertaken by contractors over a limited period.
Any actions or mitigation to reduce negative impacts	
How will the impact be monitored?	

Scope 2 Emissions

Indirect emissions occurring at the location energy is produced for council activities. This would generally be the change in electricity usage.

Nature of impact	No Impact
Description of impact	None of the signage will be illuminated in order to respect the historic setting of the town centre therefore no emissions

Any actions or mitigation to reduce negative impacts	
How will the impact be monitored?	

Section 3 – What is the impact of the policy/service in relation to RBC's Climate Strategy

Workplaces and the Economy

Nature of impact	Positive
Description of impact	Improved wayfinding will help visitors navigate the town centre, increase confidence in exploring different areas and support local businesses by encouraging longer visits and increased footfall.
Any actions or mitigation to reduce negative impacts	
How will the impact be monitored?	Footfall data, business feedback and visitor surveys

Transport

Nature of impact	Positive
Description of impact	The scheme will encourage walking and cycling by clearly identifying routes, destinations and connections between public transport facilities and key attractions. This supports sustainable travel choices.

Any actions or mitigation to reduce negative impacts	
How will the impact be monitored?	footfall monitoring and sustainable transport indicators for the County Council where available.
Natural Environment	
Nature of impact	No Impact
Description of impact	
Any actions or mitigation to reduce negative impacts	
How will the impact be monitored?	
Homes and Energy	
Nature of impact	No Impact
Description of impact	
Any actions or mitigation to reduce negative impacts	
How will the impact be monitored?	
Waste, Resources and the Circular Economy	

Nature of impact	Negative
Description of impact	Materials will be required for the new signage and there may be waste generated through replacement of existing signs.
Any actions or mitigation to reduce negative impacts	Use durable and recyclable materials, reuse existing signposts if possible, and recycle removed materials wherever possible. The sustainability of the materials will be considered through the procurement process.
How will the impact be monitored?	Through procurement specifications and contractor waste management arrangements
Climate and Nature Positive Communities	
Nature of impact	Positive
Description of impact	The project will make the town centre easier to navigate, encourage active travel and improve connections between community facilities, public spaces and green infrastructure.
Any actions or mitigation to reduce negative impacts	
How will the impact be monitored?	Visitor feedback and town centre footfall monitoring
Adaptation	
Nature of impact	Positive
Description of impact	The project can support climate adaptation by directing users to walking routes, public spaces, green areas and key services. Durable materials and resilient design will help signage withstand future weather conditions.

Any actions or mitigation to reduce negative impacts	
How will the impact be monitored?	Maintenance inspections over and asset condition reviews

<u>Section 4 – Review</u>	
Review Date	30 Apr 2027
Key points to be considered through review	- Sustainability within procurement process - User feedback following installation - Impact on walking, visitor movement and town centre footfall
Review Summary To be completed following the review	To be completed following project delivery and post-installation monitoring

Supporting Documents	
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AGENDA MANAGEMENT SHEET

Report Title:	Town Centre Regeneration Update
Name of Committee:	Cabinet
Date of Meeting:	8 September 2026
Report Director:	Strategic Director - Place
Portfolio:	Growth & Investment
Ward Relevance:	All
Prior Consultation:	Finance and Performance
Contact Officer:	Ella Casey, Principal Planning Officer (Town Centre Regeneration)
Public or Private:	Public
Report Subject to Call-In:	No
Report En-Bloc:	No
Key Decision:	No
Corporate Priorities:	This report relates to the following priority(ies): ☒ A Healthier Rugby – To support people to live healthier, longer, and more independent lives. ☒ A Thriving Rugby – To deliver a thriving economy which brings Borough-wide investment and regenerates Rugby Town Centre. ☐ A Greener Rugby – To protect the environment and ensure the Borough adapts to climate change. ☐ A Fairer Rugby – To reduce inequalities and improve housing across the Borough. Corporate Strategy 2025-2035 ☐ This report does not specifically relate to any Council priorities but reporting financial performance is a key way of demonstrating the success of delivering the Corporate Strategy.
Summary:	The report updated on the progress in relation to Town Centre Regeneration in 2026.
Local Government Reorganisation Implications:	It is recognised that the overall delivery of workstreams will not be completed before a new unitary authority is in place. Short, medium and long term schemes are being identified to

determine which schemes can be delivered by Rugby Borough Council.

Financial Implications:

The financial implications are set out within section 4 of this report, detailing the use of the Town Centre Strategy Reserve.

Risk Management/Health and Safety Implications:

A dedicated strategic risk register is in place for each strand of the Corporate Strategy. Use of reserves is a key action towards delivering on the corporate strategy priorities and a town centre regeneration budget is in place for 2026/27.

Environmental Implications:

This report summarises the progress in relation to town centre regeneration in 2026. Climate Change and Environmental Impact Assessments have been carried out for each individual project where required. The background papers listed have links to the papers for each project which include these assessments.

Legal Implications:

None arising directly from this report.

Equality and Diversity:

This report summarises the progress in relation to town centre regeneration in 2026. Equality Impact Assessments have been carried out for each individual project where required. The background papers listed have links to the papers for each project which include these assessments.

Recommendation:

IT BE RECOMMENDED TO COUNCIL THAT the Town Centre Regeneration update report be noted.

Reasons for Recommendation:

To ensure Council is kept up to date on progress with the delivery of Town Centre Regeneration to instigate positive change and to realise the development and investment opportunities in the town centre.

Cabinet - 8 September 2026

Town Centre Regeneration Update

Public Report of the Strategic Director for Place

Recommendation

IT BE RECOMMENDED TO COUNCIL THAT the Town Centre Regeneration progress report be noted.

1. EXECUTIVE SUMMARY

- 1.1 The purpose of this report is to note the progress on town centre regeneration during 2026. This report is part of the bi-annual reporting cycle to update on the progress of the various workstreams.
- 1.2 The Council has prioritised short and medium term actions to increase footfall and dwell time with a more focused approach on delivery for the current 13 workstreams in 2026. The Corporate Strategy 2025-2035 reflects this aim. This report sets out the progress which has been made by the Council since December 2025.
- 1.3 Some of the work currently undertaken by Officers is background work to allow significant decisions to be made and to inform delivery of Town Centre Regeneration. Section 3 of this report provides an update on work the Council has been undertaking in 2026 from business support and high street rental auctions to short term public realm projects and delivery options around key assets.
- 1.4 There are financial resources needed to deliver some of these workstreams, however previous Council reports have agreed to use of the Town Centre Strategy Reserve (the Reserve) to fund these workstreams. For 2026/27 there is also a Town Centre Budget which was approved as part of annual budget setting and is funded from the Reserve. An update of the spend from the Reserve, as of the financial year end (31 March 2026) is included within section 4 of this report.
- 1.5 Within the Growth and Investment team there is a dedicated resource to drive the delivery of the Town Centre Regeneration however it is a Council wide initiative which requires cross departmental working across the 13 workstreams along with other stakeholders including Warwickshire County Council.
- 1.6 This year there has been progress on bringing key assets and catalyst sites forward for redevelopment. There has also been significant progress on public realm improvements and a programme for delivery of further changes supported by the increase in events and help for businesses.

- 1.7 This report notes various future reports leading from different workstreams. A separate report on the BID 'soft landing' impact and review will be reported to the next cabinet meeting.

2. INTRODUCTION

- 2.1. Town Centre Regeneration is a key priority for the Council with a focus on increasing footfall and dwell time in the town centre, to the benefit of business and residents of the Borough as whole. Town centre regeneration as a whole has been ongoing for a number of years however a programme of works is set annually (April to March). The current programme is well underway with workstreams being progressed and completed.
- 2.2. The last update report was in December 2025, the purpose of this report is to provide an update on the progress of town centre regeneration since December 2025. Appendix 1 provides the list of workstreams and agreed workplan as of April 2026 with section 4 of this report accounting for associated progress. Strategic town centre assets are included within this.
- 2.3. A governance structure is in place to enable streamlined decision making with an officer Project Board and Programme Board, who have delegated decision making powers. These Boards report every 6 weeks to a member working group, known as the Town Centre Regeneration Working Group (hereafter referred to as the working group in this report). This group is a cross party group consisting of the following Councillors; Councillors Roodhouse (Chair), Thomas, Robinson, Brown, Poole, Ward and Glowacki.
- 2.4. The focus of the Council is on short- and medium-term actions to fulfil workstream objectives. Officers, including representatives from Warwickshire County Council's Place and Infrastructure Team, and the Working Group have a clear focus towards driving delivery of regeneration in 2026, to realise greater positive change in Rugby Town Centre. This is shown in the targeted workstreams identified within the Work Programme, which along with their objectives are set out in Appendix 1.
- 2.5. The workstreams align with the Corporate Strategy (CS) 2025-2035. The vision for 2035 is to achieve a more sustainable economy for all, where our natural environment, people and businesses are thriving. The Corporate Strategy outlines objectives to achieve the Council's vision including:
- A Healthier Rugby- bringing together our residents through cultural festivals and community events; and
 - A Thriving Rugby - create a thriving town centre with a mix of retail, leisure, residential and community spaces as well as attracting and growing innovative and sustainable businesses, benefitting local employment.

3. TOWN CENTRE REGENERATION PROGRESS UPDATE

- 3.1. The 13 workstreams identified within the 2026/27 Work Programme (Appendix 1) focus around changes to built form, public realm, town centre management, meanwhile uses and engagement to boost footfall. Some of the workstreams

are evidence gathering exercises and are the required background work to allow key decisions to be made for other projects to be delivered and are interlinked with one another.

- 3.2. The workstreams include the following projects (not exhaustive):
- Develop a Town Centre Delivery Plan
 - Develop a long-term investment plan with key priorities and next steps
 - Develop a cultural quarter in the town centre (first step – planning brief)
 - Expansion of local events programme (including ‘Love Rugby’ festival)
 - Encourage tourism into the borough
 - Public Realm improvements
 - Improvements to St Andrews Church and Gardens
 - Enhancement of the Rugby Outdoor Market
 - Promote Rugby Place Branding
 - Use High Street Rental Auction powers to reduce vacancy and introduce diversity of uses to the town
- 3.3. The main updates on the town centre workstreams between December 2025 and August 2026 are as follows:

Business, Training and Community Hub

- 3.4. Support from the Unity Hub based in the Town Hall continues and encompasses activities from stakeholders as:
- Employment assistance
 - Upskilling opportunities
 - Mentoring, training
 - Business support activity
 - Community engagement activity.
- 3.5. The Hub formally launched on the 6th March 2025 and is a success with stakeholders, the community and businesses alike, with current bookings for the space continuing to exceed expectations.
- 3.6. Work has also commenced on identifying suitable sites and options around the establishment of a business skills hub within the Town Centre. This work includes various options which could bring the Unity hub into the same space. This is fully funded by the £10 million secured already through S106 agreements specifically for this purpose.
- 3.7. Following the reduction in the retail, hospitality from 75% in 2024/25 to 40% in 2025/26 a relief scheme was adopted by the Council in June 2025. This sought to help independent small businesses in the town centre with their increased business rates. The scheme gave a maximum credit of £2,000 off the business rate bill for eligible businesses which had a rateable value of £51,000 or less. The funding was conditional that the business remains in the town centre for the full year. Through the scheme the council credited approximately £95,000 to 102 town centre businesses.

Meanwhile Uses

Outdoor Market

- 3.8. Measures have been put in place to develop and support Rugby Outdoor Market. New market trader fees and support for existing stall holders with a reduced fee until 2027 have been introduced. An independent market review has also been undertaken and next steps are currently being considered by officers.

Events

- 3.9. The approved 2026/27 events programme is well underway with a number of events delivered over the summer period. The Council agreed for financial year 26/27 to fund the 4 large events previously funded and delivered by Rugby First these include Bike Fest, two food and drink festivals and Christmas. Overall the council is funding a £275,000 events programme in 2026/27.
- 3.10. All events are promoted on The Rugby Town website. The following events has been delivered to date:
- Easter Market
 - Spring Food and Drink Festival
 - Bikefest
 - Love Rugby (variety of events)
 - Outdoor Cinema
 - Absolute PLAYHEM!
- 3.11. The events carried out to date have seen an increase in footfall on average of 10-20% compared to last year. The exception being Bikefest this year due to the wet weather.
- 3.12. Summer Sessions for the arts festival and theatre in the park were held in late August and the next upcoming event is the Autumn food and Drink festival on 19th September.
- 3.13. Work is well underway on Christmas along with plans for the 2027 events programme. Initial engagement with businesses about future events including Christmas began in June and is ongoing.

Place Branding

- 3.14. Rugby's place branding was fully launched in March – it was developed to create a consistent look and feel across everything from signage and digital platforms to printed materials and community engagement projects and is for all to use. The branding hinges around four core values that have been developed with the help of local businesses, community groups and residents:
- A people-centred town – close, connected and convenient
 - A town of action – play, perform, participate
 - Learning for life – innovation, skills and knowledge
 - Stronger together – a community that cares

- 3.15. Banners along all the main routes into the town centre have been replaced with this branding. Shop vinyls for vacant shops are also being investigated and 1 Regent Street has incorporated this branding while they carry out significant refurbishment. Hoardings on development sites such as Albert Street and the former Cemex House are in progress. Printed assets, including leaflets on town trails and information found at the Rugby Art Gallery and Museum, are currently being reviewed and rebranded and will be launched in autumn this year.

Webpage Branding

- 3.16. The Rugby Town website, a key visitor website, has been rebranded to align with the Rugby Place Brand and was relaunched on 23 July 2026 including all related social media platforms. Phase 1 of the project was to remove outdated content and new pages have been added. Phase 2 aims to provide new content and to spotlight businesses and events. This will take place during the autumn.
- 3.17. A regeneration and investment microsite is currently being progressed following the publication of the Town Centre Delivery Plan (Delivery Plan). This will form its own microsite and provide town centre regeneration updates and highlight investment opportunities.

Planning Documents

- 3.18. A significant amount of work and background studies have been undertaken to inform the Delivery Plan. This document was approved by Cabinet on 3rd August and sets out a 10-year route map to revitalise Rugby town centre, in support of the Rugby Town Centre Vision 2035. The aim of this document is to provide a basis for longer term regeneration and to enable the Council to bid for Government Funding. Any scheme within the Delivery Plan will require further consultation and approval by Members, as and when funding becomes available. It also provides a basis to market Rugby to investors to redevelop key sites not within the Council's ownership and will feature on the investor microsite.
- 3.19. A social value framework sits alongside the document to ensure that regeneration in the town centre delivers benefits beyond physical development and financial return. The document identifies seven opportunity areas:
- Town Hall
 - North Street East Car Park
 - St Andrew's Quarter
 - Cultural Quarter
 - Albert Street
 - Rugby Central
 - Rugby Art Gallery and Museum / Little Elborow
- 3.20. Each area has a different role to play, from improving public spaces and heritage assets to supporting new homes, culture, business activity and better links across the town centre. Of the seven above, three are identified as the most catalytic; Rugby Central, St Andrew's Quarter and the Cultural Quarter. The Delivery Plan provides a framework to guide future feasibility work and delivery.

- 3.21. The Delivery Plan aims to achieve over 600 residential units, up to 40,000sqft enhanced retail and leisure offer, up to 20,000sqft community and civic uses, health on the high street hub, 15,000sqft of creative/maker spaces, deliver 2 new public squares, improve business support functions and flexible workplace offer and improve public realm and wayfinding.
- 3.22. The Local Plan (2025-2042) has been submitted to the Planning Inspectorate for examination. The submission document includes policies for the town centre including residential and employment allocations.
- 3.23. A Development Brief for the Rugby Central site has been produced to ensure that any redevelopment proposals are delivered through a comprehensive plan for the area. The document was adopted as a supplementary planning document in April 2026.
- 3.24. A Development Brief for the area around Old Market and Brotherhood House to create a “cultural quarter” is due to commence now that the Delivery Plan is complete. This will shape development in this part of the town centre.

Public Realm Priority Project

- 3.25. The Public Realm Masterplan (2025) is the long-term vision for the town centre however the council is looking to bring forward a programme of short- and medium-term projects.
- 3.26. Alongside the short-term projects, the public realm priority project (projects 1-3 in the Public Realm Masterplan) has been progressed to detailed design stage (RIBA stage 3). This project is known as ‘The Stitch’. The geographical heart of Rugby is the Clock Tower. Project 1 is deemed to be the most impactful as it would create a new public space at Old Market Place which connects through to Market Place. This project would join the heart of the town centre to the heart of the proposed Cultural Quarter. As set out within the Corporate Strategy (2025-2035) and Draft Local Plan (submission version January 2026) the Cultural Quarter is a new mixed-use hub with public space at Old Market Place.
- 3.27. It has always been the intention to take Project 1 of the overall scheme forward first. This project would create a well needed further public realm square in the Town Centre to create space for people to dwell and a location for events and gathering. This project was agreed to be progressed by Council to RIBA stage 4 in July 2026. Progressing to RIBA stage 4 also increases the likelihood of securing government funding for projects within the cultural quarter and public realm more generally as they are fully worked up schemes which are costed and supported by the relevant technical documents.
- 3.28. Linked to this project is the wayfinding system which was progressed and drawn up through the RIBA stage 3. The intention is to change the wayfinding system throughout the town centre in order to have a holistic approach to signage, to help visitors navigate through the town and to ensure that visitors arriving from the railway station can be signposted to the town centre. A report on wayfinding is to be reported to Council in September.

Station Gateway

- 3.29. The submission Local Plan designated a new apartment living quarter in the Station Gateway character area. Land assembly and feasibility in this area has been investigated north and south of the railway.
- 3.30. The land directly outside the entrances to both the north and south of the station has been investigated in relation to short term public realm improvements by Warwickshire County Council. This aims to improve accessibility to both entrances and improvements for pedestrians using the tunnel. Consultation on these schemes will be undertaken by Warwickshire County Council once feasibility work has concluded.
- 3.31. Warwickshire County Council are also progressing a mural on the railway terrace wall linked to wayfinding with consultation events relating to design input being held in August.

Sustainable Transport & Modal Shift

- 3.32. Council has approved the revocation of a 1947 byelaw (“the Byelaw”) which prohibits the use of persons riding bicycles, tricycles or other similar vehicles on certain footpaths in Rugby. Legal Services are currently undertaking the necessary steps in order to revoke the Byelaw. The revocation will allow the Active Travel network within Rugby to be expanded and remove some routes that no longer exist or are already marked as Rights of Ways or cycle routes.
- 3.33. The Traffic Regulation Order (TRO) on Sheep Street, High Street, Market Place and Chapel Street controls the 11am – 4pm pedestrianised area. A public consultation for the following proposed changes was undertaken 24 September 2025 – 22 October 2025:
- No motor vehicles of any kind to access Market Place, Chapel Street, High Street and Sheep Street 11am – 11pm
 - Additional Planting and Street Furniture in locations to remove the through route from North Street to Lawrence Sheriff Street (access will be maintained to all properties)
- 3.34. The consultation response has been analysed with 96% of respondents being residents of Rugby and 77% being in favour of the changes. The Council therefore submitted an application to change the TRO to WCC in May 2026. Subject to the application and consultation process, the above changes can be enacted should the TRO application be approved by WCC.

Town Centre Asset Options

Council Assets

- 3.35. The Council has been reviewing its assets as part of the urban capacity study which was commissioned as part of the Local Plan (2025-2042). The Delivery Plan also focuses on the future uses of Council sites.

- 3.36. The Council's Albert Street site has been identified as suitable for new housing within the [Submission Local Plan](#), with early proposals suggesting around 25 homes in buildings of two to four storeys. Any future development would take account of neighbouring properties and the character of the area.
- 3.37. Rugby Art Gallery and Museum has welcomed residents and visitors for more than 25 years. Alongside Rugby Library and the Visitor Centre, it is one of the town centre's best-used public buildings, attracting more than 100,000 visitors each year. The Council is now considering improvements to the building and surrounding area. The proposals would make the museum more accessible, improve visitor experience and provide more flexible space for exhibitions and learning, introducing the infrastructures needed to be a more commercially operating venue. They would also link the project more closely with the wider regeneration of the town centre. The Council is developing a preferred option for the project and intends to seek external funding to support the next stage of work. An expression of interest is planned for submission to the National Lottery Heritage Fund, with any major refurbishment subject to further approvals and funding decisions.
- 3.38. Town centre car parking is entwined in many of the town centre workstreams. In June 2026 the Council agreed a Notice of Motion noting the work already underway in relation to car parking within the town centre. The work will inform future decisions on council assets with a review of town centre parking and related measures to support town centre vitality and regeneration. The outcomes of the review will be reported back to Cabinet in the winter.

Private Assets

- 3.39. The Council has also been facilitating discussions on a number of catalytic sites that are not in its ownership to kick start physical change within the town centre.
- 3.40. Cemex House, Evreux Way had a planning application (R22/1102) for the demolition of the building and the construction of an Aldi foodstore approved in March 2026. Demolition is due to begin on the site in September.
- 3.41. Rugby Central Shopping Centre has been a key focus over the last year. Conversations are ongoing with the overseas owners in relation to its redevelopment.
- 3.42. The Brotherhood House building is within the heart of the Cultural Quarter as set out within the Corporate Strategy. Due Diligence work regarding its redevelopment has been completed. Negotiations with the owner remain on going.
- 3.43. Discussions are continuing between the Council, WCC and developers who have an option to purchase the site known as Herbert Grey. The site has previously had planning permission for residential, however this has now lapsed as it was not implemented by the owners. This is another important site where

redevelopment would enhance connectivity and bring additional footfall into the town centre.

Town Centre Improvements

- 3.44. A key workstream associated with increasing footfall is to improve the look and feel of the town centre to ensure that visitors feel safe and have attractive public areas to dwell and also to encourage new businesses into the town. A town that looks attractive and has physical improvements is likely to be more attractive to businesses.
- 3.45. In addition to improvements to the public spaces discussed earlier in this report, other projects are underway to both the streetscape and the many beautiful buildings across the town centre.
- 3.46. St Andrews Church Improvements are underway with over half of the works being completed. All of the cleaning and improvements including replaced window guards and lighting are on track to be completed by September 2026. This will ensure that a key heritage asset and a community building at the heart of the town centre is enhanced.
- 3.47. A 3-year shopfront improvement grant scheme has already been introduced to improve the appearance of shop fronts. Year 1 is focused on distinct parts of the town. It will then be opened up to other areas of Rugby town centre in 2027. The scheme will support owners who want to invest in their buildings while taking account of Rugby's historic character. More info here: <https://www.rugby.gov.uk/w/town-centre-frontages-grant-programme>
- 3.48. Previously the Council has given 10 shops grants through UK Shared Prosperity Funding. For the new grant programme, in 2026/27 there were 16 expressions of interest in the grant. When applications were opened 10 applications were received of which 9 shops will receive grant funding for works to their shop front.
- 3.49. Funding for plans for extensive planting and seating enhancements on Market Place, Old Market, High Street and Sheep Street to improve the look and feel of the heart of the town, has been approved. The enhancements will be carried out imminently. These enhancements include Living Pillars in various locations around the town centre which will be put in place over the Autumn, the biodiversity baskets which accompany the pillars will be in place in October. These are vertical garden structures attached to lampposts and CCTV columns. They will provide environmental, ecological and aesthetic advantages for the town centre, offering air pollution mitigation, enhanced urban biodiversity and community placemaking benefits.

Town Centre Management

- 3.50. With Rugby First (the BID) ceasing to exist as of 1st April 2026 this workstream sought to put in place measures to continue certain services the council did not

previously undertake as part of a “soft landing” for 2026/27. Events, street cleaning and community safety tasks have been taken on by the council for 2026/27, which are additional services that the BID used to provide at a cost to businesses within the defined BID area.

- 3.51. Business events were held in March and June to provide updates on these additional services. These events also provided the opportunity for businesses to voice their concerns and share ideas to officers and members. The feedback from businesses is invaluable and from the previous meeting ideas for events were shared
- 3.52. A central point for town centre communications has been created (towncentre@rugby.gov.uk) in order to support businesses with this transition and beyond. This ensures that business can get answers to their queries without being passed between departments
- 3.53. A full review will be undertaken of the additional services in the coming months in order to inform next steps for future years as part of budget setting for 2027/28 and also Local Government Re-organisation.
- 3.54. The Council has entered into a new partnership with West Midlands Combined Authority to ensure that CCTV monitoring arrangements have continued as this service was previously paid for by the Council but delivered by Rugby First. A programme of upgrading and enhancement is now underway.

Vacant Shops

- 3.55. Rugby is an early adopter for High Street Rental Auctions (HRSA) and are therefore one of the first Councils in the country enacting these powers. A handful of long-term vacant units are being currently being targeted by the assets team with initial notices having been served on the properties. Rugby has felt the benefit of these powers already with 5 units of the 9 targeted to date being let almost immediately once the first stage had been undertaken.
- 3.56. Through the High Street Rental Auction Programme, a £221,625 grant to refurbish the former TSB building at 26-27 Sheep Street has been obtained by the Council from the Government. Works are underway and the unit will be auctioned through the HSRA programme later this year.
- 3.57. This programme continues with units constantly being identified and taken through this process.

4. FINANCIAL IMPLICATIONS

- 4.1. A £5million Town Centre Strategy Reserve was approved at Council on 22nd February 2023 to support the regeneration of the town.
- 4.2. Where alternative funding streams have been available and/or in cases where spend is time limited these funds have been used instead of the reserve e.g.

One Public Estate Funding and the UK Shared Prosperity Fund (UKSPF). Any workstream for which alternative funding is used is not captured below.

- 4.3. Additional alternative funding will be required for different projects in the coming years due to the significant funding required for some workstreams e.g. delivery of public realm schemes.
- 4.4. The table below shows the 2025/26 forecast spend from the Reserve, based on spend and commitments to date.

Item	Total approved budget £000	Forecast spend at 31.03.26 £000	Variance £000	Notes
Creative & Marketing	48	48	0	
Public Realm Priority Project	352	224	(128)	
Town Centre Delivery Plan	80	59	(20)	
Car Parking Strategy	77	63	(14)	
Town Centre Assets	382	365	(17)	
Outdoor Market	113	40	(70)	
Eyesore buildings	3	3	0	
Communications Strategy	27	13	(14)	
HSRA	0	4	0	0 variance due to grant being received
CCTV investigation works	32	0	(32)	
Rugby Women's World Cup	38	30	(8)	
Business Rates Reduction Scheme	103	37	(66)	
Town Centre Events	200	193	(7)	
Staffing	239	222	(17)	
BID support "soft landing"	140	14	(126)	
Total	1,834	1,316	(519)	

- 4.5. The opening balance of the Reserve at 1 April 2025 was (£4.602m), the spend during financial year 25/26 was £1.316m. In February 2026 an additional £5m

was agreed to be added to the Reserve therefore the remaining balance as of 31 March 2026 was (£8.286m). The commitments in 2026/27 currently total £1.206m.

5 CONCLUSION

- 5.1 This update provides the most up to date information in relation to town centre regeneration. The Council is actively progressing delivery in the town centre to bring benefits to its businesses, residents and stakeholders and meet the Council's ambitions as set out within the Corporate Strategy.

Name of Meeting: Cabinet

Date of Meeting: 8 September 2026

Subject Matter: Town Centre Regeneration Update

Originating Department: Place

DO ANY BACKGROUND PAPERS APPLY ☒ YES ☐ NO

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink
	Submission Local Plan 2025-2042 - Submission Local Plan - Rugby Borough Council
	Corporate Strategy 2025-2035 - https://www.rugby.gov.uk/w/corporate-strategy
	Rugby Town Centre Public Realm Priority Project Cabinet Report - https://www.rugby.gov.uk/documents/20124/62362152/PUBLIC+AGENDA+Cabinet+29+June+2026.pdf/29595f08-5787-865c-399b-51ccd252a51c?version=1.0&t=1781883898081
	Cycling Prohibition Byelaw Cabinet Report - https://www.rugby.gov.uk/documents/20124/62361322/PUBLIC+AGENDA+Council+17+June+2026.pdf/9bca9c29-08e2-2a47-8017-0462a25dcacb?version=1.0&t=1781019646197
	Town Centre Frontages Grant Scheme Cabinet Report - https://www.rugby.gov.uk/documents/20124/60878026/AGENDA+ITEM++7+Town+Centre+Frontages+Grant+Scheme.pdf/62024127-8f4e-cd0b-3c49-5f107fa3920a?version=1.0&t=1767356370801
	High Street Rental Auction Grant Cabinet Report - https://www.rugby.gov.uk/documents/20124/62362150/Agenda+item+10+-+High+Street+Rental+Auction+Grant+Funding.pdf/4390bc44-7234-7ab5-1e63-6c1d8be5449a?version=1.0&t=1781017533181
	Public Realm Priority Project Cabinet Report - https://www.rugby.gov.uk/documents/20124/62362152/PUBLIC+AGENDA+Cabinet+29+June+2026.pdf/29595f08-5787-865c-399b-51ccd252a51c?version=1.0&t=1781883898081
	RAGM Development Cabinet Report - https://www.rugby.gov.uk/documents/20124/62362152/PUBLIC+AGENDA+Cabinet+29+June+2026.pdf/29595f08-5787-865c-399b-51ccd252a51c?version=1.0&t=1781883898081
	Town Centre Regeneration Delivery Plan Cabinet Report - https://www.rugby.gov.uk/documents/20124/64075094/REVISED+AGENDA+Extraordinary+Cabinet+3+August+2026+2.pdf/22d52718-bb61-55d1-e4f1-69a1f34a6a96?version=3.0&t=1785766291874

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

☐ Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A

Appendix 1 – Town Centre Workstreams April 2026 – March 2027

Workstream	Objectives
Business, Training and Community Hub	• Provide a space for start-ups and early-stage businesses with support and resource. • Provide a collaborative ecosystem that fosters innovation, drives economic growth and creates a sustainable and prosperous business environment for all stakeholders involved.
Communication Strategy	• To update residents, businesses and partners of the progress of the Town Centre Regeneration Strategy workstreams.
Meanwhile Uses	• Boost the visitor economy and increase footfall and dwell time in the town centre. • Reduce shop vacancy by introducing temporary alternative uses (music, art, pop-up shop, etc.) • Improve the look of buildings across the town centre. • Have a successful and thriving outdoor market provision. • Support the growth of a Rugby Indoor Market and other start up facilities. • Enhance diversity and inclusion within the town centre.
Place Branding	• Positively influence people's perception of and association with Rugby and its town centre.
Planning Document/Status	• To ensure that the new Local Plan supports the delivery of the TCRS and ensure that any SPDs are developed which will guide development and improve the look of the town centre and its connectivity and useability. • Ensure Policy supports and assists delivery of regeneration. • Ensure we have a satisfactory planning framework in the interim before the new Local Plan is adopted to de-risk development and remove barriers.
Public Realm Priority Project	• Create accessible and high quality places to build civic pride, to attract visitors, workers and residents and to increase dwell time and improve health and wellbeing. • Create a public realm that reflects the heritage of Rugby. • Provide opportunities for active travel. • Ensure that all improvements are adaptable to climate changes. • Integrate water management, biodiversity, air quality priorities, renewable energy creation as part of healthy streets and spaces. • Enhancing and connecting green spaces across the town centre.
Station Gateway	• Deliver significant change in creating a high quality arrival and interchange experience. • To ensure that the railway station has a sense of arrival as a gateway to the Town Centre. • To ensure better connectivity to the Town Centre by improving transport, cycleways and footways.

	• To ensure the development potential in and around the railway station is realised. • Improve air quality to deal with traffic congestion.
Sustainable Transport & Modal Shift	• To ensure that sustainable transport is a first choice for those living and visiting the town centre in line with the climate emergency, air quality and wider council aspirations. • Promote opportunities for Active Travel. • To ensure potential routes are destination led. • Ensure that all workstreams within this action plan enable modal shift and sustainable transport. • To ensure that spaces and places within the public realm are pedestrian and cycle friendly.
Town Centre Asset Options	• To ensure that the best use of the Council's Assets is realised to deliver physical regeneration in the town centre. • To ensure that the Council is facilitating regeneration within the town centre especially in relation to catalyst sites.
Town Centre Improvements	• Provide clear priorities for improvements and direction for future developments within Rugby town centre. • Create accessible and high quality places to build civic pride, to attract visitors, workers and residents and to increase dwell time and improve health and wellbeing. • Enhancing and connecting green spaces across the town centre.
Town Centre Management	• Coordinate multiple partners to collaborate and deliver successful regeneration and growth in Town Centre.
Vacant Shops	• Reduce shop vacancy • Improve the look of buildings across the town centre.
Webpage Branding	• Promote Rugby Town Centre as a place to visit, live, do business and invest. • Positively market Rugby as an investment opportunity. • Provide confidence to the public and potential investors that Rugby Borough Council can deliver on its aspirations and is a successful partner to collaborate with. • Support Town Centre retailers in promoting their businesses.

AGENDA MANAGEMENT SHEET

Report Title: Demonstrating Compliance with the Requirements of the Housing Ombudsman Service 2025/26

Name of Committee: Cabinet

Date of Meeting: 8 September 2026

Report Director: Strategic Director - Communities

Portfolio: Communities, Housing and Safety

Ward Relevance: All Wards

Prior Consultation: Portfolio Holder Communities, Housing and Safety, Report Consultation Officers Group, Tenants Panel, Communication, Consultation and Information Manager.

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

Public or Private: Public

Report Subject to Call-In: Yes

Report En-Bloc: No

Key Decision: No

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

Summary: This report demonstrates through two appended reports the compliance of Rugby Borough Council housing service with the requirements of the Housing Ombudsman Service in 2025/26.

The Complaints Performance and Service Improvement Report 2025/26 forms appendix 1 of this report and provides an opportunity for Rugby Borough Council to be open and transparent about complaint handling performance in the housing service. The Housing Ombudsman Service requires this report to be considered by the landlord's governing body and for the report, and the governing bodies response to the report to be published.

Rugby Borough Council's self-assessment against the Complaint Handling Code of the Housing Ombudsman Service forms appendix 2 of this report.

The Complaint Handling Code requires landlords to assess themselves against each provision of the Code. This self-assessment must be considered and approved by the landlords governing body.

**Local Government
Reorganisation Implications:**

There are no implications for LGR in this report.

Financial Implications:

There are no financial implications of this report.

**Risk Management/Health and
Safety Implications:**

The Complaints Performance and Service Improvement Report 2025/26 sets out actions and measures taken which mitigate the risk of non-compliance with the Complaint Handling Code of the Housing Ombudsman Service which has since 1 April 2024 been a statutory code.

Environmental Implications:

None have been identified.

Legal Implications:

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

The Social Housing (Regulation) Act 2023 sets out that there will be a Memorandum of Understanding between the Regulator of Social Housing and the Housing Ombudsman Service enabling them to collaborate and share information to protect tenants' rights.

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

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

Equality and Diversity:

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

Options:

Option 1 - Cabinet is invited to endorse the action plan set out in Section 5.7 of appendix 1 and approve the self-assessment against the provisions of the Complaint Handling Code.

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

Recommendation:

1. The action plan, as set out in Section 5.7 of Appendix 1, be endorsed;
2. The self-assessment against the provision of the complaint handling code set out in appendix 2 be approved;
3. The improved performance during 2025/26 in respect of complaints handling be noted;
4. The Portfolio Holder for Communities, Housing and Safety be appointed as Member Responsible for Complaints, as per the requirements set out at appendix 4; and
5. A cross-party Member Working Group be appointed by the Strategic Director Communities, in consultation with the Portfolio Holder for Communities Housing and Safety, to consider the proposals to be submitted to Cabinet in September 2027, in respect of the 2026/27 Complaints Performance and Service Improvement Report and 2027 self-assessment against the Complaint Handling Code of the Housing Ombudsman Service.

Reasons for Recommendation:

This is an opportunity to ensure that Members have oversight of complaints within the housing service and the measures that

Rugby Borough Council is taking to improve
complaint handling in the housing/landlord service

Cabinet - 8 September 2026

**Demonstrating Compliance with the Requirements of the Housing
Ombudsman Service 2025/26**

Public Report of the Strategic Director - Communities

Recommendation

- 1) The action plan, as set out in Section 5.7 of Appendix 1, be endorsed;
- 2) The self-assessment against the provision of the complaint handling code set out in appendix 2 be approved;
- 3) The improved performance during 2025/26 in respect of complaints handling be noted;
- 4) The Portfolio Holder for Communities, Housing and Safety be appointed as Member Responsible for Complaints, as per the requirements set out at appendix 4; and
- 5) A cross-party Member Working Group be appointed by the Strategic Director Communities, in consultation with the Portfolio Holder for Communities Housing and Safety, to consider the proposals to be submitted to Cabinet in September 2027, in respect of the 2026/27 Complaints Performance and Service Improvement Report and 2027 self-assessment against the Complaint Handling Code of the Housing Ombudsman Service

1. Executive Summary

- 1.1. This report provides Cabinet with the opportunity to respond to the Complaints Performance and Service Improvement Report 2025/26, attached as appendix 1 in line with the requirements of the Complaint Handling Code of the Housing Ombudsman Service.
- 1.2. This report provides Cabinet with the opportunity to review and approve the self-assessment of Rugby Borough Council against the Complaint Handling Code of the Housing Ombudsman Service. The self-assessment is attached as appendix 2.
- 1.3. The Complaints Performance and Service Improvement Report 2025/26 satisfies the requirements of the Complaints Handling Code which requires the identification and sharing of intelligence and learning from complaints. The analysis in the report is of complaints made in respect of our housing service and relating to:

- Tenancy management
- Management of neighbourhoods and communities
- Responsive repairs and asset management including compliance works to keep our homes safe, planned works and environmental improvements
- Tenant involvement, empowerment and communications with our tenants

1.4. The report sets out analysis of complaints performance in 2025/26 including:

- Complaint volumes
- Complaint types
- Compliance with the complaint handling timescales required by the Complaint Handling Code of the Housing Ombudsman Service
- Learning outcomes
- Actions being undertaken to address learning outcomes

1.5. The self-assessment of Rugby Borough Council against the Complaint Handling Code of the Housing Ombudsman Service is attached at appendix 2 and demonstrates the compliance of Rugby Borough Council with the Code.

2. Background

2.1. The Complaints Performance and Service Improvement Report 2025/26 has been produced to ensure that the Council learns from complaints received and to evidence compliance with the Complaint Handling Code of the Housing Ombudsman Service. This has been a statutory code since 1 April 2024.

2.2. The report sets out complaint volumes and types within the housing service and compliance with the 10-working day timescale for responding to complaints at Stage one, and the 20-working day timescale for responding to complaints at Stage 2, as set out in the Complaint Handling Code of the Housing Ombudsman Service.

2.3. The report sets out learning from complaints and measures that we take to improve services and complaint handling.

2.4. The self-assessment against the Complaint Handling Code of the Housing Ombudsman Service should be produced at least annually and reviewed and approved by the landlords governing body. Our self-assessment of June 2026, which forms appendix 2 demonstrates compliance with the Code.

3. Performance in 2025/26

- 3.1. In 2025/26 we received 160 complaints about the housing service, compared to 98 in 2024/25. Of these complaints 82% were responded to within the 10-day response time required by the Complaint Handling Code of the Housing Ombudsman Service.
- 3.2. The increase in complaints can be attributed to a more proactive approach to recognising when a complaint has been made, in keeping with the requirement that if it looks like a complaint or sounds like a complaint then it must be recorded as one. It is not necessary for customers to specify that their issue is a complaint.
- 3.3. Of those complaints 16 progressed to Stage two. 88% of Stage two complaints were responded to within the 20-day response time required by the Complaint Handling Code of the Housing Ombudsman Service.
- 3.4. It should be noted that in its regulatory judgement, published in February 2026, the Regulator of Social Housing set out *“Rugby BC has made changes to its complaints handling service and during the inspection we gained assurance that these changes have impacted positively on response times and tenant satisfaction in relation to complaints. Rugby BC was also able to evidence that it analyses and learns from complaints via a quarterly Lessons Learned Clinic, and that learning from complaints has led to service improvements”*
- 3.5. It should be noted that compensation or financial remedies to tenants are made in accordance with guidance provided by the Housing Ombudsman Service.

4. Performance against previous year

- 4.1. There has been an improvement in performance from 2024/25 when 79% of our Stage 1 complaints were responded to within the 10-working day response time required by the Housing Ombudsman Service as one of their key indicators of compliant complaint handling.
- 4.2. This improvement has been brought about through:
 - Staff training including in house training and accessing training from the Housing Ombudsman Service
 - Establishment in 2023/24 of a quarterly Lessons Learnt Clinic which scrutinises complaints and serious incidents including how we respond to complaints
 - Tenant engagement in scrutinising complaint handling performance and effective communications in complaints
 - Close weekly monitoring of open complaints

- Setting objectives relating to appropriate complaint handling in Performance Development Reviews'
- 4.3. It should be noted that we expect complaint volumes to increase as officers continue to embed a positive culture with regard to complaints, and how they are recorded.
- 4.4. Complaints provide opportunities to learn and improve services which is welcome.
- 4.5. It is also worth highlighting that it has been reported across the housing sector that AI is increasingly common in supporting the formulation and submission of complaints. This too may lead to increasing complaints volumes.
- 4.6. It should be noted that for Housing Ombudsman complaints, despite increased volumes, only 10% progressed to Stage 2 in 2025-26, a reduction from the previous year when 18% progressed to Stage 2, indicating an improvement in the quality of responses at Stage 1.

5. Learning Outcomes

5.1 Learning outcomes in 2025 – 26 have included:

- Strengthening access to data across all our systems on the vulnerabilities of tenants, so that all relevant teams can implement required adjustments to service.
- Review of “voids, end to end procedure” ensuring that all empty properties are bought up to the agreed Lettable Standard.
- Understanding how we assess applicants as tenancy ready, including strengthening the referral process from the Housing Advice and Enabling Team to the Housing Services Team.

6. Appointment of the Member Responsible for Complaints

6.1 It is recommended that the Council appoint the Portfolio Holder for Communities, Housing and Safety as Member Responsible for Complaints (MRC) as per the requirements set out at appendix 4. The Portfolio Holder Communities and Homes, Regulation and Safety was appointed as the MRC during the previous administration through a Cabinet Report on 2 December 2024, the recommendation therefore seeks to continue with the appointment.

6.2 The MRC has key responsibilities in respect of complaint handling including:

- Promoting openness and transparency.
- Overseeing and approving the annual submission against the Complaint Handling Code.
- Alerting the Governing Body of any concerns about complaint handling.

7. Establishment of a Cross-Party Working Group

7.1 It is recommended that a cross-party Member Working Group be appointed by the Strategic Director Communities, in consultation with the Portfolio Holder for Communities Housing and Safety, to consider the proposals to be submitted to Cabinet in September 2027, in respect of the 2026/27 Complaints Performance and Service Improvement Report and 2027 self-assessment against the Complaint Handling Code of the Housing Ombudsman Service in order to:

- Provide independent Member challenge.
- Strengthen compliance with the Complaint Handling Code.
- Provide greater assurance to Cabinet.

8. Conclusion

8.1 Appendix 1, the Complaints Performance and Service Improvement Report 2025/26 summarises complaints received and enables the Council to learn from its complaints to improve services and assists compliance with the Complaint Handling Code of the Housing Ombudsman Service. Our self-assessment against the Code demonstrates compliance with the Code.

Name of Meeting: Cabinet

Date of Meeting: 8 September 2026

Subject Matter: Demonstrating Compliance with the Requirements of the Housing Ombudsman Service 2025/26

Originating Department: Communities

DO ANY BACKGROUND PAPERS APPLY

☐ YES

☒ NO

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink
App 1	Complaints Performance and Service Improvement Report 2025-26
App 2	Rugby Borough Council Self-Assessment Against the Complaint Handling Code of the Housing Ombudsman Service
App 3	Equality Impact Assessment
App 4	Expectations of the Housing Ombudsman Service for the Member Responsible for Complaints HOS Expectations of MRC

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

☐ Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A



Cabinet 8 September 2026

Demonstrating Compliance with the Requirements of the Housing Ombudsman Service 2025-26

Appendix 1

Rugby Borough Council

Communities & Homes Directorate Complaints Performance and Service Improvement Report 2025/26

Report from:	Mary Jane Gunn Communities and Projects Manager maryjane.gunn@rugby.gov.uk
Subject:	Communities and Homes Complaints Performance and Service Improvement Report 2025/26

1.	Introduction
	Rugby Borough Council is committed to learning from the complaints it receives and enables this through this report. Rugby Borough Council will use this report to: • Report to the Regulator of Social Housing (annually) • Report to the Housing Ombudsman Service (annually) • Report to our Governing Body (annually) • Understand our compliance with the Complaint Handling Codes of the Housing Ombudsman Service and the Local Government and Social Care Ombudsman • Identify trends in complaints coming forward. • Scrutinise our complaint handling to embed an ethos of continuous improvement. • Inform our tenants about the type of complaints we receive and how we learn from these complaints to improve our service to them.

	Our quarterly reports inform our quarterly “Lessons Learnt” Clinics at which we review complaints and trends and identify and monitor actions required.																				
2.	Summary																				
	This report sets out the results of an analysis of complaints performance in 2025/26 including learning outcomes and actions being taken to address those learning outcomes. This satisfies the requirements of the Housing Ombudsman Service (HOS), and the Local Government and Social Care Ombudsman (LGSCO) and their respective Complaint Handling Codes (CHC) which require the identification and sharing of intelligence and learning from complaints. The analysis in this report is of complaints made in respect of services delivered by the Communities and Homes Directorate of Rugby Borough Council (including the responsive repairs service provided by the Property Repairs Service) complaints about services are investigated by either the Housing Ombudsman Service or the Local Government and Social Care Ombudsman, and the table below indicates which services delivered by the Communities and Homes Department are referred to/investigated by which Ombudsman. <table border="1"> <thead> <tr> <th>Local Government & Social Care Ombudsman</th><th>Housing Ombudsman Service</th></tr> </thead> <tbody> <tr> <td>Housing Allocations (Under the Housing Act 1996 Part 6)</td><td>Leasehold Services</td></tr> <tr> <td>Homelessness (Under the Housing Act 1996 Part 7)</td><td>Moving to a Property</td></tr> <tr> <td>General Housing Advice</td><td>Rent and Service Charges</td></tr> <tr> <td>Housing Benefit</td><td>Occupancy Rights</td></tr> <tr> <td>Right to Buy</td><td>Property Condition – Repairs and Improvements</td></tr> <tr> <td></td><td>Tenant Behaviour</td></tr> <tr> <td></td><td>Estate Management</td></tr> <tr> <td></td><td>Complaint Handling</td></tr> <tr> <td></td><td>Compensation</td></tr> </tbody> </table>	Local Government & Social Care Ombudsman	Housing Ombudsman Service	Housing Allocations (Under the Housing Act 1996 Part 6)	Leasehold Services	Homelessness (Under the Housing Act 1996 Part 7)	Moving to a Property	General Housing Advice	Rent and Service Charges	Housing Benefit	Occupancy Rights	Right to Buy	Property Condition – Repairs and Improvements		Tenant Behaviour		Estate Management		Complaint Handling		Compensation
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	Tenant Behaviour																				
	Estate Management																				
	Complaint Handling																				
	Compensation																				
3.	How we will use this report																				
	This report will enable regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Complaint Handling Codes of the HOS and the LGSCO. This report will enable themes or trends to be assessed by relevant managers to identify potential systemic issues, serious risks or policies and procedures that require revision. It will also be used to inform staff and contractor training.																				

4.	Relevant issues and implications
4.1	Risk assessment Scrutinising complaints contributes to avoiding a finding of maladministration or the potential for the issue of a Complaints Handling Failure Notice by the HOS or the LGSCO, which could trigger a regulatory enquiry.
4.2	Policy implications This report meets the requirements of the Rugby Borough Council Customer Feedback Policy which requires the reporting of learning on complaints.
4.3	Reference to the Regulator of Social Housing (RSH) regulatory framework/legislation and the requirements of the HOS. This report assists compliance with the relevant consumer standard of the RSH: The Transparency, Influence and Accountability (TIA) Standard which requires: - Registered providers must ensure their approach to handling complaints is simple and accessible. - Registered providers must publicise their complaints process and what tenants can do if they are dissatisfied with the outcome of a complaint or how a complaint was handled. - Registered providers must provide tenants with information about the type of complaints received and how they have learnt from complaints to continuously improve services. The Tenant Satisfaction Measures Standard (of the RSH) requires us to report on satisfaction with complaints handling (see 5.3) complaint volumes and complaints responded to with the CHC timescales. This report will facilitate those reports. RSH Regulatory Judgement February 2026 In Autumn 2025, Rugby Borough Council had a routine inspection by the Regulator for Social Housing, the RSH judgement was published in February 2026 and a C3 grade was confirmed. In relation to complaints the judgement of the RSH set out: <i>“Rugby BC has made changes to its complaints handling service and during the inspection we gained assurance that these changes have impacted positively on response times and tenant satisfaction in relation to complaints. Rugby BC was also able to evidence that it analyses and learns from complaints via a quarterly Lessons Learned Clinic, and that learning from complaints has led to service improvements.”</i> The Housing Ombudsman Service Complaint Handling Code

The HOS Complaint Handling Code (CHC) is (from 1 April 2024) a statutory requirement for social landlords. The CHC was produced in consultation with landlords, tenants, and other stakeholders.

The CHC sets out the requirements for landlords to effectively respond to complaints.

The HOS monitors' social landlords' compliance with the CHC. It can issue a Complaint Handling Failure Order if a landlord does not comply.

Landlords must complete an assessment of their complaint handling as part of their annual service report. This helps the Ombudsman to check landlords are following the code, and it can use the data to identify systemic issues.

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

In January 2026, Rugby Borough Council's Complaints Policy was prioritised for a review due to the Regulator of Social Housing's judgement of a level 3 grading of its consumer standards.

The review focused on ensuring Rugby Borough Council has met the requirements of the Complaints Handling Code based on what residents can reasonably expect to be in a policy document and whether Rugby Borough Council's Annual Complaints Performance and Service Improvement Report and Governing Body response complied with the code.

The findings of the review and the Ombudsman's recommendations in respect of the annual Complaints Performance and Service Improvement Report and the Customer Feedback Policy have been implemented.

Findings – Complaints Performance and Service Improvement Report

Observations

- Information on complaints performance is difficult to find on the website (also raised as a weakness by the Regulator of Social Housing in its regulatory judgement of February 2026) – Rugby Borough Council is addressing poor usability on the Council website through an improvement project.
- The annual Complaints Performance and Service Improvement Report must include a summary of the types of complaints the landlord has refused to accept – the annual Complaints Performance and Service Improvement report will include a summary of the types of complaints the landlord has refused to accept (Where complaints have been refused)

Recommendations

- In its annual report as part of its year 3 (2025 – 26) submission Rugby BC should include specific reference to whether the landlord has received any Complaint Handling Failure Orders (CHFO) or Complaint Handling Failure Notices (CHFN) across the reporting year – This will be actioned as required within the Complaints Performance and Service Improvement Report 2025 – 26 and every year thereafter.
- In its annual report as part of its year 3 (2025 – 26) submission Rugby BC should include a link to its landlord performance report published by HOS where a report has been provided. - This will be actioned as required within the Complaints Performance and Service Improvement Report 2025 – 26 and every year thereafter. In 2025 - 26 a landlord performance report was not provided by the HOS to RBC as there were no maladministration determinations or CHFO's or CHFN's to report.

Findings – Customer Feedback Policy

A number of recommendations were made in respect of the RBC Customer Feedback Policy these have been implemented and are set out in RBC's Self-Assessment against the Complaint Handling Code of the Housing Ombudsman Service.

5 Complaint Report

5.1 Complaint Volumes

Number of complaints - HOS	Q1	Q2	Q3	Q4	Total
Stage 1	27 (90%)	35 (83%)	51 (88%)	47 (70%)	160 (82%)
Stage 1 Extensions	2	3	9	8	22
Stage 2	3 (100%)	3 (33%)	6 (100%)	4 (100%)	16 (88%)
Stage 2 Extensions	0	1	0	0	2
Ombudsman Referrals**	2	2	0	0	4

Number of complaints - LGSCO	Q1	Q2	Q3	Q4	Total
Stage 1	10 (100%)	14 (86%)	6 (100%)	17 (82%)	47 (89%)
Stage 1 Extensions	1	1	1	8	11
Stage 2*	3 (100%)	2 (100%)	0	1 (100%)	6 (100%)
Stage 2 Extensions	1	0	0	0	1
Ombudsman Referrals**	0	0	0	1	1

	Number of Complaint Handling Failure Orders/Notices	Q1	Q2	Q3	Q4	Total
	HOS	0	0	0	0	0
	LGSCO	0	0	0	0	0
	Annual Comparator – Stage 1 to 2	2023/24	2024/25		2025/26	
	HOS		98 - 18% to Stage 2		160 - 10% to Stage 2	
	LGSCO		51 -10% to Stage 2		47 - 13% to Stage 2	
	Total	130 - 7% to Stage 2	149 - 15% to Stage 2		207 - 11% to Stage 2	
	During 2023/24 complaints by Ombudsman were not split. % of complaints responded to within the timescales required by the Housing Ombudsman Service Complaint Handling Code/Local Government and the Social Care Ombudsman Complaint Handling Code (10 working days) is indicated in () At Stage 2 % of complaints responded to within the timescales required by the Housing Ombudsman Service Complaint Handling Code/Local Government and Social Care Ombudsman Complaint Handling Code (20 working days) is indicated in () *Stage 2 complaints are recorded in the Q where the Stage 2 process commenced. Stage 2 Complaints are not additional complaints. They are the appeal stage of a Stage 1 Complaint. **Complaints that go to the Ombudsman are not additional complaints, they are complaints that are being investigated by the Housing Ombudsman Service or the Local Government and Social Care Ombudsman, usually following the appeal (Stage 2) of RBC processes. Ombudsman referrals are recorded in the quarter when the referral was made to the Ombudsman. The number of complaints per 1000 tenants in 2025/2026 is 58, this is compared to the sector median average of 53.5.					

5.2	Reasons for Complaint																		
	<table><tr><td>Complaint Type (Stage 1) HOS</td><td>Q1 25/26</td><td>Q2 25/26</td><td>Q3 25/26</td><td>Q4 25/26</td><td>Total</td></tr><tr><td>Responsive Repairs</td><td>11</td><td>10</td><td>19</td><td>21</td><td>61</td></tr><tr><td>Tenancy Management</td><td>1</td><td>1</td><td>0</td><td>0</td><td>2</td></tr></table>	Complaint Type (Stage 1) HOS	Q1 25/26	Q2 25/26	Q3 25/26	Q4 25/26	Total	Responsive Repairs	11	10	19	21	61	Tenancy Management	1	1	0	0	2
Complaint Type (Stage 1) HOS	Q1 25/26	Q2 25/26	Q3 25/26	Q4 25/26	Total														
Responsive Repairs	11	10	19	21	61														
Tenancy Management	1	1	0	0	2														

Communications	1	1	1	1	4
Compensation	1	1	2	0	4
Infestation	1	0	0	1	2
Noise	1	0	1	0	2
Officer Conduct	7	4	8	5	24
Rent	3	4	2	1	10
Adaptations (Council Homes)	1	1	0	0	2
Anti-Social Behaviour	0	6	3	1	10
Fleet	0	1	0	0	1
Damp & Mould	0	1	4	6	11
Estate Management	0	5	0	0	5
Contractor Conduct	0	0	1	0	1
Damage to Property	0	0	1	0	1
Garages	0	0	1	0	1
Mutual Exchange	0	0	2	0	2
Leasehold Services	0	0	1	0	1
RBC Adaptation	0	0	1	0	1
Recharges	0	0	1	1	2
Tenant Dispute	0	0	3	0	3
Energy Efficiency	0	0	0	2	2
Estate Maintenance	0	0	0	6	6
Service Charges	0	0	0	2	2
Grand Totals	27	35	51	47	160

Complaint Type (Stage 2) HOS	Q1 25/26	Q2 25/26	Q3 25/26	Q4 25/26	Total
Damp and Mould	1	0	0	0	1
Officer Conduct	1	0	2	0	3
Responsive Repairs	1	1	1	3	6
Anti-Social Behaviour	0	1	1	0	2
Estate Management	0	1	0	0	1
Compensation	0	0	1	0	1
Damage to Property	0	0	1	0	1

	Estate Maintenance	0	0	0	1	1
	Grand Totals	3	3	6	4	16
	Complaint Type (Stage 1) LGSCO	Q1 25/26	Q2 25/26	Q3 25/26	Q4 25/26	Total
	Homelessness	4	4	1	7	16
	Allocations	5	10	5	10	30
	Right to Buy	1	0	0	0	1
	Grand Totals	10	14	6	17	47
	Complaint Type (Stage 2) LGSCO	Q1 25/26	Q2 25/26	Q3 25/26	Q4 25/26	Total
5.3	Allocations	3	1	0	1	5
	Homelessness	0	1	0	0	1
	Grand Totals	3	2	0	1	6
5.3 Satisfaction with the Complaints Process						
In 2025/26 as part of the RSH Tenant Satisfaction Measures Standard, Rugby Borough Council undertook its Tenants Survey. This was a census survey of our 3400 tenants that was conducted by post. Our response rate was 31.2%.						
The survey identified 47.6% of our tenants were satisfied with the way that RBC handles complaints, and we are delivering a number of actions in 2025/26 to increase satisfaction with our complaint handling including:						
• Training for investigating and responding officer in July 2025 and March 2026 to improve compliance with the response times required by the Housing Ombudsman Service, the quality of our complaint handling and our responses whilst also looking at the use of AI with complaint responses. • The provision of information about our complaints policy and process in our Tenants Newsletters. • Telephone surveys of tenants who have complained during so that we increase our understanding of how tenants receive our complaints handling service and identify ways we can improve. • Our suite of standard letters has been reviewed and improved.						
The Tenant's Survey is an annual requirement of the Regulator of Social Housing, and our Tenants Survey 2026/27 is taking place October 2026 – January 2027.						

5.4	Compensation In 2025-26, we settled 14 compensation claims total value £36,296.00 <i>Note: Not all compensation relates to complaints.</i>
5.5	Learning from complaints The HOS CHC requires landlords to demonstrate learning and continuous improvement from complaints, ensuring intelligence from complaints drives change and enables the resident's voice to be heard. The code sets out: <i>For boards or equivalent governance, the Code supports culture setting and intelligence for assurance exercises, using complaint data alongside other management information on stock, services and customer feedback to provide insight into their organisation. It is important for governance to understand the complaints their organisations are receiving and the impact of their complaint handling on residents.</i> <i>For chief executives and senior managers, the Code supports learning from complaints and promotes the open and transparent use of information to assess performance and risks.</i> The CHC requires reporting to residents, staff, leadership team and elected Members to ensure that a culture of learning from complaints is truly embedded. An explicit requirement of the self-assessment is to demonstrate how we share learning with our elected Members and tenants. We report on complaints in our quarterly Tenants Newsletter: Numbers, complaint types, compliance with the response handing timescales of the CHC and numbers of complaints that are satisfied at Stage 1.
5.6	Feedback From Complainants We undertake quarterly surveys with complainants following their complaint being closed. Our surveys throughout the year have told us: • There is a lack of satisfaction with communications – people struggling to get through on the phone to discuss their issues and also not having communication throughout all stages of the complaints process. • Overall, complainants said that there was very clear and accessible information available about how to make a complaint.

	- Generally, people were satisfied with the outcomes from their complaints however, there were several instances in which people were not aware that their complaint was closed and they felt confused and not kept in the loop. - There has been a good response to the response letters we have sent out with complaints saying that they were easy to read and follow. - Overall, complainants have suggested that the preferred methods for them to share their views would be via surveys and meetings.												
5.7	2025/26 Learning <table><tr><th>Learning</th><th>Action Required</th></tr><tr><td>RBC will look further into categorizing complaints & better understand what drives the complaint</td><td>Review the telephone survey with tenants, how can we get further information from tenants rather than the same responses each quarter.</td></tr><tr><td>Issues of damp and mould need to be addressed at the void stage</td><td>There is an ongoing review of procedures, the voids end to end process is under review and will include a review of the lettable standard (which will also be considered by our tenant's Consumer Standards Group).</td></tr><tr><td>RBC will better understand how we assess tenants as “tenancy ready”</td><td>Review the referral process from Housing Advice and Enabling Team to Housing Services Team to strengthen information provided in referral, strengthen information collected at Settling in Visits to ensure vulnerabilities are understood and recorded.</td></tr><tr><td>The “recharge” process, whereby tenants are recharged for damage to their property as a result of damage or neglect is poorly understood and communicated.</td><td>Recharge Policy to be reviewed in consultation with the Sundry Debtors team, once reviewed it will be communicated through the Tenants Newsletter, website, social channels etc.</td></tr><tr><td>Information about the vulnerabilities of tenants is not always available through all our systems.</td><td>Vulnerabilities to be tracked using a new intensive support module within CX</td></tr></table>	Learning	Action Required	RBC will look further into categorizing complaints & better understand what drives the complaint	Review the telephone survey with tenants, how can we get further information from tenants rather than the same responses each quarter.	Issues of damp and mould need to be addressed at the void stage	There is an ongoing review of procedures, the voids end to end process is under review and will include a review of the lettable standard (which will also be considered by our tenant's Consumer Standards Group).	RBC will better understand how we assess tenants as “tenancy ready”	Review the referral process from Housing Advice and Enabling Team to Housing Services Team to strengthen information provided in referral, strengthen information collected at Settling in Visits to ensure vulnerabilities are understood and recorded.	The “recharge” process, whereby tenants are recharged for damage to their property as a result of damage or neglect is poorly understood and communicated.	Recharge Policy to be reviewed in consultation with the Sundry Debtors team, once reviewed it will be communicated through the Tenants Newsletter, website, social channels etc.	Information about the vulnerabilities of tenants is not always available through all our systems.	Vulnerabilities to be tracked using a new intensive support module within CX
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6.0	Housing Ombudsman and Local Government and Social Care Ombudsman Referral Outcomes <table><tr><td colspan="5">Ombudsman Referrals:</td></tr><tr><th>Quarter</th><th>Ombudsman</th><th>Case ID</th><th>Current Status</th><th>Outcome</th></tr></table>	Ombudsman Referrals:					Quarter	Ombudsman	Case ID	Current Status	Outcome		
Ombudsman Referrals:													
Quarter	Ombudsman	Case ID	Current Status	Outcome									

	Q1 2025/26	LGSCO	25006089	Complete	No Further Action
		LGSCO	24010394	Complete	Orders made to RBC (apology & compensation) and complied with – Remedy satisfied on time
	Q2 2025/26	HOS	202434227/N/A	Stage 1 response requested by HOS	
		HOS	202453267	Awaiting allocation to HOS Casework and Assessment Team. RBC has provided complaint submission & stage 1 response & tenancy agreement. Request for information 7 January 2026 – deadline 28 January 2026 – Info provided on time.	
		LGSCO	25002100	Complete	No Further Action
	Q3 2025/26	LGSCO	25008072	Complete	No Further Action
		HOS	202515368	Stage 1 response requested by HOS. Referred back to Landlord complaints process	
	Q4 2025/26	LGSCO	25014876	LGSCO will not investigate the complaint because there is insufficient evidence of fault to justify their involvement.	No Further Action

Demonstrating Compliance with the Requirements of the Housing Ombudsman Service

Appendix 2

Rugby Borough Council

Self-Assessment Against the Complaint Handling Code of the Housing Ombudsman Service

Date of Self-Assessment June 2026

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>	Yes	As set out in the Rugby Borough Council Customer Feedback Policy (CFP) Section 1.1	
1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy Section 1.1 & 1.15	In its review April 2026, the HOS recommended - - Rugby Borough Council should review its complaints policy to make clear that it gives residents that express dissatisfaction a choice to make a complaint. - Rugby Borough Council should update its complaints policy to make

				clear that complaints from elected members on behalf of residents will be treated in line with its complaints procedure. These recommendations have been implemented.
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy Section 1.10	In its review April 2026, the HOS recommended - Rugby Borough Council should review its complaints policy to make clear the distinction between a service request and a complaint. Housing related examples of a service request such as a request for a repair when made for the first time or reports of anti-social behaviour could help to support a resident understanding of the difference between a service request and a complaint. This recommendation has been implemented.

1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	As set out in our Rugby Borough Council Customer Feedback Policy - Section 1.2	In its review April 2026, the HOS recommended - Rugby Borough Council should review its complaints policy to make clear that it will raise a complaint where a resident expresses dissatisfaction with the response to their service request, confirming that when a complaint is made about its response to a service request it will not impact on the actions needed to resolve any immediate issues. I.e. the landlord will not wait for the outcome of the complaint before addressing the service request. This recommendation has been implemented.
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	In line with the Transparency, Influence and Accountability Standard of the Regulator of Social Housing Rugby Borough Council undertook a Tenants Survey which took place October 2025 – January 2026. The cover letter informed tenants of the Housing Ombudsman	Extract from Tenants Survey Cover Letter “<i>This is just a reminder that you have the right to raise any housing issues with the Housing Ombudsman at any point if you are not satisfied with the service you have received from our teams. The Housing Ombudsman can provide you with free, independent advice and support. Their contact details are as follows:</i> www.housing-ombudsman.org.uk Telephone: 0300 111 3000

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Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint, they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	As set out in the Rugby Borough Council Customer Feedback Policy Section 1.3	
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy Section 1.3	In its review April 2026, the HOS recommended - Rugby Borough Council should review its complaints policy to: • Make clear that it will not take a blanket approach to excluding complaints relating to insurance claims, making clear that complaints about the Councils' handling of the claim or communication in relation to the claim are accepted as complaints. • Make clear for residents when the landlord considers a matter is subject to legal action, for example when the Claim Form and Particulars of Claim have been filed at court

				• Remove reference to excluding complaints where the persistent/vexatious complaints procedure has been invoked • Make clear that where anonymous complaints are received, they will be logged and the matter reported actioned where it is possible to do so These recommendations have been implemented.
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2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy Section 1.3	In its review April 2026, the HOS recommended - Rugby Borough Council should review its complaints policy to make clear that it will accept complaints referred to it within 12 months of the resident being made aware of the issue as well as within 12 months of the issue occurring and will apply discretion to accept complaints made outside of this timeframe. This recommendation has been implemented.
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy Section 1.3	In its review April 2026, the HOS recommended - - Rugby Borough Council should review its complaints policy to make clear that in any circumstances where it decides not to accept a complaint it will provide an explanation to the resident. - Rugby Borough Council should ensure that its complaints policy clarifies that when it decides not to accept a complaint, it will explain to the resident their right to take the decision to the Housing Ombudsman. Alternatively, the landlord can have a statement in its policy which confirms the resident has a right to contact the Housing

				Ombudsman at any point during the complaints process. These recommendations have been implemented.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy Section 1.4	We do not take a blanket approach to excluding complaints, and it is clear that each investigation must deal with separate complaints based on their individual merits

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy Section 1.4	Tenants can complain in person at the Town Hall where housing staff are available to see callers every day, in writing, by phone, using our online form. We have reintroduced a “hard copy” Tenants Newsletter which is posted out to all tenants and commenced on a quarterly basis from Summer 2024, and this contains information about how to complain and information about the Housing Ombudsman Service. In its review April 2026, the HOS recommended - Rugby Borough Council should review its complaints policy to make clear the channels through which residents are able to make a complaint. This recommendation has been implemented.
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy Section 1.4	

3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	We monitor complaints on a quarterly basis and have a quarterly “Lessons Learnt” Clinic to ensure trends are identified and necessary actions are taken.	Staff training on complaints covers the topic of a healthy complaints culture in which we learn from complaints. Training has been delivered in March 2026 to frontline staff enabling them to recognise complaints, record them appropriately and escalate them as necessary. This training will take place annually.
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord’s website.	Yes	The Rugby Borough Council Customer Feedback Policy is available on our website. It can be provided in different formats on request. Section 5.1	In its review April 2026, the HOS recommended - Rugby Borough Council should review its complaints policy to make clear that it can make its complaints policy available in accessible formats where required. The landlord may wish to provide examples of formats that are available and how these can be requested. This recommendation has been implemented.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	The Rugby Borough Council Customer Feedback Policy sets out how we will publicise our policy and information about the Housing Ombudsman Service. Section 5.1	In 2024/25 Rugby Borough Council introduced a “hard copy” Tenants Newsletter, posted to all tenants in order to reach tenants who are not connecting digitally – The Tenants Newsletter contains information about the Customer Feedback Policy, The Housing Ombudsman Service and the Complaint Handling Code in every edition. Our Tenants Handbook contains information about the Housing Ombudsman Service. In its review April 2026, the HOS recommended - Rugby Borough Council should review its complaints

				policy to make clear the methods by which it will publicise the policy, maximizing accessibility and awareness of its complaints policy for residents who may not refer to its website for this information. This recommendation has been implemented.
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3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy.	This will be promoted through our Tenants Newsletter; in 2026/27 our Tenants Handbook will be reviewed and the opportunity for tenants to have a representative deal with a complaint and to be represented or accompanied will be made clear.
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy Section 5.1	Information on how to engage with the Housing Ombudsman Service is set out in the Tenants Newsletters which is posted out in hard copy to all tenants quarterly and also in the Tenants' Handbook.

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	RBC Communications Team take responsibility for complaint handling. Complaints are assigned to a relevant officer and the Communications Team have oversight of the complaint within the system. Complaints are reported as part of wider key indicators. A quarterly report is submitted to the full Council. Complaint trends are also examined by the Audit & Ethics Committee of the Council.	The Complaints Performance and Service Improvement Report 2024/25 was considered by RBC Cabinet in September 2025, and the report and Cabinet response was provided to the Housing Ombudsman Service. The Complaint Performance and Service Improvement Report 2025/26 will be considered by the Complaints Working Party and RBC Cabinet in Q2 2026/27. There is a monthly report to our leadership team. The Strategic Director for Communities is the chair of the Lessons Learnt Clinic and has oversight of all complaints in the landlord service.
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	The complaints officer allocates complaints to appropriate managers through our system.	

4.3	Landlords are expected to prioritize complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes	All investigators and responders have undertaken training in complaint handling and have signed up to the Housing Ombudsman Centre for Learning in order that they can access the resources there. Our Housing Services Manager has completed the Housing Ombudsman's e-learning on Dispute Resolution and applying Dispute Resolution.	We have an established quarterly Lessons Learnt Clinic that monitors compliance and facilitates learning from complaints.
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Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy	
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy Section 1.2	In its review April 2026, the HOS recommended - (5.2 & 5.3) Rugby Borough Council should review its complaints policy to make clear that where it identifies an issue that can be dealt with 'quickly' which meets the definition of a complaint it will give the resident the choice to make a complaint in line with provision 1.3 of the Code.

				This recommendation has been implemented.
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5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	As set out in in the Rugby Borough Council Customer Feedback Policy Section 1.2	In its review April 2026, the HOS recommended - (5.2 & 5.3) Rugby Borough Council should review its complaints policy to make clear that where it identifies an issue that can be dealt with 'quickly' which meets the definition of a complaint it will give the resident the choice to make a complaint in line with provision 1.3 of the Code. This recommendation has been implemented.
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	As set out in in the Rugby Borough Council Customer Feedback Policy Section 2	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy Section 2	

5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.	No	As set out in the Rugby Borough Council Customer Feedback Policy Section 2	We have developed a suite of standard letters that guide investigators and responders in setting out the complaints and the outcomes the resident is seeking. We have implemented a training programme for investigators and responders that ensures tenants are contacted following their making a complaint to ensure we understand the complaint definition. In its review April 2026, the HOS recommended - (5.6 & 5.7) • Rugby Borough Council should review its complaints policy to make clear that in the acknowledgement of stage 1 complaints or in escalations to stage 2 it will set out to the resident: • Its understanding of the complaint • The outcomes the resident is seeking • Which aspects of the complaint it is and is not responsible for We do not comply with this currently in respect of acknowledgements as our complaints system generates acknowledgements for residents, RBC contacts the resident early in the investigation to ensure a shared
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				understanding of the matter.
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	No	As set out in the Rugby Borough Council Customer Feedback Policy Section 1.5	In its review April 2026, the HOS recommended - (5.6 & 5.7) • Rugby Borough Council should review its complaints policy to make clear that in the acknowledgement of stage 1 complaints or in escalations to stage 2 it will set out to the resident: • Its understanding of the complaint • The outcomes the resident is seeking • Which aspects of the complaint it is and is not responsible for We do not comply with this, as our complaints system generates acknowledgements and currently does not offer functionality for bespoke acknowledgments. We contact the resident early in the investigation to ensure a shared understanding of the matter.

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5.8	At each stage of the complaints process, complaint handlers must: - deal with complaints on their merits, act independently, and have an open mind; - give the resident a fair chance to set out their position; - take measures to address any actual or perceived conflict of interest; and - consider all relevant information and evidence carefully.	Yes	At stage 1 the investigation will be carried out by an impartial officer, complaint responses are monitored by our Communities and Projects Manager. At stage 2 our Chief Officers ensure they are able to carry out an objective review of the complaint, should there be any conflict of interest they will arrange for another Chief Officer to undertake the stage 2 process.	
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	Investigators and responders have been training in the use of extensions and we have a standard letter that guides officers. Section 1.10 of the Customer Feedback Policy	In its review April 2026, the HOS recommended - Rugby Borough Council should review its complaints policy to make clear that when a complaint response falls outside of the extended timescales set out in the Code (10 working days at stage 1 and 20 working days at stage 2) it will agree with the resident suitable intervals for keeping them informed about their complaint. This recommendation has been implemented.

5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	We are using guidance set out in the document: Spotlight on attitude, respect and rights – relationship of equals. In addition we are have implemented a new housing management system which has improved our ability to keep accurate and up to date records and also embarking on a programme of tenancy health checks which will improve out knowledge of our residents	
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5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes		
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	Yes	Our complaints system holds all documentation relating to each complaint.	
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy Section 1.22	
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	Relevant policies include: Persistent Contact Procedure and the Potentially Violent Persons Procedure.	
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	As set out in the Persistent Contact Procedure	

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	As set out in the Rugby Borough Council Customer Feedback Procedure	
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received.</u>	Yes	As set out in the Rugby Borough Council Customer Feedback Policy Section 1.11	In its review April 2026, the HOS recommended - Rugby Borough Council should review its complaints policy to make clear that stage 1 complaints are acknowledged, defined and logged within either its current response timeframe or a timeframe within the 5 working day parameter set out in the Code. This recommendation has been implemented.

6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy Section 1.11	In 2025/26 we achieved 82% of complaints responded to at stage 1 within the 10-working day response time (as set out on our Complaints Performance and Service Improvement Report 2025/26). We will continue to monitor this closely. Dedicated staff training & quality monitoring of responses have contributed to this substantial increase from last year. In its review April 2026, the HOS recommended - • Rugby Borough Council should review its complaints policy to make clear within its 'response times' table that a response to a stage 1 complaint is provided within 10 working days of the complaint being acknowledged. This recommendation has been implemented.
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6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	As set out in our suite of standard letters. Section 1.11 of the CFP	In its review April 2026, the HOS recommended - - Rugby Borough Council should review its complaints policy to make clear that at stage 1 complaint extensions will be no more than 10 working days without good reason and contact will be made with the resident to explain its reasons and the expected timescale for response. - This recommendation has been implemented.
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Covered in our training to investigators and responders and included in our suite of standard letters.	
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy, also covered in our training and in our suite of standard letters. Section 1.11 of the CFP	In its review April 2026, the HOS recommended - Rugby Borough Council should review its complaints policy to make clear that it will provide its complaint response when the answer is known and not when all outstanding actions are completed and where outstanding actions are included with a complaint response updates are provided to residents

				through to completion. This recommendation has been implemented.
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6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy and guidance provided to investigators and responders through training and our suite of standard letters.	
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy – Section 1.20	In its review April 2026, the HOS recommended - Rugby Borough Council should review its complaints policy to make clear that it will incorporate any related additional complaints into the stage 1 response if it has not been issued or would not unreasonably delay the response to do so. Any new issues will be logged as a new complaint where the stage 1 response has been issued, the issues are unrelated or it would unreasonably delay the response. This recommendation has been implemented.

6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy Section 1 and our suite of standard letters.	
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Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy Section 2.2	In its review April 2026, the HOS recommended - Rugby Borough Council should review its complaints policy to make clear that a complaint will progress directly from stage 1 to stage 2, if all or part of the complaint is not resolved to the residents' satisfaction. This recommendation has been implemented.
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy Section 2.2	In its review April 2026, the HOS recommended - Rugby Borough Council should review its complaints policy to make clear that stage 2 complaints are acknowledged, defined and logged within either its current response timeframe or a timeframe within the 5 working day parameter set out in the Code. This recommendation has been

				implemented.
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Yes	As set out in the Rugby Borough Council Customer Complaints Policy. We accept complaints at stage 2 at the direction of the resident. Section 2.2	In its review April 2026, the HOS recommended - Rugby Borough Council should review its complaints policy to make clear that residents are not required to provide reasons for requesting their complaint to be escalated to stage 2. This recommendation has been implemented.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	The Strategic Director for Communities will normally consider all housing services complaints at stage 2. Should there be a conflict of interest another Director will respond to the stage 2 complaint	

6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	The Rugby Borough Council Customer Feedback Policy sets out a 20 working day response time for stage 2 complaints. Section 1.1 of the CFP	In its review April 2026, the HOS recommended - Rugby Borough Council should review its complaints policy to make clear within its 'response times' table that a response to a stage 2 complaint is provided within 20 working days of the complaint being acknowledged. This recommendation has been implemented.
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy and supported by our suite of standard letters. Section 2.2	In its review April 2026, the HOS recommended - Rugby Borough Council should review its complaints policy to make clear that a complaint extension at stage 2 must be no more than 20 working days without good reason and that these reasons will be clearly explained to the resident alongside the expected timescale for response. This recommendation has been implemented.

6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy Section 2 and included in our suite of standard letters.	
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy and our suite of standard letters. Section 2.2	In its review April 2026, the HOS recommended - Rugby Borough Council should review its complaints policy to make clear that it will provide its complaint response when the answer is known and not when all outstanding actions are completed and that where outstanding actions are included with a complaint response updates are provided to residents through to completion. This recommendation has been implemented.
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Guidance is provided through training and through our suite of standard letters, complaint responses are routinely monitored by our complaints officer. Our Communities and Projects Manager facilitates our Lessons Learnt Clinic which also maintains an oversight of responses and their effectiveness	

6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Yes	As set out in our suite of standard letters.	
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes		All suitable staff members are involved as appropriate in our stage 2 responses.

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: • Apologizing; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy Section 1.22 and through our suite of standard letters.	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	We follow guidance provided by the Housing Ombudsman Service through it's comprehensive content for landlords	
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	As set out in the Rugby Borough Council Customer Feedback Policy Section 1.22 and through our suite of standard letters.	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies	Yes	Yes, as stated in 7.2	

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: - the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. - a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; - any findings of non-compliance with this Code by the Ombudsman; - the service improvements made as a result of the learning from complaints; - any annual report about the landlord's performance from the Ombudsman; and any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	Yes	Our 2025/26 Complaints Performance and Service Improvement Report is available on our website. We had 0 CHFO's in 2025/26	In its review April 2026, the HOS recommended - - In its annual report as part of its year 3 submission Rugby BC should include specific reference to whether the landlord has received any CHFO/Ns across the reporting year. - In its annual report as part of its year 3 submission Rugby BC should include a link to its landlord performance report published by HOS where a report has been provided. These recommendations have been implemented.

8.2	The annual Complaints Performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	The Complaints Performance and Service Improvement Report 2025/26 is published on the website and will be reported to Members in the appropriate way as soon as is practicable.	
8.3	Landlords must also carry out a self- assessment following a significant restructure, merger and/or change in procedures.	Yes	If required.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	If required	
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes	Noted	

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	We have established a Lessons Learnt Clinic which meets quarterly to consider the Complaints Performance and Service Improvement Report for the previous quarter and consider complaints and serious incidents.	The Lessons Learnt Clinic has Terms of Reference and is chaired by the Strategic Director for Communities.
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	Our Lessons Learnt Clinic facilitates a positive complaint handling culture, and this is built into its functions and scope through a term of reference.	
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes	We report on complaints to our Tenants Panel, and to staff at team meetings and through our Tenants Newsletter.	
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes	Our Communication Consultation and Information Manager is the senior lead person accountable for complaints within the Borough, for complaints relating to housing services they are supported by the Communities and Projects Manager within the Communities and Homes directorate. The Strategic Director for Communities is responsible for all Stage 2 responses for complaints for landlords services, they maintain oversight of all complaints through chairing the Lessons Learnt Clinic.	

9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes	The Portfolio Holder for Communities and Homes, Regulation and Safety is the Member Responsible for Complaints.	
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	See 9.5	

9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.	Yes	Our Complaints Performance and Service Improvement Report 2025/26	
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.	Yes	Rugby Borough Council has adopted a Performance Development Review process, this process will include a standard objective in relation to complaint handling for all relevant employees.	

Appendix 3 EQUALITY IMPACT ASSESSMENT (EqIA)

Demonstrating Compliance with the Requirements of the Housing Ombudsman Service 2025/26

For Cabinet on 8 Sep 2026

Approved by	Mary Jane Gunn
Policy being assessed	Demonstrating Compliance with the Requirements of the Housing Ombudsman Service 2025/26
Service Area	Communities & Homes
Name of Officer completing the assessment	Craig Oakley
Other Officers involved	Vanessa Niemczewska
Date of this assessment	14 Jul 2026
Date of review	8 Sep 2027

<u>Stage 1 – Policy to be analysed</u>	
(1) Describe the main aims, objectives and purpose of the Policy?	The Complaint Handling Code of the Housing Ombudsman Service sets out: “The annual Complaints Performance and Service Improvement report must be reported to the landlord’s governing body (or equivalent) and published on the section of its website relating to complaints. The governing body’s response to the report must be published alongside this” On 1 April 2024 the Complaint Handling Code of the Housing Ombudsman Service became a statutory code. The Complaints Performance and Service Improvement Report considers complaints about the housing/landlord service which includes: • Tenancy matters. • Neighbourhood and Community matters including tackling anti-social behaviour. • Repairs and planned works. • Tenant involvement, engagement and communications. Landlords are also required to undertake an annual self-assessment against the provisions of the Complaint Handling Code in order to understand and demonstrate compliance with the Code and for this self-assessment to be considered and approved by the landlords governing body.
(2) How does it fit with Rugby Borough Council’s Corporate priorities and your service area priorities?	This report relates to the following priorities: •A Healthier Rugby – To support people to live healthier, longer and more independent lives. •A Fairer Rugby – To reduce inequalities and to improve housing across the Borough.
(3) What are the expected outcomes you are hoping to achieve?	Compliance with the requirements of the Housing Ombudsman Service and the Regulator of Social Housing. Improved outcomes for tenants as a result of timely and effective complaint handling and service improvements as a result of lessons learnt from complaints.

(4) Does or will the policy affect: • Customers • Employees • Wider community or groups	Customers, Employees This report will affect RBC tenants and RBC employees; we are working to achieve improved outcomes for RBC tenants by ensuring complaints are handled promptly and effectively, with feedback used to identify and deliver service improvements. RBC employees will benefit from clearer processes, shared learning, and improved support to resolve issues and provide a more consistent tenant experience.
(5) Will the policy involve substantial changes in resources?	No
(6) Is a full Equality Impact Assessment needed? If no, please give reason why.	Yes
(7) Please describe how the policy will meet the aims of the Equality Duty: a. Eliminate unlawful discrimination, harassment, victimisation and any other unlawful conduct prohibited by the act b. Advance equality of opportunity between people who share and people who do not share a relevant protected characteristic c. Foster good relations between people who share and people who do not share a relevant protected characteristic	Rugby Borough Council will use this report to: • Inform our tenants about the type of complaints we receive and how we learn from these complaints to improve our services. • Report to the Regulator of Social Housing (RSH) (annually) • Report to the Housing Ombudsman Service (HOS) (annually) • Understand our compliance with the Complaint Handling Code (CHC) of the Housing Ombudsman Service and the Local Government and Social Care Ombudsman (LGSCO) • Report to our Complaints Working Party and Cabinet (annually) • Identify trends in complaints coming forward. • Scrutinise our complaint handling to embed an ethos of continuous improvement
<u>Stage 2 – Evidence about user population and consultation</u>	

(1) What does the data tell you about the groups this policy impacts?	We have good quality data available on our tenants through our CX system, and we are improving it through a programme of tenancy health checks - improved data includes information on disability and additional needs of tenants, which will enable us to improve our service delivery and access to services. We have data on protected characteristics, however this is a main focus of the data project we are currently rolling out as a result of the Regulator of Social Housing Inspection and this will be much more robust once we have completed this. By having a more complete and accurate understanding of protected characteristics, we can make better-informed decisions, target support where it is most needed, and ensure our services are fair, inclusive and responsive to the diverse needs of our communities.
Additional evidence can be found:	



(2) Have you consulted or involved those groups that are likely to be affected by the policy you want to implement? If yes, please state which groups were involved in the consultation and what were their views and how have their views influenced the policy? If you have not consulted or engaged with communities that are likely to be affected by the policy, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary	Yes We undertake an annual tenants survey, in line with the requirements of the Regulator of Social Housing. In the survey we ask: "Have you made a complaint to Rugby Borough Council in the last 12 months? If yes, how satisfied, or dissatisfied are you with RBC's approach to complaints handling?" The survey goes out by post to our 3400 tenants, and, in 2025/26 we achieved a response rate of 31.2% which was comparable to the response rate in 2024/25. In 2025/26, 47.6% of our tenants who reported having made a complaint were satisfied with our approach to complaint handling, up from 44.7% in 2024/25. We undertake quarterly telephone surveys with tenants and applicants whose complaints have closed in order that we can understand how we can improve the experience of those who complain. Feedback has included requests for more regular communication throughout the complaints process, as well as comments that making a complaint online is much quicker than doing so by phone. We have a Transparency, Influence and Accountability Tenants Group who we work with on a regular basis including to improve our complaint handling including reviewing correspondence and developing a positive complaints culture. We have implemented a number of changes including: • Investigators/responders to contact the complainant as their first action & establish lines of communication, identify who the investigating officer is and how the process will roll out. • Improved letter templates for complaint responses • Training on quality responses for investigators/responders • Weekly monitoring of open complaints so as to improve response times • Reporting on complaints and complaint handling through our quarterly Tenants Newsletter
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Stage 3 – Analysis of impact			
(1) <u>Protected Characteristics</u> From your data and consultations, are there any positive or negative impacts identified for any particular group? If left blank, this means that no impacts have been identified for this group.	Protected Characteristic	Nature of Impact Positive, Negative, Both	Explain why
	Age		
	Disability		
	Sex		
	Gender reassignment		
	Marriage/civil partnership		
	Pregnancy/maternity		
	Race		
	Religion/belief		
	Sexual Orientation		
(2) <u>Cross cutting themes</u>	Description of impact	Nature of impact Positive, Negative, Both	Explain why



	Socio-economic e.g.: child poverty, income level, education level, working hours/occupation, family/social support, access to good nutrition	Positive	Tenants of social housing are more likely than the general population to be in receipt of means tested benefits and therefore more likely to be exposed to social inequalities.
	Environmental e.g.: housing status, transport links, geography, access to services, air quality, noise pollution		
(4) Are there any barriers to accessing the service? If yes, how can they be overcome?	Yes There were 160 complaints about the housing/landlord service in 2025/26, or 58 complaints per 1000 homes. In terms of sector benchmarking this is a comparable number of complaints (54 complaints per 1000 homes is broadly where we should be aiming). We have a number of measures in place to enable tenants to access the complaints service thus giving us greater opportunities to learn from complaints, put things right as necessary and continue to improve our services, policies and communications. Measures to remove barriers to the complaints process include: • Annual training of frontline staff on, recording complaints appropriately, escalating complaints appropriately and having a positive complaints culture • Reporting on complaints and how to make a complaint in our quarterly tenants' newsletter • Improving communications around complaints by working with our Transparency, Influence and Accountability Tenants Group		

(5) What data will be collected to analyse impact? How will the data collected be used?	We collect data on complaint volumes and complaint types, and this information is set out in the Complaints Performance and Service Improvement Report within appendix 1 of this report. We have seen in the last couple of years a large rise in complaints as a result of the work we have done in response to the Social Regulation Act. We have also significantly increased our percentage of complaints responded to in target timescales.
(6) Complete this section if any adverse impacts were identified in 3.1. Outline any actions that will be taken to remove or mitigate the adverse impacts identified in 3.1 to ensure that no discrimination is taking place. If removing or mitigating the impact is not possible, you may in certain circumstances, justify the discrimination. If that is the case, please give evidence for why justifying is possible in this case.	
Stage 5 – Review not to be completed on initial assessment	
(1) What evidence of impact has been collected?	
Additional evidence can be found:	
(2) Were the impacts as expected from the original EqIA?	
(3) Will there be any changes made as a result of this review?	

Expectations for the Member Responsible for Complaints role

On this page

- [Purpose](#)
 - [Responsibilities - Governing body assurance](#)
 - [Responsibilities - Complaint Handling Code](#)
 - [Responsibilities - Learning](#)
-

Purpose

The statutory Complaint Handling Code requires landlords to appoint a governing body member as their Member Responsible for Complaints (MRC).

The MRC has 2 core functions:

- championing a positive complaint handling culture within the organisation
- overseeing complaints performance and providing assurance to the governing body

The MRC challenges data and information presented to the board, cabinet, or committee. They seek assurance from complaints and operational teams that complaints are being managed properly, that what is happening, and residents are being heard.

They seek
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Helpful Links

[The Complaint Handling Code](#)

[Assurance and information to carry out the role of MRC](#)

[Understanding the role](#)

Responsibilities: governing body assurance

Promoting openness and transparency

The MRC:

- treats resident complaints as insight into how the organisation is managed
- provides assurance that systems are in place to capture learning from complaints and that the governing body is engaged with this
- ensures senior level ownership of learning and accountability from complaints

Providing assurance on complaint handling to the governing body

The MRC:

- works with operational teams to make sure complaints are valued as an opportunity to learn
- uses complaints as an early warning of ineffective processes, policies, or behaviour
- Identifies areas for improvement and monitors how these are being addressed across the organisation

Engaging with the chair of the audit and risk committee, or equivalent

The MRC discusses risks emerging from complaints and any recommendation for service improvement that may be relevant to internal audit.

Overseeing and approving the annual landlord submission against the Complaint Handling Code

The MRC:

- makes sure an accurate self-assessment is produced and published each year, or following operational change
- involves residents in the self-assessment process where possible

Alerting the governing body of any concerns about complaint handling

The MRC raises concerns about issues giving rise to complaints, or the outcome of individual complaints, with the governing body.

Championing a positive complaint handling culture

The MRC:

- makes sure the governing body receives regular, meaningful information on complaint handling performance and understands its responsibilities in embedding a positive complaint culture
- lead or facilitates discussion at board level and seeks assurance that learning from complaints is informing decision making

Responsibilities: Complaint Handling Code

Reviewing communication and tone

The MRC uses the 4 T's test to assess whether communications are timely, transparent, tailored, and appropriate in tone. They review internal and external communication methods to make sure they are open, clear, empathetic and suited to the situation.

Overseeing timely compliance with Housing Ombudsman requests and orders

The MRC provides assurance that the organisation responds to Housing Ombudsman information requests and orders on time.

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Promoting a culture where effective complaint handling is supported at every level

The MRC:

- encourages a culture where complaint handlers have the authority and respect to help put things right when they go wrong – including where landlords use contractors or other service providers
- maintains a visible presence in the organisation and engages with colleagues to test that proactive complaint handling is embedded at all levels

Ensuring the complaints team has the resources to meet its obligations

Following the self-assessment, the MRC seeks assurance that the complaints team has sufficient resources to fulfil its obligations under the Code.

Regularly reviewing complaints performance data

The MRC:

- reviews quarterly updates on complaint volumes, categories, outcomes and handling performance
 - take an inquisitive approach to make sure information gives the governing body confidence in a well-managed, customer-focused complaints process
-

Responsibilities: learning

Using Housing Ombudsman Good Practice and learning from reports

The MRC:

- facilitates discussion with the governing body on how the organisation can learn and improve from report recommendations
- considers whether relevant policies and procedures are effective when Good Practice guidance is published
- signs up to our Centre for Learning Hub to support ongoing learning and to connect with other MRCs

Encouraging collaboration to improve service delivery

The MRC identifies and raises gaps in cross-department working, or areas where teams could work more effectively together across the organisation.

Encouraging senior management to review complaint trends regularly

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The MRC:

- makes sure themes or trends that highlight potential systemic issues, serious risks, or ineffective policies and procedures are reported to the governing body, assessed, and reviewed
 - seeks assurance that where change is needed, actions are followed through and communicated to the governing body
 - encourages resident engagement in service delivery changes to make sure residents are involved in improvement
-
-

Was the information on this page helpful?

☐ Yes

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AGENDA MANAGEMENT SHEET

Report Title: Regulator of Social Housing - Service Improvement Plan

Name of Committee: Cabinet

Date of Meeting: 8 September 2026

Report Director: Strategic Director - Communities

Portfolio: Communities, Housing and Safety

Ward Relevance: All

Prior Consultation: Portfolio Holder Communities, Housing and Safety, Tenants Panel, Report Consultation Officers Group, the Regulator of Social Housing.

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

Public or Private: Public

Report Subject to Call-In: Yes

Report En-Bloc: Yes

Key Decision: No

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

Summary: A routine inspection of the Council's landlord service by the Regulator of Social Housing (RSH) took place in October 2025. The RSH published its regulatory judgement in February 2026, confirming a C3 grading. This reflects the RSH's view that

there are serious failings in the Council's delivery of outcomes under the consumer standards and that significant improvement is needed. In May 2026 the RSH updated its judgement to include the Rent Standard.

There are four consumer standards of the RSH:

- The Tenancy Standard
- The Neighbourhood and Community Standard
- The Transparency, Influence, and Accountability Standard
- The Safety and Quality Standard.

In addition, there is the Rent Standard.

The regulatory judgement identified weaknesses and failures in the delivery of the Transparency, Influence and Accountability Standard, the Safety and Quality Standard and the Rent Standard.

These standards are attached as Appendices 1, 2 and 3 respectively.

The regulatory judgement and the Council's response to it are attached as Appendix 4.

This report sets out a high-level improvement plan and proposed governance arrangements to drive the required service improvement. The improvement plan and proposed governance arrangements are attached as Appendix 5. This report follows the report to Cabinet on 29 June 2026, which set out:

- a summary of the areas to be covered by the developing improvement plan
- an update on the engagement programme with the RSH
- Overview of arrangements for governance and assurance including regular updates to Cabinet.

**Local Government
Reorganisation Implications:**

The provision of high-quality housing services will continue to be a key priority for Rugby Borough Council and successor organisations through Local Government Reorganisation, and this will be addressed through transition planning.

Financial Implications:	Investment in the workforce, systems and stock will be required to reach a C1 grade. Initiatives such as the new single asset management system and the rolling stock condition survey already have budget provision. The redesign of the website is being undertaken within existing resources. Other initiatives, including strengthening tenant engagement and sourcing external expertise in some areas of compliance, will be the subject of growth bids in 2026/27 and will be considered by Council as part of budget setting.
Risk Management/Health and Safety Implications:	A C3 Grade represents a risk to the Council and its tenants. Officers will be working intensively with the RSH on the Council's improvement plan as set out in this report. The Council's priority and the priority of the RSH is that risks to tenants are adequately managed and mitigated.
Environmental Implications:	There are no direct environmental implications arising from this report.
Legal Implications:	The Housing and Regeneration Act 2008 sets out the fundamental objectives of the Regulator of Social Housing. The Social Housing (Regulation) Act 2023 introduced a revised regulatory regime for social housing, intended to drive significant change in landlord behaviour and strengthen protections for tenants. The Act provides the basis for proactive regulation of social landlords and for the consumer standards that apply to the Council as a registered provider. The four consumer standards came into effect in April 2024: the Safety and Quality Standard; the Transparency, Influence and Accountability Standard; the Tenancy Standard; and the Neighbourhood and Community Standard. These standards set out the outcomes and specific expectations that landlords must deliver.
Equality and Diversity:	An Equality Impact Assessment has been undertaken and is attached as Appendix 6.
Options:	1. That Cabinet approves the content of the report and appendices and endorses the

approach to service improvement, including the proposed governance and assurance arrangements.

2. Referral to Scrutiny Committee for further review.

Option 1 is the preferred option because it gives Cabinet, Rugby Borough Council tenants and the RSH assurance that the failures and weaknesses identified are being addressed proactively and in a timely way. The improvement plan has been shared with the RSH in the spirit of co-regulation, which is the cornerstone of its engagement with social landlords. Ongoing scrutiny will also be provided through the RSH's regular engagement meetings with officers.

Recommendation:

- (1) The improvement plan be approved;
- (2) the proposed governance arrangements be approved; and
- (3) Cabinet notes the progress being made against the improvement plan and receives regular updates on its implementation and impact.

Reasons for Recommendation:

A C3 judgement, with identified failures and weaknesses in the delivery of two consumer standards, requires a proactive, sustained and focused approach. The proposed improvement plan is intended to move Rugby Borough Council, in a timely and sustainable way, towards a C1 judgement, demonstrating that the Council is delivering the outcomes required by the consumer standards for its tenants.

Cabinet - 8 September 2026

Regulator of Social Housing - Service Improvement Plan

Public Report of the Strategic Director - Communities

Recommendation

- (1) The improvement plan be approved;
- (2) the proposed governance arrangements be approved; and
- (3) Cabinet notes the progress being made against the improvement plan and receives regular updates on its implementation and impact.

1.0 EXECUTIVE SUMMARY

- 1.1 Following a routine inspection by the RSH in Autumn 2025, the Council received a C3 grading in February 2026, indicating serious failings on delivering aspects of the Consumer Standards and that significant improvement is required.
- 1.2 The regulatory notices published by the RSH show that, of the 90 councils inspected so far, 37 have been awarded a C3 grading. The grading of the remainder can be summarised as follows: C1, 13.5%; C2, 37%; and C4, 7.9%.
- 1.3 The regulatory judgement identified failings and weaknesses in the Transparency, Influence and Accountability Standard, the Safety and Quality Standard and the Rent Standard. These are attached as Appendices 1, 2 and 3 respectively. The regulatory judgement and the Council's response are attached as Appendix 4.
- 1.4 The RSH acknowledged that the Council is engaging constructively, understands the issues it needs to address and is taking action to rectify the failures and weaknesses identified.
- 1.5 The Council's improvement plan, attached as Appendix 5, sets out targeted actions to address the weaknesses identified by the RSH. It focuses on rent, stock condition data, repairs performance, electrical inspections, smoke alarm compliance, compliance tracking and strengthened escalation procedures for properties where access cannot be gained.
- 1.6 The plan also strengthens tenant engagement, improves tenant data and supports improvements to the Council's website so that tenants can access accurate and timely service and performance information.

- 1.7 Governance arrangements have been established to provide oversight, assurance and regular monitoring of delivery.

2.0 Introduction

- 2.1 The Social Housing (Regulation) Act 2023 set out a new regulatory framework for providers of social housing requiring the RSH to undertake proactive inspections with providers every 4 years.
- 2.2 The Council's first scheduled inspection took place in Autumn 2025 following a prior self-referral to the RSH resulting from a third-party assessment that highlighted issues relating to the accuracy and completeness of information relating to repairs.
- 2.3 Following the RSH judgement and the C3 grading, published in February 2026, the Council has been engaging with the RSH in developing an improvement plan, in the spirit of co-regulation, which underpins the regulatory inspection regime. The improvement plan has been shared with the RSH and with tenants groups.

3.0 Consultation

- 3.1 Consultation took place with the Tenants Panel on 2 June 2026 and with the RSH on 10 July 2026. In addition, a wider range of tenants are being consulted on the plans through pop-up events in communities and neighbourhoods and through online surveys. The plans were well received by tenants, who endorsed the emphasis on tenant safety, the safety and quality of homes and the need for evidence-led home improvement programmes informed by robust stock condition surveys.
- 3.2 The improvement plans have been shared with the RSH, which has endorsed the emphasis on safety and quality and welcomed the proposals for website improvement and improved data on the protected characteristics of tenants.
- 3.3 Consultation has taken place with the Portfolio Holder for Communities, Housing and Safety, who endorses the improvement plan.

4.0 Summary of the areas covered in the Improvement Plan

- 4.1 Safety and Quality – To achieve the outcome of accurate, valid and reliable understanding of stock condition and the performance of the repairs service Rugby Borough Council will:
 - Implement a single asset management system (AMS)
 - Complete a full data validation and reconciliation
 - Deliver a rolling Stock Condition Survey Programme
 - Introduce Performance Dashboards.
- 4.2 To achieve the outcome of identifying and meeting all legal requirements that relate to the health and safety of tenants in their homes and

communal areas and ensure that all actions arising from required health and safety assessments are conducted within appropriate timescales
Rugby Borough Council will:

- Complete an accelerated Electrical Inspection Condition Report (EICR) programme – ensuring all homes have the required inspections.
- Achieve 100% smoke alarm compliance
- Introduce central compliance checking of actions required following safety inspections.
- Strengthen “No Access” procedures.

4.3 Transparency, Influence and Accountability – To achieve the outcome of ensuring a wide range of meaningful opportunities for tenants to scrutinise landlord performance and influence how its housing services are delivered Rugby Borough Council will:

- Implement a strengthened Tenant Engagement Framework

4.4 To achieve the outcome of ensuring that sufficient information is held to demonstrate the diverse needs of our tenants are understood and how our services deliver fair and equitable outcomes.

- Deliver a data improvement programme – ensuring all opportunities, including our annual tenants survey and our programme of tenancy health checks are taken to improve our understanding of our tenants and their needs.

4.5 To address issues of poor useability and outdated information on Rugby BC’s website Rugby Borough Council will:

- Deliver a website improvement programme – ensuring our tenants have access to a range of landlord service and performance information.

4.6 The Council has identified errors in how some target rents were applied over a number of years, which may have resulted in some tenants being overcharged. The issue was identified through work to improve the council's housing services and has since formed part of the Regulator of Social Housing's regulatory engagement with the council. This followed the Regulator's published judgement of 27 May 2026.

4.7 The council has appointed an independent organisation to provide expert assurance. This work includes reviewing rent overcharges, the method used to identify who is affected, rent-setting arrangements, rent policy, and how service charges are managed.

4.8 Rent calculations have now been corrected for current charges, and further work is under way to establish the full extent of the issue and determine the appropriate way forward.

5.0 Engagement with the RSH

5.1 The RSH noted in its judgement: *“Rugby BC has been engaging constructively with us. It has an understanding of the issues it needs to address and is taking action to rectify the failures and weaknesses identified. We are engaging with Rugby BC as it continues to address the issues set out in this judgement.”*

5.2 The post inspection engagement process has now commenced with the RSH and includes:

- Consideration and endorsement by the RSH of the Rugby Borough Council improvement plan.
- Provision by Rugby Borough Council to the RSH of regular performance information, particularly in relation to repairs performance, stock condition, decent homes and tenant engagement.
- Touchpoints for the RSH with elected members.

6.0 Proposals on Governance and Assurance

6.1 The housing service has:

- A RSH Programme Management Group has been established to deliver the outcomes of the improvement plan. The group is chaired by the Interim Assistant Director Communities and Homes, who is the Senior Responsible Officer for the improvement plan.
- Workstream leads and dedicated operational teams have been established to drive delivery across key areas of the improvement programme. Each workstream is chaired by a service manager and supported by a bespoke action plan with clear actions, responsibilities and timescales.

6.2 Officers will provide regular updates on progress to the Cabinet Member, Communities, Housing and Safety as part of the broader performance monitoring framework which is overseen by the service specific Performance, Risk and Assurance Group, chaired by the Cabinet Member for Communities, Housing and Safety.

7.0 Conclusion

7.1 The C3 regulatory judgement represents a significant challenge for Rugby Borough Council and highlights the need for sustained improvement across key areas of landlord service delivery. The Council has responded by developing a targeted improvement plan to address the weaknesses identified by the RSH. A Communications Plan will ensure tenants, stakeholders, the RSH and Members remain informed about progress against the improvement plan.

7.2 The measures set out in the improvement plan are intended to improve tenant safety, strengthen service performance, enhance transparency and accountability, and give tenants a stronger voice in shaping services. Cabinet is asked to approve the improvement plan and governance

arrangements so that delivery can continue with clear oversight, monitoring and assurance.

Name of Meeting: Cabinet

Date of Meeting: 8 September 2026

Subject Matter: Regulator of Social Housing - Service Improvement Plan

Originating Department: Communities

DO ANY BACKGROUND PAPERS APPLY ☒ YES ☐ NO

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink
App 1	Transparency, Influence and Accountability Standard
App 2	Safety and Quality Standard
App 3	https://www.gov.uk/government/publications/rent-standard-2026
App 4	Regulatory Judgement and the Council's response. Council responds to historic rent compliance issue - Rugby Borough Council
App 5	High Level Improvement Plan
App 6	Equality Impact Assessment

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

☐ Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A



Regulator of
Social Housing

Transparency, Influence and Accountability Standard

Consumer standards

1 April 2024



1. Required outcomes

1.1 Fairness and respect

- 1.1.1 Registered providers must treat tenants¹ and prospective tenants with fairness and respect.

1.2 Diverse needs

- 1.2.1 In relation to the housing and landlord services they provide, registered providers must take action to deliver fair and equitable outcomes for tenants and, where relevant, prospective tenants.

1.3 Engagement with tenants

- 1.3.1 Registered providers must take tenants' views into account in their decision-making about how landlord services are delivered and communicate how tenants' views have been considered.

1.4 Information about landlord services

- 1.4.1 Registered providers must communicate with tenants and provide information so tenants can use landlord services, understand what to expect from their landlord, and hold their landlord to account.

1.5 Performance information

- 1.5.1 Registered providers must collect and provide information to support effective scrutiny by tenants of their landlord's performance in delivering landlord services.

1.6 Complaints

- 1.6.1 Registered providers must ensure complaints are addressed fairly, effectively, and promptly.

¹ Throughout the consumer standards 'tenants' means tenants and other occupiers of social housing which includes licensees and shared owners (unless explicitly stated).

2. Specific expectations

2.1 Diverse needs

2.1.1 Registered providers must use relevant information and data to:

- a) understand the diverse needs of tenants, including those arising from protected characteristics, language barriers, and additional support needs; and
- b) assess whether their housing and landlord services deliver fair and equitable outcomes for tenants.

2.1.2 Registered providers must ensure that communication with and information for tenants is clear, accessible, relevant, timely and appropriate to the diverse needs of tenants.

2.1.3 Registered providers must ensure that landlord services are accessible, and that the accessibility is publicised to tenants. This includes supporting tenants and prospective tenants to use online landlord services if required.

2.1.4 Registered providers must allow tenants and prospective tenants to be supported by a representative or advocate in interactions about landlord services.

2.2 Engagement with tenants

2.2.1 Registered providers must give tenants a wide range of meaningful opportunities to influence and scrutinise their landlord's strategies, policies and services. This includes in relation to the neighbourhood where applicable.

2.2.2 Registered providers must assist tenants who wish to implement tenant-led activities to influence and scrutinise their landlord's strategies, policies and services. This includes in relation to the neighbourhood where applicable.

2.2.3 Registered providers must provide accessible support that meets the diverse needs of tenants so they can engage with the opportunities in 2.2.1 and 2.2.2.

2.2.4 Registered providers must support tenants to exercise their Right to Manage, Right to Transfer or otherwise exercise housing management functions, where appropriate.

2.2.5 Registered providers, working with tenants, must regularly consider ways to improve and tailor their approach to delivering landlord services including tenant engagement. They must implement changes as appropriate to ensure services deliver the intended aims.

2.2.6 Where a registered provider is considering a change in landlord for one or more tenants, or a significant change in management arrangements, it must consult affected tenants on its proposals at a formative stage and take those views into account in reaching a decision. The consultation must:

- a) be fair and accessible
- b) provide tenants with adequate time, information and opportunities to consider and respond
- c) set out actual or potential advantages and disadvantages (including costs) to tenants in the immediate and longer term, and
- d) demonstrate to affected tenants how the consultation responses have been taken into account in reaching a decision.

2.3 Information about landlord services

2.3.1. Registered providers must provide tenants with accessible information about the:

- a) available landlord services, how to access those services, and the standards of service tenants can expect
- b) standards of safety and quality tenants can expect homes and communal areas to meet
- c) rents and service charges that are payable by tenants, and
- d) responsibilities of the registered provider and the tenant for maintaining homes, communal areas, shared spaces² and neighbourhoods.

2.3.2 Registered providers must provide tenants with accessible information about tenants' rights in respect of registered providers' legal obligations and relevant regulatory requirements that registered providers must meet in connection with the homes, facilities or landlord services they provide to tenants. This must include information about:

² 'Shared spaces' are those spaces associated with a registered providers' homes and used by their tenants that are not the responsibility of the landlord, as opposed to communal areas where landlords have direct responsibilities for ensuring their safety and maintenance.

- a) the requirement to provide a home that meets the government's Decent Homes Standard;
- b) the registered provider's obligation to comply with health and safety legislation;
- c) the rights conferred on tenants by their tenancy agreements including rights implied by statute and/or common law, in particular—
 - (i) the right to a home that is fit for human habitation; and
 - (ii) the right to receive notice of a proposed visit to carry out repairs or maintenance or to view the condition and state of repair of the premises; and
- d) the rights of disabled tenants to reasonable adjustments.

2.3.3 Registered providers must communicate with affected tenants on progress, next steps and outcomes when delivering landlord services.

2.3.4 Registered providers' housing and neighbourhood policies must be fair, reasonable, accessible and transparent. Where relevant, policies should set out decision-making criteria and appeals processes.

2.3.5 Registered providers must make information available to tenants about the relevant roles and responsibilities of senior level employees or officers, including who has responsibility for compliance with the consumer standards.

2.4 Performance information

2.4.1 Registered providers must meet the regulator's requirements in relation to the tenant satisfaction measures set by the regulator as set out in Tenant Satisfaction Measures: Technical requirements and Tenant Satisfaction Measures: Tenant survey requirements.

2.4.2 Registered providers must:

- a) collect and process information specified by the regulator relating to their performance against the tenant satisfaction measures. The information must be collected within a timeframe set by the regulator and must meet the regulator's requirements in Tenant Satisfaction Measures: Technical requirements and Tenant Satisfaction Measures: Tenant survey requirements

- b) annually publish their performance against the tenant satisfaction measures. This should include information about how they have met the regulator's requirements set out in Tenant Satisfaction Measures: Technical requirements and Tenant Satisfaction Measures: Tenant survey requirements. This information must be published in a manner that is timely, clear, and easily accessed by tenants; and
- c) annually submit to the regulator information specified by the regulator relating to their performance against those measures. The information must be submitted within a timeframe and in a form determined by the regulator.

2.4.3 In meeting 2.4.1 and 2.4.2 above, registered providers must ensure that the information is an accurate, reliable, valid, and transparent reflection of their performance against the tenant satisfaction measures.

2.4.4 Registered providers must provide tenants with accessible information about:

- a) how they are performing in delivering landlord services and what actions they will take to improve performance where required
- b) how they have taken tenants' views into account to improve landlord services, information and communication
- c) how income is being spent, and
- d) their directors' remuneration and management costs.

2.5 Complaints

2.5.1 Registered providers must ensure their approach to handling complaints is simple, accessible and publicised.

2.5.2 Registered providers must provide accessible information to tenants about:

- a) how tenants can make a complaint about their registered provider
- b) the registered provider's complaints policy and complaints handling process
- c) what tenants can do if they are dissatisfied with the outcome of a complaint or how a complaint was handled, and

- d) the type of complaints received and how they have learnt from complaints to continuously improve services.

2.6 Self-referral

- 2.6.1 Registered providers must communicate in a timely manner with the regulator on all material issues that relate to non-compliance or potential non-compliance with the consumer standards.



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or write to:

Regulator of Social Housing

Level 2

7-8 Wellington Place

Leeds LS1 4AP

The Regulator of Social Housing regulates registered providers of social housing to promote a viable, efficient and well-governed social housing sector able to deliver and maintain homes of appropriate quality that meet a range of needs.



Regulator of
Social Housing

Safety and Quality Standard

Consumer standards

1 April 2024



1. Required outcomes

1.1 Stock quality

- 1.1.1 Registered providers must have an accurate, up to date and evidenced understanding of the condition of their homes that reliably informs their provision of good quality, well maintained and safe homes for tenants¹.

1.2 Decency

- 1.2.1 Registered providers must ensure that tenants' homes meet the standard set out in section five of the Government's Decent Homes Guidance and continue to maintain their homes to at least this standard unless exempted by the regulator.

1.3 Health and safety

- 1.3.1 When acting as landlords, registered providers must take all reasonable steps to ensure the health and safety of tenants in their homes and associated communal areas.

1.4 Repairs, maintenance and planned improvements

- 1.4.1 Registered providers must provide an effective, efficient and timely repairs, maintenance and planned improvements service for the homes and communal areas for which they are responsible.

1.5 Adaptations

- 1.5.1 Registered providers must assist tenants seeking housing adaptations to access appropriate services.

¹ Throughout the consumer standards 'tenants' means tenants and other occupiers of social housing which includes licensees and shared owners (unless explicitly stated).

2. Specific expectations

2.1 Stock quality

- 2.1.1 Registered providers must have an accurate record at an individual property level of the condition of their homes, based on a physical assessment of all homes and keep this up to date.
- 2.1.2 Registered providers must use data from across their records on stock condition to inform their provision of good quality, well maintained and safe homes for tenants including:
 - a) compliance with health and safety legal requirements
 - b) compliance with the Decent Homes Standard
 - c) delivery of repairs, maintenance and planned improvements to homes, and
 - d) allocating homes that are designed or adapted to meet specific needs appropriately.

2.2 Health and safety

- 2.2.1 Registered providers must identify and meet all legal requirements that relate to the health and safety of tenants in their homes and communal areas.
- 2.2.2 Registered providers must ensure that all required actions arising from legally required health and safety assessments are carried out within appropriate timescales.
- 2.2.3 Registered providers must ensure that the safety of tenants is considered in the design and delivery of landlord services and take reasonable steps to mitigate any identified risks to tenants.

2.3 Repairs, maintenance and planned improvements

- 2.3.1 Registered providers must enable repairs and maintenance issues to be reported easily.
- 2.3.2 Registered providers must set timescales for the completion of repairs, maintenance and planned improvements, clearly communicate them to tenants and take appropriate steps to deliver to them.

- 2.3.3 Registered providers must keep tenants informed about repairs, maintenance and planned improvements to their homes with clear and timely communication.
- 2.3.4 Registered providers must understand and fulfil their maintenance responsibilities in respect of communal areas.
- 2.3.5 Registered providers must ensure that the delivery of repairs, maintenance and planned improvements to homes and communal areas is informed by the needs of tenants and provides value for money, in addition to the requirement at 2.1.2.

2.4 Adaptations

- 2.4.1 Registered providers must clearly communicate to tenants and relevant organisations how they will assist tenants seeking housing adaptations services.
- 2.4.2 Registered providers must co-operate with tenants, appropriate local authority departments and other relevant organisations so that a housing adaptations service is available to tenants where appropriate.



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or write to:

Regulator of Social Housing

Level 2

7-8 Wellington Place

Leeds LS1 4AP

The Regulator of Social Housing regulates registered providers of social housing to promote a viable, efficient and well-governed social housing sector able to deliver and maintain homes of appropriate quality that meet a range of needs.



Regulator of Social Housing

Rent Standard

April 2026



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1. Required outcome

- 1.1 Registered providers must comply with all the requirements and expectations set out in this Rent Standard and the Rent Policy Statement from 1 April 2026.

2. Exceptions from this Rent Standard

- 2.1 This Rent Standard applies, subject to the exceptions in paragraphs 2.2 to 2.5, to low cost rental accommodation.
- 2.2 This Rent Standard does not apply to the following categories of property, as defined in Chapter 5 of the Rent Policy Statement:
- Shared ownership low cost rental accommodation
 - Intermediate rent accommodation
 - Specialised supported housing
 - Relevant local authority accommodation
 - Student accommodation
 - PFI social housing
 - Temporary social housing
 - Care homes
- 2.3 Paragraphs 3.1 to 3.6 and paragraphs 3.8 to 3.13 of this Rent Standard do not apply in relation to the rent of tenants who are high income social tenants. This exception will end where the tenant no longer fits the definition of high income social tenant, or where there is no longer a tenant.
- 2.4 The regulator may, in relation to a private registered provider, grant an exemption from or vary a requirement of this Rent Standard if the regulator considers that complying with the requirement would jeopardise the financial viability of the provider.¹

¹ Arrangements for formal applications from local authority providers to disapply government rent policy are set out in paragraphs 5.7 and 5.8 of the Rent Policy Statement.

- 2.5 In a situation (such as an insolvency) where there is a mortgagee in possession, or receiver in place, or where the registered provider's stock is sold to a non-registered landlord following intervention by the regulator, neither the mortgagee in possession, nor the receiver, nor the landlord to whom the stock is sold will be bound by this Rent Standard. Where a Housing Administration Order applies to a registered provider, the Rent Standard will continue to apply to that provider unless an exemption has been granted by the regulator to that provider.

3. Specific expectations

Social rent housing

- 3.1 When setting initial rent for a new tenant of social rent housing, and subject to the rent cap requirement, the maximum weekly rent (exclusive of service charges) is formula rent with an upwards tolerance of:
- If the accommodation is supported housing, up to 10% of formula rent; or
 - If the accommodation is not supported housing, up to 5% of formula rent.
- 3.2 When a tenancy of social rent housing is granted to an existing tenant, the rent must not be re-set.
- 3.3 For rent increases applied in the period 1 April 2026 to 31 March 2027, and subject to the rent cap requirement, the weekly rent of an existing tenant of social rent housing may only be increased by up to CPI+1% in any year, unless the following condition applies:
- If the weekly rent when increased by CPI+1% exceeds the rent flexibility level for the year in which the rent increase will apply, weekly rent may only be increased by up to CPI.
- 3.4 For rent increases applied in the period from 1 April 2027 to 31 March 2028, and subject to the rent cap requirement, the weekly rent of an existing tenant of social rent housing may only be increased by up to CPI+1% in any year, unless one of the following conditions applies:
- If the weekly rent when increased by CPI+1% exceeds the rent flexibility level for the year in which the rent increase will apply, weekly rent may only be increased by up to CPI.

- If the weekly rent when increased by CPI+1% is below formula rent for the year in which the rent increase will apply, weekly rent may only be increased by up to CPI+1% plus £1. However, if the weekly rent when increased by up to CPI+1% plus £1 exceeds formula rent for the year in which the rent increase will apply, weekly rent may only be increased by up to CPI+1% plus the relevant amount that brings it to the level of formula rent for the year in which the rent increase will apply.

3.5 For rent increases applied from 1 April 2028, and subject to the rent cap requirement, the weekly rent of an existing tenant of social rent housing may only be increased by up to CPI+1% in any year, unless one of the following conditions applies:

- If the weekly rent when increased by CPI+1% exceeds the rent flexibility level for the year in which the rent increase will apply, weekly rent may only be increased by up to CPI.
- If the weekly rent when increased by CPI+1% is below formula rent for the year in which the rent increase will apply, weekly rent may only be increased by up to CPI+1% plus £2. However, if the weekly rent when increased by up to CPI+1% plus £2 exceeds formula rent for the year in which the rent increase will apply, weekly rent may only be increased by up to CPI+1% plus the relevant amount that brings it to the level of formula rent for the year in which the rent increase will apply.

3.6 A registered provider must not charge a tenant of social rent housing a weekly rent (exclusive of service charges) that is more than the rent cap.

3.7 Properties currently or previously let as social rent housing must not be converted (including on re-let) to:

- Affordable rent housing
- Market rent (other than in the circumstances set out in Chapter 4 of the Rent Policy Statement); or
- Other forms of low cost rental accommodation set out in Chapter 5 of the Rent Policy Statement (unless that accommodation is relevant local authority accommodation as defined in paragraph 5.7 of the Rent Policy Statement).

- 3.8 In the case of tenancies subject to fair rent protection, the maximum weekly rent is the lower of the fair rent set by the Rent Officer, and the rent that is permissible under paragraphs 3.1 to 3.6.
- 3.9 Registered providers may not increase the rent of a tenant with fair rent protection by more than the maximum in any year permitted by paragraphs 3.3 to 3.6 (even if the tenant's rent is below the formula rent level and the maximum fair rent is increased by more than that amount).
- 3.10 On re-let of a property where a tenant previously had fair rent protection, rent should be charged in accordance with paragraphs 3.1 and 3.6.

Affordable rent housing

- 3.11 When setting initial rent for a new tenant of affordable rent housing, the maximum weekly gross rent is the higher of:
- 80% of the weekly gross market rent for the accommodation, and
 - The social rent for the accommodation.
- 3.12 When a tenancy of affordable rent housing is granted to an existing tenant, the rent must not be re-set.
- 3.13 The weekly gross rent of an existing tenant of affordable rent housing may only be increased by up to CPI+1% in any year.
- 3.14 Properties currently or previously let as affordable rent housing must not be converted (including on re-let) to:
- Market rent (other than in the circumstances set out in Chapter 4 of the Rent Policy Statement); or
 - Forms of low cost rental accommodation set out in Chapter 5 of the Rent Policy Statement (unless that accommodation is relevant local authority accommodation as defined in paragraph 5.7 of the Rent Policy Statement).
- 3.15 Affordable rent may be charged where the property has been acquired by a registered provider and was affordable rent housing when it was acquired.

Local authority information requirements

- 3.16 Local authority registered providers shall communicate with the regulator in an accurate and timely manner. This includes all data and information required by the regulator in respect of compliance with this Rent Standard. Where material issues that relate to non-compliance or potential non-compliance with this Rent Standard are identified by local authorities, they are expected to communicate these to the regulator promptly.

4. Definitions used in this Rent Standard

- 4.1 Any terms used in this Rent Standard which are not defined below have the same meaning as in the Rent Policy Statement.
- 4.2 'Affordable rent housing' is accommodation (excluding accommodation to which the Rent Standard does not apply under paragraph 2.2) which satisfies either a) or b) below:
- a) The accommodation is:
 - i) Provided by a registered provider pursuant to a housing supply delivery agreement between that provider and the Homes and Communities Agency (now known as Homes England) or the Greater London Authority and the accommodation is permitted by that agreement to be let at an affordable rent; or
 - ii) Provided pursuant to an agreement between a local authority and the Secretary of State and the accommodation is permitted by that agreement to be let at an affordable rent; or
 - iii) Provided by a local authority, and the Secretary of State, Homes England or the Greater London Authority has agreed that it is appropriate for the accommodation to be let at an affordable rent.
 - b) A provider chooses to let the accommodation with the gross rent charged in accordance with paragraphs 3.11 to 3.13, and the accommodation has not been converted from social rent housing.
- 4.3 'CPI' means the general index of consumer prices (for all items) published by the Office for National Statistics or, if that index is not published for any month, any substituted index or index figures published by that Office; and where this Rent Standard refers to CPI this is a reference to the percentage

change in the CPI in the 12 months to the September falling in the preceding financial year.

- 4.4 'Existing tenant' means, in relation to particular accommodation, a tenant who is not a new tenant. Further details are provided in 2.30, 2.31, 3.19 and 3.20 of the Rent Policy Statement.
- 4.5 'Financial year' means a year beginning on 1 April.
- 4.6 'Formula rent' means the amount calculated in accordance with the method set out in paragraphs 2.9 to 2.12 and 2.20 to 2.26 of the Rent Policy Statement.
- 4.7 'Gross rent' means the rent inclusive of all service charges.
- 4.8 'Gross market rent' means, in relation to accommodation, an estimate of its market rent inclusive of all service charges at the time the tenancy is granted that is based on a valuation in accordance with a method recognised by the Royal Institution of Chartered Surveyors.
- 4.9 'High income social tenant' means the tenant of a household that had a total household income of £60,000 or more in the relevant tax year, where—
- a) 'total household income' means, in relation to accommodation—
 - i) if there is one resident, the income of that resident,
 - ii) if there are two residents, the sum of the residents' incomes, and
 - iii) if there are more than two residents, the sum of the two highest incomes of the residents;
 - b) 'resident' means—
 - i) any person who is the tenant or a joint tenant, and
 - ii) any person who resides at the accommodation and is the spouse, civil partner or partner of the tenant or of a joint tenant;
 - c) 'income' has the same meaning as 'total income' as described in section 23 of the Income Tax Act 2007;
 - d) 'partner', except in the expression 'civil partner', means a person who—

- i) is not married to, or a civil partner of, the tenant or a joint tenant, and
 - ii) lives with the tenant or joint tenant in the accommodation as if they were married or in a civil partnership;
 - e) 'relevant tax year' means the tax year ending on the 5th April which falls in the financial year prior to the financial year in which the rent is reviewed.
- 4.10 'Low cost rental accommodation' is as defined by section 69 of the Housing and Regeneration Act 2008.
- 4.11 'New tenant' means, in relation to particular accommodation, a tenant who is granted a tenancy of that accommodation for the first time. Further details are provided in 2.8 and 3.18 of the Rent Policy Statement.
- 4.12 'Rent' includes payments under a licence to occupy accommodation.
- 4.13 'Rent cap' means, in relation to accommodation, the amount calculated in accordance with paragraphs 11 and 12 of Appendix A to the Rent Policy Statement, for the financial year in which rent is being set or increased.
- 4.14 'Rent cap requirement' is the requirement in paragraph 3.6.
- 4.15 'Rent flexibility level' means:
- a) 105% of formula rent, or
 - b) If the accommodation is supported housing, 110% of formula rent.
- 4.16 'Rent Policy Statement' means the Policy Statement on Rents for Social Housing issued by the Secretary of State for Housing, Communities and Local Government on 28 January 2026.²
- 4.17 'Social rent' means, in relation to accommodation, the amount of rent that a new tenant of the accommodation could be charged under paragraphs 3.1 and 3.6 if the accommodation were social rent housing (and the exception in paragraph 2.3 did not apply).
- 4.18 'Social rent housing' is low cost rental accommodation that is not affordable rent housing (excluding accommodation to which the Rent Standard does not apply under paragraph 2.2).

² [Policy statement on rents for social housing](#)

- 4.19 'Tenancies' and 'tenants' should be read as also referring to licences and licensees (as applicable).



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or call 0300 124 5225.

or write to:

Regulator of Social Housing

Level 2

7-8 Wellington Place

Leeds LS1 4AP

The Regulator of Social Housing regulates for a viable, efficient, and well governed social housing sector able to deliver quality homes and services for current and future tenants.

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Council responds to historic rent compliance issue

Rugby Borough Council has responded to a Regulator’s report on its response to historic rent compliance issues affecting some council tenancies.



09 lipca 2026 | [News](#)

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The council has identified errors in how some target rents were applied over a number of years, which may have resulted in some tenants being overcharged. The issue was identified through work to improve the council's housing services and has since formed part of the Regulator of Social Housing's regulatory engagement with the council. This followed the Regulator's published judgement of 27 May 2026.

The council has appointed an independent organisation to provide expert assurance. This work includes reviewing rent overcharges, the method used to identify who is affected, rent-setting arrangements, rent policy, and how service charges are managed.

Rent calculations have now been corrected for current charges, and further work is under way to establish the full extent of the issue and determine the appropriate way forward.

Alongside this, the council is reviewing tenancy enforcement cases where action against historic rent arrears may have been affected. This review will, on a case-by-case basis and with appropriate legal advice, consider whether any rent overcharge contributed to arrears or to enforcement decisions taken.

Cllr Claire Edwards, Rugby Borough Council Portfolio Holder for Communities and Homes, Regulation and Safety, said: "We recognise the seriousness of this issue and the concern it may cause for tenants.

"Rent should always be calculated correctly, and we are sorry that this has not happened in every case.

"Our priority is to establish the full facts and ensure the work is carried out carefully, fairly and transparently. That is why we have commissioned independent assurance alongside our own review.

"We are also strengthening our processes and controls as part of our wider housing improvement programme.

"While there is still work to do, we are committed to learning from what has happened and rebuilding confidence in our housing service."

The council continues to work closely with the Regulator of Social Housing as it delivers its housing improvement programme and strengthens its arrangements to help prevent similar issues occurring in the future.

[View the Regulator of Social Housing’s report.](#)

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Regulator of
Social Housing

Rugby Borough Council (44UD) Regulatory Judgement

27 May 2026

Our Judgement

	Grade/Judgement	Change	Date of assessment
Consumer	C3 Our judgement is that there are serious failings in the landlord delivering the outcomes of the consumer standards and significant improvement is needed.	Based on previous assessment	February 2026
Rent	Our judgement is that there are serious failings in the landlord delivering the outcomes of the Rent Standard and significant improvement is needed.	New judgement	May 2026

Reason for publication

We are publishing this regulatory judgement for Rugby Borough Council (Rugby BC) to confirm that there are serious failings in how Rugby BC is delivering the outcomes of the Rent Standard and significant improvement is needed. This regulatory judgement follows responsive engagement with Rugby BC.

Prior to this regulatory judgement, the consumer grade for Rugby BC was last updated in February 2026 to confirm a C3 grade following an inspection. Our assessment of Rugby BC's consumer grade remains unchanged, and we are continuing to work with Rugby BC as it addresses the identified issues.

Summary of the decision

From the evidence and assurance gained during the inspection which concluded in February 2026, we found that there are serious failings in Rugby BC delivering the outcomes of the consumer standards and significant improvement is needed, specifically in relation to the outcomes in our Safety and Quality Standard and Transparency, Influence and Accountability Standard. Based on this assessment, we concluded a C3 grade for Rugby BC.

Since then, from evidence and assurance gained through our responsive engagement, we have also concluded that there has been serious failings in how Rugby BC is delivering the outcomes of the Rent Standard. Rugby BC overcharged a large number of tenants and former tenants over a prolonged period due to errors it made in setting rents.

How we reached our judgement

We carried out an inspection of Rugby BC, which concluded in February 2026, to assess how well it is delivering the outcomes of the consumer standards, as part of our regulatory inspection programme. During the inspection we considered all four of the consumer standards: Neighbourhood and Community Standard, Safety and Quality Standard, Tenancy Standard, and the Transparency, Influence and Accountability Standard.

During the inspection we observed Rugby BC's Performance, Risk and Assurance Group. We met with tenants, officers, the leader of Rugby BC and the portfolio holder for housing. We also reviewed a wide range of documents provided by Rugby BC.

Alongside the inspection, and in response to information from our annual rent data review, we carried out responsive engagement with Rugby BC that focused on issues related to rent setting. This responsive engagement included reviewing documents and information provided by Rugby BC, and follow up meetings and discussions with Rugby BC.

Our judgement is based on all the relevant information obtained during the inspection and responsive engagement, as well as analysis of information received through routine regulatory returns and other regulatory engagement activity.

Summary of findings

Consumer – C3 – February 2026

The Safety and Quality Standard requires landlords to have an accurate record at an individual property level of the condition of their homes, based on a physical assessment of all homes, and to ensure that homes meet the requirements of the Decent Homes Standard. Rugby BC has used an external company to complete stock condition surveys for 86% of its homes, however Rugby BC currently only holds partial information from these surveys, so is unable to fully analyse the results. Rugby BC reports that over 99% of its homes meet the Decent Homes Standard, however this figure has not been checked against the stock condition survey information. We have concluded that this is a weakness in Rugby BC's assurance that it fully meets the requirements around the condition of its homes, which it needs to address. We will continue to engage with Rugby BC as it seeks to understand the quality of its homes and uses the information to inform its improvement programmes.

The Safety and Quality Standard also requires landlords to identify and meet all legal requirements that relate to the health and safety of tenants in their homes and communal areas and ensure that all actions arising from required health and safety assessments are conducted within appropriate timescales. Overall, we have assurance that Rugby BC is meeting the legal requirements that relate to the health and safety of tenants in their homes and communal areas, although there are some identified weaknesses, which it is addressing. Rugby BC identified 800 homes with Electrical Installation Condition Reports over five years old and has implemented an accelerated inspection programme to complete these. There are also 600 homes without a smoke alarm, and Rugby BC is using a range of initiatives to gain access and complete installation. We also identified a weakness in its approach to tracking and reporting safety remedial actions. Rugby BC has plans to address this through the implementation of a new asset management system. We will continue to engage with Rugby BC as it completes these improvements.

We found serious failings in Rugby BC meeting one of the outcomes of the Safety and Quality standard, which requires landlords to deliver an effective, efficient, and timely repairs service. Prior to the inspection Rugby BC made a self-referral to us following a third-party assessment that highlighted issues relating to the accuracy and completeness of information relating to repairs. During the inspection Rugby BC was unable to demonstrate it had an accurate understanding of how its repairs service was performing. Rugby BC reported that issues were in part due to a lack of integration across its systems. We were therefore unable to gain assurance that the required outcomes were being delivered. Rugby BC has recognised that improvements are needed and has procured a new single asset management

system to hold repairs information and ensure accurate reporting. We will continue to engage with Rugby BC as it makes these improvements.

The Neighbourhood and Community Standard requires that landlords must work in partnership with appropriate local authority departments, the police, and other relevant organisations to deter and tackle anti-social behaviour and hate incidents in the neighbourhoods where they provide social housing. Through the inspection we saw evidence that Rugby BC deals effectively with anti-social behaviour and hate incidents in line with its policy and procedures and in partnership with relevant organisations.

In relation to the Tenancy Standard the inspection found evidence that Rugby BC is offering tenancies or terms of occupation that are compatible with the purpose of the accommodation, the needs of individual households, the sustainability of the community, and the efficient use of their housing stock. Rugby BC has a lettings policy that sets out its approach to ensuring all properties are let in a fair and transparent way and that it considers the needs of its tenants and prospective tenants.

The Transparency, Influence and Accountability standard sets out the outcomes that landlords must deliver about being open with tenants and treating them with fairness and respect so that tenants can access services, raise complaints, influence decision making and hold their landlord to account. During the inspection we identified a serious failing in relation to tenant engagement and scrutiny. We do not have assurance that Rugby BC is engaging with tenants in a way that allows them to influence how Rugby BC delivers its services. The inspection found a limited range of opportunities for tenants to scrutinise their landlord's performance and influence how its housing services are delivered, and we do not have assurance that these opportunities were meaningful. Rugby BC told us it is implementing a new framework for tenant engagement, and we will continue to work with it as it makes these improvements.

We also found weaknesses relating to the requirements around fairness and respect, meeting diverse needs and the provision of service and performance information. While we observed a respectful approach to tenants during our inspection, Rugby BC does not hold sufficient information to demonstrate that it understands the diverse needs of its tenants or how its services deliver fair and equitable outcomes for tenants. Rugby BC provides a range of service and performance information in its tenants' newsletter, which is sent to every tenant. However, the inspection found numerous examples of poor usability and outdated information on Rugby BC's website. Rugby BC has acknowledged the issues with its website, and we will continue to work with Rugby BC as it develops and delivers its improvement plan across all these areas of weakness.

Rugby BC has made changes to its complaints handling service and during the inspection we gained assurance that these changes have impacted positively on response times and tenant satisfaction in relation to complaints. Rugby BC was also able to evidence that it analyses and learns from complaints via a quarterly Lessons Learned Clinic, and that learning from complaints has led to service improvements.

Rugby BC has been engaging constructively with us. It has an understanding of the issues it needs to address and is taking action to rectify the failures and weaknesses identified. We are engaging with Rugby BC as it continues to address the issues set out in this judgement. Our engagement will be intensive, and we will seek assurance that Rugby BC is making sufficient change and progress, including ongoing monitoring of how it delivers its improvement programme. Our priority will be that risks to tenants are adequately managed and mitigated. We are not proposing to use our enforcement powers at this stage but will keep this under review as Rugby BC seeks to resolve these issues.

Rent – Serious failings in delivering outcomes - May 2026

Through our annual review of rent data, we identified a potential failure by Rugby BC in delivering the outcomes of the Rent Standard. Specifically, Rugby BC applied a general rent setting approach that failed to apply the correct property valuations as the basis for formula rent.

During Rugby BC's ongoing investigation into the issue, when it applied the correct property valuations it identified that approximately 4,000 tenancies had been overcharged, totalling approximately £415k. Rugby BC informed us that a small number of tenants who were evicted had an overcharge on their rent account at the time of the eviction. These overcharges range from 0.2% to 48.9% of their arrears, and Rugby BC has told us that these are the approximate values and it is unable, at this time, to confirm the exact position.

Rugby BC has confirmed that new tenancies are now charged at the correct rent, and that rents have been corrected for those tenants previously overcharged so further overcharges do not occur. Rugby BC is continuing to investigate the issues and has sought external legal support to inform its plan to correct the errors. Rugby BC has advised us that it is starting work to confirm the refunds due to individual tenants.

Taking into account the extent of these issues and the potential impact on tenants, we have concluded that there are serious failings in how Rugby BC is delivering the outcomes of the Rent Standard.

Rugby BC continues to engage constructively with us as it addresses the issues that led to this situation. Our engagement with Rugby BC is intensive and we will seek

evidence to give us the assurance that sufficient change and improvement is being made. Our priority will be that any relevant risks to tenants are adequately managed and mitigated, and that affected tenants have appropriate redress.

Background to the judgement

About the landlord

Rugby BC owns and manages 3,448 social and affordable rent homes, with 1,223 independent living homes.

Our role and regulatory approach

We regulate for a viable, efficient, and well governed social housing sector able to deliver quality homes and services for current and future tenants.

We regulate at the landlord level to drive improvement in how landlords operate. By landlord we mean a registered provider of social housing. These can either be local authorities, or private registered providers (other organisations registered with us such as non-profit housing associations, co-operatives, or profit-making organisations).

We set standards which state outcomes that landlords must deliver. The outcomes of our standards include both the required outcomes and specific expectations we set. Where we find there are significant failures in landlords which we consider to be material to the landlord's delivery of those outcomes, we hold them to account. Ultimately this provides protection for tenants' homes and services and achieves better outcomes for current and future tenants. It also contributes to a sustainable sector which can attract strong investment.

We have a different role for regulating local authorities than for other landlords. This is because we have a narrower role for local authorities and the Governance and Financial Viability Standard, and Value for Money Standard do not apply. Further detail on which standards apply to different landlords can be found on our [standards page](#).

We assess the performance of landlords through inspections and by reviewing data that landlords are required to submit to us. We also respond where there is an issue or a potential issue that may be material to a landlord's delivery of the outcomes of our standards. We publish regulatory judgements that describe our view of landlords' performance with our standards. We also publish grades for landlords with more than 1,000 social housing homes.

The Housing Ombudsman deals with individual complaints. When individual complaints are referred to us, we investigate if we consider that the issue may be material to a landlord's delivery of the outcomes of our standards.

For more information about our approach to regulation, please see [Regulating the standards.](#)

Update on the Use of Monday.com to Deliver the Improvement Plan

Monday.com has been implemented as the central platform for managing and monitoring the delivery of the RSH Improvement Plan. It provides a single source of information for all improvement actions, milestones, risks and supporting evidence, improving transparency and consistency across the programme. The system supports our governance arrangements by providing real-time visibility of progress, clear ownership of actions, and regular reporting through established governance forums. This enables effective oversight of delivery, including the identification and escalation of risks, issues and dependencies. Progress is monitored against agreed milestones, with actions tracked to completion and supported by evidence. The platform also provides an auditable record of activity and enables timely reporting to Members, governance boards and the regulator. Overall, Monday.com has strengthened programme management, accountability and performance monitoring, supporting a structured and evidence-based approach to delivering the Improvement Plan. Within this pack you will see an exported spreadsheet, however, we will be able to show you the system on Friday when we meet.

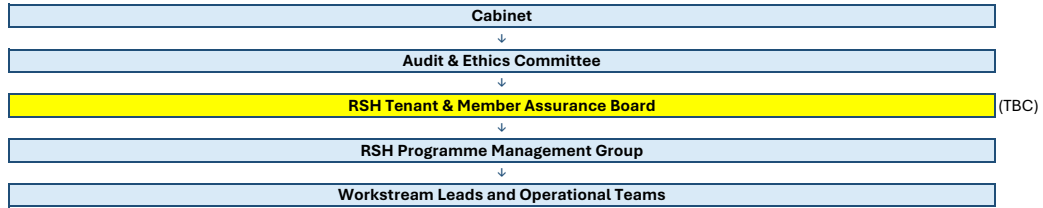
RSH Improvement Plan Board		This spreadsheet was created using monday.com									
Safety and Quality Standard - Tyler Baverstock-Kay											
	Name	Subitems	Officers	Timeline - Start	Timeline - End	Due Date	Priority	Status	Root Causes	Current Position	
RSH-01: Weakness in the accuracy and completeness of stock condition information and repairs-related asset data.	Implement a single Asset Management System to establish one reliable source of asset and compliance information. Finding an interim solution to store all SC data onto RBC system		Tyler Baverstock-Kay	03/11/2025	31/10/2026	31/10/2026	High	Chasing	Fragmented systems, not fit for purpose	Waiting for stock condition information from ARK for integration into RBC systems, while deploying a unified asset management system (Total Mobile) to streamline repair processes.	
	Subitems	Name	Officers	Timeline - Start	Timeline - End	Due Date	Priority	Status	Root Causes	Current Position	
		Implement a single Asset Management System to establish one reliable source of asset and compliance information.	Bradley Elliott, Tyler Baverstock-Kay, Linda.Webster@brugby.gov.uk	03/11/2025	31/10/2026	31/10/2026	High	In Progress	Fragmented systems, not fit for purpose	Linda Webster as project manager with Total Mobile Asset system to be live in October 2026.	
	Finding an interim solution to store all SC data onto RBC system	Tyler Baverstock-Kay	01/04/2026	30/06/2026	30/06/2026	High	Chasing	Fragmented systems, not fit for purpose	RBC is ready to receive ARK photos/reports, ARK is downloading all reports after a file naming error, on target for weekly lulu for photos and reports.		
RSH-02: Weakness in data quality, reconciliation and confidence in records used to manage services.	Implement integrated repairs system, Complete full data validation and reconciliation across stock condition, compliance and repairs datasets.		Tyler Baverstock-Kay	01/04/2026	31/10/2026	31/10/2026	High	In Progress	Fragmented systems, not fit for purpose	A review of the Asset Maintenance system is in progress to guarantee accurate tracking of gas and electric repairs and proper contractor management. An interim solution is being developed to support compliance checks, as Technology	
	Subitems	Name	Officers	Timeline - Start	Timeline - End	Due Date	Priority	Status	Root Causes	Current Position	
		Complete full data validation and reconciliation across stock condition, compliance and repairs datasets.	Tyler Baverstock-Kay	01/04/2026	31/08/2026	31/08/2026	High	In Progress	Fragmented systems, not fit for purpose	The Property Repairs Service needs minimal data cleaning to their Total Mobile system. However, the Asset Maintenance system, Technology Forge, demands immediate review to ensure the accuracy of gas and electric repairs and contractor management. Additionally, an interim system must be established to effectively monitor compliance checks, as Technology	
	Implement integrated repairs system	Tyler Baverstock-Kay, Bradley Elliott, Linda.Webster@brugby.gov.uk	01/04/2025	31/10/2026	31/10/2026	High	In Progress	Fragmented systems, not fit for purpose	Linda Webster as project manager with Total Mobile Asset system to be live in October 2026.		
RSH-03: Limited assurance regarding up-to-date understanding of stock condition.	Deliver a rolling Stock Condition Survey Programme to strengthen the evidence base for asset investment and service planning		Tyler Baverstock-Kay	02/03/2026	31/07/2026	30/09/2026	Medium	In Progress	Fragmented systems, not fit for purpose, information held on contractor systems and not migrated across	Rayleys surveyors will soon conduct all no access surveys from ARK and renew inspections of properties with category 1 and 2 H&SBR hazards	
Subitems	Name	Officers	Timeline - Start	Timeline - End	Due Date	Priority	Status	Root Causes	Current Position		
	Deliver a rolling Stock Condition Survey Programme to strengthen the evidence base for asset investment and service planning	Tyler Baverstock-Kay, Linda.Webster@brugby.gov.uk	02/03/2026	31/07/2026	31/07/2026	Medium	In Progress	Fragmented systems, not fit for purpose, information held on contractor systems and not migrated across	Rayleys surveyors received 700 initial properties for the stock condition programme to start in July 2026.		
RSH-04: Need for stronger oversight of landlord performance and service assurance.	Establish a data governance framework, Introduce performance dashboards for repairs, stock condition, compliance and related improvement measures.		Tyler Baverstock-Kay, Aina Kaur	01/04/2025	31/07/2026	31/07/2026	Medium	In Progress	- Before 2025, there was a lack of data analysis staff and governance framework, with a lack of data collaboration between department systems. - The Asset system, Technology Forge, struggles to provide an accurate position of stock condition and compliance checks. - ARK stock condition data held with ARK, and not migrated.	Ongoing efforts focus on enhancing current methods to measure and monitor performance across all departments. Senior leaders will regularly review KPI narratives. Additionally, new Power BI dashboards and narrative reports are being developed to support this process.	
	Subitems	Name	Officers	Timeline - Start	Timeline - End	Due Date	Priority	Status	Root Causes	Current Position	
		Establish a data governance framework	Tyler Baverstock-Kay, Aina Kaur	01/04/2025	31/07/2026	31/07/2026	Medium	In Progress	- Before 2025, there was a lack of data analysis staff and governance framework, with a lack of data collaboration between department systems.	Power BI reports track department performance and support monthly senior leadership team meetings with detailed narratives. These reports are regularly reviewed and refined based on feedback from the	
	Introduce performance dashboards for repairs, stock condition, compliance and related improvement measures.	Tyler Baverstock-Kay, Aina Kaur	01/04/2025	31/07/2026	31/07/2026	Medium	In Progress	- Before 2025, there was a lack of data analysis staff and governance framework, with a lack of data collaboration between department systems.	Reasons to ensure accurate and reliable reports are required to monitor stock condition and ensure compliance, complementing the existing repair tracking system. Compliance data under assurance review and data is reviewed		
RSH-06: Need for full assurance on smoke alarm compliance.	Achieve 100% smoke alarm compliance and strengthen monitoring of ongoing compliance.		Tyler Baverstock-Kay, Darren Reeves, Jason Husain	01/04/2026	31/07/2026	31/07/2026		In Progress	Fragmented systems, not fit for purpose	Current smoke alarm position being investigated into the Asset system	
	Subitems	Name	Officers	Timeline - Start	Timeline - End	Due Date	Priority	Status	Root Causes	Current Position	
		Achieve 100% smoke alarm compliance and strengthen monitoring of ongoing compliance.	Tyler Baverstock-Kay, Jason Husain, Darren Reeves	01/04/2026	31/07/2026	31/07/2026	Critical	In Progress	Fragmented systems, not fit for purpose	Current smoke alarm position being investigated into the Asset system	
RSH-07: Need for stronger control of follow-up actions arising from safety inspections.	Introduce central compliance tracking for actions arising from inspections, tests and safety assessments.		Tyler Baverstock-Kay, Jason Husain, Darren Reeves	01/04/2026	31/07/2026	31/07/2026		To Start	Fragmented systems, not fit for purpose	Current position update needed from Assets. New interim solution to be planned to properly track remedial actions	
	Subitems	Name	Officers	Timeline - Start	Timeline - End	Due Date	Priority	Status	Root Causes	Current Position	
		Introduce central compliance tracking for actions arising from inspections, tests and safety assessments.	Tyler Baverstock-Kay, Bradley Elliott, Jason Husain, Linda.Webster@brugby.gov.uk	01/04/2026	31/07/2026	31/07/2026	Critical	To Start	- Current Asset system, Technology Forge, is not fit for purpose to track gas/electric repairs and all compliance items.	New interim solution to be planned to properly track remedial actions. Long term solution is the ALM Total Mobile system being developed for October 2026.	
RSH-06: Weakness in assurance that all required electrical inspections are completed within required timescales.	Complete an accelerated Electrical Inspection Condition Report programme and close any outstanding cases.		Tyler Baverstock-Kay, Darren Reeves	01/04/2026	31/07/2026	30/08/2026		In Progress	- Current Asset system, Technology Forge, is not fit for purpose to track gas/electric repairs and all compliance items.	Assets are working to provide an interim solution to show EICRs.	
	Subitems	Name	Officers	Timeline - Start	Timeline - End	Due Date	Priority	Status	Root Causes	Current Position	
		Complete an accelerated Electrical Inspection Condition Report programme and close any outstanding cases.	Tyler Baverstock-Kay, Darren Reeves	01/04/2026	31/07/2026	30/06/2026	Critical	In Progress	- Current Asset system, Technology Forge, is not fit for purpose to track gas/electric repairs and all compliance items.	Assets are working to provide an interim solution to show EICRs.	
RSH-08: Need for more robust escalation where access to properties is not obtained for safety-critical checks.	Strengthen no access escalation procedures to support timely entry, management oversight and risk mitigation.		Rob Foster, Aina Kaur, Mary Jane Gunn, Craig Oakley	01/01/2026	31/08/2026	31/08/2026	Medium	In Progress	- No access policy in place, but process and implementation is segmented between departments.	No access policy up-to-date, empowering RBC teams required. A meeting is booked between Repairs and Housing to ensure both departments provide the correct information to each other to enforce the no-access measures.	
	Subitems	Name	Officers	Timeline - Start	Timeline - End	Due Date	Priority	Status	Root Causes	Current Position	
		Strengthen no access escalation procedures to support timely entry, management oversight and risk mitigation.	Aina Kaur, Mary Jane Gunn, Rob Foster, Craig Oakley	01/01/2026	31/08/2026	31/08/2026	Medium	In Progress	- No access policy in place, but process and implementation is segmented between departments.	No access policy up-to-date, empowering RBC teams required. A meeting is booked between Repairs and Housing to ensure both departments provide the correct information to each other to enforce the no-access measures.	
			01/04/2025	31/10/2026	2026-07-31 to 2026-10-31						
Transparency, Influence and Accountability - Craig Oakley											
	Name	Subitems	Officers	Timeline - Start	Timeline - End	Due Date	Priority	Status	Root Causes	Current Position	
RSH-09: Failure in the range and effectiveness of opportunities for tenants to influence services and scrutinise performance.	Implement a strengthened Tenant Engagement Framework with clear routes for scrutiny, feedback and co-production.		Tyler Baverstock-Kay, Mary Jane Gunn, Craig Oakley, Amin Aden	01/04/2026	01/04/2027	01/04/2027	Medium	In Progress	Organisational Culture- New Housing staff seen as experts, asking tenants for their views is not hardwired into our processes or planning, engagement staff not sufficiently integrated into operational teams. A lack of visible impact, service improvements, changes in policy, performance improvement, complaints leading to service improvement not communicated effectively i.e. through "You Said, We Did" feedback. Limited Representation: Our engagement offer/methods have attracted older residents, retired people, long term tenants. Inadequate resources and skills, including a lack of data on tenant demographics, a small tenant engagement team (2 F/T staff members) which hinders embedding tenant engagement in operational teams, insufficient staff training on co-production techniques.	A cohort of involved tenants. A structure for engagement - Have Your Say and Make a Difference, including mechanisms for scrutinising performance (Tenants Panel) and influencing service delivery (Tenants Consumer Standards Groups) A comprehensive tenant's newsletter, posted out to all tenants every quarter. Improved performance reporting adopted in 2025/26 that enables tenants to understand what is working well, what requires improvement, driving active tenant engagement in service improvement. RBC supports a range of tenant led activities, mainly in our independent living schemes to foster community cohesion and social isolation.	
	Subitems	Name	Officers	Timeline - Start	Timeline - End	Due Date	Priority	Status	Root Causes	Current Position	
		Implement a strengthened Tenant Engagement Framework with clear routes for scrutiny, feedback and co-production.	Tyler Baverstock-Kay, Amin Aden, Mary Jane Gunn	01/04/2026	01/04/2027	01/04/2027	Medium	In Progress	Our systems did not allow meaningful scrutiny of performance enabling tenants to understand what was going well and where improvement is required. We have missing information on disabilities, ethnicity, language needs and household composition	New framework in development with feedback from tenants informing development of KPI presentation and report narrative focus. We have established a data collection project team with a project plan that will move us towards improved data quality.	
RSH-10: Insufficient information to consistently demonstrate understanding of tenants' diverse needs and delivery of fair and equitable service outcomes.	Deliver a tenant data improvement programme using surveys, tenancy health checks and routine contacts to strengthen tenant insight, Tenants Portal Setup		Mary Jane Gunn, Craig Oakley	01/04/2026	01/04/2027	01/04/2027	Medium	In Progress	Weak data collection and management. No comprehensive approach to collecting equality, diversity and inclusion (EDI) information. Multiple IT systems that do not share information. Lack of regular data quality checks and analysis. Data collected at tenancy sign up, current housing management system does not facilitate use of that data. Challenging move from one housing system to our current housing management system due to lack of skills and resource. Limited understanding of the tenant population. Limited tenant profiling. Insufficient analysis of who uses services and who experiences poorer outcomes. Limited understanding of digital exclusion or	We have baseline data on our tenants protected characteristics which the gaps in our data. We have a programme in place for filling those gaps, including use of the annual tenants survey, setting in visits and tenancy health checks. We are investigating use of the tenants portal as a means for tenants providing up to date demographic data. Potential use of consultant to survey all tenants at a point in time.	
	Subitems	Name	Officers	Timeline - Start	Timeline - End	Due Date	Priority	Status	Root Causes	Current Position	
		Deliver a tenant data improvement programme using surveys, tenancy health checks and routine contacts to strengthen tenant insight.	Mary Jane Gunn, Craig Oakley	01/04/2026	01/04/2027	01/04/2027	Medium	In Progress			

RSH Improvement Plan Governance Framework

Purpose

G

Governance Structure



Roles and Assurance Responsibilities

Governance forum	Role / assurance focus
Cabinet	Provides political leadership, receives strategic updates, considers significant policy decisions and monitors progress against corporate objectives.
Audit & Ethics Committee	Provides independent oversight and assurance. Reviews programme performance, key risks, compliance, governance arrangements and progress against regulatory requirements.
RSH Tenant & Member Assurance Board	Chaired by the Portfolio Holder and includes senior officers and resident representatives. Provides challenge, scrutiny and assurance over delivery, resident outcomes, regulatory compliance, risks, performance information and customer feedback.
RSH Programme Management Group	Coordinates delivery of the Improvement Plan, oversees milestones, risks, issues, dependencies, resources and evidence collection, and escalates strategic risks and decisions. Led by the Assistant Director for Communities and Homes.
Workstream Leads and Operational Teams	Implement actions, maintain evidence, manage operational risks and deliver improvement outcomes within agreed timescales.

Programme Management Group Responsibilities

- Monitor delivery of all improvement plan actions and milestones.
- Maintain programme risk, issue and dependency logs.
- Coordinate workstreams and monitor interdependencies.
- Maintain regulatory assurance evidence and audit trail.
- Provide progress reporting to the Tenant & Member Assurance Board, Audit & Ethics
- Escalate strategic risks, resource issues and decisions requiring leadership

Tenant & Member Assurance Board Responsibilities

- Provide strategic challenge and oversight of programme delivery.
- Review resident outcomes and customer experience improvements.
- Review key performance indicators and regulatory compliance.
- Provide assurance that risks are appropriately managed.
- Promote transparency, accountability and co-regulation.
- Support organisational learning and continuous improvement.

Reporting Cycle

Workstream Leads report to the RSH Programme Management Group. The Programme Management Group reports to the RSH Tenant & Member Assurance Board. Assurance Board outcomes inform reporting to Audit & Ethics Committee and Cabinet.

Expected Benefits

- Clear lines of accountability and escalation.
- Stronger resident influence and co-regulation.
- Improved visibility of programme risks and performance.
- Robust assurance arrangements for Members and the Regulator.
- Stronger governance supporting the ambition to achieve a C1 regulatory judgement.

Appendix EQUALITY IMPACT ASSESSMENT (EqIA)

Regulator of Social Housing – Service Improvement Plan

For Cabinet on 8 Sep 2026

Approved by	Mary Jane Gunn
Policy being assessed	Regulator of Social Housing – Service Improvement Plan
Service Area	Communities & Homes
Name of Officer completing the assessment	Mary Jane Gunn
Other Officers involved	Vanessa Niemczewska
Date of this assessment	14 Jul 2026
Date of review	8 Sep 2027

<u>Stage 1 – Policy to be analysed</u>	
(1) Describe the main aims, objectives and purpose of the Policy?	This EQIA relates to the response of the Council to the Regulatory Judgement and Grading of C3 in respect of the Landlord service published by the Regulator of Social Housing (RSH) in February 2026. The Council is responding to the judgement and grading through an improvement plan with actions on: - Safety and Quality - Transparency, Influence and Accountability - Engagement with tenants and the RSH - Enhanced governance and assurance
(2) How does it fit with Rugby Borough Council's Corporate priorities and your service area priorities?	A fairer Rugby - To reduce inequalities and improve housing across the Borough.
(3) What are the expected outcomes you are hoping to achieve?	Compliance with the consumer standards of the RSH.
(4) Does or will the policy affect: • Customers • Employees • Wider community or groups	Customers, Employees The activities set out in this report will impact: - RBC tenants - RBC employees The Service Improvement Plan will primarily affect RBC tenants and RBC employees. Tenants will benefit from improvements to service quality, safety, communication and engagement, ensuring greater compliance with the Regulator of Social Housing's Consumer Standards. Staff will be affected through changes to processes, training and ways of working to support the delivery of improved and compliant services.
(5) Will the policy involve substantial changes in resources?	No

(6) Is a full Equality Impact Assessment needed? If no, please give reason why.	Yes
(7) Please describe how the policy will meet the aims of the Equality Duty: a. Eliminate unlawful discrimination, harassment, victimisation and any other unlawful conduct prohibited by the act b. Advance equality of opportunity between people who share and people who do not share a relevant protected characteristic c. Foster good relations between people who share and people who do not share a relevant protected characteristic	The proposals will help the Council deliver its equality duties by improving access, safety, engagement and fairness for all tenants, including those with protected characteristics such as older people, disabled residents, and vulnerable households. In particular, the proposals will: - Improve tenant safety through stronger compliance arrangements, including electrical inspections, smoke alarm compliance, and better tracking of safety actions, helping to protect vulnerable residents and ensure safe homes for all tenants. - Strengthen understanding of tenants' diverse needs through improved tenant data, surveys and tenancy health checks, enabling services to be tailored more fairly and equitably. - Increase tenant voice and participation by introducing a strengthened Tenant Engagement Framework and wider consultation opportunities, ensuring all tenants have opportunities to influence services and scrutinise performance. - Improve transparency and accessibility of information through website improvements and clearer service information, helping tenants access information more easily and reducing barriers to engagement. - Support fair and consistent service delivery through improved governance, performance monitoring and oversight arrangements, helping ensure housing services are delivered equitably across the Borough. Overall, the proposals support the Council's Public Sector Equality Duty by helping to eliminate disadvantage, improve accessibility and participation, and ensure housing services meet the differing needs of tenants.
<u>Stage 2 – Evidence about user population and consultation</u>	

(1) What does the data tell you about the groups this policy impacts?	Evidence used: - Regulatory Judgement and Grading - Annual Tenants Satisfaction Surveys (23/24, 24/25, 25/26) that identify satisfaction with landlord services and indicate areas of priority for RBC tenants. - A regular programme of engagement with tenants at both a strategic and neighbourhood level. - Our Hsg Mgt system, Cx hold data on the characteristics our our tenants. However, the improvement plan in response to the regulatory judgement includes a project that will increase the data that we hold, so as to better understand the diverse needs of our tenants and how our services deliver fair and equitable outcomes.
Additional evidence can be found:	
(2) Have you consulted or involved those groups that are likely to be affected by the policy you want to implement? If yes, please state which groups were involved in the consultation and what were their views and how have their views influenced the policy? If you have not consulted or engaged with communities that are likely to be affected by the policy, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary	Yes We consult all tenants through our annual Tenants Survey, this enables us to identify areas of concern such as tackling ASB and satisfaction with complaint handling. Resources have been focused on these two areas as a result of our tenant consultation. RBC has a Tenants Panel - Whose role it is to scrutinise landlord performance and hold us to account in delivering service improvements, RBC has a Tenants Consumer Standards Group - Who work with us and provide the tenants voice in policy development and service improvement. Both the groups above will be involved in developing and monitoring our improvement plan. In addition, we will be consulting tenants in our neighbourhoods and communities through a series of pop up events that allow tenants to influence our plans.
<u>Stage 3 – Analysis of impact</u>	

(1) <u>Protected Characteristics</u> From your data and consultations, are there any positive or negative impacts identified for any particular group? If left blank, this means that no impacts have been identified for this group.	Protected Characteristic	Nature of Impact Positive, Negative, Both	Explain why
	Age	Positive	The proposals are likely to have a positive impact on age because they will improve the safety, accessibility and responsiveness of housing services for older tenants as well as younger households and families. In particular: - Improved electrical safety inspections, smoke alarm compliance and stronger compliance monitoring will help protect older and potentially more vulnerable residents who may be at greater risk from hazards within the home. - Better stock condition data and repairs performance will support quicker identification and resolution of housing issues that can disproportionately affect older people, such as damp, disrepair, or accessibility concerns. - The strengthened Tenant Engagement Framework and wider consultation



			activity will create more opportunities for tenants of influence housing services and raise concerns. - Improvements to tenant data and tenancy health checks will help the Council better understand the differing needs of tenants across age groups and provide more tailored support where required. - Website and communication improvements will help ensure tenants can access clearer and more timely information about landlord services and performance, while ongoing engagement activities provide alternative routes for those who may be less digitally confident. Overall, the proposals support fairer outcomes across different age groups by improving housing safety, service quality, accessibility and tenant involvement.
	Disability	Positive	The proposals are likely to have a positive impact on disabled tenants by



			improving housing safety, strengthening understanding of tenants' individual needs, and making services more responsive and accessible. In particular: - The accelerated electrical inspection programme, improved compliance monitoring and achievement of full smoke alarm compliance will help ensure homes are safer for disabled tenants, who may be more adversely affected by hazards within the home. - Improvements to repairs performance, stock condition information and asset management will support earlier identification and resolution of issues that may disproportionately affect disabled tenants, including repairs relating to accessibility, heating, damp or safety. - The strengthened Tenant Engagement Framework will provide disabled tenants with more opportunities to influence services and raise
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			concerns about accessibility and service delivery. - The tenant data improvement programme and tenancy health checks will help the Council better understand tenants' diverse needs, including disabilities and support requirements, enabling more equitable and tailored services. - Website and communication improvements should improve access to information about landlord services and performance, while wider engagement activity can provide alternative ways for disabled tenants to participate where digital access may be a barrier. - Stronger governance, oversight and accountability arrangements will help ensure that issues affecting disabled tenants are identified, monitored and addressed more effectively. Overall, the proposals support the Council's equality duties by helping to
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			remove barriers, improve safety and accessibility, and promote fairer housing outcomes for disabled tenants.
	Sex		
	Gender reassignment		
	Marriage/civil partnership		
	Pregnancy/maternity		
	Race		
	Religion/belief		
	Sexual Orientation		
(2) <u>Cross cutting themes</u>	Description of impact	Nature of impact Positive, Negative, Both	Explain why
	Socio-economic e.g.: child poverty, income level, education level, working hours/occupation, family/social support, access to good nutrition	Positive	The proposals are likely to have a positive impact on social inequalities, including for households experiencing poverty and tenants living in disadvantaged communities, by improving the quality, safety and fairness of housing services across the Borough. In particular: - Improvements to repairs performance, stock



			condition data and asset management will help ensure tenants living in poorer quality housing receive more timely and effective repairs and maintenance services. - Enhanced safety measures, including electrical inspections and smoke alarm compliance, will particularly benefit lower income households who may be more vulnerable to the impacts of unsafe housing conditions. - The strengthened Tenant Engagement Framework and wider community consultation activity will provide greater opportunities for tenants from disadvantaged communities to influence housing services and raise concerns. - The tenant data improvement programme and tenancy health checks will help the Council better understand the needs and circumstances of different tenant groups, enabling services to be delivered
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			more fairly and targeted where inequalities exist. - Website and communication improvements will improve access to information about landlord services and performance, helping tenants better understand and access the support available to them. - The overall focus on achieving compliance with the Consumer Standards and improving accountability will help ensure more consistent service delivery for tenants across all communities within the Borough. Overall, the proposals are expected to contribute positively towards reducing housing-related inequalities and improving outcomes for tenants living in more disadvantaged circumstances.
	Environmental e.g.: housing status, transport links, geography, access to services, air quality, noise pollution		



(4) Are there any barriers to accessing the service? If yes, how can they be overcome?	No
(5) What data will be collected to analyse impact? How will the data collected be used?	Repairs and Asset Management Performance The report proposes a single Asset Management System, stock condition surveys, and enhanced performance monitoring. Relevant data will include: - Percentage of repairs completed within target times (emergency & Non emergency) - Number of overdue repairs - Tenant satisfaction with repairs - Number of outstanding disrepair cases - Accuracy/completeness of stock condition records - Percentage of homes surveyed annually - Decent Homes Standard compliance rates 2. Safety and Compliance Data - Percentage of properties with valid EICRs - Gas safety compliance rates - Fire risk assessment completion rates - Smoke alarm installation and testing rates - Number of overdue compliance actions - Number of “no access” cases - Time taken to resolve safety issues - Damp and mould reports and resolution times 3. Tenant Satisfaction and Engagement Data will include: - Tenant Satisfaction Measures (TSMs) - Complaints volumes and themes - Complaint escalation rates to the Housing Ombudsman - Tenant participation rates in consultations/events - Diversity of tenants engaged - Website usage analytics

	- Response rates to tenant surveys - Perceived influence over decisions 4. Equality and Inclusion Data Relevant analysis will include: - Complaints patterns among different tenant groups - Engagement participation by age, ethnicity, disability, etc. - Translation/interpreter service demand - Outcomes for vulnerable tenants This helps assess whether services are becoming more equitable. 5. Governance and Organisational Performance - Delivery progress against the improvement plan - Internal audit compliance findings - Frequency and quality of performance reporting - RSH feedback and regulatory milestones 7. Regulatory Outcomes Since the aim is to move from a C3 to a C1 grading, regulatory data is central. This will include: - Progress against RSH action plan milestones - Benchmarking against peer landlords - Consumer Standard compliance assessments
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(6) Complete this section if any adverse impacts were identified in 3.1.

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



AGENDA MANAGEMENT SHEET

Report Title:	Impact of Voluntary and Community Sector Support 2025/26
Name of Committee:	Cabinet
Date of Meeting:	8 September 2026
Report Director:	Strategic Director - Communities
Portfolio:	Communities, Housing and Safety
Ward Relevance:	All wards
Prior Consultation:	Warwickshire Community and Voluntary Action (WCAVA) 6 Community Associations (CA) – Brownsover CA, Benn Partnership Centre, Overslade CA, Newbold on Avon Community Partnership, New Bilton CA, Long Lawford CA Bedworth, Rugby and Nuneaton Citizens Advice Bureau (BRANCAB) Rugby Foodbank
Contact Officer:	Mary Jane Gunn Communities and Projects Manager maryjane.gunn@rugby.gov.uk
Public or Private:	Public
Report Subject to Call-In:	Yes
Report En-Bloc:	Yes
Key Decision:	No
Corporate Priorities:	This report relates to the following priority(ies): ☒ A Healthier Rugby – To support people to live healthier, longer, and more independent lives. ☒ A Thriving Rugby – To deliver a thriving economy which brings Borough-wide investment and regenerates Rugby Town Centre. ☒ A Greener Rugby – To protect the environment and ensure the Borough adapts to climate change. ☒ A Fairer Rugby – To reduce inequalities and improve housing across the Borough. Corporate Strategy 2025-2035 ☐ This report does not specifically relate to any Council priorities but

Summary:	The Impact Report, attached as appendix 1, highlights the positive impact and achievements of the voluntary and community sector organisations funded by the council during 2025/26.
Local Government Reorganisation Implications:	Rugby's Community and Voluntary Sector will continue to be a valuable resource through LGR and our transition arrangements will ensure that Rugby's VCS is recognised by the future unitary council. The current funding arrangements for WCAVA and Brancab finish on the 31 March 2027 and so, during 2026-27, Cabinet will be asked to consider funding arrangements for WCAVA and Brancab in 2027-28.
Financial Implications:	There are no direct financial implications arising from this report, however the Impact Report, attached as appendix 1 serves to demonstrate a return on investment and highlights the social value delivered by the VCS.
Risk Management/Health and Safety Implications:	There is a risk that financial support provided to community and voluntary sector organisations may not achieve the intended outcomes, may be misused or may create financial, legal, reputational or service-continuity risks for the Council. This could result in loss of public funds, reduced confidence in the Council and disruption to services relied upon by residents. This risk is mitigated by risk-based monitoring proportionate to the amount of funding and includes quarterly reports and monitoring meetings, "Heath Checks" undertaken by Warwickshire Community and Voluntary Action for the Community Associations and Community Partnerships, verification of governance arrangements, bank details and appropriate policies being in place.
Environmental Implications:	No specific issues identified.
Legal Implications:	The Council has a wide power within Section 2 of the Local Government Act 2000. This is known as the "wellbeing power" and seeks to promote or improve the economic, social, and environmental wellbeing of the Council's area. This includes the power to provide financial assistance to achieve this purpose.

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

Equality and Diversity:

An Equality Impact Assessment has been carried out and is attached as appendix 2 to this report.

Options:

The report is for information.

Recommendation:

- 1) The content of the report be noted; and
- 2) the achievements of the organisations supported through Council grant funding during 2025/26 be commended.

Reasons for Recommendation:

To ensure that Members are aware of the positive outcomes achieved by voluntary and community sector organisations in receipt of grant funding during 2025/26, and the resulting valuable contribution to supporting the outcomes of the corporate strategy.

Cabinet - 8 September 2026

The impact of the Voluntary and Community Sector organisations funded by the Council in 2025/26

Public Report of the Strategic Director - Communities

Recommendation

- 1) The content of the report be noted; and
- 2) the achievements of the organisations supported through Council grant funding during 2025/26 be commended.

1. Executive Summary

- 1.1. The impact report (Appendix 1) demonstrates the achievements of voluntary and community organisations in receipt of grant funding from the Council and how their work has contributed to supporting the delivery of the corporate strategy outcomes during 2025/26.

2. Background

- 2.1. The report outlines the contributions of voluntary and community sector groups funded by the council in 2025/26, and highlights:
 - The diversity and scope of the services and support they deliver
 - The reach of their work, reflected in the number of residents supported
 - The positive impact of those services and support on residents, including tackling social isolation, enhancing mental wellbeing, boosting income and improving access to nutritious food
- 2.2 The funding provided was as follows:
 - Community Associations / Partnerships: £8,240 each and an optional £1,000 to administer microgrants in consultation with local Ward Members
 - Microgrants: £3,545.00
 - Bedworth, Rugby and Nuneaton Citizens Advice Bureau (BRANCAB): £73,000
 - Warwickshire Community and Voluntary Action (WCAVA): £39,600
 - The Rugby Foodbank: £8,792

Total funding awarded to the VCS in 2025-26 - £180,377.00

- 2.2 It should be noted that the funding for the Foodbank and the community associations / partnerships is in the form of grants, whilst the WCAVA and

BRANCAB funding arrangements are contractual, with their services having been procured. A copy of the SLA objectives with the Community Associations / Partnerships is attached as appendix 3.

3. Funding for 2026-27 and 2027-28

- 3.1 Recognising that the existing model for supporting Community Associations and Partnerships has remained largely unchanged and consistent across organisations over time, proposals were presented to Cabinet on 1 December 2025 to enable consideration of how the Council commissions support for the voluntary and community sector in 2026/27. Cabinet subsequently approved the proposed changes to the commissioning arrangements:
- Funding continues through 2026-27 and 2027-28 for the Community Associations/Partnerships operating in the most deprived wards (as confirmed by the latest Thriving Places and Warwickshire County Council's Business Intelligence data) subject to budget setting for 2026/27 and 2027/28.
 - The duration of the Service Level Agreement (SLA) with community associations/partnerships to change from one year to two years, the SLA's will conclude on 31 March 2028.
 - Additional funding of £18,974 in 2026/27, equal to the allocation for two community associations, be provided to strengthen provision in Hillmorton and Admirals Estate. This will continue, subject to budget setting to 31 March 2028.
 - Further additional funding in 2027/28 be considered for two other areas meeting the deprivation criteria, including Eastlands, with allocations equal to those provided for Hillmorton and Admirals Estate.
 - It should be noted that current funding arrangements for WCAVA and Brancab will cease on 31 March 2027 and therefore Cabinet will be asked, in 2026-27, to consider proposals for funding WCAVA and Brancab in 2027-28.
- 3.2 It should be noted that Rugby Lotto, supporting over 50 "Good Causes" in the Borough continues to be an effective way of fundraising for the local VCS, in particular providing them with unrestricted funds.

4. Impact at a glance

- 4.1 The high-level data demonstrates the significant contribution that community associations and voluntary sector partners make to the wellbeing, resilience and quality of life of residents across the borough. Collectively, these organisations are not only providing practical support to people experiencing hardship, but are also creating opportunities for residents to connect, develop skills, improve their health and play an active role in their communities.

- 4.2 This is demonstrated by WCAVA supporting 172 organisations, placing 403 volunteers into roles and helping secure over £205,000 in additional funding, alongside an estimated £1.47 million in economic value generated through volunteering.
- 4.3 Rugby Citizens Advice provided support to 5,309 clients, addressing almost 15,000 issues and securing outcomes worth more than £5.5 million, particularly in relation to benefits, tax credits and debt.
- 4.4 At the same time, Rugby Foodbank provided 5,858 emergency food parcels during 2025/26, highlighting the continuing level of need for crisis and cost-of-living support.
- 4.5 Alongside this essential assistance, community groups are delivering social, educational, environmental and physical activity programmes that help prevent isolation, improve wellbeing and build stronger communities.
- 4.6 Taken together, the data illustrates that the sector provides substantial social and economic value, often reaching residents who may be vulnerable, disadvantaged or otherwise less likely to access mainstream services, while also strengthening community capacity and reducing pressure on statutory services.

5. Conclusion

- 5.1 The groups can demonstrate how they have utilised funding to support Rugby communities in 2025/26.
- 5.2 It should be noted that grant provision is just one of the ways the council supports the wider voluntary and community sector in Rugby.
- 5.3 Additional support from the Council includes Rugby Lotto as a fundraising tool for local charities and community groups.

Name of Meeting: Cabinet

Date of Meeting: 8 September 2026

Subject Matter: The impact of the Voluntary and Community Sector organisations funded by the Council in 2025/26

Originating Department: Communities

DO ANY BACKGROUND PAPERS APPLY ☐ YES ☐ NO

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink
App 1	Impact Report 2025-26
App 2	Equality Impact Report
App 3	Service Level Agreements for the Community Associations/Community Partnerships 2025-26

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

☐ Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A



APPENDIX 1: VOLUNTARY AND COMMUNITY SECTOR (VCS) IMPACT REPORT

2025–26

CONTEXT

Throughout 2025/26, the Council continued to work alongside the voluntary and community sector to support community resilience and help ensure local services remain accessible to Rugby residents. This ongoing relationship improves the Council’s understanding of local challenges, allowing services to be delivered and adapted in a more effective and efficient manner. By investing in the voluntary and community sector, the Council is helping residents today while building stronger, healthier and more resilient communities for the future.

In 2025/26 the Council continued funding agreements with the following organisations:

- **6 Community Associations and Community Partnerships** operating in the most deprived wards: Benn, Brownsover, Long Lawford, New Bilton, Newbold upon Avon and Overslade
- **Warwickshire Community and Voluntary Action (WCAVA)**
- **Rugby Foodbank**
- **Bedworth, Rugby and Nuneaton Citizens Advice (BRANCAB)**

The organisations provided activities that contributed to the following Rugby Borough Council Corporate Strategy 2025-35 priorities:

- **A Healthier Rugby** – to support people to live healthier, longer and more independent lives
- **A Greener Rugby** – to protect the environment and ensure the borough adapts to climate change
- **A Thriving Rugby** – To deliver a thriving economy which brings Borough-wide investment and regenerates Rugby Town Centre

The report provides an overview of key activities delivered by organisations supported through our funding.

ORGANISATION	NOTES	FUNDING FOR 2025-26
COMMUNITY ASSOCIATIONS AND COMMUNITY PARTNERSHIPS	The Community Associations and Community Partnerships deliver activities that help reduce social isolation and loneliness while also addressing wider economic inequalities. • Benn Partnership Centre (BPC) • Brownsover Community Association (BCA) • Long Lawford Community Association (LLCA) • New Bilton Community Association (NBCA) • Newbold on Avon Community Partnership (NOACP) • Overslade Community Association (OCA)	They each received £8,240, and an optional £1,000 to administer microgrants in consultation with local Ward Members.
WCAVA	Community and voluntary infrastructure support.	£39,600*
Rugby Foodbank	Support for emergency food donations.	£8,792
BRANCAB	Provision of advice to the residents of the borough.	£73,000*
* The contract commenced on 1 April 2023 for an initial two-year term, with an option to extend for a further two years. Delegated authority was granted to the Chief Officer for Communities and Homes, who exercised the extension option in 2025/26.		

IMPACT AT A GLANCE

COMMUNITY ASSOCIATIONS / PARTNERSHIPS

The organisations have delivered a wide range of inclusive, community-led activities for people of all ages and backgrounds:

- **Social groups** such as weekly meet-ups, craft nights and board games have helped reduce loneliness and strengthen social connections across the community.
- **Food support**, including warm meals and access to community fridges and pantries, has provided essential assistance for residents experiencing financial hardship.
- Initiatives such as community gardening and community orchards have **enhanced public spaces** while supporting both physical and mental wellbeing.
- **Free or low-cost exercise classes for all ages and abilities**, such as kickboxing and Pilates, have helped promote healthier, more active lifestyles.
- **Educational opportunities**, including ESOL classes, computer literacy support and job-seeking assistance, have empowered individuals by building new skills, confidence and pathways to employment.

WCAVA (RUGBY)

- A total of **172 organisations** were supported with setting up, developing policies, volunteering, finding funding opportunities and securing funding, as well as promoting services and events. This enabled many not-for-profit groups to grow and better engage with their communities.
- Support in identifying funding opportunities led to **£205,672.08** secured, while volunteering activities generated an estimated **£1,467,977.40** in economic value.
- **403 volunteers** were placed into roles that helped them build skills, confidence, experience and increase capacity for local services to be delivered.
- The team held and contributed to **events**, such as the **WCC Rugby Library Careers Fair** strengthening local partnerships and promoting the services.

BRANCAB (RUGBY)

- Over the past year, Rugby Citizens Advice made a significant impact by supporting **5,309 clients**.
- **A total of 14,931 issues were addressed**, with the most common relating to **Benefits & Tax Credits and Debt**
- The support delivered resulted in outcomes worth over **£5.5 million**

Through expert guidance and practical help, Rugby Citizens Advice strengthened financial security and resilience for individuals and families across the borough, who are facing hardship.

RUGBY FOODBANK

- Rugby Foodbank **provided 5858 emergency parcels** to people in crisis in 2025-26.
- Rugby Foodbank and Hope 4 Rugby deliver more than emergency food – they offer practical support on cost-of-living pressures, financial advice and housing issues.

BENN PARTNERSHIP

ACTIVITIES OFFERED INCLUDE

Cooking Course for Men

The centre delivered four sessions during July and August 2025. All ingredients and cooking equipment were provided. The sessions were very well attended and received positive feedback.

Free Exercise Classes, including:

- Children's Exercise Classes – free boxercise sessions for children aged 6–11.
- Women's Fitness Classes
- Tai Chi Based Classes
- Chair Based Exercise Sessions
- “Activity Den” with RBC Play Rangers – Weekly sports and play sessions delivered for children aged 5–11. This initiative was funded by the National Lottery Community Fund.
- Walking Group during the warmer months.

Gardening Club

The centre was awarded a Gold Award from Rugby in Bloom.

Weekly Meet & Eat Community Café

A welcoming community space where people can come together to share a free meal, meet others and enjoy conversation.

Community Fridge

Located near reception, the community fridge provides free food items for anyone in need. Supplies are provided through FareShare in partnership with local supermarkets such as Tesco.

ESOL Classes

English for Speakers of Other Languages (ESOL) classes are available four times a week to support language learning and integration.

WHAT'S ON THIS WEEK
AT BENN PARTNERSHIP CENTRE

EVERYONE WELCOME! **MAKE NEW FRIENDS, TRY SOMETHING NEW AND HAVE FUN!**

MONDAY
BPC WALKING GROUP
🕒 10:00am
Due to weather, we will have the walks from April to October.
📍 Meet at Benn Partnership Centre, Railway Terrace, Rugby CV21 3HR (Enquire at Reception)
👟

MONDAY
PEAS SOCIAL GROUP
🕒 10:00am – 12:00pm
Art, craft and other interesting activities.
£1 per session: Tea, coffee and juice available.
📍 Benn Partnership Centre, Railway Terrace, Rugby CV21 3HR
🎨

TUESDAY
TOP TWENTY MUSIC BINGO
🕒 10:30am – 11:30am
Sing and dance, clap your hands, tap your toes to amazing music bingo.
Fun for all! £2 donation.
📍 Lucas House, Railway Terrace, Rugby CV21 3HR ☎ 01788 553033
🎵

THURSDAY
EXPRESS ART GROUP
run by Rugby Art Gallery and Museum At Benn Partnership Centre
🕒 11:30am – 12:30pm
Term Time Only
Free to all
🖼️

FRIDAY
FREE MUSIC LESSONS FOR ADULTS
10:00AM EACH FRIDAY MORNING
🎤 **SINGING**
🎸 **GUITAR (classical)**
🎺 **TRUMPET**
🎹 **KEYBOARD/PIANO**
Please call: 01788 553033 or email: info@bennpartnership.org.uk to book your free lesson. Individual classes are also available at a fee.

FRIDAY
MEET AND EAT COMMUNITY CAFE
EVERY FRIDAY FROM 12:00PM TO 2:00PM
The Meet and Eat Community Cafe is a community space where anyone is welcome to come along to share a meal, spend time together, make friends and chat.
📸
We will from time to time have guests and advisors, to educate us on healthy living, energy saving, bills & debt management etc.
EVERYONE IS WELCOME.

ALL FOOD IS FREE!

📍 Benn Partnership Centre, Railway Terrace, Rugby CV21 3HR | ☎ 01788 553033 | 🌐 www.bennpartnership.org.uk

The poster was published on BPC Facebook page on 7 July 2026.

BENN PARTNERSHIP CENTRE

ACTIVITIES OFFERED INCLUDE – CONT.

Computer Literacy Support

For people wishing to improve digital skills, including using phone apps, internet browsers and email.

Work Club

Guidance and support with job searching, CV writing and completing / understanding job applications.

Advice and Support Appointments

Regular appointments to support residents with applications for visas, Universal Credit, housing, PIP and other benefits. Organisations such as BRANCAB (Rugby) and RBC signpost individuals to the centre for assistance.

Partnership Activities

Working in partnership with a range of organisations offering services at the centre, including OCD support group and Rugby Art Gallery & Museum who runs Express Art Group every week.

Benn Ward Community Fun Day 2025

Together with RBC, the Centre successfully secured National Lottery funding to hold the Benn Ward Community Fun Day in Millennium Green Park again. The event was a great success, with over 200 residents attending and providing positive feedback.

Thanks to the funding, all activities were free. These included play and sports sessions with RBC Play Rangers and Barnardo's, a circus skills workshop, face painting, free pizza slices in the park, and afternoon tea at the Centre. A fire engine was also in the park, giving children the chance to explore the equipment, and a number of organisations provided information stalls, including BRANCAB, Warwickshire Police, WCAVA and Act on Energy.



Benn Ward Community Fun Day 2026

NEW BILTON COMMUNITY ASSOCIATION

ACTIVITIES OFFERED INCLUDE

Community Gardens

NBCA maintains Jubilee Recreation Ground, Gladstone Green pocket park, and the New Bilton Community Orchard. The parks have received Green Flag Community Awards for several consecutive years and are cared for by volunteers and residents, who grow a range of pollinator-friendly plants. NBCA also supports Garden Organic and Warwickshire County Council's Kind Communities and Kind Food initiatives, promoting biodiversity and sustainable food growing through local and county-wide events.

Children's Play Sessions

In partnership with RBC, NBCA secured funding for free Play Ranger sessions in June - July 2025 at Jubilee Recreation Ground and Freemantle Play Park, offering children fun, active outdoor play during the summer.

Wednesday Drop-in at Rugby Quaker Meeting House

Weekly sessions provide social activities alongside practical support with job search, applying for benefits and financial support, and with everyday issues. Digital support is also offered to help residents build confidence using computers, smartphones and the internet.

Food Poverty & Financial Inclusion Support

NBCA supports local food initiatives by donating vegetables to the Christian Life Centre Food Hamper Project and running borough-wide cooking sessions focused on teaching residents how to cook affordable, healthy meals using air fryers, which participants receive on completion; NBCA distributed over 30 air fryers. NBCA also works with VCFS partners through the Community of Practice to tackle food inequality.

New Bilton Facebook Group

NBCA runs a growing community group with over 1,800 members, sharing job vacancies, wellbeing initiatives, local events and council updates.



Source: Rugby Borough Council Website

BENN AND NEW BILTON AREA ACTION PLANS

As part of the 2025–26 Benn Ward and New Bilton Ward Area Action Plans, we delivered the following activities in partnership with Benn Partnership Centre and New Bilton Community Association:

- **Benn Ward Community Fun Day 2025**
- **Green Flag Community Awards** in Gladstone Green and Jubilee Street Recreation Ground
- **Environmental Visual Audits** – carried out across Benn and New Bilton wards twice a year to identify and record issues of concern, such as fly-tipping and highways problems. Findings are then referred to the relevant agencies for action.
- **Free community activities for children and young people** –NBCA and BPC worked with RBC's Sports and Recreation Team to secure funding for free weekly activities. NBCA secured funding for Play Ranger sessions at Freemantle Play Park and New Bilton Recreation Ground every Friday during term time in June and July 2025, while BPC secured National Lottery funding for the weekly **Activity Den** sessions for children aged 5–11, held every Tuesday during term time.



The poster is for the 'Activity Den' in Benn Ward. It features a blue background with a large yellow banner at the top that says 'Activity Den'. Above the banner, it says 'Benn Ward' and 'Benn Partnership Centre'. There are logos for 'Play Rangers' and 'Rugby'. Below the banner, there are three photos of children playing. To the right, a green speech bubble says 'FREE SESSION Every Tuesday 4pm-5:30pm'. Below that, a light blue box says 'Funded by National Lottery Play Rangers bring FREE activity to Benn Ward for all children 5-11yrs Children under the age of 8 must have a guardian present'. At the bottom, it says 'for more information contact: playdevelopment@rugby.gov.uk' and 'Benn Partnership Centre, Railway Terrace, Rugby, CV21 3HR'. The bottom of the poster has a yellow banner that says 'PLAY. CREATE. EXPLORE' with a paintbrush icon.

Benn Ward

Activity Den

FREE SESSION
Every Tuesday
4pm-5:30pm

Funded by National Lottery
Play Rangers bring FREE
activity to Benn Ward for all
children 5-11yrs
Children under the age of 8
must have a guardian
present

for more information contact: playdevelopment@rugby.gov.uk
Benn Partnership Centre, Railway Terrace, Rugby, CV21 3HR

PLAY. CREATE. EXPLORE

BROWNSOVER COMMUNITY ASSOCIATION

ACTIVITIES OFFERED INCLUDE

Winter Family Project

Launched in October 2022, the project continued to run every Sunday throughout Winter 2025-26, offering hot and nutritious meals at no cost. Volunteers also offered signposting to local support services and organised activities for children, creating a welcoming and supportive environment for local families.

Buddy Club

Support with completing online forms, job searches and CV writing, benefits applications, digital access and signposting to relevant services.

Youth Club (Delivered by On Track, Funded by BCA)

A safe, welcoming space where children and young people can socialise, take part in organised activities and access support from trusted youth workers.

Lunch Club

The Lunch Club offers older and more isolated residents the opportunity to enjoy a freshly prepared meal while socialising with others. Sessions also include games and bingo, helping to reduce loneliness and strengthen community connections.

ESOL (English for Speakers of Other Languages)

Weekly two-hour ESOL sessions provide creative English language learning in a relaxed and supportive environment.

Citizens Advice Drop-in (funded by BCA)

Free advice and guidance on a range of issues.

Community Garden and Book Library

The Community Garden remains an open and well-used space for residents, also hosting an informal book library, where residents are encouraged to borrow, return and donate books.

LONG LAWFORD COMMUNITY ASSOCIATION

ACTIVITIES OFFERED INCLUDE

On Track Youth Club

The Community Associations funds RBC On Track to deliver weekly sessions in the village, offering a range of multisport and creative activities, that are well-attended.

Post Office and Mobile Library

The Post Office service is available to Long Lawford residents every week, and mobile library comes every three weeks.

The Telephone Box Project

LLCA funded the refurbishment of the old red telephone box, transforming an unused landmark into a valued community feature. The telephone box is regularly decorated to reflect different seasons and celebrations, such as Easter and Christmas.

Supporting the Graveyard Project

The LLCA supports the group working to improve the local graveyard. Recent work includes the installation of raised beds, which are being maintained by dedicated volunteers. Accessibility has also been enhanced through the addition of a new pathway, which has been assessed with wheelchair users, as well as the installation of a new gate.

Supporting the Lawford Summer Festival

This popular annual event is well attended by residents of the Lawfords. It features craft stalls, children's activities, live music, food and drinks, offering something for everyone to enjoy.

Supporting groups deliver activities in the village

The LLCA continues to support local community groups, including Ladybirds, Brownies and Pilates classes; Funding has been provided to help cover local Brownies' affiliation costs, helping to keep weekly fees affordable for current members. The LLCA also funds Chair Pilates classes so they can be offered at a discounted price for residents.



Source: Facebook

NEWBOLD ON AVON COMMUNITY PARTNERSHIP

ACTIVITIES OFFERED INCLUDE

Newbold Pantry

Residents of Newbold and Long Lawford can become members for just £5, giving them access to food worth significantly more. Members will always find a wide range of items available, including fresh, frozen and long-life foods, as well as fruit, vegetables and essential non-food items.

Allotment Growing Workshops with Garden Organic

A free workshop where attendees learned about sustainable food growing, including composting, seasonal planting and how to plan and manage their allotment plots.

Fruit Trees - Creating a Community Orchard

Residents worked alongside colleagues from Rugby Borough Council and Warwickshire County Council to establish a new community orchard, planting fruit trees at Centenary Park on Parkfield Road.

Free Kickboxing Sessions

Free sessions led by qualified instructors, open to participants of all ages and abilities.

Free Cooking Classes

The Chapel Newbold hosted four cooking sessions focused on nutritious and budget-friendly recipes that are easy to follow. Each session was attended by 12–16 participants. At the end of the four-week course, participants who completed the course received air fryers.

Music Sessions with School of Rap CIC

The School of Rap CIC offers workshops for kids and adolescents focusing on beatmaking, lyricism, rapping, music production and performing.



Newbold Pantry. Source: Facebook

OVERSLADE COMMUNITY ASSOCIATION

ACTIVITIES OFFERED INCLUDE

Craft & Cake Nights

A relaxed evening where people bring along their craft projects, enjoy cake and share time together with others.

Board Game Nights

Opportunity for residents to grab their favourite game and pop in for a fun-filled evening of gaming.

Overslade Gardening Club

A welcoming group for people of all gardening abilities, offering free tea and coffee in a friendly space. In partnership with Garden Organic, the club focuses on easy-to-grow crops for beginners. The Centre also hosted an afternoon of Spring activities with Garden Organic, including making an apple bird feeder.

Overslade Warm Hub

A welcoming space offering free hot and cold drinks, an affordable lunch option and free Wi-Fi. Held every other Wednesday during the colder months.

Community Space

The Overslade Community Centre is a well used space by many organisations delivering community activities, such as Brownies, Rugby Yoga and Take A Break.

Christmas Warm Hub

In addition to their regular hub, the Centre also held an all-day Warm Hub on Christmas Day, offering a welcoming, warm space with food, drink and company.

Following the cancellation of the Benn Partnership Centre's annual Christmas Day lunch due to their chef's illness, Overslade kindly stepped in at short notice; They centre invited all guests to attend their Christmas Day lunch instead, ensuring everyone still had a place to go and a warm meal to enjoy.



MICROGRANTS

Some of the projects funded through the microgrants programme

Brownsover Brownies

The microgrant covered weekly rental costs, ensuring Brownie sessions could continue without increasing fees for families who may already be under financial pressure. It effectively allowed to free up other income to benefit the group with more enriching and valuable activities. The project benefitted 24 brownies and a team of young leaders.

People Enjoying Art Socially

The microgrant helped cover stationery and art supplies needed to run weekly craft sessions at the Benn Partnership Centre. Around 40 people have taken part, including people with health conditions and those on low incomes. The group brings together a wide age range (25–80) and a rich mix of cultures, which has helped create a friendly space where people share experiences, learn from each other and connect across generations.

School of Rap

The microgrant covered the costs of 6 tutoring sessions with a professional music producer and youth worker at the Newbold Village Hall. The School of Rap CIC Quarry Clan is a youth project using rap, lyric writing and music production to help young people express themselves and build confidence in an inclusive environment.

Make Lunch Rugby

The microgrant funded a visit to Yum Yum World soft play for 29 children and their carers who attend Make Lunch Rugby. Make Lunch Rugby provides hot, nutritious meals and enrichment activities for families at risk of hunger during the school holidays, delivering 12 sessions each year with activities aimed at primary school-aged children. The visit was organised to bring these families together, helping to build a supportive community among those experiencing financial and social hardship, while providing a fun experience for children and their carers.

School of Rap

The group created "Love Rugby Song" (2025) – *'A Heartfelt Anthem of Community and Pride Produced by School of Rap CIC Rugby as the emotional centrepiece of the 2025 Love Rugby Festival, the song "Love Rugby" is a powerful and uplifting tribute to the town's deep roots.'*

Source: Instagram: [school_of_rap_cic786](#)



WCAVA

Supported 172 organisations through:

Organisational Development & Governance

- Supported community organisations to develop robust policies, strengthen governance, and improve organisational effectiveness.
- Delivered governance "health checks" for the Community Associations and Partnerships under SLAs.

Volunteering Support

- **466 Volunteers recruited.**
- **403 Volunteers placed.**
- **£1,467,977 Economic value of volunteering.**
- Connected residents with volunteering opportunities to build skills, confidence, experience and improve employability.
- Supported organisations to recruit volunteers and board members.
- Worked with schools, colleges, The King's TRust and alternative education providers to create meaningful volunteering opportunities that enhance CVs, while developing skills, confidence and personal growth.
- Connected with a wide range of people through organisations that support employment, health, resettlement and community engagement to promote volunteering opportunities and provide ongoing support throughout their volunteering journey.

Funding & Project Development

- **Helped secure £205,672 in external funding.**
- Provided advice on funding applications, identified suitable funding opportunities and connected organisations with appropriate funders.
- Organised "Meet the Funder" events to connect organisations with funding providers and raise awareness of available grant opportunities.

Promotion & Communications

- Supported organisations to promote their services and activities through social media and newsletters, helping increase their reach.

Community Engagement

- **3,707 Attendees reached**
- Organised and supported a range of community events, including the Benn Ward Community Fun Day 2025 and local job fairs, helping to engage residents of all ages and backgrounds and promote available services and opportunities.

Networking & Partnership Building

- Supported networking and collaboration across the VCS, drawing on extensive knowledge of organisations operating across the borough and beyond.



RUGBY FOODBANK

Emergency Food Support

5858 parcels issued to people in crisis in 2025-2026. Compared to 2024-25, this represents a 3% increase in the total number of emergency food parcels distributed. Around 35% of parcels issued are to feed children.

Top 3 wards:

- Benn: 733 vouchers fulfilled
- Newbold and Brownsover: 359 vouchers fulfilled
- New Bilton: 309 vouchers fulfilled

Holistic Support Beyond Food Provision

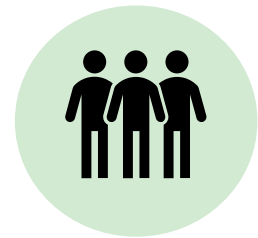
Rugby Foodbank and Hope 4 offer a comprehensive approach that goes beyond emergency food assistance; Alongside food support, they provide **guidance on a range of issues, including cost of living pressures, financial advice and housing support.**

Collaborative Community Partnerships and Referrals

Rugby Foodbank also works closely with other voluntary, community and faith-based organisations. This collaboration **includes receiving food donations as well as mutually supporting clients through referrals, ensuring people are connected to the right services at the right time.**

BRANCAB

IMPACT AT A GLANCE



5,221 Clients



14,931 Issues



£5,593,772 Financial Impact



**Top 3 wards accessing support:
Benn, Brownsover & Newbold on
Avon, and New Bilton**

Financial Impact = £5,593,772

including:

- £1,814,061 in Income Gain
- £2,166,465 in Debts Written Off
- £122,521 Repayments Scheduled
- £64,158 in Re-imbursements, Services, Loans

Top 3 Issues:

- 3951 Benefits and tax credits
- 3296 Debt
- 1074 Benefits Universal Credit

Supporting Clients with Complex and Multiple Needs

Rugby Citizens Advice often supports clients who present with **multiple, distinct issues**, such as a consumer problem alongside an employment matter. In these cases, a separate case is opened for each issue to ensure they are managed effectively. This approach enables **clients to receive holistic support**, recognising that their circumstances are often complex and span different areas of advice.

Rugby Citizens Advice is **committed to addressing the full range of issues** clients face, ensuring each is given the appropriate attention and expertise.

BRANCAB

ANONYMISED CASE STUDY

Vicky is a hardworking, single mum of a teenager, who is studying at college. Vicky arrived at the Rugby Citizens Advice drop-in session in September 2025, requesting a foodbank voucher. After Vicky's wages are deducted from the UC award, she receives just enough Universal Credit (UC) to cover her monthly council tax bill, and a bit leftover towards food. Due to a genuine error on Vicky's part, the child element of the UC was removed in June - Vicky thought that she needed to report that her child was in full-time education each year, not once at the start of the education. Vicky had been trying to get UC to overturn the decision and had all the information requested to upload onto her UC account. However, UC were making it difficult for Vicky to submit the information and re-instate the Child Element. By now, Vicky had got into arrears with her council tax.

How BRANCAB helped:

- BRANCAB helped Vicky to post messages on her UC journal and called the UC helpline with her. The issue was not being resolved, and BRANCAB assisted Vicky to submit a formal complaint to the DWP due to the poor administration of this case.
- BRANCAB supported Vicky with food bank vouchers throughout the period that this was being resolved.
- The complaint was upheld, and the child element of UC was reinstated and backdated.

Financial Outcomes:

- 6 months backdated child element of UC: **£2,034**
- A further 6 months of the child element of UC until her child finishes education: **£2,034**
- 6 food bank vouchers: **£450**
- **Total: £4,518**

CONTRIBUTION TO THE COUNCIL'S CORPORATE STRATEGY 2025-2035

Examples of how the services and activities offered by the Community Associations / Partnerships, WCAVA, BRANCAB and Rugby Foodbank in 2025-26 contributed to the objectives of the RBC's Corporate Strategy.



A HEALTHIER RUGBY

To support people to live healthier, longer and more independent lives.

- Advice and support with understanding and applying for benefits, housing and other assistance, as well as signposting to relevant services
- Running and enabling social groups
- Providing / enabling activities for children and families
- Food support
- Offering volunteering opportunities and supporting and connecting with volunteers
- Offering / working with organisations that provide exercise opportunities
- Offering opportunities to make friends and a friendly, safe space to spend time

A THRIVING RUGBY

To deliver a thriving economy which brings borough-wide investment and regenerates Rugby town centre.

- Skills development and employment support
- Supporting delivery of events that attract residents
- Creating safe and welcoming spaces
- Collaborating with local businesses
- Initiatives to improve public spaces such as maintaining community gardens

A GREENER RUGBY

To protect the environment and ensure the borough adapts to climate change

- Community gardens – ongoing maintenance and planting of a diverse range of pollinator-friendly plants to support local biodiversity and attract beneficial insects
- Green Flag Award
- Reducing food waste – working in partnership with shops to support people facing food poverty, while also actively tackling food waste through redistribution

SUMMARY

It has been another great year for the VCS organisations we support.

The Community Associations and Partnerships continued to provide activities for people of all ages and backgrounds, with opportunities to make connections and build new friendships through different events and weekly activities (e.g. the Community Café at Benn Partnership Centre, Board Game Nights at Overslade Centre) as well as access a wide range of support, including help with job searches, benefit applications, and skills development through computer literacy support sessions and English classes. Residents, including children, could access sports activities tailored to different abilities, either for free or at a reduced price.

Rugby Foodbank provided 5858 emergency food parcels in 2025-26. Their support extends beyond food provision, with Rugby Foodbank and Hope 4 offering guidance on issues including cost of living pressures, financial advice and housing support.

Rugby Citizens Advice (BRANCAB) continues to provide free specialist advice and practical support to residents facing complex challenges. In 2025-26, they supported 5,221 clients with 14,931 issues, ensuring residents received appropriate advice and expertise.

WCAVA strengthens the wider voluntary and community sector through volunteer development, partnership working and organisational support. Their expertise helps organisations maintain effective governance, secure funding and develop sustainable services. In 2025-26, WCAVA helped secure £205,672 in external funding for community activities and supported residents into volunteering opportunities, with 466 volunteers recruited and 403 volunteers placed, helping them develop skills and confidence.

Together, these organisations play a vital role in supporting residents before issues reach crisis point. Their local knowledge, trusted relationships and ability to respond flexibly to community needs make them a first point of contact for many people seeking support.



Appendix 2

EQUALITY IMPACT ASSESSMENT (EqIA)

Impact of Voluntary and Community Sector Support 2025/26

For Cabinet on 8 Sep 2026

Approved by	Mary Jane Gunn
Policy being assessed	Impact of Voluntary and Community Sector Support 2025/26
Service Area	Communities & Homes
Name of Officer completing the assessment	Vanessa Niemczewska
Other Officers involved	
Date of this assessment	14 Jul 2026
Date of review	8 Sep 2027

<u>Stage 1 – Policy to be analysed</u>	
(1) Describe the main aims, objectives and purpose of the Policy?	This Equality Impact Assessment and the associated report details the proposed support of the Voluntary and Community Sector by Rugby Borough Council in 2025/26.
(2) How does it fit with Rugby Borough Council's Corporate priorities and your service area priorities?	This initiative will contribute to the following outcomes of the Corporate Strategy 2021 – 2024: • Outcome 1 Environment “Rugby is an environmentally sustainable place, where we work together to reduce and mitigate the effects of climate changes • Outcome 2 Economy “Rugby has a diverse and resilient economy that benefits and enables opportunities for all residents” • Outcome 3 Health and Wellbeing: “Residents live healthy, independent lives, with the most vulnerable protected”
(3) What are the expected outcomes you are hoping to achieve?	The proposals will enable our voluntary and community sector to achieve the following outcomes: The delivery of projects/activities and services that contribute to: • the well-being of the community • tackling issues of isolation and loneliness • supporting more vulnerable groups • tackling social exclusion • tackling issues of financial exclusion • combat food poverty • working collaboratively with other partners and agencies to deliver the above, avoid duplication as well as ensure the best use of resources

(4) Does or will the policy affect: • Customers • Employees • Wider community or groups	Wider Community or Groups, Customers, Employees This decision is expected to have a positive affect/impact on residents of Rugby, the wider community and groups in Rugby – This is demonstrated annually through an Impact Assessment. The proposed funding will be focused on supporting residents and helping them avoid crisis. Our employees will monitor the contracts and SLA's and work collaboratively with the organisations we support. This proposal offers our community associations, community partnerships and the Foodbank surety of funding to help them provide much needed core services in our priority areas in terms of deprivation.
(5) Will the policy involve substantial changes in resources?	No
(6) Is a full Equality Impact Assessment needed? If no, please give reason why.	Yes
(7) Please describe how the policy will meet the aims of the Equality Duty: a. Eliminate unlawful discrimination, harassment, victimisation and any other unlawful conduct prohibited by the act b. Advance equality of opportunity between people who share and people who do not share a relevant protected characteristic c. Foster good relations between people who share and people who do not share a relevant protected characteristic	Equality will be promoted by: - Support for the community associations and community partnerships is targeted in our most deprived wards. - Those community associations and community partnerships undertake a range of projects that deliver services but also enable an understanding of the issues facing those communities. - The report proposes additional activity, such as research and development of a community supermarket for Rugby that will aim to tackle in equalities in access to healthy food.

<u>Stage 2 – Evidence about user population and consultation</u>				
(1) What does the data tell you about the groups this policy impacts?		The report contains an appendix (4) that provides an evidence base for the proposals contained within the report.		
Additional evidence can be found:		[Appendix 4] AGENDA Cabinet 2 December 2024 (2).pdf		
(2) Have you consulted or involved those groups that are likely to be affected by the policy you want to implement? If yes, please state which groups were involved in the consultation and what were their views and how have their views influenced the policy? If you have not consulted or engaged with communities that are likely to be affected by the policy, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary		Yes We have consulted and involved those groups that will be affected by this decision. We have quarterly meetings with our community associations and community partnerships who report to us on the activities they are delivering to support residents in their localities. We monitor and support the Foodbank through the Rugby Homeless Forum and our regular contact with them.		
<u>Stage 3 – Analysis of impact</u>				
(1) <u>Protected Characteristics</u> From your data and consultations, are there any positive or negative impacts identified for any particular group? If left blank, this means that no impacts have been identified for this group.		Protected Characteristic	Nature of Impact Positive, Negative, Both	Explain why
		Age		
		Disability		
		Sex		



	Gender reassignment		
	Marriage/civil partnership		
	Pregnancy/maternity		
	Race		
	Religion/belief		
	Sexual Orientation		
(2) <u>Cross cutting themes</u>	Description of impact	Nature of impact Positive, Negative, Both	Explain why



	Socio-economic e.g.: child poverty, income level, education level, working hours/occupation, family/social support, access to good nutrition	Positive	Our proposals will impact on child poverty and geographically disadvantaged communities, by supporting residents: - To access very local support offered by their community associations and community partnerships who are best placed to understand and meet local needs. - To access the wealth of support offered by the foodbank including signposting to the Bedworth, Rugby and Nuneaton Citizens Advice Bureau (Brancab)
	Environmental e.g.: housing status, transport links, geography, access to services, air quality, noise pollution	Positive	the VCS organisations, that the Council funds, offer services that improve access to local services, especially in more deprived wards.
(4) Are there any barriers to accessing the service? If yes, how can they be overcome?	No		



(5) What data will be collected to analyse impact? How will the data collected be used?	We hold quarterly meetings with our community associations and community partnerships, during which they report on the activities they are delivering to support residents in their local communities. These meetings enable us to monitor the impact of their work and ensure they are meeting the objectives set out in their SLA. We monitor and support the Foodbank through the Rugby Homeless Forum, as well as through our regular engagement with the organisation. Both BRANCAB and WCAVA provide detailed quarterly reports, and we maintain regular communication with both organisations to monitor progress, discuss any emerging issues and provide support where needed.
(6) Complete this section if any adverse impacts were identified in 3.1. Outline any actions that will be taken to remove or mitigate the adverse impacts identified in 3.1 to ensure that no discrimination is taking place. If removing or mitigating the impact is not possible, you may in certain circumstances, justify the discrimination. If that is the case, please give evidence for why justifying is possible in this case.	
<u>Stage 5 – Review</u> not to be completed on initial assessment	

(1) What evidence of impact has been collected?	Evidence includes the delivery of social groups to reduce loneliness, food support through warm meals and community pantries, community gardening projects, free exercise sessions, and educational opportunities such as ESOL, digital skills and employment support. In 2025/26, WCAVA supported 172 organisations, helped secure £205,672.08 in funding, placed 403 volunteers into roles, and generated an estimated £1,467,977.40 in volunteering economic value. BRANCAB supported 5,309 clients, addressed 14,931 issues, and helped secure outcomes worth over £5.5 million, improving financial resilience for residents experiencing hardship. Rugby Foodbank provided 5858 emergency parcels to people in crisis and, alongside Hope 4 Rugby, offered wider support with cost-of-living pressures, financial advice and housing issues. Collectively, this evidence demonstrates that the VCS organisations we support are helping to reduce the impact of child poverty and supporting residents in geographically disadvantaged communities by improving access to food, financial advice, employment support, volunteering opportunities and inclusive community activities.
Additional evidence can be found:	Impact Report VCS 2025-26 Appendix 1 (1).pptx



(2) Were the impacts as expected from the original EqlA?	Yes. The Voluntary and Community Sector organisations in receipt of funding from Rugby Borough Council continue to deliver valued services and support to communities across Rugby. These services are inclusive and accessible, helping to reduce barriers for disadvantaged groups, and contribute to the objectives of the Corporate Strategy 2025–35, in relation to health and wellbeing, economy and environment. The services offered by the organisations positively impacted child poverty and geographically disadvantaged communities by providing free access to food, advice, regular activities and practical support. This included community fridges, meals, cooking courses, financial advice, ESOL and digital support and community initiatives offered to all ages. In terms of protected characteristics, whilst the original EqlA (Cabinet 2 December 2024) did not identify any impacts, the review found that during 2025–26 the services offered by the organisations had positive impacts on several groups: - Age - Activities were available for people of all ages, this includes volunteering opportunities, youth clubs, Play Ranger sessions, Brownies, Lunch Clubs, chair-based exercise classes and community activities that helped reduce social isolation. - Sex – Women's fitness classes and cooking courses for men - Race – ESOL classes supported people whose first language is not English, helping to improve communication, confidence and integration within the community. - Pregnancy and Maternity – free / more affordable sessions for children, mother and toddler group, sports and play activities during the summer holidays.
(3) Will there be any changes made as a result of this review?	No - no changes will be made as a result of this review.

Impact of Voluntary and Community Sector Support 2025-26

Appendix 3

SLA for the Community Associations/Community Partnerships 2025-26

1.0 Objectives:

The grant funding from the council will be awarded to support the organisation in meeting the following objectives:

1. Understanding the needs of the community they support, for example through community surveys, community consultation and events that engage the local community.
2. Enabling people to take an active role in their community, for example through facilitating neighbourhood watch, residents groups and gardening projects.
3. Providing / enabling activities and services which contribute to:
 - the well-being of the community
 - tackling issues of isolation and loneliness
 - supporting more vulnerable groups
 - tackling social exclusion
 - tackling issues of financial exclusion
 - combat food poverty
 - working collaboratively with other partners and agencies to deliver the above, avoid duplication as well as ensure the best use of resources
4. Provide activities which recognise Rugby Borough Council's Corporate Strategy 2025-2035:
 - **A Healthier Rugby** - to support people to live healthier, longer and more independent lives.
 - **A Thriving Rugby** - to deliver a thriving economy which brings borough-wide investment and regenerates the town centre
 - **A Greener Rugby** - to protect the environment and ensure the borough adapts to climate change
 - **A Fair Rugby** - to reduce inequalities and improve housing across the borough

The organisation will have at their disposal annually £1000 in order to distribute microgrants to organisations in their ward that support the above objectives. Microgrants to be distributed in line with the criteria agreed by RBC and WCAVA.

2.0 SLA payment triggers:

Payments will be triggered by the following:

- Completion of an annual organisational health review in respect of governance, required policies and insurances. An instalment equivalent to 20% of the annual SLA payment will be triggered by completion of this review.
- Completion and/or update of the Community ProEngagement in quarterly review meetings with officers of the Communities and Projects Team, to discuss progress in achieving the objectives outlined in 1.0. The completion of each review meeting will trigger SLA payment.

AGENDA MANAGEMENT SHEET

Report Title:	Councillor Grants Scheme 2026/27 – Delegation of Authority to Determine Individual Awards
Name of Committee:	Cabinet
Date of Meeting:	8 September 2026
Report Director:	Strategic Director – Communities/Chief Officer – Legal and Governance (Monitoring Officer)
Portfolio:	Communities, Housing and Safety
Ward Relevance:	All Wards
Prior Consultation:	Portfolio Holder
Contact Officer:	John Murphy, Chief Officer Legal and Governance, Monitoring Officer
Public or Private:	Public
Report Subject to Call-In:	Yes
Report En-Bloc:	No
Key Decision:	No
Corporate Priorities:	This report relates to the following priority(ies): ☒ A Healthier Rugby – To support people to live healthier, longer, and more independent lives. ☐ A Thriving Rugby – To deliver a thriving economy which brings Borough-wide investment and regenerates Rugby Town Centre. ☐ A Greener Rugby – To protect the environment and ensure the Borough adapts to climate change. ☒ A Fairer Rugby – To reduce inequalities and improve housing across the Borough. Corporate Strategy 2025-2035 ☒ The Councillor Grants Scheme forms part of the ‘Liveable Neighbourhoods’ programme within the Corporate Strategy 2025-2035.
Summary:	To close a governance gap by delegating to a named officer post the authority to determine individual awards under the Councillor Grants Scheme 2026/27, within the policy and budget already approved by Council on 9 February 2026,

and to authorise a consequential minor amendment to the Constitution.

**Local Government
Reorganisation Implications:**

None arising from this report.

Financial Implications:

None arising from this report. The scheme budget of £126,000 (£3,000 per member across 42 members) was approved by Council on 9 February 2026 as part of the Liveable Neighbourhoods growth item. This report concerns only the authority to determine individual awards within that approved budget; it does not authorise new expenditure.

**Risk Management/Health and
Safety Implications:**

Determinations to approve or decline individual awards are currently being taken without an express constitutional basis, exposing those decisions to challenge on vires grounds. Placing the delegation on a clear footing before further awards are declined and contested reduces legal and reputational risk. No health and safety implications arise.

Environmental Implications:

None arising directly from this report.

Legal Implications:

As detailed in the report. The grants function rests with the Executive under Part 2A, s.5.5(e)(i) of the Constitution. Part 2B (Scheme of Delegation to Officers) contains no express delegation for this scheme. The recommended delegation is a matter for the Executive; the consequential Part 2B entry may be made by the Monitoring Officer under Article 15.2(a)(ii).

Equality and Diversity:

The Council has considered the relevant equality and diversity implications. The scheme, and the determination of awards under it, will be administered consistently across all wards and irrespective of the political affiliation of the nominating member. None are directly arising from this report.

Options:

As detailed in the report.

Recommendation:

As detailed in the report.

**Reasons for
Recommendation:**

As detailed in the report.

Cabinet - 8 September 2026

Councillor Grants Scheme 2026/27 – Delegation of Authority to Determine Individual Awards

**Public Report of the Strategic Director – Communities/Chief Officer
- Legal and Governance (Monitoring Officer)**

Recommendation

Cabinet:

- (1) notes the governance gap identified by the Monitoring Officer, namely that no express delegation to officers is contained in Part 2B of the Constitution for the determination of individual Community Grant and Direct Local Action awards under the Councillor Grants Scheme 2026/27, that function resting with the Executive under Part 2A, s.5.5(e)(i);
- (2) delegates to the post of Communities & Projects Manager the authority to determine (that is, to approve or to decline) individual Community Grant and Direct Local Action applications under the Councillor Grants Scheme 2026/27, in accordance with the policy and budget approved by Council on 9 February 2026, with authority to authorise a named officer post within Communities & Projects to exercise that function on their behalf under paragraph 1(b) of the Part 2B Introduction;
- (3) requires that each determination be recorded formally by way of a written decision record, and that the delegation be exercised at, or countersigned at, Assistant Director level, to ensure decisions are taken at a level appropriate to withstand any perception of member pressure; and
- (4) notes that, following this decision, the Monitoring Officer will insert a corresponding express entry into Part 2B under Article 15.2(a)(ii) of the Constitution, taking immediate effect, and will report that change, for information only, to the next ordinary meeting of Full Council. No Full Council decision or resolution is required to give effect to this delegation.

1. Executive Summary

- 1.1. The Councillor Grants Scheme 2026/27 allocates £3,000 to each of the Council's 42 ward members (£126,000 in total) to support ward-specific Community Grants and Direct Local Action. The budget and policy concept were approved by Council on 9 February 2026 within the Liveable Neighbourhoods growth item.

- 1.2. Under the scheme, each member decides how to direct their allocation (the democratic decision), while officers carry out eligibility, governance, procurement and financial checks and determine whether an individual award may proceed (the administrative decision).
- 1.3. The Monitoring Officer's review has identified that no express delegation to officers exists in Part 2B of the Constitution for the determination of individual awards. On the face of the Constitution the function rests with the Executive under Part 2A, s.5.5(e)(i) ('Grants to community and voluntary organisations'). Officers are therefore determining awards without a confirmed constitutional basis.
- 1.4. Nominations opened on 17 August 2026. Closing the gap now, by an express Executive delegation, places the officer determination of awards on a secure footing and removes the risk of a declined award being challenged on the ground that the decision-maker lacked authority.

2. Recommendations

- 2.1. As set out in the Recommendation box above: that Cabinet delegate the determination of individual awards to the post of Communities & Projects Manager within the approved policy and budget, subject to formal recording and an appropriate decision level, and note the consequential Part 2B amendment to be made by the Monitoring Officer.

3. Reasons for Recommendations

- 3.1. To ensure that decisions to approve or decline individual awards are taken by an officer who holds a clear and express delegated authority, and to protect those decisions — and the members and applicants who rely on them — from challenge.
- 3.2. To do so by the route that actually confers the authority currently missing: a delegation from the body that holds the function (the Executive), followed by a recording amendment to the Scheme of Delegation.
- 3.3. Because the function is already an Executive function, this route does not require a Full Council decision or a Full Council amendment process; it can therefore be completed on the Executive's own authority and takes effect immediately.

4. Details

4.1 Background

- 4.1.1 The Councillor Grants Scheme 2026/27 was established through the Cabinet Report of 9 February 2026 (Council Tax Base 2026/27, General Fund Budget and Medium Term Financial Plan). That report allocated £3,000 to each ward member to progress ward-specific schemes — addressing matters such as fly-tipping, anti-social behaviour, littering, the support of local community groups and the protection of green spaces — as part of the Liveable

Neighbourhoods programme. It established both the £126,000 budget and the policy concept.

- 4.1.2 The scheme operates through two routes: a Community Grant (a grant to a constituted community or voluntary organisation) and Direct Local Action (works or activity commissioned directly). Members decide how to direct their allocation to reflect ward priorities; officers complete eligibility, governance, procurement and financial checks and determine whether an award may proceed. A single organisation may receive no more than £5,000 across the programme year.

4.2 The governance gap

- 4.2.1 The 9 February 2026 report established and funded the scheme, but it did not delegate to officers the authority to determine individual awards. That is a separate decision, and it has not been located.
- 4.2.2 Checked against the Constitution (December 2025 issue): Part 2A, s.5.5(e)(i) lists 'Grants to community and voluntary organisations' within the Communities and Homes, Regulation and Safety Portfolio. On the face of the Constitution the function therefore sits with the Executive, not with officers. Part 2B (Scheme of Delegation to Officers) contains no entry naming the Councillor Grants Scheme, Community Grants or Direct Local Action. Where the Council has delegated grant-determination powers to officers elsewhere — for example landscape conservation, listed-building and local environmental improvement grants at Part 2B, para 2(t)(iii) — it has done so expressly and narrowly, 'in accordance with policy and budget provision'. No equivalent entry exists for this scheme.
- 4.2.3 The only basis presently available to officers is the general day-to-day administration power in paragraph 1(a) of the Part 2B Introduction ('day-to-day management and routine administration ... within approved budgets'). That power is a sound basis for administering a fully-approved scheme, but it is a thin basis for a discretionary decision to approve or, in particular, to decline an individual award, which is the point most likely to be tested.

4.3 Why this matters now

- 4.3.1 Nominations opened on 17 August 2026. Members were briefed on 11 August 2026, with a further session planned for September. It was identified that highlighted the boundary between a member's democratic decision and an officer's administrative decision, including whether there is any appeal against an officer's refusal, at what officer level decisions are taken, and how consistency and transparency are assured. The scheme's profile and the cross-party interest in it make a clear, citable basis for officer determinations the prudent course.
- 4.3.2 Because determinations have been made since 17 August 2026 under the general administration power, the recommendation includes a limb confirming that those determinations stand, so that the position both before and after this decision is clear on the record.

4.4 Options

- 4.4.1 **Option A** — Executive delegation to a named officer post (recommended). A short Executive decision delegating to the post of Communities & Projects Manager the authority to determine — to approve or to decline — individual Community Grant and Direct Local Action awards, within the policy and budget approved on 9 February 2026. This mirrors the drafting already used for conservation grants ('Determine applications ... in accordance with policy and budget provision'). This is the route that confers the authority currently missing and is capable of taking effect immediately. It does not require a decision of, or a resolution by, Full Council: the underlying function is already held by the Executive, and the consequential Part 2B entry is made by the Monitoring Officer under the minor-change power at Article 15.2(a)(ii), taking immediate effect and reported to Full Council only for information. This is the recommended route.
- 4.4.2 **Option B** — Full Council resolution. Council could instead resolve to endorse the scheme and delegate its administration to officers. This is procedurally heavier and slower, and is not legally necessary because the Executive already holds the underlying function; it would, however, provide a higher-profile endorsement if that were considered desirable given the scheme's profile.
- 4.4.3 **Option C** — Constitutional amendment alone. Amending Part 2B to add a delegation entry, without an underlying Executive or Council decision behind it, would not be effective. The Monitoring Officer can record a delegation but cannot create one — the delegation must come from the body that holds the function. This option is set out only to rule it out.
- 4.4.4 **Option D** — Do nothing. Continuing to rely solely on the general administration power, now that the gap has been identified and documented, is not recommended.

4.5 Implications

- 4.5.1 In the writing of this report, taking into account financial, legal, staffing, risk, equality and diversity, climate change, and any other key issues, the following implications have been considered.

4.6 Financial

- 4.6.1 There are no financial implications arising from this report. The £126,000 budget was approved by Council on 9 February 2026. This report concerns only the authority to determine individual awards within that approved budget. As the expenditure has already been authorised, the delegation of its administration is not considered to constitute a new key decision within Article 13.4.

4.7 Legal

- 4.7.1 The grants function is an Executive function under Part 2A, s.5.5(e)(i). Part 2B contains no express delegation for the scheme. The recommended delegation is properly a matter for the Executive. Delegation runs to an individual post-holder and not to a group or board; the recommendation therefore delegates to the post of Communities & Projects Manager, with express authority under paragraph 1(b) of the Part 2B Introduction to authorise a named officer to act on that post-holder's behalf.
- 4.7.2 Once the Executive has made the delegation, the Monitoring Officer may insert a corresponding entry into Part 2B under Article 15.2(a)(ii) of the Constitution — a change 'required to be made so as to put into effect any decision of ... the Executive'. Such a change takes immediate effect and is reported to the next Full Council meeting for information. Neither the delegation nor the recording amendment requires the approval of Full Council; the mandatory report to Full Council is a notification, not a decision, and does not delay effect. Draft wording is at Appendix 1.

4.8 Risk

- 4.8.1 The principal risk is that an award declined by an officer without express delegated authority is challenged on the ground that the decision-maker lacked vires. The recommended route removes that risk prospectively and, through recommendation (4), addresses the position for determinations already made. Recording each determination formally, and taking or countersigning decisions at an appropriate level, further mitigates the risk of inconsistency or perceived member pressure.

4.9 Equality and Diversity

- 4.9.1 The scheme will be administered consistently across all wards and irrespective of the political affiliation of the nominating member. No adverse equality implications arise from this report.

Appendix 1 — Draft Part 2B Delegation Entry

Proposed insertion into Part 2B (Scheme of Delegation to Officers), Communities and Homes delegations, on the making of the Executive decision recommended in this report and mirroring the existing drafting at Part 2B, para 2(t)(iii):

Councillor Grants Scheme

() Determine applications for Community Grants and requests for Direct Local Action under the Councillor Grants Scheme, in accordance with policy and budget provision, and record each such determination formally.

The paragraph reference to be assigned on insertion. Change to be made by the Monitoring Officer under Article 15.2(a)(ii) and reported to the next Full Council meeting.

Name of Meeting: Cabinet

Date of Meeting: 8 September 2026

Subject Matter: Councillor Grants Scheme 2026/27 – Delegation of Authority to Determine Individual Awards

Originating Department: Chief Executive's Directorate

DO ANY BACKGROUND PAPERS APPLY

☒ **YES**

☐ **NO**

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink
1	Cabinet Report, 9 February 2026 — Council Tax Base 2026/27, General Fund Budget and Medium Term Financial Plan

Exempt information: None. This is a public report.

AGENDA MANAGEMENT SHEET

Report Title:	Future Hosting Arrangements for the Home Environment Assessment and Response Team (HEART)
Name of Committee:	Cabinet
Date of Meeting:	8 September 2026
Report Director:	Strategic Director - Communities
Portfolio:	Communities, Housing and Safety
Ward Relevance:	All
Prior Consultation:	Portfolio Holder, Senior Leadership Team, scrutiny committee (July 2026 meeting) and HEART Board.
Contact Officer:	Michelle Dickson - Strategic Director (Communities)
Public or Private:	Public
Report Subject to Call-In:	Yes
Report En-Bloc:	No
Key Decision:	No
Corporate Priorities:	This report relates to the following priority(ies): ☒ A Healthier Rugby – To support people to live healthier, longer, and more independent lives. ☐ A Thriving Rugby – To deliver a thriving economy which brings Borough-wide investment and regenerates Rugby Town Centre. ☐ A Greener Rugby – To protect the environment and ensure the Borough adapts to climate change. ☐ A Fairer Rugby – To reduce inequalities and improve housing across the Borough. Corporate Strategy 2025-2035 ☐ This report does not specifically relate to any Council priorities
Summary:	The HEART partnership comprises the district and borough councils in Warwickshire along with Warwickshire County Council. It is the conduit for the delivery of much of their mandatory Disabled Facilities Grant (DFG) function and wider housing adaptation work for private sector housing

(including that of Registered Providers – often referred to as Housing Associations).

Nuneaton and Bedworth Borough Council (NBBC), the current host authority for the Home Environment Assessment and Response Team (HEART), has formally notified the partnership that it will cease hosting the service from 1 April 2027.

**Local Government
Reorganisation Implications:**

On 16 July 2026, the Secretary of State for Housing Communities & Local Government declared their preferred option for Rugby to form part of the north for two new unitary authorities for Warwickshire.

This is a material consideration when developing a future delivery model to discharge these private sector housing duties.

Financial Implications:

None directly arising from this report.

**Risk Management/Health and
Safety Implications:**

This report sets out the intention of partners to develop new options for service delivery. A key issue will be the assessment of risks and opportunities associated with each identified option.

Environmental Implications:

None directly arising from this report.

Legal Implications:

The Council has duties under the Care Act 2014, Housing Act 1996, and Equality Act 2010 to support vulnerable residents, including those with disabilities and long-term conditions. The implementation of mandatory disabled facilities grant works supports compliance with these statutory responsibilities, particularly in relation to reasonable adjustments and promoting independent living.

Council housing disability adaptations fall outside of the scope of the mandatory Disabled Facilities Grant, and it is a requirement that they be funded via the Housing Revenue Account.

The Human Rights Act 1998. Article 8 of the European Convention on Human Rights (right to respect for private and family life and the home) is directly engaged by housing adaptation decisions for people with serious and progressive disabilities. The work undertaken by the Heart Partnership

supports compliance with the Human Rights Act 1998.

In offering 12 months' notice, the current host has acted in accordance with the conditions set out in the partnership agreement.

Any new operating model will need to ensure continued compliance with employment obligations and commercial contractual arrangements.

The range of implications will be identified and considered as the review of delivery options progresses.

Equality and Diversity:

The options identification and their subsequent evaluation will be supported by equality and diversity considerations.

Options:

These are in the process of being identified and being evaluated by the board and will form the basis of a future report for the consideration of the Scrutiny Committee. The feedback from scrutiny will be incorporated into a further report to Cabinet.

Recommendation:

Cabinet notes the:

1. Notice given by Nuneaton and Bedworth Borough Council to cease as host of the HEART project as of 31 March 2027.
2. Work in progress by the HEART board to generate options for the future delivery of disabled facility grants in Warwickshire
3. Intent to share the identified options for consideration by the Scrutiny Committee to help inform a recommended option for consideration by Cabinet

Reasons for Recommendation:

To ensure that Cabinet have oversight of the developing situation.

To utilise this opportunity to engage the views of the Scrutiny Committee in supporting the assessment of the identified options ahead of a recommended option being brought forward for consideration by Cabinet.

Cabinet - 8 September 2026

**Future Hosting Arrangements for the Home Environment
Assessment and Response Team (HEART)**

Public Report of the Strategic Director - Communities

Recommendation

Cabinet notes the:

1. Notice given by Nuneaton and Bedworth Borough Council to cease as host of the HEART project as of 31 March 2027.
2. Work in progress by the HEART board to generate options for the future delivery of disabled facility grants in Warwickshire
3. Intent to share the identified options for consideration by the Scrutiny Committee to help inform a recommended option for consideration by Cabinet

1.0 EXECUTIVE SUMMARY

- 1.1 The six Councils of Warwickshire currently work collaboratively in a formal partnership – HEART - to discharge their duties in respect of mandatory Disabled Facilities Grants for qualifying private sector households.
- 1.2 HEART is currently hosted by Nuneaton and Bedworth Borough Council, who have formally given notice of their intention to cease hosting (but to remain a partner) with effect from 31 March 2027. They have not given a reason for this decision.
- 1.3 The councils – through the HEART Partnership Board- are identifying and evaluating potential options for continued service delivery post the withdrawal of the current host.
- 1.4 The delivery of disabled facilities grants is mandatory and therefore there is no suggestion that this statutory responsibility will no longer be met. However, it is important to identify and evaluate potential delivery options (for example another host being appointed). These must take account of the recent announcement on the future of local government in Warwickshire.
- 1.5 On 16 July 2026, the Council's Scrutiny Committee was advised by the Portfolio Holder – Communities, Housing & Safety of the host's notice to step

down from that role on 31 March 2027. The committee expressed a wish to support the evaluation of identified options to assist the formulation of a recommended option for the consideration of Cabinet, during Autumn 2026

2.0 INTRODUCTION

- 2.1 HEART is a long-established partnership supporting residents to remain living independently in their home through housing adaptations and preventative interventions. The partnership currently includes Rugby Borough Council, Nuneaton and Bedworth Borough Council (host), North Warwickshire Borough Council, Warwick District Council, Stratford-on-Avon District Council working closely with Warwickshire County Council.

3.0 LEGAL CONTEXT

- 3.1 The Council has a duty under the Housing Grants, Construction and Regeneration Act 1996 to provide Mandatory Disabled Facilities Grants to eligible applicants. Funding is provided through the Better Care Fund and supports the national objective of enabling disabled people to live safely and independently at home.
- 3.2 The service also supports the Care Act 2014 wellbeing principles, Better Care Fund objectives, NHS prevention agenda and integrated neighbourhood working by reducing avoidable admissions, facilitating discharge and delaying the need for residential care.

4.0 LINKS TO THE COUNCIL'S CORPORATE STRATEGY

- 4.1 The service contributes directly to Rugby Borough Council's Corporate Strategy by protecting vulnerable residents, improving health and wellbeing, supporting independent living, strengthening partnerships and delivering efficient services. It also aligns with the Coventry & Warwickshire Integrated Care Board's ambitions to reduce health inequalities, improve population health, integrate health and housing and provide care closer to home.

5.0 LOCAL GOVERNMENT REORGANISATION IMPLICATIONS

- 5.1 NBBC's decision relates solely to the hosting function rather than their continued participation in the HEART partnership. Chief Executives across the partnership have sought clarification regarding the timing of the decision to cease hosting on 31 March 2027, given the scheduled vesting day for the new Warwickshire unitary authorities in April 2028.
- 5.2 Nevertheless it is essential to continue contingency planning to safeguard statutory service delivery in the intervening 12 months and beyond.

6.0 FINANCIAL IMPLICATIONS

- 6.1 Whilst the current report has no direct financial implications, a future report will be presented to Council that identifies a recommended option. This will include implications for consideration in respect of revenue costs, transition costs, ICT requirements, accommodation, management overheads, TUPE

implications where applicable, partnership contributions and sensitivity analysis.

- 6.2 Future arrangements must comply with the Housing Grants, Construction and Regeneration Act 1996, Better Care Fund conditions, procurement requirements, employment legislation, information governance legislation and any revised partnership agreement.

7.0 RISK MANAGEMENT

- 7.1 As part of the exercise to generate options for consideration, risks and potential benefits will be identified in readiness for more detailed evaluation when a preferred option is identified.

8.0 CONCLUSION

- 8.1 The requirement to identify a new host presents both a challenge and an opportunity to strengthen the long-term resilience of the HEART partnership.
- 8.2 Collaboration and decision making involving several stakeholders across a geographical area can introduce challenges in terms of achieving a consensus on what right looks like.
- 8.3 An outline of options will ensure Cabinet can make an informed decision that protects statutory service delivery, supports residents to remain independent and aligns with both Rugby Borough Council's strategic priorities and those of the Coventry & Warwickshire ICB.

Name of Meeting: Cabinet

Date of Meeting: 8 September 2026

Subject Matter: Future Hosting Arrangements for the Home Environment
Assessment and Response Team (HEART)

Originating Department: Communities

DO ANY BACKGROUND PAPERS APPLY

☐ YES

☒ NO

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink

AGENDA MANAGEMENT SHEET

Report Title: Private Sector Housing Enforcement and Civil Penalties Policies: Renters' Rights Act 2025 Implementation

Name of Committee: Cabinet

Date of Meeting: 8 September 2026

Report Director: Strategic Director - Communities

Portfolio: Communities, Housing and Safety

Ward Relevance: No individual ward relevance

Prior Consultation: Portfolio Holder, Internal Consultees Group, Housing Advice and Enabling Team, National Residential Landlord Association, local landlord representatives.

Contact Officer: Paul Pritchett - Environmental Health and Community Safety Manager
paul.pritchett@rugby.gov.uk

Public or Private: Public

Report Subject to Call-In: Yes

Report En-Bloc: No

Key Decision: Yes

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

Summary: The Renters' Rights Act 2025 introduces significant new duties, powers and enforcement requirements for local housing authorities. This report seeks

approval of a new Private Sector Housing Enforcement Policy and a revised Private Sector Housing Civil Penalties Policy, based on the nationally recognised Association of Chief Environmental Health Officers (ACEHO) model, to provide a clear, consistent and legally robust framework for private sector housing enforcement.

**Local Government
Reorganisation Implications:**

The proposed policies will support delivery of private sector housing enforcement functions during the transition to local government reorganisation. Whilst housing enforcement arrangements may be reviewed as part of future unitary authority implementation, adoption of the proposed policies will ensure the Council has an appropriate and legally compliant framework in place to discharge its statutory duties under the Renters' Rights Act 2025 during the intervening period.

Financial Implications:

Approval of the proposed policies does not itself commit the Council to expenditure; the policies set out a framework for exercising powers the Council already holds or has been given by statute, rather than creating a new spending commitment.

Operating that framework does have resource implications, which are being managed within existing service arrangements. The Council has secured New Burdens funding from Government in recognition of the additional duties introduced by the Act, which supports a dedicated temporary RRA Project Officer post to lead implementation.

The level of income the Council may generate from civil penalties under the revised policy is not yet known. Civil penalties issued under the Council's existing policy have not historically generated significant income, and in the initial period of implementing the Act the Council intends to work with landlords to secure compliance before escalating to financial penalties, so penalty income is expected to remain low in the short term. This position will be kept under review and any budgetary assumptions revisited if penalty income increases significantly.

**Risk Management/Health and
Safety Implications:**

Failure to maintain an up-to-date housing enforcement framework presents legal, operational and reputational risks, including inconsistent enforcement decisions, increased vulnerability to

challenge and an inability to demonstrate compliance with statutory duties under the Renters' Rights Act 2025. Adoption of the proposed policies will provide a clear, transparent and consistent framework for enforcement decision-making, reducing these risks. There are no direct health and safety implications arising from this decision.

Environmental Implications:

See Appendix D. There are no direct environmental implications arising from the adoption of the proposed policies, but it does include energy efficiency which could potentially have a positive impact on reducing environmental impact.

Legal Implications:

The Renters' Rights Act 2025 introduces new duties, powers and enforcement requirements for local housing authorities. The proposed policies have been developed to support the lawful exercise of those functions and provide a clear framework for enforcement decision-making. Adoption of the policies will assist the Council in demonstrating compliance with its statutory duties, promote consistency and transparency in enforcement activity, and support the defensibility of enforcement decisions. The Council's Corporate Enforcement Policy will remain in place as the overarching enforcement framework, with the proposed Private Sector Housing Enforcement Policy providing a housing-specific framework for private sector housing enforcement.

Equality and Diversity:

Following an Equality Impact Assessment (Appendix C), the change from an automatic 50% penalty reduction for low-income landlords to an individually evidenced assessment of financial hardship is considered a justifiable, proportionate change, subject to ongoing monitoring. No unlawful discrimination has been identified; overall, the proposed policies are expected to have a positive effect on tenants, particularly those in poorer-quality housing and vulnerable groups. The policies are intended to promote fair, transparent and consistent enforcement and support improved housing standards and tenant protections across the private rented sector.

Options:

Option 1 – Approve the proposed Private Sector Housing Enforcement Policy and Private Sector Housing Civil Penalties Policy.
This option will ensure the Council has an up-to-date and legally compliant framework for the

exercise of private sector housing enforcement functions and implementation of the Renters' Rights Act 2025.

Option 2 – Do not approve the proposed policies. This option would leave the Council reliant on existing policy frameworks which pre-date the Renters' Rights Act 2025 and do not reflect the expanded duties, powers and enforcement requirements introduced by the legislation.

Recommendation:

Cabinet:

(1) approves the Private Sector Housing Enforcement Policy attached at Appendix A;

(2) approves the Private Sector Housing Civil Penalties Policy attached at Appendix B;

(3) delegates authority to the Assistant Director, Regulation and Safety, in consultation with the Portfolio Holder for Regulation and Safety and the Monitoring Officer, to make minor amendments required to reflect commencement regulations, statutory guidance, case law, organisational changes or consequential legislative amendments.

**Reasons for
Recommendation:**

The proposed policies will ensure the Council has an up-to-date, consistent and legally robust framework for private sector housing enforcement. Adoption of the policies will support implementation of the Renters' Rights Act 2025, provide transparency in enforcement decision-making and civil penalty calculations, and assist the Council in meeting its statutory duties and regulatory responsibilities.

Cabinet - 8 September 2026

**Private Sector Housing Enforcement and Civil Penalties Policies:
Renters' Rights Act 2025 Implementation**

Public Report of the Strategic Director - Communities

Recommendation

Cabinet:

- 1) approves the Private Sector Housing Enforcement Policy attached at Appendix A.
- 2) approves the Private Sector Housing Civil Penalties Policy attached at Appendix B.
- 3) delegates authority to the Assistant Director, Regulation and Safety, in consultation with the Portfolio Holder for Regulation and Safety and the Monitoring Officer, to make minor amendments required to reflect commencement regulations, statutory guidance, case law, organisational changes or consequential legislative amendments.

1. Executive Summary

- 1.1. This report seeks Cabinet approval to adopt a revised Private Sector Housing Enforcement Policy (Appendix A) and a revised Private Sector Housing Civil Penalties Policy (Appendix B), replacing the Council's existing 2019 civil penalties policy and enforcement arrangements.
- 1.2. The Renters' Rights Act 2025 significantly expands local housing authorities' enforcement duties, powers and offences, and introduces a new civil penalty regime with statutory maxima of £7,000 and £40,000. The Council's current framework predates the Act and does not reflect these changes. The proposed policies are based on the Association of Chief Environmental Health Officers (ACEHO) model framework, which a number of other local authorities have also adopted, to ensure a consistent, transparent and legally robust approach.
- 1.3. The revised Civil Penalties Policy replaces the 2019 policy's flat additive charging structure with the ACEHO five-step matrix (starting point, landlord type adjustment, mitigating/aggravating factors, financial considerations, and totality) and moves from a single £30,000 cap to tiered statutory maxima. Members should note that the automatic 50% penalty reduction for landlords on low income is not carried forward under the new methodology; the implications of this change are addressed in the Equality Impact Assessment at Appendix C.
- 1.4. Cabinet is asked to approve both policies and delegate authority to the Assistant Director, Regulation and Safety, in consultation with the Portfolio Holder and

Monitoring Officer, to make minor amendments to reflect future commencement regulations, statutory guidance, case law or legislative change.

2. Introduction

- 2.1.** The Renters' Rights Act 2025 introduces significant reforms to the private rented sector and expands the enforcement responsibilities of local housing authorities. The legislation introduces new duties, powers and offences, together with an enhanced civil financial penalty regime and additional reporting requirements. The Act also introduces a statutory duty on local housing authorities to enforce landlord legislation and report on the exercise of those functions.
- 2.2.** The Council's existing housing enforcement framework was developed prior to the introduction of the Act and does not fully reflect the new legislative requirements. In response, the Association of Chief Environmental Health Officers (ACEHO) has developed nationally recognised model policies to support local authorities in implementing the new regime and promoting consistency and transparency in enforcement activity.
- 2.3.** This report presents a proposed Private Sector Housing Enforcement Policy (Appendix A) and Private Sector Housing Civil Penalties Policy (Appendix B). Together, these documents provide an updated framework for the exercise of the Council's private sector housing enforcement functions and support implementation of the Renters' Rights Act 2025.

3. Background

- 3.1.** The Council currently operates a Corporate Enforcement Policy, a Private Sector Housing Civil Penalties Policy and a range of housing enforcement procedures which support the regulation of standards within the private rented sector. Whilst these arrangements have supported enforcement activity to date, they were developed prior to the introduction of the Renters' Rights Act 2025 and do not fully reflect the expanded duties, powers and enforcement mechanisms introduced by the Act.
- 3.2.** The Renters' Rights Act 2025 represents the most significant reform of private rented sector regulation in a generation. The Act introduces a range of new landlord obligations and offences, expands the circumstances in which civil financial penalties may be imposed and introduces new investigatory and enforcement powers for local housing authorities. The Act also places new reporting requirements on local authorities and strengthens expectations regarding the consistent enforcement of landlord legislation.
- 3.3.** Historically, approaches to housing enforcement and civil penalty calculations have varied significantly between local authorities. This has led to inconsistencies in enforcement outcomes, uncertainty for landlords operating across multiple authority areas and increased potential for challenge to enforcement decisions.
- 3.4.** In response, the Association of Chief Environmental Health Officers (ACEHO) has developed a suite of nationally recognised model policies to support local

authorities in implementing the new legislative framework. ACEHO is the national, local authority specific, environmental health chief officer group which represents the interests of environmental health in local councils with parliament, local authorities, government agencies and other interested parties. They are also actively involved in producing policies for adoption nationally to improve consistency. Their remit includes private sector residential accommodation regulation. The model policies have been developed with reference to statutory guidance, relevant tribunal decisions and emerging best practice and are intended to promote greater consistency, transparency and robustness in local authority enforcement activity.

- 3.5. A number of local authorities have already adopted, or are currently considering, policies based upon the ACEHO model framework. The proposed policies attached to this report have been developed using those model documents as the basis for Rugby Borough Council's local approach.
- 3.6. The Council's mandatory HMO licence conditions are also being reviewed and updated to reflect the requirements of the Renters' Rights Act 2025. As this is an operational matter falling within existing officer delegations under Part 2B, paragraph 2.11(t) of the Council's Constitution, it is being progressed separately and does not form part of this report.

4. Consultation

- 4.1. The proposed policies have been consulted on with a range of internal and external stakeholders. Internally, the drafts were circulated to the Council's internal report consultees, including Legal Services and the Monitoring Officer, Finance, the Assistant Director, Regulation and Safety, and the Environmental Health Team Leader, via the Report Consultation process. Comments received were limited to drafting and presentational points, all of which have been incorporated into the current draft; no substantive objections to the proposed policy framework were raised.
- 4.2. Externally, the draft policies were offered to the National Residential Landlords Association (NRLA) on 31 July 2026, with the full documents provided on 18 August 2026. The NRLA's policy team, who lead on local authority enforcement matters, are currently reviewing the drafts; their feedback, if available, will be reported to Members prior to or at the Cabinet meeting.
- 4.3. The Council also intends to share the draft policies with local letting and managing agents and selected larger landlords via the Landlord Forum, at its next meeting (date to be confirmed), to provide a further opportunity for comment ahead of implementation. Any feedback received through this route can be reflected within the policies via the delegated authority sought at recommendation (3), under which the Assistant Director, Regulation and Safety, in consultation with the Portfolio Holder for Regulation and Safety and the Monitoring Officer, may make minor amendments to the adopted policies.

5. Proposed Policy Framework

The Council's current housing enforcement framework requires updating to reflect the duties, powers and enforcement mechanisms introduced by the Renters' Rights Act 2025. The proposed Housing Enforcement Policy, Civil Financial Penalties

Policy and revised mandatory HMO licence conditions form the Council's updated private sector housing enforcement framework.

5.1. Private Sector Housing Enforcement Policy

- 5.1.1.** The proposed Private Sector Housing Enforcement Policy establishes the Council's approach to the investigation and enforcement of landlord legislation and wider private sector housing standards. The policy sets out the enforcement tools available to the Council, the circumstances in which they may be used and the principles that will guide enforcement decision-making.
- 5.1.2.** The policy has been updated to reflect the investigatory powers, enforcement duties and offences introduced by the Renters' Rights Act 2025, together with existing housing enforcement powers available under the Housing Act 2004 and associated legislation.

5.2. Private Sector Housing Civil Penalties Policy

- 5.2.1.** The proposed Private Sector Housing Civil Penalties Policy updates the Council's existing policy of the same name (originally adopted in 2019) and introduces a revised methodology, based on the ACEHO model, for determining the level of civil penalties..
- 5.2.2.** The policy adopts a structured and transparent approach to penalty setting, taking account of statutory guidance, the seriousness of the offence, landlord culpability, harm caused, aggravating and mitigating factors and relevant tribunal decisions. The policy also incorporates the additional offences and civil penalty powers introduced by the Renters' Rights Act 2025.
- 5.2.3.** The policy provides a clear and consistent framework for determining civil financial penalties and support the defensibility of enforcement decisions.
- 5.2.4.** Members should be aware that, in addition to reflecting the new offences and statutory maxima introduced by the Renters' Rights Act 2025, the proposed policy makes several substantive methodological changes from the Council's existing 2019 policy:
- The flat additive charging structure (a starting figure plus fixed premiums) is replaced by the ACEHO model's five-step matrix (starting point, landlord type adjustment, mitigating/aggravating factors, financial considerations, and the totality principle).
 - Statutory maxima are no longer a single £30,000 cap but are tiered at £7,000 or £40,000 depending on the offence.
 - The existing policy provides an automatic 50% reduction in penalty where a landlord demonstrates income below £440 per week. The proposed policy has no direct equivalent: a low income does not automatically reduce a penalty under the revised methodology, representing a reduction in the automatic protection previously available to low-income landlords. This change is specifically addressed in the Equality Impact Assessment.

- Numeric thresholds for aggravating factors (e.g. a "large portfolio" previously defined as 10 or more units) are replaced by the ACEHO model's own thresholds (six or more properties, or three or more HMOs).

6. National Context and Best Practice

- 6.1. The Renters' Rights Act 2025 introduces a significantly expanded enforcement regime for local housing authorities. In anticipation of the implementation of the Act, the Association of Chief Environmental Health Officers (ACEHO) has developed a suite of model housing enforcement policies to support local authorities in establishing consistent, transparent and legally robust approaches to enforcement.
- 6.2. The ACEHO model policies have been developed with reference to statutory guidance, relevant tribunal decisions and practical experience from housing enforcement authorities across England. The policies are intended to promote greater consistency in enforcement outcomes, provide clarity for landlords and tenants and support local authorities in discharging their statutory duties.
- 6.3. The proposed **Private Sector Housing Enforcement Policy and Private Sector Housing Civil Penalties Policy** have been developed using the ACEHO model documents as the basis for Rugby Borough Council's local framework. Whilst adapted to reflect local arrangements and governance requirements, the proposed policies remain aligned with the core principles and methodology contained within the national model.
- 6.4. A number of local authorities, including North Norfolk District Council, Woking Borough Council, Great Yarmouth Borough Council and Herefordshire Council, have already adopted, or are in the process of adopting, policies based upon the ACEHO framework as part of their preparations for implementation of the Renters' Rights Act 2025. Adoption of a policy based upon the same framework will assist the Council in maintaining a consistent and defensible approach to housing enforcement and civil financial penalties whilst retaining appropriate local discretion in individual cases.

7. Transitional Arrangements

- 7.1. The proposed policies will take effect once the Cabinet decision has taken effect in accordance with the Council's call-in procedure (Part 3C, Standing Order 14 of the Constitution). The decision will be published, normally within three working days of the meeting, and will come into force on the expiry of five clear working days after publication, unless called in for scrutiny by the Chair and two members of the Scrutiny Committee, or by three members of the Council. Subject to the decision not being called in, this is anticipated to be on or around 17 September 2026, though the precise date will depend on the publication date and will be confirmed by Democratic Services following the meeting. Existing enforcement activity and any transitional arrangements will continue to be managed in accordance with legal advice and the applicable legislative framework to ensure fairness, consistency and legal certainty..

8. Conclusion

- 8.1.** The proposed policies will ensure the Council has an up-to-date, transparent and legally robust framework for private sector housing enforcement and support the implementation of the Renters' Rights Act 2025. Adoption of the policies will support the consistent exercise of enforcement powers and assist the Council in meeting its statutory duties as a local housing authority.
- 8.2.** The Renters' Rights Act 2025 will raise quality and safety standards in the private rented sector. Further measures, including the planned decent home standard, will give tenants improved housing conditions and provide councils with more effective enforcement tools.

9. Appendices

Appendix A – Private Sector Housing Enforcement Policy
Appendix B – Private Sector Housing Civil Penalties Policy
Appendix C – Equality Impact Assessment
Appendix D – Environmental Impact Assessment

Name of Meeting: Cabinet

Date of Meeting: 8 September 2026

Subject Matter: Policy adoption

Originating Department: Communities

DO ANY BACKGROUND PAPERS APPLY ☒ **YES** ☐ **NO**

LIST OF BACKGROUND PAPERS

Doc No	Title of Document and Hyperlink
	Renters' Rights Act 2025
	Ministry of Housing, Communities and Local Government – Enforcement of the New Tenancy System under the Renters' Rights Act 2025: Statutory Guidance for Local Housing Authorities
	Rugby Borough Council Corporate Enforcement Policy
	Rugby Borough Council Private Sector Housing Civil Penalties Policy (2019)
	Civil penalties under the Renters' Rights Act 2025 and other housing legislation
	ACEHO Model Civil Financial Penalties Policy

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

☐ Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A

Rugby Borough Council

Private Sector Housing Enforcement Policy

1. Introduction

- 1.0.1 This policy sets out Rugby Borough Council's approach to the exercise of its functions as a Housing Authority and provides the framework within which enforcement decisions relating to privately rented accommodation will be made.
- 1.0.2 Section 3 of the Housing Act 2004 places a duty on local housing authorities to keep housing conditions within their district under review with a view to identifying any action that may need to be taken. The Council exercises a range of statutory powers and duties in relation to housing conditions, property management standards, licensing and landlord compliance.
- 1.0.3 Section 107 of the Renters' Rights Act 2025 places a duty on local housing authorities to enforce Landlord Legislation. For the purposes of that Act, Landlord Legislation comprises:
- Chapters 3 and 6 of Part 1 of the Renters' Rights Act 2025;
 - Part 2 of the Renters' Rights Act 2025;
 - Sections 1 and 1A of the Protection from Eviction Act 1977; and
 - Chapter 1 of Part 1 of the Housing Act 1988.
- 1.0.4 Section 110 of the Renters' Rights Act 2025 further requires local housing authorities to report to the Secretary of State on the exercise of their functions under the Landlord Legislation.
- 1.0.5 This policy applies to the Council's housing enforcement functions under the Renters' Rights Act 2025, the Housing Act 2004 and other relevant housing legislation. It should be read alongside the Council's Corporate Enforcement Policy and Private Sector Housing Civil Penalties Policy.
- 1.0.6 For the purposes of this policy, the term "landlord" includes letting agents, managing agents, licensors, property owners, directors of corporate landlords and any other person involved in the letting or management of privately rented accommodation. The terms "House in Multiple Occupation" (HMO) and "House of Multiple Occupation" have the meanings given by the Housing Act 2004.

1.1. Aims of the Policy

- 1.1.1 The purpose of this policy is to provide a framework for the exercise of the Council's housing enforcement functions and to ensure that enforcement action is taken in accordance with relevant legislation, statutory guidance and established principles of public law.
- 1.1.2 The Landlord Legislation, as defined by section 107 of the Renters' Rights Act 2025, falls outside the scope of the Regulators' Code. Chapter 1 of Part 1 of the Housing Act 2004 also falls outside the scope of the Code.
- 1.1.3 Notwithstanding this, the Council remains committed to the principles of transparency, consistency, proportionality and accountability in the exercise of its housing enforcement functions.
- 1.1.4 The following legislation falls within the scope of the Legislative and Regulatory Reform (Regulatory Functions) Order 2007 and is therefore subject to the Regulators' Code:

- Parts 8, 9 and 10 of the Housing Act 1985;
- Part 8 of the Housing Act 1996; and
- Parts 2 to 5 of the Housing Act 2004.

1.1.5 This policy sets out what landlords, property owners, agents, tenants and other interested parties can expect from the Council when investigating non-compliance and exercising its housing enforcement functions.

1.1.6 All enforcement action will be undertaken in accordance with applicable legislation, statutory guidance, relevant Codes of Practice, Council policies and established enforcement procedures.

1.1.7 In exercising its functions, the Council will have regard to its obligations under the Human Rights Act 1998, the Equality Act 2010 and the principles of public law.

1.2. Approach to Enforcement

1.2.1 The Council seeks to work with responsible landlords, agents and property managers to maintain and improve housing standards within the private rented sector. However, landlords and those responsible for the management of privately rented accommodation are expected to understand and comply with the legal requirements that apply to them.

1.2.2 Section 5 of the Housing Act 2004 places a duty on local housing authorities to take the appropriate enforcement action where a Category 1 hazard exists.

1.2.3 Section 7 of the Housing Act 2004 provides local housing authorities with powers to take enforcement action where a Category 2 hazard exists. The Council will normally consider enforcement action where a Category 2 hazard is identified, having regard to the circumstances of the case and the nature of the hazard.

1.2.4 The Council may identify the need for enforcement action through a range of activities, including proactive inspections, licensing activity, complaints, requests for assistance and referrals from partner organisations and other public bodies. Investigations will be undertaken in accordance with the relevant statutory requirements and the Council's governance arrangements.

1.2.5 The Council may commence enforcement with formal action in the first instance where it considers this to be appropriate and proportionate. In determining the most appropriate course of action, the Council will consider the circumstances of the case. Relevant factors may include, but are not limited to:

- Risk to the health, safety or welfare of occupiers or members of the public;
- A deliberate, reckless or serious breach of legal requirements;
- A history of non-compliance;
- Failure to comply with previous advice, informal action or formal enforcement action;
- The need to secure compliance within a reasonable timescale; and
- Any other aggravating or mitigating factors relevant to the case.

1.2.6 The Council will normally consider formal enforcement action in the first instance where there has been:

- Non-compliance with previous informal or formal action;
- Offences relating to the licensing or management of HMOs; or
- Serious breaches of housing legislation.

- 1.2.7 In accordance with its duties under section 107 of the Renters' Rights Act 2025, the Council will normally commence enforcement through formal action where breaches of the Landlord Legislation are identified. The nature of that action will be determined having regard to the circumstances of the case, the available enforcement options and any applicable statutory guidance.

2. Investigatory Powers

- 2.0.1 The Council has a range of statutory powers to investigate suspected breaches of housing legislation, establish ownership and management arrangements, obtain information and evidence, and determine whether enforcement action is appropriate.
- 2.0.2 The Council will exercise its investigatory powers in accordance with the relevant legislative requirements, statutory guidance, applicable Codes of Practice and the principles set out within this policy. The powers described below are not exhaustive and may be supplemented by other statutory powers available to the Council from time to time.
- 2.1. Power to Investigate**
- 2.1.1 The Council has a range of statutory powers to obtain information and evidence for the purpose of investigating suspected breaches of housing legislation, determining whether enforcement action is appropriate and exercising its housing enforcement functions.
- 2.1.2 Section 114 of the Renters' Rights Act 2025 permits the Council to issue a notice requiring a relevant person to provide specified information. Such notices may be served on any person with an estate or interest in the land, a licensor, an agent or a marketer of a property in connection with offences under:
- Sections 1 and 1A of the Protection from Eviction Act 1977;
 - Chapter 1 of Part 1 of the Housing Act 1988;
 - Section 83(1) or 84(1) of the Enterprise and Regulatory Reform Act 2013;
 - Sections 21 to 23 of the Housing and Planning Act 2016; and
 - Chapter 3 of Part 1 and Part 2 of the Renters' Rights Act 2025.
- 2.1.3 Failure to comply with a section 114 notice is an offence under section 131 of the Renters' Rights Act 2025. It is also an offence to intentionally or recklessly provide false or misleading information or to obstruct the exercise of investigatory powers without reasonable excuse.
- 2.1.4 Section 115 of the Renters' Rights Act 2025 permits the Council, where it reasonably suspects a breach of the Rented Accommodation Legislation, to require any person to provide specified information for the purposes of investigating a suspected breach or determining the amount of a financial penalty.
- 2.1.5 Where a person fails to comply with a section 115 notice, section 116 of the Renters' Rights Act 2025 permits the Council to apply to the Court to enforce the notice and recover the costs of the application.
- 2.1.6 The Council may also utilise information gathering powers available under other legislation, including section 235 of the Housing Act 2004 and section 16 of the Local Government (Miscellaneous Provisions) Act 1976, to obtain information, documents and evidence necessary to exercise its housing enforcement functions.

2.2. Entry to Premises

- 2.2.1 The Council has a range of statutory powers to enter premises for the purpose of investigating suspected breaches of housing legislation, obtaining evidence and exercising its housing enforcement functions.
- 2.2.2 Sections 118 and 121 of the Renters' Rights Act 2025 provide powers for authorised officers to enter business premises used in connection with rental sector activities where this is necessary to obtain evidence or documents relevant to an investigation. Depending upon the circumstances, these powers may be exercised with or without a warrant.
- 2.2.3 Following entry under the Renters' Rights Act 2025, authorised officers may require the production of documents, take copies of documents and, where appropriate, seize and retain documents which may be required as evidence in proceedings relating to breaches of, or offences under, the Rented Accommodation Legislation.
- 2.2.4 Section 126 of the Renters' Rights Act 2025 permits authorised officers to enter residential premises at a reasonable time where this is necessary for the investigation of suspected offences. Where required by legislation, notice of entry will be provided to occupiers and other relevant persons.
- 2.2.5 In addition, section 239 of the Housing Act 2004 permits authorised officers to enter residential premises at a reasonable time in order to carry out surveys, inspections and examinations for the purpose of exercising the Council's functions under Parts 1 to 4 of that Act, including determining whether enforcement action is appropriate.
- 2.2.6 Where authorised by legislation, the Council may apply to the Court for a warrant authorising entry to premises, including entry by force where necessary.

3. Enforcement Options

3.1. Informal action

- 3.1.1 Informal action may include the provision of written or verbal advice, guidance, warnings, requests for information or recommendations for remedial action.
- 3.1.2 The Council may undertake site visits, inspections or other investigations where it considers this necessary to assess compliance with housing legislation or to determine whether enforcement action is appropriate.
- 3.1.3 Where deficiencies are identified and the Council considers informal action to be appropriate, officers may provide advice and recommendations to secure compliance. Where written advice is issued, the Council will normally specify a reasonable timescale within which any required action should be completed.
- 3.1.4 The Council may consider informal action where this is proportionate to the circumstances of the case, particularly where deficiencies are minor, there is no significant risk to health or safety and there is a reasonable expectation that compliance will be achieved without the need for formal enforcement action.
- 3.1.5 Nothing in this policy prevents the Council from commencing formal enforcement action in the first instance where it considers this to be appropriate, necessary or proportionate. The Council is not required to provide written or verbal advice before exercising any formal enforcement powers available to it.

3.2. Formal action

3.2.1 If formal action is considered appropriate, the following options are available to the Council.

Part 1 of the Housing Act 2004

3.2.2 Where hazards are identified within residential premises, the Council may exercise one or more of the enforcement powers available under Part 1 of the Housing Act 2004.

3.2.3 These powers include:

- Service of an Improvement Notice requiring specified remedial works to be completed within a defined timescale;
- Service of a Prohibition Order restricting the use or occupation of all or part of a property, including restrictions on the number of occupants;
- Service of a Hazard Awareness Notice to notify owners and occupiers of hazards identified by the Council;
- Making an Emergency Prohibition Order where there is an imminent risk of serious harm to the health or safety of occupiers or others;
- Taking Emergency Remedial Action where a Category 1 hazard presents an imminent risk of serious harm;
- Suspending an Improvement Notice or Prohibition Order where the Council considers this appropriate and permitted by legislation;
- Making a Demolition Order or declaring a Clearance Area where the statutory tests are met.

3.2.4 The Council will determine the most appropriate course of action having regard to the nature and severity of the hazard, the risk to occupiers and others, the vulnerability of those affected, the likelihood of compliance and any other relevant circumstances of the case.

3.2.5 Failure to comply with statutory notices may constitute a criminal offence and may result in prosecution, the imposition of a civil financial penalty, works in default or other enforcement action as considered appropriate by the Council.

3.2.6 The Council may also utilise other powers available under the Housing Act 2004, including powers relating to entry, information gathering, overcrowding and the exercise of other housing enforcement functions.

3.3. Works in default

3.3.1 Where legislation permits, the Council may undertake works in default where a person has failed to comply with a statutory notice, licence condition or other legal requirement.

3.3.2 The decision to undertake works in default will be made on a case-by-case basis, having regard to the nature of the non-compliance, the risk to occupiers or others, the urgency of the required works, the likely effectiveness of alternative enforcement options and the resources available to the Council.

3.3.3 The Council is under no general duty to undertake works in default and the use of such powers will remain at the Council's discretion. Where works in default are undertaken, the Council will seek to recover all reasonable costs and associated expenses from the person responsible, where permitted by legislation.

- 3.3.4 The undertaking of works in default does not prevent the Council from taking additional enforcement action in respect of the same matter, including prosecution, the imposition of a civil financial penalty or other enforcement measures available to it.

3.4. Emergency and Suspended Enforcement Action

- 3.4.1 The Council has a range of emergency enforcement powers available under Part 1 of the Housing Act 2004 where conditions within a property present an imminent risk of serious harm to the health or safety of occupiers or others.
- 3.4.2 Where the statutory tests are met, the Council may make an Emergency Prohibition Order under section 43 of the Housing Act 2004 to prohibit the use or occupation of all or part of a dwelling with immediate effect.
- 3.4.3 The Council may also undertake Emergency Remedial Action under section 40 of the Housing Act 2004 where a Category 1 hazard presents an imminent risk of serious harm. Where emergency remedial action is undertaken, the Council may seek to recover all reasonable costs and associated expenses from the person responsible, where permitted by legislation.
- 3.4.4 The Council may suspend Improvement Notices or Prohibition Orders where legislation permits and where it considers this to be the most appropriate course of action. In determining whether to suspend enforcement action, the Council will have regard to the circumstances of the case, the interests of occupiers and any other relevant factors.

3.5. HMO Licence Conditions

- 3.5.1 The Council may impose conditions on HMO licences where permitted by legislation. Licence conditions may require works, management arrangements, monitoring, certification, maintenance or other measures necessary to ensure the property is suitably managed and occupied.
- 3.5.2 In general, the Council will seek to identify, remove or reduce Category 1 and Category 2 hazards through the exercise of its powers under Part 1 of the Housing Act 2004 rather than through the use of licence conditions. However, this does not prevent the Council from imposing licence conditions relating to the installation, maintenance or management of facilities, equipment or other matters where it considers this to be appropriate and lawful.
- 3.5.3 Failure to comply with a licence condition may constitute a criminal offence and may result in prosecution, the imposition of a civil financial penalty or other enforcement action available to the Council.

3.6. Alternative Legislative Remedies

- 3.6.1 Where deficiencies or hazards are identified, the Council will consider the full range of enforcement powers available to it and will select the most appropriate and proportionate course of action having regard to the circumstances of the case.
- 3.6.2 In some cases, legislation other than Part 1 of the Housing Act 2004 may provide a more appropriate mechanism for securing compliance, reducing risk or addressing the underlying issue. This may include powers relating to housing management standards, licensing, statutory nuisance, public health, building safety or other relevant regulatory functions.
- 3.6.3 The Council will determine the most appropriate legislative route on a case-by-case basis, taking account of the nature of the hazard or deficiency, the outcome sought and the effectiveness of the available enforcement options.

3.7. Prosecution

- 3.7.1 The Council may institute criminal proceedings where legislation provides a power to prosecute and where it considers prosecution to be the most appropriate enforcement response.
- 3.7.2 Where a Civil Financial Penalty is available as an alternative to prosecution, the Council will normally reserve prosecution for the most serious cases. Relevant considerations may include the seriousness of the offence, the conduct of the offender, previous compliance history, the deterrent effect of prosecution and the wider public interest.
- 3.7.3 Any decision to prosecute will be made having regard to the evidential sufficiency of the case and the public interest test contained within the Code for Crown Prosecutors.
- 3.7.4 Where an offence has been committed by a body corporate, the Council will consider whether enforcement action should also be taken against any director, officer, manager, secretary, member or other person who may be liable under the relevant legislation.
- 3.7.5 The Council will determine, on a case-by-case basis, whether enforcement action should be taken against the body corporate, any individual connected with it, or both.

3.8. Civil Financial Penalties

- 3.8.1 Civil Financial Penalties are available as an enforcement tool in respect of specified offences under housing and landlord legislation. The current list of eligible offences, together with the methodology for determining whether a penalty should be imposed and its amount, is set out in the Council's Private Sector Housing Civil Penalties Policy.

3.9. Rent Repayment Orders

- 3.9.1 Part 2 of the Housing and Planning Act 2016 permits the Council to apply to the First-tier Tribunal (Property Chamber) for a Rent Repayment Order (RRO) requiring a landlord to repay rent, housing benefit or the housing element of Universal Credit received during a period in which a qualifying offence has been committed.
- 3.9.2 Section 48 of the Housing and Planning Act 2016 places a duty on the Council to consider applying for a Rent Repayment Order where it becomes aware that a landlord has committed a qualifying offence.
- 3.9.3 Where a landlord has been convicted of a qualifying offence or has been issued with a Civil Financial Penalty in respect of that offence, the Tribunal must award the maximum amount of rent repayable unless there are exceptional circumstances.
- 3.9.4 The Council will consider the use of Rent Repayment Orders in all cases involving qualifying offences where there is sufficient evidence to support a successful application.
- 3.9.5 At the date of adoption of this policy, qualifying offences include:
- Unlawful eviction or harassment of an occupier under the Protection from Eviction Act 1977;
 - Failure to comply with an Improvement Notice under section 30 of the Housing Act 2004;
 - Failure to comply with a Prohibition Order under section 32 of the Housing Act 2004;
 - Offences relating to the licensing of HMOs under section 72 of the Housing Act 2004;
 - Offences relating to selective licensing under section 95 of the Housing Act 2004;

- Breach of a Banning Order under section 21 of the Housing and Planning Act 2016;
- Using violence to secure entry contrary to section 6 of the Criminal Law Act 1977;
- Knowingly or recklessly misusing a possession ground under section 16J of the Housing Act 1988;
- Letting or marketing a property within the prescribed restriction period following use of the moving or selling grounds; and
- Other offences prescribed by legislation from time to time.

3.9.6 An application for a Rent Repayment Order may be pursued in addition to other enforcement action, including prosecution proceedings or the imposition of a Civil Financial Penalty.

3.9.7 Where public funds have been paid to a landlord who has committed a qualifying offence, the Council will normally consider applying for a Rent Repayment Order to recover those sums.

3.9.8 Section 49 of the Housing and Planning Act 2016 enables the Council to assist tenants in making applications for Rent Repayment Orders. The Council may provide information, advice, signposting or other assistance as considered appropriate in the circumstances of the case.

3.10. Banning Orders

3.10.1 Part 2, Chapter 2 of the Housing and Planning Act 2016 enables the Council to apply to the First-tier Tribunal for a Banning Order against a person who has been convicted of a banning order offence.

3.10.2 A Banning Order may prohibit a person from:

- Letting housing in England;
- Engaging in letting agency work in England;
- Engaging in property management work in England; or
- Carrying out two or more of those activities.

3.10.3 The Council may consider seeking a Banning Order in the most serious cases. In determining whether to make an application, the Council will consider all relevant circumstances, including:

- The nature and seriousness of the offence or offences committed;
- The harm caused, or potential harm caused, to tenants, occupiers or others;
- Any previous convictions, Civil Financial Penalties or other enforcement action;
- Any history of non-compliance with housing legislation or regulatory requirements;
- The need to protect tenants and maintain confidence in the private rented sector;
- The likelihood of further offending; and
- Any other aggravating or mitigating factors relevant to the case.

3.10.4 Each case will be assessed on its own merits and the Council will determine whether a Banning Order application is appropriate having regard to the available evidence and the public interest.

3.11. Costs and Charges

- 3.11.1 The Council incurs costs in carrying out its housing enforcement functions. Where legislation permits, the Council will seek to recover reasonable costs, charges and expenses associated with its enforcement, licensing and wider regulatory activity.
- 3.11.2 This may include, but is not limited to, costs arising from inspections, investigations, evidence gathering, notices and other statutory documentation, follow-up action, compliance monitoring, works in default and other interventions.
- 3.11.3 Recovery may be pursued using any lawful mechanism available to the Council, including civil recovery, local land charges, charges against property and other statutory recovery processes.
- 3.11.4 Where permitted by legislation, interest may be applied to outstanding sums until payment is made in full.

3.12. Complaints

- 3.12.1 The Council welcomes feedback regarding the services it provides. Complaints, compliments and suggestions may be submitted using the Council's published complaints procedures.
- 3.12.2 Contact may be made by email at EHCS@rugby.gov.uk or by post to:

Environmental Health and Community Safety
Rugby Borough Council
Town Hall
Evreux Way
Rugby
CV21 2RR
- 3.12.3 The submission of a complaint will not prevent or delay the Council from exercising any statutory powers or pursuing enforcement action where it considers it necessary or appropriate to do so.
- 3.12.4 Where statutory notices, orders or other formal enforcement action have been taken, the Council's complaints procedure does not replace any statutory right of appeal, right to make representations or other legal remedy available to the recipient.
- 3.12.5 Any person wishing to challenge a statutory notice, order or enforcement decision should follow the appeal or representation process specified within the relevant documentation and within the applicable statutory timescales.

Appendices

Appendix 1 – Statement of principles to determine the amount of a penalty charge under Part 4 of The Smoke and Carbon Monoxide Alarm (England) Regulations 2015 as amended by The Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022 (“the Regulations”)

- A1.1 Section 13 of the Regulations requires local housing authorities to prepare and publish a statement of principles which they propose to follow in determining the amount of a penalty charge. The Regulations introduced legal requirements on relevant landlords to:
 1. Equip a smoke alarm on each storey of the premises on which there is a room used wholly or partly as living accommodation.
 2. During any period when the premises were occupied under the tenancy, to ensure that a carbon monoxide alarm is equipped in any room of the premises

which is used wholly or partly as living accommodation and which contains fixed combustion appliance other than a gas cooker.

3. Carry out checks by or on behalf of the landlord to ensure that each prescribed alarm is in proper working order on the day the tenancy begins if it is a new tenancy.
4. Where, following a report made on or after 1st October 2022 by a tenant or by their nominated representative to the landlord, a prescribed alarm is found not to be in proper working order, the alarm is repaired or replaced.

- A1.2 For the purposes of the legislation, living accommodation includes a bathroom or lavatory.
- A1.3 Where the Council believe that a landlord is in breach of one or more of the above duties, the Council must serve a remedial notice on the landlord. The remedial notice is a notice served under Regulation 5 of the Regulations.
- A1.4 If the landlord then fails to take the remedial action specified in the notice within the specified timescale, the Council can require a landlord to pay a penalty charge and can arrange for remedial action to be taken under certain circumstances. The power to charge a penalty arises from Regulation 8 of the Regulations. Failure to comply with each remedial notice can lead to a fine of up to £5,000. Fines will be applied per breach, rather than per landlord or property.
- A1.5 The Council will impose a penalty charge where it is satisfied, on the balance of probabilities, that the landlord has not complied with the action specified in the remedial notice within the required timescale.
- A1.6 A landlord will not be considered to be in breach of their duty to comply with the remedial notice if they can demonstrate they have taken all reasonable steps to comply. Where there is evidence, including written correspondence, of repeated and consistent efforts to obtain access to the property, with access repeatedly being prevented by the occupant(s) of the property, a landlord will not be considered to be in breach of their duty to comply with the remedial notice. A landlord will be expected to have:
- Communicated the risk of harm that the lack of functioning alarms posed to all occupants in writing on multiple occasions
 - Requested access to comply with the remedial notice on a regular basis of no longer than every seven days in writing
- A1.7 In considering the imposition of a penalty, the Council may look at the evidence concerning the breach of the requirement of the notice. A non-exhaustive list of methods that may be used to obtain relevant evidence includes, but is not limited to:
- Evidence obtained from a property inspection
 - Evidence provided by the tenant or agent
 - Evidence provided by the landlord demonstrating compliance with the Regulations by supplying dated photographs of alarms, together with installation records
 - That all detector heads have not passed their expiration or replacement date
- A1.8 Landlords need to take steps to demonstrate that they have met the testing requirements at the start of the tenancy requirements. A non-exhaustive list of methods that may be used to evidence compliance with these testing requirements includes, but is not limited to:

- Tenants signing an inventory form which states that they observed the alarms being tested and confirming that the alarms were in working order at the start of the tenancy

- A1.9 Where a landlord is in breach, the local housing authority may serve a remedial notice. Failure to comply with each remedial notice can lead to a fine of up to £5,000. Fines will be applied per breach, rather than per landlord or property.
- A1.10 When determining the amount of the penalty charge, regard will be had to whether this is a first breach under the Regulations.

Determining the amount of the penalty charge for a first breach

- A1.11 The minimum amount of a penalty charge for a first breach of the Regulations will be £2,500. Only in exceptional circumstances may the Council depart from the application of this statement of principles and issue a penalty charge for less than £2,500. Exceptional circumstances are rare and unusual and are not established merely by the presence of multiple mitigating factors.
- A1.12 The starting level of a penalty charge for a first breach of the Regulations will be £3,000. The penalty charge amount will then be varied depending on aggravating and mitigating factors.
- A1.13 Aggravating factors include, but are not limited to:
- The number of alarms not working or missing (the Regulations state there should be one per storey)
 - Other fire safety concerns/defects in the property which increase the risk posed to the occupants
 - The length of time the offence is believed to have been on-going
 - The frequency of complaints by the occupiers to the landlord about the non-working or missing alarms
 - The costs of any remedial work the Council have carried out in response to the breach
 - Whether the property is let as a HMO (which increases the overall risk)
 - The number of occupants living in the property
 - Presence of vulnerable occupiers such as elderly, children or disabled people
 - Any history of previous enforcement or non-compliance of the landlord
 - Attempts to obstruct the investigation
- A1.14 Mitigating factors include, but are not limited to:
- The property being small and low-risk (for example a one-bedroom ground floor flat with a large number of fire escapes including large windows)
 - A single occupant living in the property
 - Evidence that all required alarms were checked and in working order at the start of the tenancy
 - Written evidence that some efforts to gain access and comply with the remedial notice were made and access was prevented by the occupant

Determining the amount of the penalty charge for a subsequent breach

- A1.15 The penalty for subsequent breaches by the same landlord will be £5,000. Only in exceptional circumstances may the Council depart from the application of this statement

of principles and issue a penalty charge for less than £5,000. Exceptional circumstances are rare and unusual and are not established merely by the presence of multiple mitigating factors.

Appendix 2: Statement of principles to determine the amount of a penalty charge for a breach of minimum energy efficiency standards (MEES) with respect to domestic privately rented property

- A2.1 The Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015 (“the Regulations”) make it unlawful to rent out a domestic property if it has an EPC (Energy Performance Certificate) rating of F or G (unless a valid exemption has been registered on the PRS Exemptions register).
- A2.2 The Regulations make it unlawful to fail to comply with a compliance notice served by the Council. The Regulations cover all relevant properties, even where there has been no change of tenancy.
- A2.3 The Regulations were introduced to improve the energy efficiency of housing in the private rented sector and to reduce greenhouse gas emissions and tackle climate change. They should help make tenants’ homes more thermally efficient.
- A2.4 An energy performance certificate (EPC) gives the property an energy efficiency rating – A rated properties are the most energy efficient and G rated are the least efficient. It’s valid for 10 years and must be provided by the owner of a property, when it is rented or sold.
- A2.5 If you are a landlord and you fail, when requested, to provide an EPC for the start of a tenancy, you will be in breach of the Regulations.
- A2.6 An EPC contains information about the type of heating system and typical energy costs. It also gives recommendations about how the energy use could be reduced, lowering running costs. You can find the recommended energy efficiency improvements on the current EPC. If you’re a private landlord, you must either:
- ensure your rented properties have an EPC with a minimum ‘E’ rating
 - register a valid PRS exemption on the PRS exemptions register
- A2.7 Failure to do either of these is a breach of the Regulations.
- A2.8 The Council investigates any potential breaches of the regulations. If the Council is satisfied that you are or have at any time in the 18 months preceding the date of service of the penalty notice, breached the Regulations, you may be subject to a penalty notice imposing a financial penalty. The Council may also impose a publication penalty.
- A2.9 The “publication penalty” means publication, for a minimum period of 12 months, or such longer period as the Council may decide, on the PRS Exemptions Register of such of the following information in relation to a penalty notice as the Council decides:
- Where the landlord is not an individual, the landlord’s name
 - Details of the breach of these Regulations in respect of which the penalty notice has been issued
 - The address of the property in relation to which the breach has occurred, and
 - The amount of any financial penalty imposed.
- A2.10 The Council will impose the following financial penalties:
- (a) letting a property with an F or G rating for less than 3 months: £2,000

- (b) letting a property with an F or G rating for more than 3 months: £4,000
- (c) registering false or misleading information on the PRS exemptions register:
£1,000
- (d) failing to provide information to the Council demanded by a compliance notice:
£2,000

A2.11 The Council may not impose a financial penalty under both subsections (a) and (b) above in relation to the same breach of the Regulations. But they may impose a financial penalty under either paragraph (a) or paragraph (b), together with financial penalties under paragraphs (c) and (d), in relation to the same breach. Where penalties are imposed under more than one of these paragraphs, the total amount of the financial penalty may not be more than £5,000.

Rugby Borough Council

Private Sector Housing Civil Penalties Policy

1. Introduction

- 1.1 Rugby Borough Council's Environmental Health and Community Safety team is committed to ensuring good quality, healthy housing for all, by improving standards within the private housing sector.
- 1.2 The Borough's private rented sector has grown substantially over recent years. The majority of private landlords operate within the law, providing a high standard of rented accommodation. Environmental Health and Community Safety works with landlords where necessary to provide advice and guidance to support them to achieve compliance. However, in cases where landlords put their tenants' health and safety at risk and fail to comply with their statutory obligations, the Council will take enforcement action in accordance with the Private Sector Housing Enforcement Policy.
- 1.3 The Renters' Rights Act 2025 significantly expands the civil penalty regime previously introduced by the Housing and Planning Act 2016, increasing the range of offences for which a civil penalty may be imposed and introducing new statutory maxima of £7,000 and £40,000 depending on the breach or offence concerned.
- 1.4 This policy applies once the Council has made a decision to commence civil penalty proceedings. It should be read alongside the Council's Corporate Enforcement Policy and Private Sector Housing Enforcement Policy.
- 1.5 In this policy, the term "landlord" includes letting agents, managing agents, licensors, property owners, corporate landlords, directors of corporate landlords, registered providers of social housing, and any other person involved in the letting or management of accommodation. The term "corporate landlord" refers to a body corporate that meets the definition of "landlord" above. The terms "House in Multiple Occupation" and "HMO" are defined by the Housing Act 2004.
- 1.6 This is the version of the policy for use by an authority with no selective licensing designations. Rugby Borough Council does not currently operate a selective licensing scheme; the Borough's only relevant designation is an Article 4 Direction (a planning control removing permitted development rights for HMO conversions), which is separate from, and does not engage, the Housing Act 2004 Part 3 selective licensing regime.

2. Purpose

- 2.1 The purpose of this policy is to ensure transparency, consistency and fairness in how and when civil penalties are imposed. Environmental Health and Community Safety has had regard to the ACEHO (Association of Chief Environmental Health Officers) model policy and associated statutory guidance in setting the framework for determining the level of civil penalty in any particular case, to ensure a consistent approach with other local authorities.
- 2.2 The application of a civil penalty will be made in accordance with the Private Sector Housing Enforcement Policy, as part of the enforcement options available to Environmental Health and Community Safety to achieve safe and healthy private sector housing. It will assist the Council in dealing with those landlords who put tenants at unacceptable risk or fail to meet their statutory obligations.
- 2.3 This policy outlines the Council's methodology and mechanism for assessing and setting the level of a civil penalty at all stages where a civil penalty is under consideration,

including the preparation of a notice of intent, and where a final decision has been made to impose a civil penalty.

- 2.4 The Council considers the need for transparency and consistency to be of primary importance to ensure fairness in the discharge of its functions. The general objective of this policy is to promote both transparency and consistency in the imposition of financial penalties so that those involved in the letting or management of accommodation (a) know how the Council will generally penalise relevant breaches and offences, and (b) are assured that, generally, like cases will be penalised similarly, and different cases penalised differently.
- 2.5 The Council recognises that, despite its best efforts, landlords may operate unlawfully for a significant period without detection, and that only a proportion of those committing relevant breaches and offences will be identified. Accordingly, the Council seeks to ensure that civil penalties are set at a level that makes it clear to the landlord concerned, and to others, that operating unlawfully as a landlord is financially disadvantageous when compared to operating lawfully.

3. Legislative Background and Scope

- 3.1 Statutory guidance has been issued by the Government entitled "Civil penalties under the Renters' Rights Act 2025 and other housing legislation." The Council has regard to this guidance in the exercise of its functions in respect of civil penalties.
- 3.2 The following breaches are subject to a civil penalty with a statutory maximum of £7,000:
- Failure to give a written statement of terms and any other prescribed information under section 16D of the Housing Act 1988.
 - Attempting to let a property for a fixed term under section 16E of the Housing Act 1988.
 - Attempting to end a tenancy by service of a notice to quit under section 16E of the Housing Act 1988.
 - Attempting to end a tenancy orally or requiring that it is ended orally under section 16E of the Housing Act 1988.
 - Serving an eviction notice that attempts to end a tenancy outside the prescribed section 8 process under section 16E of the Housing Act 1988.
 - Relying on a ground where the landlord does not reasonably believe that the landlord is/will be able to obtain possession under section 16E of the Housing Act 1988.
 - Failing to provide a tenant with prior notice that a ground which requires it may be used under section 16E of the Housing Act 1988.
 - Failure to give an existing tenant prescribed information about changes made by the Renters' Rights Act 2025 in the prescribed form and timeframe under paragraph 7(2) of schedule 6 to the Renters' Rights Act 2025.
 - Discrimination relating to children in the lettings process under section 33 of the Renters' Rights Act 2025.
 - Discrimination relating to benefits in the lettings process under section 34 of the Renters' Rights Act 2025.
 - Failure to specify proposed rent within a written advertisement or offer under section 56 of the Renters' Rights Act 2025.
 - Inviting, encouraging or accepting any offer of rent greater than the stated rate under section 56 of the Renters' Rights Act 2025.

3.3 The following breach is subject to a civil penalty with a statutory maximum of £40,000:

- Breach of duty under Regulation 3, 3B, 3C, and 3D of the Electrical Safety Standards in the Private Rented Sector and Social Rented Sector (England) Regulations 2020.

3.4 The following offences are subject to a civil penalty with a statutory maximum of £40,000:

- Unlawful eviction and harassment of occupier under section 1 of the Protection from Eviction Act 1977.
- Continuation of conduct subject to a relevant penalty (under s.16I or s.16K Housing Act 1988) after the 28-day period (or, if appealed, after conclusion of the appeal) where the final notice has not been withdrawn, under section 16J of the Housing Act 1988.
- Conduct giving rise to liability under s.16I, where within the preceding five years the landlord has either (i) had a relevant penalty imposed for different conduct and the final notice has not been withdrawn, or (ii) been convicted under s.16J for different conduct, under section 16J of the Housing Act 1988.
- Relying on a ground knowing the landlord would not be able to obtain possession, or being reckless as to whether they would, under section 16J of the Housing Act 1988.
- Breach of restrictions relating to reletting or remarketing a property within the restricted period after using Grounds 1 or 1A of Schedule 2 to the Housing Act 1988, under section 16J of the Housing Act 1988.
- Breach of a banning order under section 21 of the Housing and Planning Act 2016.
- Failure to comply with an Improvement Notice under section 30 of the Housing Act 2004.
- Contravention of an overcrowding notice under section 139 of the Housing Act 2004.
- Failure to obtain an HMO licence under section 72 of the Housing Act 2004.
- Knowingly permitting over-occupation of an HMO under section 72 of the Housing Act 2004.
- Failure to comply with management regulations in respect of HMOs under section 234 of the Housing Act 2004.
- Failure to comply with HMO licence conditions under section 72 of the Housing Act 2004.

3.5. Evidential standard and relationship with prosecution

3.5.1 A civil penalty may only be imposed where the Council is satisfied, beyond reasonable doubt, that the relevant breach or offence has been committed. This is the same standard of proof required for a criminal conviction, reflecting the fact that a civil penalty is available only as an alternative to prosecution for the same conduct.

3.5.2 Where a civil penalty has already been imposed in respect of an offence, the offender cannot be prosecuted for that same offence. Likewise, a person who has been, or is being, prosecuted for a particular offence cannot be issued with a civil penalty for that same offence.

- 3.5.3 Only one civil penalty may be imposed on a person for the same offence, save that, in respect of breaches of HMO management regulations, a separate civil penalty may be imposed for the breach of each separate regulation, as set out at section 5.6 above.
- 3.5.4 This evidential standard applies to the civil penalties described within this policy. It does not apply to fixed penalty charges imposed under separate statutory regimes, such as those relating to smoke and carbon monoxide alarms or minimum energy efficiency standards, which are determined on the balance of probabilities and are addressed within the Council's Private Sector Housing Enforcement Policy.
- 3.6 If a landlord has committed multiple breaches or offences, a separate civil penalty can, and usually will, be imposed for each breach and offence. If multiple landlords have committed the same breach or offence at the same property, a separate civil penalty can, and usually will, be imposed on each offender.
- 3.7 The offences and breaches for which civil penalties may be imposed may be amended from time to time by legislation.

4.Determining the Level of a Civil Penalty

- 4.1 The Council has considered the following factors in developing this policy, to help ensure that a civil penalty is set at an appropriate level:
- Severity of the breach or offence — the more serious the breach or offence, the higher the penalty should be.
 - Culpability and track record of the offender — a higher penalty will be appropriate where the offender has a history of failing to comply with their obligations and/or their actions were deliberate and/or they knew, or ought to have known, that they were in breach of their legal responsibilities.
 - The harm caused to the tenant — this is a very important factor. The greater the actual harm or potential for harm, principally to the tenant but also potentially the local community, the higher the penalty should be.
 - Punishment of the offender — the penalty should, fairly, both punish the offender and demonstrate the consequences of not complying with their responsibilities.
 - Deterring the offender from repeating breaches or offences — the level of penalty should be set at a level likely to have a significant deterrent effect.
 - Deterring others from committing similar breaches or offences — the civil penalty policy itself is public, and the Council will consider how its formal enforcement activity can be effectively publicised.
 - Removing any financial benefit the offender may have obtained — it should not be in a landlord's financial interest to commit a breach or offence rather than comply. The absence of any financial benefit does not mean the penalty should be reduced.
- 4.2 When applying the civil penalties matrix, interim calculations at individual stages may result in figures that exceed the statutory maximum. Where the final amount reached following application of all relevant steps exceeds the statutory maximum, the civil penalty will be reduced to the applicable statutory maximum.
- 4.3 The Council has a duty to act fairly, transparently and consistently when assessing civil penalties. The Council will not give weight to claims advanced as factors that might reduce a civil penalty unless supported by evidence the Council reasonably considers relevant, reliable, credible and sufficient. Where such evidence is not provided, and no adequate explanation is given, the Council may draw an adverse inference.

The Civil Penalties Matrix

- 4.4 In determining the level of a civil penalty, officers will have regard to the following sequential steps:
1. Determining the starting point based on the seriousness of the breach or offence, as set out in the offence tables at section 5.
 2. Adjustment for factors relating to the type of landlord — size and type of portfolio, experience ("Landlord Type").
 3. Mitigating and aggravating factors, including track record, culpability, and actual or potential harm to occupants.
 4. Financial considerations.
 5. Applying the totality principle.
- Step 2: Landlord Type adjustment**
- 4.5 A higher standard of professionalism and regulatory awareness is reasonably expected of landlords who operate at greater scale, have greater experience, or are involved in more complex forms of letting.
- 4.6 An upward adjustment of 20% of the applicable starting point will be applied where the landlord meets any one or more of the following:
- Has, at any point in time, controlled, owned, or managed six or more properties (need not be concurrent).
 - Has, at any point in time, controlled, owned, or managed three or more properties that operated as HMOs (need not be concurrent).
 - Is, or has previously been, a director of a corporate landlord.
 - Is a corporate landlord.
 - Has, in the Council's assessment, significant experience in the letting or management of property.
- 4.7 A downward adjustment of 20% of the applicable starting point will be applied only where all of the following are met:
- Has, at any point in time, controlled, owned, or managed no more than two properties.
 - Has controlled, owned, or managed no more than one property that has operated as an HMO.
 - Has, in the Council's assessment, very limited experience in the letting or management of property.
- Step 3: Mitigating and aggravating factors**
- 4.8 Each breach or offence may have offence-specific mitigating and/or aggravating factors, as set out in the tables at section 5, considered alongside the generic factors below. Where multiple civil penalties are issued against the same landlord at the same time, mitigating and aggravating factors are considered and applied separately to each penalty unless expressly stated otherwise.
- 4.9 Mitigating factors — the Council may reduce a civil penalty by up to 20% of the applicable starting point to reflect mitigating factors. Only in exceptional circumstances may the Council apply a reduction in excess of 20%; exceptional circumstances are rare and unusual, and are not established merely by the presence of multiple mitigating

factors. Generic mitigating factors considered in respect of each breach or offence include:

- Steps taken to remedy the breach — e.g. promptly remedying all, or all significant, elements of the breach after Council communication.
- A high level of cooperation — e.g. proactive provision of significant relevant information beyond that required by statutory notice.
- Acceptance of liability — e.g. accepting liability before or within the representations period. Where a landlord relies on a reasonable excuse defence or otherwise contests liability, this will not usually apply.
- Health circumstances — e.g. a serious health condition or medical incident with clear, reliable evidence of direct and material impact on the landlord's ability to comply.
- Diminished culpability (limited responsibility) — e.g. a joint landlord who evidences that compliance arrangements were directed and controlled by another joint landlord; or a landlord who became involved only after an unforeseen change in circumstances and committed the breach only for a limited period while putting affairs in order. The instruction of a managing or letting agent, or reliance on an agent's actions or omissions, does not of itself constitute diminished culpability.

4.10 Aggravating factors — the Council may increase a civil penalty by up to 20% of the applicable starting point. Only in exceptional circumstances may the Council apply an increase in excess of 20%. Generic aggravating factors considered in respect of each breach or offence include:

- Previous history of non-compliance — e.g. previous successful prosecutions, including relevant spent convictions, civil penalties, rent repayment orders, works in default, or simple cautions. Concurrent investigations or proceedings are not treated as previous non-compliance.
- Non-cooperation with the Council — e.g. failure to comply with information notices under s.16 of the Local Government (Miscellaneous Provisions) Act 1976, s.235 Housing Act 2004, or s.114 Renters' Rights Act 2025; failing to respond substantively to a letter of alleged offence; failing to attend agreed meetings. Where the Council has prosecuted, or is pursuing prosecution, for the same failure to provide information, that conduct will not also be treated as aggravating for civil penalty purposes, to avoid double counting. Where multiple civil penalties are imposed on the same landlord at the same time, this factor is applied only to the penalty with the highest starting point, unless there is a clear and reasoned basis for applying it differently.
- Deliberate intent or negligence — e.g. knowledge that the breach was occurring; continuation after Council communication; premeditation or steps to prevent detection; providing false or misleading information; applying pressure to occupants to deter cooperation.
- The number of occupants affected.
- Duration of non-compliance.
- Vulnerability of occupants — including children and young adults, persons vulnerable by age, disability or sensory impairment, persons with drug or alcohol dependency, victims of domestic abuse, children in care, persons with complex health needs, persons who do not speak English as a first language, victims of trafficking or sexual exploitation, refugees, asylum seekers, and pregnant women.

Step 4: Financial considerations

- 4.11 The Council will review the quantum of the civil penalty and consider whether it is sufficient to act as an effective deterrent. Where the Council has sufficiently reliable evidence regarding a landlord's rental income and/or asset value, it may determine an increase is appropriate to achieve effective deterrence. As an absolute minimum, landlords must not financially benefit from their offending behaviour. Financial circumstances are ordinarily considered after written representations have been received, as part of determining the final notice.
- 4.12 Where a landlord seeks to rely on a strained or limited financial position, that position must be supported by appropriate, verifiable evidence. Unsupported assertions, partial disclosure, or selective provision of information will not be given weight. At a minimum, and where such information exists, the Council may request:
- The last three full tax years' self-assessment tax returns filed with HMRC, including supplemental pages;
 - The last three full tax years' SA302 documents and tax year overviews;
 - The last three months' payslips;
 - The last three years' P60 certificates;
 - The last twelve months' Universal Credit payment statements;
 - A list of all property assets owned or jointly owned, not limited to rental properties, with Land Registry title documents;
 - A list of all property assets owned, or held on long lease, by any corporate entity in which the landlord has a beneficial interest, with Land Registry documentation;
 - The most recent annual mortgage statement for each property, or the last 12 months' statements where the mortgage is under 12 months old;
 - Valuation statements for all ISAs held;
 - Statements from any cryptoasset exchange accounts;
 - A list of all shareholdings;
 - Recent bank statements for any account holding a balance in excess of £5,000;
 - Recent statements for all secured and unsecured loans;
 - Bankruptcy orders and official notifications of bankruptcy.
- 4.13 Where the Council is not satisfied it has been provided with sufficiently reliable, complete and accurate information to assess a landlord's financial position, the Council may infer that the landlord is able to pay the civil penalty as imposed. A claimed inability to pay will not, of itself, outweigh the need to ensure effective deterrence or to remove any financial benefit obtained.

Step 5: The totality principle

- 4.14 The Council will have regard to the totality principle to ensure the overall outcome of its enforcement action is just and proportionate. In exceptional cases, the Council may take account of totality at an earlier stage by deciding not to pursue a civil penalty for a specific breach where doing so would render the overall outcome disproportionate.
- 4.15 Generally, totality is applied as the final step, after written representations have been considered and before final notices are issued, once each individual civil penalty has been assessed. As a final step, the Council will consider whether multiple civil penalties against the same landlord at the same time result in an aggregate amount that is just and proportionate, and if not, whether a proportionate reduction is appropriate.

- 4.16 The totality principle does not operate across different legal persons separately liable in law, nor across civil penalties imposed at different times. Where an officer of a body corporate, or person concerned in its management, may be separately liable for the same conduct as the body corporate, and also holds a shareholding interest in it, the Council will consider whether penalties imposed on both at the same time result in punitive duplication.
- 4.17 Where a reduction is applied, the Council will ordinarily apply a uniform percentage reduction across all relevant civil penalties forming part of the same totality assessment, save where a differential adjustment is needed to address punitive duplication arising from a shared economic interest.
- 4.18 Any rent repayment orders made in respect of the same breach or offence are disregarded for the purposes of assessing totality.

5. Penalty Charging Tables

- 5.0.1 Starting points, statutory maxima, Landlord Type adjustments, and offence-specific mitigating/aggravating factors, by legislation. All figures below reflect the ACEHO model matrix as adopted by the Council.

5.1. Protection from Eviction Act 1977

Unlawful eviction and harassment of occupier — section 1

Starting point	Statutory maximum	Downward Landlord Type	No adjustment	Upward Landlord Type
£35,000	£40,000	£28,000	£35,000	£42,000*

**Capped at the £40,000 statutory maximum where the upward adjustment would otherwise exceed it.*

- 5.1.1 Offence-specific mitigating factors: none.
- 5.1.2 Offence-specific aggravating factors: violence or threats of violence; disposal or threats to dispose of possessions; breach or evasion of an injunction or undertaking; loss of home.

5.2. Housing Act 1988 breaches and offences

Breach/offence	Section	Starting point	Statutory max	Downward	No adj.	Upward
Failure to give written statement of terms and prescribed information	16D	£4,000	£7,000	£3,200	£4,000	£4,800
Attempting to let for a fixed term	16E(1)(a)	£4,000	£7,000	£3,200	£4,000	£4,800
Attempting to end tenancy by notice to quit	16E(1)(b)	£6,000	£7,000	£4,800	£6,000	£7,000*
Attempting to end tenancy orally / requiring it end orally	16E(1)(c)	£6,000	£7,000	£4,800	£6,000	£7,000*
Serving a possession notice outside the prescribed s.8 process	16E(1)(d)	£6,000	£7,000	£4,800	£6,000	£7,000*
Relying on a ground not reasonably believed available, tenant surrendered within 4 months	16E(1)(e)	£6,000	£7,000	£4,800	£6,000	£7,200*
Failing to give prior notice that a ground requiring it may be used	16E(1)(f)	£3,000	£7,000	£2,400	£3,000	£3,600
Failure to give existing tenant prescribed RRA transition information	Sch.6 para 7(2)	£4,000	£7,000	£3,200	£4,000	£4,800

Breach/offence	Section	Starting point	Statutory max	Downward	No adj.	Upward
	RRA 2025					
Continuation of conduct subject to a relevant penalty after 28 days	16J(3)	Double the starting level of the two constituent breaches	£40,000	Dependent on constituent breaches	Dependent on constituent breaches	Dependent on constituent breaches
Conduct giving rise to liability under s.16I with relevant history in preceding 5 years	16J(4)	Double the starting level of the two constituent breaches	£40,000	Dependent on constituent breaches	Dependent on constituent breaches	Dependent on constituent breaches
Relying on a ground knowing/reckless landlord could not obtain possession, tenant surrendered within 4 months	16J(1)	£30,000	£40,000	£24,000	£30,000	£36,000
Breach of reletting/remarking restriction after Grounds 1 or 1A	16J(2)	£25,000	£40,000	£20,000	£25,000	£30,000

**Capped at the £7,000 statutory maximum.*

5.2.1 Offence-specific mitigating/aggravating factors:

- s.16D: mitigating — provision of some required terms/information within the required period.
- s.16E(1)(b)–(d): aggravating — tenant vacates within four months of the date specified in the notice.
- Sch.6 para 7(2) RRA 2025: mitigating — provision of some required information within the required period; provision of information but not in the prescribed form.
- s.16J(3)/(4): dependent on the constituent breaches / most recent conduct giving rise to liability under s.16I.
- All others: none specified.

5.3. Housing and Planning Act 2016

Breach of a banning order — section 21(1)

Starting point	Statutory maximum	Downward	No adjustment	Upward
£35,000	£40,000	£28,000	£35,000	£42,000*

**Capped at £40,000.*

5.3.1 Offence-specific mitigating factors: a single, isolated incident.

5.3.2 Offence-specific aggravating factors: concealment or evasion.

5.4. Renters' Rights Act 2025 breaches

Breach	Section	Starting point	Statutory max	Downward	No adj.	Upward
Discrimination relating to children in lettings	33(1)	£6,000	£7,000	£4,800	£6,000	£7,200
Discrimination relating to benefits in lettings	34(1)	£6,000	£7,000	£4,800	£6,000	£7,200
Failure to specify proposed rent in advertisement/offer	56(2)	£3,000	£7,000	£2,400	£3,000	£3,600

Breach	Section	Starting point	Statutory max	Downward	No adj.	Upward
Inviting/encouraging/accepting rent greater than stated rate	56(3)	£4,000	£7,000	£3,200	£4,000	£4,800

5.5. Electrical Safety Standards Regulations 2020

Regulation(s) breached	Starting point	Statutory max	Downward	No adj.	Upward
Reg 3(3)(b),(3)(d),(3)(e); Reg 3D(a),(b),(c),(f)	£5,000	£40,000	£4,000	£5,000	£6,000
Reg 3(1)(a)-(c),(3)(a),(3)(c),(3)(ca),(5)(b),(5)(c); Reg 3B(1)(a)-(c); Reg 3C(1),(2)(a); Reg 3D(d),(e)	£12,500	£40,000	£10,000	£12,500	£15,000
Reg 3(4),(5a),(6); Reg 3C(2)(b),(4)	£20,000	£40,000	£16,000	£20,000	£24,000

- 5.5.1 Offence-specific mitigating factors: the report or record evidences that the electrical installations were compliant at all points. Offence-specific aggravating factors: the number, nature or severity of the issues observed on the report or record.

5.6. Housing Act 2004 offences

Offence	Section	Starting point	Statutory max	Downward	No adj.	Upward
Failure to comply with an Improvement Notice	30(1)	£25,000	£40,000	£20,000	£25,000	£30,000
Failure to comply with an overcrowding notice	139(7)	£20,000	£40,000	£16,000	£20,000	£24,000
Failure to obtain an HMO licence	72(1)	£17,000	£40,000	£13,600	£17,000	£20,400
Knowingly permitting over-occupation of an HMO	72(2)	£20,000	£40,000	£16,000	£20,000	£24,000

- 5.6.1 Offence-specific factors:

- Improvement Notice — mitigating: nature/extent of hazard(s) once the deadline has passed; whether the property is unoccupied once the deadline has passed; access prevented by occupant(s) where the landlord evidences steps taken but falling short of a reasonable excuse. Aggravating: nature/extent of hazard(s) once the deadline has passed.
- Overcrowding notice — aggravating: the level of overcrowding present.
- HMO licence — aggravating: landlord's knowledge/experience of licensing requirements; condition of the unlicensed property.
- Over-occupation — mitigating: suitable amenity and space provisions in the HMO. Aggravating: level of over-occupation present.

Failure to comply with management regulations (HMOs) — section 234(3)

- 5.6.2 This covers duties under the Management of Houses in Multiple Occupation (England) Regulations 2006 and the Licensing and Management of HMOs (Additional Provisions) (England) Regulations 2007. Where multiple breaches of a single Management Regulation occur at one HMO, a single civil penalty covers all breaches of that Regulation; where multiple Regulations are breached, a separate penalty applies to each.

Management duty	Starting point	Statutory max	Downward	No adj.	Upward
Providing information to occupiers	£3,000	£40,000	£2,400	£3,000	£3,600
Taking safety measures (incl. fire safety)	£20,000	£40,000	£16,000	£20,000	£24,000
Maintaining water supply and drainage	£10,000	£40,000	£8,000	£10,000	£12,000
Supplying/maintaining gas and electricity	£12,000	£40,000	£9,600	£12,000	£14,400
Maintaining common parts, fixtures, fittings, appliances	£7,000	£40,000	£5,600	£7,000	£8,400
Maintaining living accommodation	£7,000	£40,000	£5,600	£7,000	£8,400
Providing waste disposal facilities	£7,000	£40,000	£5,600	£7,000	£8,400

- 5.6.3 Offence-specific factors: generally, nature/number/extent of offences within the specific regulation (both mitigating and aggravating, depending on direction). For the information duty specifically, an additional aggravating factor applies where the landlord refuses to provide outstanding contact information more than 48 hours after it is requested by or on behalf of an occupant. For waste disposal, additional aggravating factors apply where insufficient refuse/litter containers have been previously reported, or where the waste requiring disposal includes hazardous materials.

Breach of HMO licence conditions — section 72(3)

- 5.6.4 Where a licence condition could fall within two potential starting levels, the higher level applies. Where multiple licence conditions are breached at a single property, a separate civil penalty applies to each.

Licence condition category (examples)	Starting point	Statutory max	Downward	No adj.	Upward
Signage/tenant information; written terms; complaints; tenant vetting; deposit protection; rent records/collection; occupancy information; manager/holder change notification; property change information; sale requirements; training attendance; insurance requirements/documentation; references; keys/alarm codes; access security; temperature regulation means; other schedule-of-works items	£4,000	£40,000	£3,200	£4,000	£4,800
Inspection/repair procedures; common parts and living area maintenance/use; safeguarding during works; alteration/construction information; emergency procedures; waste/pests/minor repairs; entry notice; access for inspection; water contamination risk; furnishing fire safety compliance; mechanical extraction/electrical socket works	£7,000	£40,000	£5,600	£7,000	£8,400
EPC, fire detection/prevention, emergency lighting, CO detection, fire risk assessment, gas/electric installation documentation; fit-and-proper-person notifications; ASB procedures; personal hygiene/kitchen/heating works	£12,500	£40,000	£10,000	£12,500	£15,000
Minimum floor areas; occupancy rates; non-sleeping room use; household number limits	£20,000	£40,000	£16,000	£20,000	£24,000
Smoke/CO alarms, emergency lighting, gas/electric installations, fire detection/safety features; means of escape provision/maintenance; fire safety or CO detector schedule-of-works items	£25,000	£40,000	£20,000	£25,000	£30,000

- 5.6.5 Offence-specific factors: nature and extent of the licence condition breach (both mitigating and aggravating, throughout).

- 5.6.6 As set out at section 3.4 above, this policy does not include charging bands for failure to obtain a selective licence or breach of selective licence conditions under section 95, as Rugby Borough Council does not operate a selective licensing scheme.

6. Procedure for Imposing a Civil Penalty

Notice of intent

- 6.1 Before imposing a civil penalty, the Council will give the landlord a notice of intent, setting out:

- The amount of the proposed civil penalty;
- The reasons for proposing to impose it;
- Information about the right to make written representations.

Right to make written representations

- 6.2 A landlord given a notice of intent may make written representations within 28 days beginning with the day after the notice of intent was given.

Decision after the representations period

- 6.3 After the representations period, the Council will decide whether to impose a civil penalty and, if so, its amount — which may be higher or lower than the amount in the notice of intent.
- 6.4 A landlord's rectification of the breach during the representations period will rarely, of itself, lead the Council to conclude a penalty is inappropriate, but will usually be relevant to mitigation. Similarly, an admission of liability will rarely, of itself, avoid a penalty, but will usually be relevant to mitigation.

Final notice

- 6.5 If the Council decides to impose a civil penalty, it will give the landlord a final notice setting out:

- The amount of the civil penalty;
- The reasons for imposing it;
- Information about how to pay;
- The period for payment;
- Information about rights of appeal;
- The consequences of failure to comply.

Withdrawal or reduction of a notice

- 6.6 The Council may, at any time, withdraw a notice of intent or final notice, or reduce the amount specified within it. Where the Council decides to take either action, it will give written notice to the person to whom the original notice was given.

Discount for prompt payment

- 6.7 Where a civil penalty imposed by a final notice is paid in full within the period specified in that notice, normally 28 days beginning with the day after the final notice is given, the Council will apply a discount of 15% to the amount of the civil penalty.
- 6.8 The availability of the discount is conditional upon full payment being received within the specified period. The discount period will not be extended or suspended by the bringing of an appeal. A landlord who chooses to appeal may still benefit from the discount by

paying the civil penalty in full within the specified period; however, where payment is not made within that period, the discount will not apply.

- 6.9 *Illustrative example: The landlord of an HMO property fails to obtain a licence. They operate only two HMO properties and there are no other relevant or aggravating features. The starting point under the Council's civil penalties matrix is £17,000. Following a notice of intent proposing £17,000, the landlord makes written representations; having considered these, the Council determines a civil penalty of £16,000 in the final notice. If the landlord pays in full within the specified period, the 15% prompt payment discount applies, resulting in a discounted payment of £13,600.*

Appeals

- 6.10 A landlord given a final notice may appeal to the First-tier Tribunal (Property Chamber) against the decision to impose a civil penalty and/or its amount, within 28 days beginning with the day after the final notice was given. Where an appeal is brought, the final notice is suspended until the appeal is finally determined or withdrawn.
- 6.11 An appeal is by way of re-hearing; the Tribunal may have regard to matters of which the Council was unaware at the time of its decision. The Tribunal may dismiss an appeal that is frivolous, vexatious, an abuse of process, or has no reasonable prospect of success.
- 6.12 The Tribunal may invite the parties to consider mediation or other alternative dispute resolution. The Council will not generally agree to mediation regarding the level of a civil penalty, as penalties are determined by reference to this policy to promote fair, consistent and proportionate outcomes; agreeing reductions outside the policy framework would risk undermining consistency and the Council's enforcement objectives.
- 6.13 On determination, the Tribunal may confirm, vary, increase or decrease, or cancel the civil penalty. Where the Tribunal increases a penalty, it may do so only up to the applicable statutory maximum, £7,000 or £40,000 as applicable. A party may apply for permission to appeal to the Upper Tribunal (Lands Chamber).

7. Enforcement and Use of Civil Penalties

- 7.1 Where a landlord or property agent fails to pay a civil penalty in full, the Council will recover the amount by order from the County Court, together with reasonable costs incurred in taking that action, where permitted by legislation.
- 7.2 Where a landlord receives two or more civil penalties over a 12-month period, the Council will consider whether it is appropriate to include the person's details on the database of rogue landlords and property agents, so that other local authorities in England are made aware that formal action has been taken.
- 7.3 If a landlord receives a civil penalty, Environmental Health and Community Safety will, where appropriate, take this into account when considering whether the landlord is a fit and proper person to hold an HMO licence.
- 7.4 All income received from a civil penalty will be retained by the Council to be used to further its statutory functions in relation to enforcement activity covering the private rented sector, in accordance with the Rent Repayment Orders and Financial Penalties (Amounts Recovered) (England) Regulations 2017.

Appendix C EQUALITY IMPACT ASSESSMENT (EqIA)

Private Rented Sector Enforcement Policy

For Cabinet on 8 Sep 2026

Approved by	David Burrows
Policy being assessed	Private Rented Sector Enforcement Policy
Service Area	Regulation and Safety
Name of Officer completing the assessment	Paul Pritchett
Other Officers involved	
Date of this assessment	31 Jul 2026
Date of review	1 Aug 2027

<u>Stage 1 – Policy to be analysed</u>	
(1) Describe the main aims, objectives and purpose of the Policy?	The proposed Private Sector Housing Enforcement Policy and Private Sector Housing Civil Penalties Policy set out how Rugby Borough Council will exercise its housing enforcement functions as a local housing authority, replacing the Council's 2019 Civil Penalties Policy and existing enforcement arrangements. Their aim is to provide an up-to-date, transparent and legally robust framework for regulating standards in the private rented sector, reflecting the duties, powers and offences introduced by the Renters' Rights Act 2025. The Enforcement Policy sets out the investigatory and enforcement tools available to the Council (informal action, statutory notices, works in default, licensing conditions, prosecution, civil penalties, rent repayment orders and banning orders) and the principles guiding when each will be used. The Civil Penalties Policy sets out the methodology for calculating civil financial penalties for specified breaches and offences, based on the ACEHO national model, including starting points, statutory maxima (£7,000 or £40,000), landlord-type adjustments, mitigating and aggravating factors, financial considerations and the totality principle. The objective is to ensure enforcement decisions are consistent, proportionate and defensible; to protect tenants from unsafe or poorly managed accommodation; to hold non-compliant and criminal landlords to account; and to give landlords, agents and tenants clarity about what to expect from the Council. The policies apply to all landlords, letting/managing agents and other persons involved in letting or managing private rented accommodation in the Borough, and to the tenants and occupiers of that accommodation.

(2) How does it fit with Rugby Borough Council's Corporate priorities and your service area priorities?

The proposed policies align directly with the Council's Corporate Strategy 2025–2035, in particular the "A Fairer Rugby" priority to reduce inequalities and improve housing across the borough. That priority commits the Council to improving the availability of quality housing, ensuring consistency in the private rented sector (including through a Landlord Forum and Landlord Charter), and creating safe communities. A robust, up-to-date enforcement and civil penalties framework is the regulatory mechanism that underpins this: it gives the Council the tools to hold non-compliant and criminal landlords to account and to drive up standards in privately rented homes.

The policies also support "A Healthier Rugby", since poor housing conditions (damp, mould, cold, fire and electrical hazards) are a direct driver of health inequalities; effective enforcement helps prevent harm to tenants' physical and mental health, particularly for vulnerable occupiers.

They contribute to the "good governance" foundation of the Strategy by ensuring decisions on enforcement and civil penalties are transparent, consistent, proportionate and defensible, reducing the risk of successful challenge and demonstrating sound use of Council resources.

At a service level, the policies are central to Environmental Health and Community Safety's priority of maintaining safe, well-managed private sector housing and implementing the Council's statutory duties under the Renters' Rights Act 2025, including the new duty to enforce landlord legislation and report on enforcement activity to the Secretary of State.



(3) What are the expected outcomes you are hoping to achieve?

Rugby Borough Council has an up-to-date, legally robust housing enforcement and civil penalty framework that reflects the duties, powers and offences introduced by the Renters' Rights Act 2025, replacing the outdated 2019 Civil Penalties Policy and pre-Act enforcement arrangements.

Enforcement and civil penalty decisions are made consistently, proportionately and transparently, using a structured methodology (the ACEHO five-step matrix) rather than ad hoc judgement, so that similar cases are treated similarly and decisions are defensible on appeal to the First-tier Tribunal.

Landlords, agents and tenants have clarity about what standards are expected, what enforcement action may follow non-compliance, and how civil penalties will be calculated, improving voluntary compliance and reducing the burden of formal enforcement over time.

Tenants and occupiers of privately rented accommodation, particularly vulnerable groups, are better protected from unsafe, poorly managed or unlicensed housing, through a fuller range of enforcement options (informal action, statutory notices, licensing conditions, works in default, prosecution, civil penalties, rent repayment orders and banning orders) and new investigatory powers.

Civil penalties are set at a level that removes any financial benefit from non-compliance, acts as an effective deterrent to the landlord concerned and to others, and reflects the increased statutory maxima (£7,000/£40,000) introduced by the Act.

The Council meets its new statutory duties to enforce landlord legislation and to report to the Secretary of State on the exercise of those functions, reducing legal and reputational risk to the Council.

Approach remains broadly consistent with other local authorities adopting the same ACEHO model framework, supporting a level playing field for landlords operating across multiple areas.



(4) Does or will the policy affect: • Customers • Employees • Wider community or groups	Wider Community or Groups, Customers Tenants and occupiers (Wider Community/Groups) should see improved protection: the policies give the Council a fuller and more consistently applied set of enforcement tools, so hazards, illegal eviction, harassment, unlicensed HMOs and unsafe conditions are more likely to be addressed promptly and proportionately. Vulnerability (age, disability, dependency, domestic abuse victims, pregnant women, etc.) is an explicit aggravating factor in the civil penalty matrix, meaning cases affecting vulnerable occupiers attract higher penalties, reflecting greater harm. Some tenants may experience short-term disruption where enforcement action (e.g. a Prohibition Order or Emergency Prohibition Order) restricts occupation of a property, though this is to protect their safety. Landlords, letting/managing agents and corporate landlords (Customers) will be subject to a more structured and, for some, stricter regime: new offences and investigatory powers under the Renters' Rights Act 2025, statutory maxima rising to £7,000/£40,000, and a five-step penalty matrix that applies an upward adjustment for larger or more experienced landlords/corporate landlords. Landlords on low incomes will no longer receive an automatic 50% penalty reduction as under the 2019 policy; any claim of limited means will instead need to be evidenced in detail as part of the financial considerations step. This represents a reduction in the automatic protection previously available to low-income landlords, which could disproportionately affect smaller or amateur landlords without professional support, and is the key equalities-relevant change addressed in this assessment. Compliant landlords and reputable agents should benefit from greater clarity and a more predictable, transparent penalty framework, and from a more level playing field relative to non-compliant competitors.
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(5) Will the policy involve substantial changes in resources?	Yes Wider community/groups: tenants and occupiers of privately rented accommodation across the borough, including vulnerable groups (families with young children, older residents, disabled residents, and others more exposed to housing-related hazards), who stand to benefit from stronger enforcement of housing standards. Customers: landlords, letting/managing agents, corporate landlords and other persons involved in letting or managing accommodation, who are directly regulated by the policies and subject to the enforcement options and civil penalty methodology they set out. Substantial changes in resources: the Renters' Rights Act 2025 introduces new investigatory powers (e.g. information notices, entry to business and residential premises with/without warrant), new offences, and a new duty to report enforcement activity to the Secretary of State. Officers will need training on the new powers, offences and civil penalty matrix, and case-handling processes will need updating to reflect the five-step methodology (starting point, landlord type adjustment, mitigating/aggravating factors, financial considerations, totality). The financial considerations step is more resource-intensive than the previous flat-rate approach: where a landlord claims limited means, officers may need to request and assess detailed financial evidence (tax returns, SA302s, bank and mortgage statements, property and shareholding information) before finalising a penalty, rather than applying an automatic reduction. The Council anticipates increased enforcement and investigation activity as the new duties take effect and awareness of the expanded penalty regime grows, alongside the £18.2m of national funding allocated to authorities in 2025/26 to build enforcement capacity for RRA implementation. Resourcing will be kept under review as the new framework beds in.
(6) Is a full Equality Impact Assessment needed? If no, please give reason why.	Yes



(7) Please describe how the policy will meet the aims of the Equality Duty: a. Eliminate unlawful discrimination, harassment, victimisation and any other unlawful conduct prohibited by the act b. Advance equality of opportunity between people who share and people who do not share a relevant protected characteristic c. Foster good relations between people who share and people who do not share a relevant protected characteristic	a. Neither policy applies rules by reference to protected characteristics; enforcement decisions are made on the facts of the case. Vulnerability (including age and disability) is an aggravating factor that increases scrutiny and penalty where a breach has caused greater harm to a vulnerable occupier — protecting people with protected characteristics rather than disadvantaging them. Officers operate within the Council's existing Human Rights Act 1998 and Equality Act 2010 duties, which the Enforcement Policy expressly requires. Nothing in either policy authorises or risks discrimination, harassment or victimisation. b. The policies chiefly advance equality of opportunity for tenants: clearer, more consistently applied powers help address unsafe or poorly managed housing, which is concentrated in the lower-cost end of the private rented market where lower-income and more deprived households are disproportionately represented. Treating vulnerability as an aggravating factor weights enforcement and penalty severity towards protecting those most at risk of harm. The main caution is the withdrawal of the automatic 50% penalty reduction for low-income landlords under the 2019 policy; this could reduce equality of opportunity for low-income or "accidental" landlords, who must now evidence hardship individually rather than receive an automatic discount. This is a genuine trade-off, not a clear net gain, and is the key point for decision-makers. c. Clear, published, consistently applied expectations and processes should reduce landlord/tenant disputes rooted in uncertainty, and pursuing rogue landlords more effectively protects the reputation of the compliant majority. Neither policy is likely to materially affect relations between groups defined by protected characteristics as such, since its focus is landlord/tenant conduct rather than group identity.
<u>Stage 2 – Evidence about user population and consultation</u>	



(1) What does the data tell you about the groups this policy impacts?	No local statistical evidence (census, IMD, stock condition or complaints data) has been compiled specifically for this assessment. However, published national evidence supports the reasoning applied. English Housing Survey data (MHCLG) shows private renters are consistently the tenure most likely to live in poor-quality or non-decent housing (22% in non-decent homes in 2024–25, versus 14% of owner-occupiers and 12% of local authority renters), and are disproportionately represented among low-income households. A 2022 government report, "Local authority enforcement in the private rented sector: headline report", found statistically significant relationships between local authorities' enforcement activity and levels of deprivation and stock condition, with enforcement concentrated in more deprived areas. ESRC-funded research, "Landlord criminality in the Private Rented Sector in England" (Universities of York, Sheffield and Northumbria, with Safer Renting), further evidences a "shadow" private rented sector serving tenants excluded from mainstream housing by poverty, Universal Credit reliance, insecure immigration status or language barriers, where exploitation and poor conditions are structural rather than exceptional. Together, this supports the assessment that enforcement activity — and the civil penalties incurred by the landlords concerned — is more likely to affect the more deprived segment of the rental market, though no Rugby-specific data has been analysed to confirm this locally.
Additional evidence can be found:	
(2) Have you consulted or involved those groups that are likely to be affected by the policy you want to implement? If yes, please state which groups were involved in the consultation and what were their views and how have their views influenced the policy? If you have not consulted or engaged with communities that are likely to be affected by the policy, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary	Yes NRLA (National Residential Landlords Association), local letting and managing agents, and a selection of larger landlords The draft policies are due to go out to the NRLA, local letting and managing agents, and a selection of larger landlords for comment ahead of the report going to Cabinet. This is an industry-facing exercise rather than a public or tenant-facing consultation, and has not been used as a source of equality evidence in this assessment. Any feedback received will be considered separately and, if it raises matters relevant to equality, addressed at Cabinet or folded into a future review



Stage 3 – Analysis of impact			
(1) <u>Protected Characteristics</u> From your data and consultations, are there any positive or negative impacts identified for any particular group? If left blank, this means that no impacts have been identified for this group.	Protected Characteristic	Nature of Impact Positive, Negative, Both	Explain why
	Age	Both	Positive: age-related vulnerability is an explicit aggravating factor in the Civil Penalties Policy — children and young adults, and older residents (65+), are named vulnerable groups under the HHSRS hazard/age matrix referenced in the policy (e.g. excess cold, excess heat, falls, fire risk are all age-weighted hazards). Where a breach causes or risks greater harm to a child or older occupier, this increases the penalty applied, meaning enforcement resource and financial deterrence is weighted towards protecting the age groups most exposed to harm from poor housing conditions. This is a positive impact for younger and older tenants. Negative: the withdrawal of the 2019 policy's automatic



			50% penalty reduction for landlords evidencing income below £440/week may disproportionately affect older landlords on fixed retirement incomes, or "accidental" landlords who inherited or fell into letting a single property later in life, who are more likely to have low, fixed incomes without the professional support enjoyed by larger or more experienced landlords. Under the new methodology, these landlords must evidence financial hardship individually as part of the financial considerations step, rather than receiving an automatic discount, and may therefore face proportionately higher penalties than under the previous policy for the same breach. No local age-disaggregated data has been used; both points are reasoned from the policy text and national evidence rather than Rugby-specific statistics.
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	Disability	Positive	Disability or sensory impairment, and persons with complex health needs, are explicitly named vulnerable groups in the Civil Penalties Policy's aggravating factors. Where a breach causes or risks greater harm to a disabled occupier, this increases the penalty applied, weighting enforcement resource and financial deterrence towards protecting disabled tenants from poor housing conditions. The policy also introduces "health circumstances" as an explicit generic mitigating factor for landlords — e.g. a serious health condition or medical incident with clear, reliable evidence of direct and material impact on the landlord's ability to comply. This gives disabled landlords, or those with a health condition affecting compliance, a defined route to mitigation that did not exist in the same form under the 2019 policy (which only offered an
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			automatic low-income discount). The requirement to evidence this individually is a modest evidential burden but not a new disadvantage introduced by this policy. No local disability-disaggregated data has been used; this is reasoned from the policy text.
	Sex		
	Gender reassignment		
	Marriage/civil partnership		



	Pregnancy/maternity	Positive	Pregnant women are explicitly named as a vulnerable group in the Civil Penalties Policy's aggravating factors. Where a breach causes or risks greater harm to a pregnant occupier, this increases the penalty applied. This gives pregnant tenants an explicit, named protection that did not exist under the 2019 policy's more generic approach, weighting enforcement severity towards protecting this group from harm caused by poor housing conditions (e.g. cold, damp, hazards affecting maternal or infant health). No negative impact on this group has been identified; no local data has been used.
	Race	Both	Positive: published evidence shows ethnic minority households are markedly more likely to live in overcrowded or poor-condition private rented housing (e.g. 13% of ethnic-minority-headed PRS households overcrowded vs 7% of white-headed



households, per English Housing Survey/Race Equality Foundation data). Stronger, more consistent enforcement should therefore disproportionately benefit ethnic minority tenants, who are overrepresented among those living in the conditions the policy targets.

Caution: research (ESRC-funded "Landlord criminality in the PRS" study) also found that tenants excluded from mainstream housing by insecure immigration status, lack of English as a first language, or refugee/asylum status are least likely to access complaint-led enforcement routes, since much enforcement activity is triggered by tenant complaints. This suggests the policy's benefits may reach the most marginalised ethnic/migrant groups less effectively than others, even though the policy is not itself discriminatory. No Rugby-specific ethnicity data has been used.



	Religion/belief		
	Sexual Orientation		
(2) <u>Cross cutting themes</u>	Description of impact	Nature of impact Positive, Negative, Both	Explain why
	Socio-economic e.g.: child poverty, income level, education level, working hours/occupation, family/social support, access to good nutrition	Both	Positive: enforcement activity is more likely to be directed at lower-cost, poorer-quality private rented housing, where lower-income and more deprived households are disproportionately represented (see Stage 3 evidence — English Housing Survey, 2022 LA enforcement headline report). Stronger, more consistent enforcement and higher civil penalties should therefore disproportionately benefit lower-income tenants, who are overrepresented among those living in substandard conditions and least able to move elsewhere. Negative: the 2019 policy's automatic 50% penalty reduction for landlords evidencing income below £440/week is not carried



			forward under the new methodology. Financial hardship is still a relevant consideration (Step 4), but must now be evidenced individually rather than applied automatically. This may disadvantage low-income or "accidental" landlords (e.g. a single-property landlord on a low fixed income) relative to the previous policy, who could see a proportionately higher penalty for the same breach than they would have under the 2019 approach. No local income-level data has been used; this is reasoned from the policy text and national evidence.
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	Environmental e.g.: housing status, transport links, geography, access to services, air quality, noise pollution	Positive	The core purpose of both policies is to improve physical housing conditions — damp, mould, cold, fire and electrical hazards, overcrowding and disrepair — through more effective enforcement. This is a direct positive environmental/housing-status impact for occupiers of poor-quality private rented accommodation. There is a geographic dimension, in that enforcement activity (and therefore this benefit) is unlikely to be evenly spread across the Borough and will tend to concentrate where poor conditions and non-compliance are found, but this reflects the objective distribution of housing problems rather than a policy-driven inequality, and the Enforcement Policy's commitment to proactive inspection (not complaints alone) helps ensure coverage isn't limited only to areas where tenants are able or willing to complain. No local geographic data has been used to confirm
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(4) Are there any barriers to accessing the service? If yes, how can they be overcome?	Yes The main access barrier identified is that much enforcement activity is triggered by tenant complaints, and tenants excluded from mainstream housing by insecure immigration status, limited English, fear of eviction/retaliation, or lack of awareness of their rights are less likely to complain — meaning they may benefit less from the policies even though they are often in greatest need of protection. This can be partly overcome by ensuring enforcement is not solely complaint-led: both policies already commit the Council to identifying cases through proactive inspection, HMO licensing activity, and referrals from partner organisations (e.g. Housing Options, safeguarding teams, tenancy relations, voluntary and community sector organisations working with migrant, refugee or non-English-speaking communities), rather than relying on tenants to come forward. Officers should continue to build and use these referral routes actively, not just in principle. Practical steps to support this include: ensuring key information for tenants (how to report hazards, what to expect from the Council) is available in plain English and, where practicable, other commonly spoken local languages; working with community and voluntary sector partners who already have trusted relationships with harder-to-reach tenants; and ensuring officers are trained to recognise indicators of vulnerability or exploitation during inspections, rather than relying solely on what a tenant discloses. No new statutory duty or resource is required to implement these steps, as they build on approaches already referenced in the Enforcement Policy.
(5) What data will be collected to analyse impact? How will the data collected be used?	No data is currently collected on how cases are identified (proactive inspection vs. complaint vs. referral) in a way that would allow this specific access barrier to be tracked. It is recommended that Environmental Health and Community Safety record the source of each case (complaint, proactive inspection, licensing activity, or partner referral) going forward, to allow future review of whether enforcement activity is reaching tenants who are less likely to self-report, and to inform whether additional outreach with community partners is needed. This can be built into existing case management processes without collecting new personal data from individuals.



(6) Complete this section if any adverse impacts were identified in 3.1. Outline any actions that will be taken to remove or mitigate the adverse impacts identified in 3.1 to ensure that no discrimination is taking place. If removing or mitigating the impact is not possible, you may in certain circumstances, justify the discrimination. If that is the case, please give evidence for why justifying is possible in this case.	The withdrawal of the automatic 50% low-income landlord discount is only partially mitigated: financial hardship remains a relevant consideration under Step 4 of the civil penalty methodology, but must be evidenced individually rather than applied automatically above a fixed threshold. This is considered a justifiable difference in treatment rather than an unmitigated negative — it replaces a blunt, easily-gamed automatic discount with a case-by-case evidence-based assessment, improving consistency and ensuring penalties still remove financial benefit from non-compliance and act as an effective deterrent, while genuine hardship can still be recognised. Officers will apply Step 4 consistently and give fair weight to well-evidenced hardship claims. For the geographic/environmental dimension, the Enforcement Policy commits the Council to identifying cases through proactive inspection and licensing activity across the Borough, not complaints alone, reducing the risk that enforcement benefits become concentrated only in areas where tenants are willing or able to complain, rather than where conditions are objectively worst.
Stage 5 – Review not to be completed on initial assessment	
(1) What evidence of impact has been collected?	
Additional evidence can be found:	
(2) Were the impacts as expected from the original EqIA?	
(3) Will there be any changes made as a result of this review?	



Appendix D

Climate Change and Environmental Impact Assessment

Private Sector Housing Enforcement and Civil Penalties Policies: Renters' Rights Act 2025 Implementation

For Cabinet on 8 Sep 2026

Approved by	David Burrows
Policy being assessed	Private Sector Housing Enforcement and Civil Penalties Policies: Renters' Rights Act 2025 Implementation
Service Area	Regulation and Safety
Is this a new or existing policy/service	New
Name of Officer completing the assessment	Paul Pritchett
Timeline for policy/service delivery	Ongoing policy/service. Both policies have no fixed end date or delivery period — they set a continuing framework for how the Council exercises its housing enforcement and civil penalty functions. Recommendation (3) provides for the Assistant Director, Regulation and Safety (in consultation with the Portfolio Holder and Monitoring Officer) to make minor amendments on a rolling basis to reflect commencement regulations, statutory guidance, case law or legislative change.
Climate Change and Environmental Impact Assessment Review Team	
Date of this assessment	31 Jul 2026
Date of review	31 Mar 2028

Section 1: Summary of Policy/Service and Climate Change and Environmental Impacts

The Private Sector Housing Enforcement Policy and Private Sector Housing Civil Penalties Policy set out how the Council will investigate and enforce housing standards in the private rented sector, and how civil financial penalties will be calculated, replacing the Council's 2019 arrangements and reflecting the Renters' Rights Act 2025. Both are administrative/regulatory policies governing decision-making processes; they do not involve construction, land use, fleet, energy use or procurement, and therefore have no direct greenhouse gas, biodiversity or habitat impact. There is one indirect link: the Enforcement Policy's civil penalty provisions cover breaches of minimum energy efficiency standards (MEES) in privately rented homes, so more effective enforcement should, at the margin, support faster remediation of poorly insulated/inefficient rented properties — a modest positive contribution to the Council's net zero and Climate Change Strategy objectives. Conclusion: no negative climate or environmental impact identified; a minor indirect positive impact via energy efficiency enforcement.

Section 2 – How will the Policy/Service impact RBC's greenhouse gas emissions

Scope 1 Emissions

Direct emissions from council owned resources, for example through boilers or vehicles.

Nature of impact	No Impact
Description of impact	Neither policy involves any Council-owned or operated asset (boilers, vehicles, buildings). They govern how existing enforcement functions are exercised — investigation, notices, licensing conditions, prosecution and civil penalties — using existing officer resource and existing methods of service delivery (site visits, inspections). Adopting these policies does not itself change Council vehicle use, fuel consumption or any other direct emissions source.
Any actions or mitigation to reduce negative impacts	
How will the impact be monitored?	

Scope 2 Emissions Indirect emissions occurring at the location energy is produced for council activities. This would generally be the change in electricity usage.	
Nature of impact	No Impact
Description of impact	The policies do not change Council electricity usage, premises, or energy demand. They are a change to decision-making framework and methodology, not to any Council-operated facility or process that consumes energy.
Any actions or mitigation to reduce negative impacts	
How will the impact be monitored?	

<u>Section 3 – What is the impact of the policy/service in relation to RBC's Climate Strategy</u>	
Workplaces and the Economy	
Nature of impact	No Impact
Description of impact	
Any actions or mitigation to reduce negative impacts	
How will the impact be monitored?	
Transport	

Nature of impact	No Impact
Description of impact	
Any actions or mitigation to reduce negative impacts	
How will the impact be monitored?	
Natural Environment	
Nature of impact	No Impact
Description of impact	
Any actions or mitigation to reduce negative impacts	
How will the impact be monitored?	
Homes and Energy	
Nature of impact	Positive

Description of impact	This is the section where the policies have their clearest, most relevant link to the Climate Change Strategy. The Enforcement Policy's civil penalty provisions cover breaches of minimum energy efficiency standards (MEES) in privately rented homes, giving the Council a more consistently applied enforcement tool to secure improvement of poorly insulated or inefficient rented properties — directly supporting the "improving the energy efficiency of buildings" strand of this section. The policies also strengthen enforcement of Housing Act 2004 hazards including Excess Cold and Excess Heat (both explicitly referenced in the Civil Penalties Policy's vulnerability provisions), which relate to how well homes cope with weather extremes made more frequent by climate change — supporting the "how homes are able to cope with weather changes" strand. This is an indirect benefit of more effective enforcement rather than a scheme that directly funds or delivers retrofit; it does not involve RBC's own social housing stock, engagement with developers, or low-carbon new-build methods, which fall outside the scope of these policies.
Any actions or mitigation to reduce negative impacts	
How will the impact be monitored?	Suggested proxy metrics, using data the Council will hold anyway as part of casework rather than anything additional: Number of MEES-related compliance/penalty notices issued each year, and the number of those properties subsequently confirmed to have reached at least an EPC 'E' rating (or where a valid exemption is registered) — an increase in properties brought up to standard is a reasonable proxy for improved energy efficiency across the enforced portion of the private rented stock. Number of Improvement Notices served for Excess Cold and Excess Heat hazards under the Housing Act 2004, and the proportion closed as complied with — a higher compliance rate implies more homes better able to cope with weather extremes. These could be reported annually (e.g. within existing housing enforcement performance reporting) and reviewed alongside the policy's own scheduled review, rather than requiring a new monitoring system.
Waste, Resources and the Circular Economy	
Nature of impact	No Impact

Description of impact	
Any actions or mitigation to reduce negative impacts	
How will the impact be monitored?	
Climate and Nature Positive Communities	
Nature of impact	No Impact
Description of impact	
Any actions or mitigation to reduce negative impacts	
How will the impact be monitored?	
Adaptation	
Nature of impact	Positive

Description of impact	This section asks how climate change will affect the proposal, rather than how the proposal affects climate. Here there's a genuine link: as the borough experiences hotter summers, wetter winters and more extreme weather, housing-related hazards that the Enforcement and Civil Penalties Policies already target — Excess Heat, Excess Cold, and Damp and Mould Growth (all defined Housing Act 2004/HHSRS hazard categories referenced in the Civil Penalties Policy's vulnerability provisions) — are likely to become more prevalent and severe in the private rented stock, particularly in poorly insulated or poorly ventilated properties. Because the policies' hazard-based enforcement framework is not tied to today's climate baseline, it is inherently able to respond as these risks intensify: officers will continue to assess and enforce against these hazards under existing powers regardless of how much more common they become. No additional measures are proposed at this stage, since the existing framework already covers the relevant hazard types; this should be revisited at the policy's scheduled review if climate-driven housing hazards increase materially in frequency or severity.
Any actions or mitigation to reduce negative impacts	
How will the impact be monitored?	Environmental Health and Community Safety could track, as part of existing housing enforcement casework reporting: the number and proportion of enforcement cases each year relating to Excess Heat, Excess Cold and Damp and Mould Growth hazards specifically (as distinct from other Housing Act 2004 hazards), and how this changes year on year relative to overall case volumes. A rising share of cases attributable to these three hazard categories over time would be a reasonable proxy that climate-driven housing risk is increasing in the borough's private rented stock, and would signal that the policy's approach to these hazards should be revisited at review — even without separate climate/weather data. This uses data officers already record during casework (hazard type under HHSRS) rather than requiring a new data collection exercise.

<u>Section 4 – Review</u>	
Review Date	31 Mar 2028

Key points to be considered through review	Whether MEES/EPC compliance outcomes have improved (number of properties brought up to at least EPC 'E', or valid exemptions registered, following enforcement action). Whether the proportion of cases relating to Excess Heat, Excess Cold and Damp and Mould Growth hazards has changed, as an indicator of climate-driven housing risk (see Adaptation monitoring above). Whether removal of the automatic 50% low-income landlord discount has produced disproportionate outcomes — volume and outcome of financial hardship claims made under Step 4 of the civil penalty matrix, and whether genuine hardship cases are being fairly recognised. Whether case identification remains complaint-led in practice, or whether proactive inspection and partner referrals are genuinely reaching tenants less likely to self-report (e.g. those with insecure immigration status or limited English) — see equalities barriers monitoring above. Whether enforcement activity, when mapped against ward-level deprivation data, is concentrated in more deprived areas as reasoned in this assessment, and whether that has implications for resourcing or targeting. Any changes to the Renters' Rights Act 2025 implementation timetable, statutory guidance, case law, or ACEHO model updates that may require amendment under the delegated authority in Recommendation (3).
Review Summary To be completed following the review	

Supporting Documents	
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