

To: Councillor Terry (Chair)
Councillors Leng, Barnett-Ward, Eden,
Emberson, Ennis, Gittings, Griffith, Nikulina,
Rowland, R Singh, Thompson, White and
Yeo

Committee.Services@reading.gov.uk

10 October 2025

Your contact is: **Simon Hill - Committee Services**

NOTICE OF MEETING - POLICY COMMITTEE 20 OCTOBER 2025

A meeting of the Policy Committee will be held on Monday, 20 October 2025 at 6.30 pm in the Council Chamber, Civic Offices, Reading, RG1 2LU. The Agenda for the meeting is set out below.

1. CHAIR'S ANNOUNCEMENTS

2. DECLARATIONS OF INTEREST

3. MINUTES 5 - 12

4. DELEGATED DECISIONS 13 - 16

5. PUBLIC PETITIONS AND QUESTIONS

To receive any petitions from the public and any questions from the public.

6. QUESTIONS FROM COUNCILLORS

7. REVIEW OF THE ANTI-FRAUD, BRIBERY & CORRUPTION POLICY AND ANTI-MONEY LAUNDERING POLICY, AND ADOPTION OF A FRAUD SANCTION AND PROSECUTION POLICY BOROUGH WIDE 17 - 54

This report sets out the updated Anti-Fraud and Corruption Strategy and Anti-Money Laundering Policy for approval and a newly developed Fraud Sanction and Prosecution Policy for formal adoption.

8. UPDATE TO THE COUNCIL'S ADVERTISING POLICY

**BOROUGH
WIDE**

55 - 80

This report proposes an update to the Council's Advertising Policy which would introduce restrictions on the advertising and promotion of High Fat, Salt and Sugar products across Council-owned and contracted advertising spaces.

EXCLUSION OF THE PRESS AND PUBLIC

If required the following motion will be moved by the Chair:

“That, pursuant to Section 100A of the Local Government Act 1972 (as amended) members of the press and public be excluded during consideration of the following items, as it is likely that there would be disclosure of exempt information as defined in the relevant Paragraphs of Part 1 of Schedule 12A (as amended) of that Act”

WEBCASTING NOTICE

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Members of the public seated in the public gallery will not ordinarily be filmed by the automated camera system. However, please be aware that by moving forward of the pillar, or in the unlikely event of a technical malfunction or other unforeseen circumstances, your image may be captured. **Therefore, by entering the meeting room, you are consenting to being filmed and to the possible use of those images and sound recordings for webcasting and/or training purposes.**

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Present: Councillor Terry (Chair);

Councillors Leng (Vice-Chair), Barnett-Ward, Emberson, Ennis, Gittings, Griffith, Rowland, R Singh, Thompson, White and Yeo

Apologies: Councillors Eden and Nikulina

21. MINUTES

The Minutes of the meeting held on 21 July 2025 were agreed as a correct record and signed by the Chair.

22. DELEGATED DECISIONS

The delegated decisions were noted and it was requested that the expected timescales for the delegated decisions to be made be completed for all the decisions.

23. PETITIONS AND QUESTIONS

A petition was presented by Adrian Lawson on tackling rubbish and bins on the Oxford Road. Councillor Rowland, Lead Councillor for Environmental Services and Community Safety, responded to the petition.

Questions on the following matters were submitted by Councillors:

	<u>Questioner</u>	<u>Subject</u>	<u>Reply</u>
1.	Cllr Thompson	External Enforcement Partnership Trial	Cllr Rowland
2.	Cllr White	Roadworks	Cllr Ennis
3.	Cllr White	Tackling Missed and Delayed Bin Collections	Cllr Rowland

(The full text of the questions and responses was made available on the Reading Borough Council website).

24. CONSTITUTION - BUDGET & POLICY FRAMEWORK PROCEDURE RULES/FINANCIAL REGULATIONS AMENDMENT

The Committee received a report seeking approval to recommend to Council the adoption of revised Budget & Policy Framework Procedure Rules and revised Financial Regulations.

The report explained that both documents had been reviewed and updated to ensure they were current and to simplify their content, making them easier for users to understand. The Budget & Policy Framework Procedure Rules set out the process for the adoption and implementation of the Council's budget and policy framework, while the Financial Regulations provide the framework for managing the Council's financial affairs.

Recommended to Council –

- (1) That the revised Budget & Policy Framework Procedure Rules, attached as Appendix 1 to the report, be adopted;**
- (2) That the revised Financial Regulations, attached as Appendix 2, be adopted.**

25. JOINT PROCUREMENT FOR PARKING ENFORCEMENT SERVICES

The Committee received a report to commence a joint procurement exercise for parking enforcement, permit management, Penalty Charge Notice (PCN) processing, and postal services, in partnership with Oxfordshire County Council (OCC) and potentially other neighbouring authorities.

The report explained that currently Trellint, which was part of the Modaxo Group, provided parking enforcement services for both Reading Borough Council (RBC) and Oxfordshire County Council (OCC) as separate contracts. The Council's contract with Trellint had commenced in October 2023, and the initial term would expire in October 2027 with a total value of £2m.

The Council had an option to extend the existing contract, however, Trellint had indicated that it was exiting the parking enforcement market and would not be content for the contract to be extended beyond October 2027. As Oxfordshire's contract would expire in April 2027 at the latest, there was an opportunity for both Councils to benefit from economies of scale garnered through procuring collaboratively and to commence a joint procurement exercise. It was noted that other near neighbours might also wish to join a shared procurement exercise. The intention would be for each council to have its own contract, but with the procurement dealt with jointly. It was noted that the Council's contract extended beyond Oxfordshire's contract by six months and this would be a material consideration in relation to possible early termination of Reading Borough Council's contract with Trellint.

The report also noted that the Council's contract for Penalty Charge Notice (PCN) processing, permit management and postal services would also expire in October 2027. These were currently provided by a different supplier and the Council would seek to procure a new contract for these services at the same time. This could result in a staggered start to the contract arrangements, but the contract terms would seek to ensure all elements of these contracts ended at the same time in the future to allow easier bundling of these linked services. Aggregation of contracts in this manner might lead to improved pricing and positive impact on each Council's finances; however, steps would be taken to ensure that doing so would not hamper small/medium enterprises from bidding as required under the National Procurement Policy Statement (e.g. permitting consortium bids).

The report explained that in a marketplace that had few suppliers, procuring at the same time as with a neighbouring authority could lead to lost opportunities and unbalanced competitive tension in the market; whilst procuring together simplified the opportunity for bidders and put the combined authorities in a stronger position to require competitive bids. By joining with Oxfordshire the procurement value would be much higher and therefore

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attract wider interest for both service areas. A joint procurement would also reduce costs and demand on resources for both authorities.

Resolved –

(1) That the Executive Director for Economic Growth and Neighbourhood Services, in consultation with the Lead Councillor for Climate Strategy and Transport, Assistant Director of Legal and Democratic Services, and Director of Finance be authorised to:

- a. Commence a procurement exercise independently or in partnership with other councils for parking enforcement, permits, Penalty Charge Notice processing and postal services;**
- b. Terminate, if appropriate, the existing contract for parking enforcement with Trellint (part of the Modaxo Group) by mutual agreement at a date that allowed an orderly handover to new contract arrangements;**
- c. Enter into a suitable agreement with another council or councils to undertake the necessary procurement exercises on behalf of Reading Borough Council;**
- d. Enter into an agreement with a company individually or jointly procured to provide on street and off-street parking enforcement services;**
- e. Enter into an agreement with a company individually or jointly procured to deliver Penalty Charge Notice processing, issue permits for residents and businesses and provide postal services for same;**
- f. Undertake any required contract modifications (to include extension / variation) as might be required from time to time to ensure effective operational management of the contract, subject to that impact not exceeding key decision thresholds.**

26. 2025/26 QUARTER 1 PERFORMANCE AND MONITORING

The Committee considered a report setting out an overview of the Council's financial and performance position as at the end of Quarter 1 of the 2025/26 financial year. The report included updates on the General Fund Revenue and Capital budgets, the Housing Revenue Account (HRA), savings delivery, debt performance, and progress against the Corporate Plan performance measures and projects. The following documents were attached to the report:

- Appendix 1 – Summary of the General Fund Budget and Forecast 2025/26
- Appendix 2 - Savings Tracker Quarter 1
- Appendix 3 - General Fund Capital Programme
- Appendix 4 - Housing Revenue Account (HRA) Capital Programme
- Appendix 5 - Corporate Plan Performance Measures Quarter 1
- Appendix 6 - Corporate Plan Projects Quarter 1
- Appendix 7 - Debt Write-Offs (Exempt Information under Paragraph 3 of Part 1 of Schedule 12A of the Local Government Act 1972, as amended)

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The report stated that the forecast General Fund revenue outturn position for Quarter 1 was an adverse net variance of £4.180m. This was primarily due to pressures within Children's Services delivered by Brighter Futures for Children (£5.210m), Economic Growth & Neighbourhood Services (£1.869m), and Resources (£0.267m), partially offset by a positive variance of £3.138m within Corporate Budgets. Recovery plans were in place or being developed to mitigate these pressures.

The report also provided an update on savings delivery, noting that £1.180m (10%) of savings had been delivered, £6.424m (56%) were on track, £1.888m (16%) were categorised as non-deliverable, and £2.024m (18%) were at risk.

The General Fund Capital Programme was forecasting a positive net variance of £0.168m against the proposed revised budget of £86.500m.

The report explained that the Housing Revenue Account (HRA) was projecting an adverse net variance of £0.176m, resulting in a forecast drawdown from reserves of £4.641m, compared to the approved budgeted drawdown of £4.465m. The HRA Capital Programme was forecasting to spend to budget against the proposed revised budget of £80.933m.

The report also set out performance against the Council Plan success measures. Of the 17 KPIs monitored monthly or quarterly, 53% were at or above target, 6% were within 10% of target, 35% were more than 10% off target, and 6% were to be confirmed. Of the 51 Corporate Plan projects, 63% were on track, 35% were within 10% of target, and 2% were off track. A full list of Performance Measures was attached at Appendix 5 and the list of Projects attached at Appendix 6.

Resolved –

(1) That the following be noted:

- a) **The forecast General Fund revenue outturn position for Quarter 1 of an adverse net variance of £4.180m (Appendix 1);**
- b) **That £1.180m (10%) of savings had been delivered (blue) and £6.424m (56%) of savings were on track to be delivered (green) by March 2026. £1.888m (16%) of savings were currently categorised as non-deliverable (red) and £2.024m (18%) categorised as at risk of delivery (amber) (Appendix 2);**
- c) **That the General Fund Capital Programme was forecasting a positive net variance of £0.168m against the proposed revised budget of £86.500m (Appendix 3);**
- d) **That there was a total £2.927m Delivery Fund available for 2025/26 (inclusive of 2024/25 approved carry forwards). At Quarter 1, £2.801m of this funding had been allocated out to approved schemes;**
- e) **That the Housing Revenue Account (HRA) was projecting an adverse net variance of £0.176m as at the end of Quarter 1, which resulted in a forecast drawdown from HRA Reserves of £4.641m rather than the approved budgeted drawdown of £4.465m;**
- f) **That the HRA Capital Programme was forecasting to spend to budget against the proposed revised budget of £80.933m (Appendix 4);**

- g) The performance achieved against the Council Plan success measures as set out in Section 12 of the report and Appendices 5 and 6;**
- (2) That the amendments to the General Fund Capital Programme (as set out in Section 8 of the report and Appendix 3) resulting in a revised Capital Programme budget of £86.500m for 2025/26 be approved;**
- (3) That the amendments to the HRA Capital Programme (as set out in further detail in Section 11 of the report and Appendix 4) resulting in a revised HRA Capital Programme budget of £80.933m for 2025/26 be approved;**
- (4) That the write-off of debts be approved, as set out in Section 6 of the report and Appendix 7, relating to:**
- a) Non-Domestic Rates - £691,677.05;**
b) Sundry Debt - £47,291.46.

27. BROAD STREET MALL REDEVELOPMENT

The Committee received a report seeking approval for the surrender of the Council's lease of the Broad Street Mall (BSM) carpark to facilitate the redevelopment of the site as part of the wider Minster Quarter regeneration.

The report outlined the strategic importance of the BSM development, which formed part of the Council's longstanding ambition to regenerate the southwestern part of the town centre. The proposed redevelopment, led by AEW and their appointed developer McLaren Living Limited (McL BSM), would deliver approximately 643 Build to Rent units, public realm improvements, and retain part of the existing shopping centre.

To enable the development, AEW and McL BSM required access to and alterations of the BSM carpark and adjoining Council-owned land. The Council held a long leasehold interest in the carpark, comprising circa 784 spaces, and the proposed development would result in a permanent reduction of approximately 330 spaces.

Three options were considered for the carpark transaction:

- Option A – Full Surrender (recommended)
- Option B – Partial Surrender
- Option C – Do Nothing

Option A was recommended as it provided a capital receipt representing best consideration, subject to conditions ensuring the carpark remained operational until development certainty was achieved. The Council would retain a minimum number of public and operational spaces, including for the Hexagon Theatre.

The report also proposed entering into an overarching Construction and Management Agreement (CMA) to govern access, construction logistics, and land management during and after development. The CMA would safeguard the Council's interests, including the

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Hexagon Theatre and Minster Quarter Central development, and provide flexibility for the developer's construction programme.

Resolved –

- (1) That the Heads of Terms for the full surrender of the Council's lease of the Broad Street Mall carpark recommended under Option A be approved;**
- (2) That the principles proposed for an overarching Construction and Management Agreement be agreed;**
- (3) That the proposed route map and timeline up to exchange of the agreement for surrender of the carpark and related conditionality for completion of the surrender be noted;**
- (4) That authority be delegated to the Executive Director of Economic Growth and Neighbourhood Services, in consultation with the Leader of the Council, Lead Councillor for Planning and Assets, Assistant Director of Legal and Democratic Services, Director of Finance, and Assistant Director of Property and Asset Management, to:**
 - (a) Negotiate and conclude terms with relevant parties in respect of the Heads of Terms for the surrender and the Construction and Management Agreement;**
 - (b) Negotiate and conclude terms for disposals and acquisitions in accordance with sections 123 and 120 of the Local Government Act 1972;**
 - (c) Negotiate to enter into any required and/or ancillary documentation and agreements to facilitate the Broad Street Mall development, and;**
 - (d) Procure commercial, professional technical and legal advisors and consultants as necessary, to facilitate the Broad Street Mall development.**

28. EXCLUSION OF THE PRESS AND PUBLIC

Resolved –

That pursuant to Section 100A of the Local Government Act 1972 (as amended), members of the press and public be excluded during consideration of items 29 and 30 below as it was likely that there would be a disclosure of exempt information as defined in Paragraph 3 specified in Part 1 of Schedule 12A to that Act.

29. BROAD STREET MALL REDEVELOPMENT

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The Committee received a confidential report and appendices to consider options available for the Council in relation to providing the BSM carpark to AEW for McLaren BSM to carry out redevelopment proposals (Minute 27 above refers). The report and appendices contained exempt information and were therefore submitted separately from the main report which had been considered in the public session.

30. READING TRANSPORT LIMITED (RTL) SHAREHOLDER REPORT

The Committee, in its capacity as shareholder of Reading Transport Limited (RTL), considered a report setting out at Appendix 1, the Shareholder Update Report.

The cover report set out key points arising from the Shareholder Update including operational performance, social performance, financial performance, pension scheme commitments, capital investment programme and fleet replacement strategy, dividend policy and strategic planning and risk management.

The report also proposed the re-appointment of five Non-Executive Directors whose terms were due to end in December 2025.

Resolved –

- (1) That the content of the report and the Shareholder Update Report as attached as Appendix 1 be noted;**
- (2) That the Board-approved capital investment programme set out in Section 8 of Appendix 1 be noted;**
- (3) That a second term of office for five non-executive directors (Bob Pinkett until 2026; Peter Mihofer until 2029; Ian Feast until 2029; Pam Turton until 2029 and Gush Uppal to 2029) be approved;**
- (4) That a Gush Uppal may retire in December 2028 to assist with future Board rotation be noted;**
- (5) That the dividend proposal outlined in the report be approved.**

(The meeting started at 6.30 pm and closed at 7.53 pm)

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Committee	Date of meeting	Minute number	Item title	Decision	Officer delegated to	Lead Councillor portfolio	Expected timescale for decision
Policy Committee	20/01/25	55(6)	Local Authority New Build Programme Update	That the Executive Director of Communities and Adult Social Care, in consultation with the Director of Finance, the Assistant Director for Procurement and the Assistant Director of Legal and Democratic Services, be authorised to enter into contract with relevant parties to enable delivery of the schemes listed at paragraph 2.1 of the report;	Exec Director of Community and Adult Social Care Services	Housing	The LANB schemes listed in 2.1 of the report are expected to complete by 2028. We will need to reserve this delegation until then, with contracts for each scheme coming forward as required.
Policy Committee	20/01/25	55(7)	Local Authority New Build Programme Update	That the latest position on Dee Park be noted and that the Executive Director of Communities and Adult Social Care, in consultation with the Director of Finance, be authorised to procure an appropriate multi-disciplinary team as set out in the report;	Exec Director of Community and Adult Social Care Services	Housing	This delegation refers specifically to the procurement of an multi-disciplinary team to develop and submit a planning application for Dee Park Phase 3. Decision on this expected to be required Q2 2025/26.
Policy Committee	20/01/25	55(9)	Local Authority New Build Programme Update	That the Executive Director of Communities and Adult Social Care, in consultation with the Assistant Director of Legal and Democratic Services, be authorised to enter into collateral warranties as required on all phases of the LANB programme.	Exec Director of Community and Adult Social Care Services	Housing	The LANB schemes linked to this delegation are expected to complete by 2028. We will need to reserve this delegation until then, with CWs for each scheme coming forward as required.
Policy Committee	17/03/25	69 (1)	Discretionary Licensing in the Private Rented Sector - Implementation Proposal	That the Assistant Director for Planning, Transport and Public Protection be authorised to procure a delivery partner to support the processing and compliance checks for the Council's agreed Discretionary Licensing scheme;	AD of Planning, Transport & Public Protection Services	Housing	Tender application deadline passed in early October with a decision expected by the end of the month.
Policy Committee	17/03/25	69 (2)	Discretionary Licensing in the Private Rented Sector - Implementation Proposal	That the Assistant Director for Planning, Transport and Public Protection, in consultation with the Director of Finance, Executive Director for Economic Growth and Neighbourhood Services and Lead Councillor for Housing, be authorised to enter into a 5-year contract plus 2 years to support the delivery of the licence processing and compliance checks element of the Discretionary licensing in the private rented sector scheme.	AD of Planning, Transport & Public Protection Services	Housing	Tender application deadline passed in early October with a decision expected by the end of the month.
Policy Committee	09/06/25	5(3)	Appointments to Outside Bodies	That the Monitoring Officer, in consultation with the Leader of the Council and the relevant Group Leader (if applicable), be authorised to appoint to any vacancies not appointed to at this meeting or arising mid-year;	AD of Legal & Democratic Services/Monitoring Officer/Returning Officer	Leadership	Delegation may be required at any point during the Municipal Year. Any appointments made using this delegation will be reported under Chair's Announcements at the next available meeting of the Committee and recorded in the Minutes.
Policy Committee	07/04/25	79 (1)	Disposal of Yeomanry House	That authority be delegated to the Assistant Director of Property and Asset management to sell the property to Bidder A on the terms set out in confidential appendix;	AD of Property & Asset Management	Leadership;#Planning and Assets	(July 2025) The sale is currently being progressed, documentation is with Legal Services and sale should complete in the next few months.
Policy Committee	07/04/25	79 (2)	DISPOSAL OF YEOMANRY HOUSE	That if the purchaser did not perform to an acceptable timescale the Executive Director for Economic Growth and Neighbourhood Services be given delegated authority, in consultation with the Leader of the Council and the Lead Councillor for Planning & Assets, to: a) Agree a revised offer price and terms where appropriate which secure Best Consideration; b) Re-engage with other bidders as appropriate or remarket the property for disposal at Best Consideration.	Exec Director of Economic Growth and Neighbourhood Services	Leadership;#Planning and Assets	This delegation is only required if purchaser does not perform to an acceptable timescale.
Policy Committee	21/07/25	10	Simpler Recycling - Glass Collections from Kerbside	That the Assistant Director of Environmental and Commercial Services be authorised to undertake a tender exercise including, in consultation with the Director of Finance, an award of contract of the required vehicles as set out in paragraph 10.2 of the associated report.	AD of Environmental and Commercial Services	Environmental Services and Community Safety	A report is being prepared for the December policy committee, seeking approval for the detailed implementation of the service.
Policy Committee	21/07/25	12	Insurance Contract Tender	That the Director of Finance in consultation with the Lead Councillor for Corporate Services and Resources and the Assistant Director for Legal and Democratic Services be authorised to make relevant decisions regarding policy cover, levels of deductibles and award the contract at the end of the tender process to the winning tenderer/s.	Director of Finance/s151 officer;#AD of Legal & Democratic Services/Monitoring Officer/Returning Officer	Corporate Services and Resources	Evaluation end of November and aim to award in the middle of February 2026, for the contract to be in place by the 1 April 2026.
Policy Committee	21/07/25	12	Insurance Contract Tender	That the Director of Finance be authorised to approve the runoff insurance cover where appropriate for the decommissioned Children's Company 'Brighter Futures for Children'.	Director of Finance/s151 officer	Corporate Services and Resources	From 1 October 2025
Policy Committee	21/07/25	14	Managed Stores Procurement 2025	That the Executive Director of Communities and Adult Social Care, in consultation with the Lead Councillor for Housing, the Director of Finance, and the Assistant Director of Legal and Democratic Services be authorised to: (a) Procure and award a contract with the successful tenderer(s) for the Managed Stores contract. The contract would be for up to 7 years (5 initial years and then up to 2 further years). (b) Negotiate with the successful tenderer to mobilise the contract, vary the contract, extend the contract at the appropriate time, and otherwise contract manage the contract throughout its lifecycle.	Exec Director of Community and Adult Social Care Services;#AD of Legal & Democratic Services/Monitoring Officer/Returning Officer;#Director of Finance/s151 officer	Housing	Out for tender October 2025, expect to award in November 2025 so would exercise the delegation then.
Policy Committee	21/07/25	15	Implications of Oxfordshire Local Government Reorganisation Proposals	That the Chief Executive be authorised to undertake all necessary activities to inform and evidence the request, in line with the initial proposal as set out in Appendix 3 of the report, and consultation with the Leader of the Council	Chief Executive	Leadership	November 2025

Committee	Date of meeting	Minute number	Item title	Decision	Officer delegated to	Lead Councillor portfolio	Expected timescale for decision
Policy Committee	21/07/25	17	Reading Hampshire Property Partnership Ltd Company Closure	- That the Assistant Director for Legal and Democratic Services be authorised to act as the shareholder representative with full authority to approve the Board resolution for the formal closure of Reading Hampshire Property Partnership Ltd and to deal with all miscellaneous and consequential matters.	AD of Legal & Democratic Services/Monitoring Officer/Returning Officer	Leadership	Awaiting confirmation from Hampshire CC
Policy Committee	21/07/25	18	Brighter Futures for Children Ltd - Waiver for Articles	That the Executive Director of Resources, be authorised to act on behalf of Policy Committee (as the representative of the sole member of the Company) from 1 October 2025 and deal with all company closure matters which were the responsibility of the members of the Company, in particular, to agree to the closure of the Company following the signing of the final accounts	Exec Director of Resources	Leadership	From 1 October 2025
Policy Committee	21/07/25	18	Brighter Futures for Children Ltd - Waiver for Articles	That the Executive Director of Resources, be authorised to act on behalf of Policy Committee (as representative of the sole member of the Company) from 1 October 2025 in consultation with the Leader of the Council and the Lead Councillors for Children's Services and Education, to deal with any other miscellaneous matters, including Reserved Matters, which arose whether about the closure of the Company or otherwise.	Exec Director of Resources	Leadership	From 1 October 2025
Policy Committee	17/09/25	25	Joint Procurement for Parking Enforcement Services	<p>(1) That the Executive Director for Economic Growth and Neighbourhood Services, in consultation with the Lead Councillor for Climate Strategy and Transport, Assistant Director of Legal and Democratic Services, and Director of Finance be authorised to:</p> <p>a. Commence a procurement exercise independently or in partnership with other councils for parking enforcement, permits, Penalty Charge Notice processing and postal services;</p> <p>b. Terminate, if appropriate, the existing contract for parking enforcement with Trellint (part of the Modaxo Group) by mutual agreement at a date that allowed an orderly handover to new contract arrangements;</p> <p>c. Enter into a suitable agreement with another council or councils to undertake the necessary procurement exercises on behalf of Reading Borough Council;</p> <p>d. Enter into an agreement with a company individually or jointly procured to provide on street and off-street parking enforcement services;</p> <p>e. Enter into an agreement with a company individually or jointly procured to deliver Penalty Charge Notice processing, issue permits for residents and businesses and provide postal services for same;</p> <p>f. Undertake any required contract modifications (to include extension / variation) as might be required from time to time to ensure effective operational management of the contract, subject to that impact not exceeding key decision thresholds.</p>	Exec Director of Economic Growth and Neighbourhood Services;#AD of Legal & Democratic Services/Monitoring Officer/Returning Officer;#Director of Finance/s151 officer	Climate Strategy and Transport	Detailed procurement discussions have now commenced with Oxfordshire CC we expect to issue the Invitation to Tender at the beginning of November, with a short list being produced in January 2026 and an award being made in April 2026.

Committee	Date of meeting	Minute number	Item title	Decision	Officer delegated to	Lead Councillor portfolio	Expected timescale for decision
Policy Committee	17/09/25	27	Broad Street Mall Redevelopment	<p>(4) That authority be delegated to the Executive Director of Economic Growth and Neighbourhood Services, in consultation with the Leader of the Council, Lead Councillor for Planning and Assets, Assistant Director of Legal and Democratic Services, Director of Finance, and Assistant Director of Property and Asset Management, to:</p> <p>(a) Negotiate and conclude terms with relevant parties in respect of the Heads of Terms for the surrender and the Construction and Management Agreement;</p> <p>(b) Negotiate and conclude terms for disposals and acquisitions in accordance with sections 123 and 120 of the Local Government Act 1972;</p> <p>(c) Negotiate to enter into any required and/or ancillary documentation and agreements to facilitate the Broad Street Mall development, and;</p> <p>(d) Procure commercial, professional technical and legal advisors and consultants as necessary, to facilitate the Broad Street Mall development.</p>	Exec Director of Economic Growth and Neighbourhood Services;#Director of Finance/s151 officer;#AD of Legal & Democratic Services/Monitoring Officer/Returning Officer;#AD of Property & Asset Management	Leadership;#Planning and Assets	<p>(a)i. Target for Conditional Exchange of Carpark Surrender Agreement – June 2026</p> <p>ii. Target for agreeing Construction and Management Agreement (CMA) – Oct 2026</p> <p>(b)i. Target for Conditional Exchange of Carpark Surrender Agreement – June 2026</p> <p>(c)i. This would be in parallel to and following agreement of the CMA and would continue up to BSM starting on site in Q3 of 2027; there may also be requirements to enter in to agreements following works starting on site, this is TBD.</p> <p>(d)i. Procurement process commencing Oct 2025</p>

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Policy Committee

20 October 2025



Reading
Borough Council
Working better with you

Title	Review of the Anti-Fraud, Bribery & Corruption Policy and Anti-Money Laundering Policy, and Adoption of a Fraud Sanction and Prosecution Policy
Purpose of the report	To make a decision
Executive Director/ Statutory Officer Commissioning Report	Darren Carter, Director of Finance
Report status	Public report
Report author	Paul Harrington, Chief Auditor
Lead Councillor	Councillor Ellie Emberson, Lead Councillor for Corporate Services & Resources
Corporate priority	Our Foundations
Recommendations	<p>The Committee is recommended to;</p> <ol style="list-style-type: none"> 1. Review and approve the Council's revised Anti-Fraud, Bribery and Corruption Policy. See Appendix A. 2. Review and approve the Council's revised Anti-Money Laundering Policy. See Appendix B. 3. Review and adopt a new Fraud Sanction and Prosecution Policy. See Appendix C.

1. Executive Summary

- 1.1 To present the Committee with the Council's updated **Anti-Fraud and Corruption Strategy** and **Anti-Money Laundering Policy** for review and approval. These revisions align with best practice guidance from the Chartered Institute of Public Finance and Accountancy (CIPFA), the National Audit Office, and the *Fighting Fraud and Corruption Locally Strategy 2020*¹.
- 1.2 To provide the Committee with the Council's newly developed **Fraud Sanction and Prosecution Policy**, also recommended by CIPFA and the *Fighting Fraud and Corruption Locally Strategy 2020*, for review, comment, and formal adoption.

¹ The "Fighting Fraud and Corruption Locally (FFCL) Strategy 2020" is a counter-fraud and corruption strategy specifically designed for local governments in the UK. It provides a framework for councils to coordinate their response to fraud and corruption, with a focus on prevention, detection, investigation, and recovery. The strategy emphasizes the importance of strong leadership commitment, collaboration, and the use of technology to enhance counter-fraud efforts.

2. Policy Context

2.1 Anti-Fraud, Bribery and Corruption Policy

- 2.1.1 The Council's Anti-Fraud, Bribery and Corruption Policy is designed to promote prevention, encourage detection, and establish a clear framework for investigation. It is supported by a Fraud Response Plan, which serves as a practical guide for all staff on how to report suspected fraudulent activity. The plan also outlines the process for conducting investigations and the actions to be taken where fraud is proven.
- 2.1.2 The revised policy, attached at Appendix A, has been updated to reflect the introduction of the new *Failure to Prevent Fraud* offence, which comes into force on 1 September 2025. Under the Economic Crime and Corporate Transparency Act 2023, large organisations may be held criminally liable if they fail to prevent fraud committed by employees or associated persons, unless they can demonstrate that reasonable fraud prevention procedures are in place.
- 2.1.3 This policy forms part of the Council's broader framework to safeguard against fraud and other forms of economic crime. It should be viewed alongside related policies and procedures addressing bribery, corruption, and money laundering.
- 2.1.4 Once adopted, this policy will replace the existing Anti-Fraud and Corruption Policy, which was originally introduced in March 2018 and subsequently reviewed as part of the Council's Financial Regulations.

2.2 Anti-Money Laundering Policy

- 2.2.1 While local authorities are not legally required to comply with the Money Laundering Regulations 2017, CIPFA guidance recommends that councils adopt the principles of the legislation, given its relevance to certain areas of local government activity. Accordingly, the Council has a responsibility to implement internal procedures aimed at preventing the misuse of its services for money laundering purposes.
- 2.2.2 The legislation places a duty on individuals to report suspected money laundering, such as suspicious cash payments, to the National Crime Agency. This report introduces an updated Anti-Money Laundering Policy, supported by practical guidance notes, to help staff recognise and respond to potentially suspicious transactions encountered in the course of their duties at Reading Borough Council. The policy outlines a clear process for reporting such concerns to a designated officer for assessment and, where appropriate, escalation to the relevant authorities.
- 2.2.3 Once approved, this updated policy will replace the existing version adopted in March 2018.

2.1 Fraud Sanction and Prosecution Policy

- 2.3.1 If the Council is to be effective in preventing and deterring fraud and corruption it is essential that it has in place a transparent response that reinforces the message that acts of fraud committed against the Council will be dealt with robustly.
- 2.3.2 The proposed Fraud Sanction and Prosecution Policy shows that fraud will not be tolerated and indicates how those who commit fraud against the Council can expect to be dealt with. The Policy also acts as a guide and procedural note on how and when certain sanctions might be applied and who key decision makers are. Legal Services, and key officers and members have been consulted with during the development of this policy.

2.4 Publication, Training and Awareness to Embed Policies

- 2.3.2 To maximise the deterrent effect of the proposed policy changes and new policies once they are adopted, they will be shared through publication on the Councils webpages and internal/external communications. Work will be undertaken to review and reference these policies in related documents such as financial regulations, induction, procurement process, etc. It is essential for the policies to be effective, and that staff are aware of them so that they understand the fraud risks in their service areas and how to deal with or report suspected fraud, bribery or money laundering.
- 2.3.3 We will need to make sure the Council's Fraud Sanction and Prosecution Policy is publicised and referenced across a number of service areas to ensure that the public, service users, customers and third parties that the Council works with are aware of the penalties that could apply in the event that fraud is identified. This will act as a deterrent and potentially prevent fraud taking place by visibly demonstrating the Councils stance on all fraud and corruption.
- 2.3.4 Training will be key to ensuring staff are aware of these policies and whilst the Corporate Investigations Team are already working with some service areas to deal with the risk of fraud and specific fraud awareness in those services. A corporate approach will also need to be taken.

3 Contribution to Strategic Aims

- 3.1 The maintenance of governance with the Council to ensure that it is efficient, effective and economic in everything it does is achieved through the improvement of corporate governance by ensuring effective management practices are in place. Therefore preventing loss, and by deterring others from committing fraudulent activity, helps to safeguard the Council's resources to be able to achieve the Corporate Plan priorities.

4 Environmental and Climate Implications

- 4.1 N/A

5 Community Engagement

- 5.1 N/A

6 Equality Implications

- 6.1 There are no equality issues arising from this report

7 Other Relevant Considerations

- 7.1 N/A

8 Legal Implications

- 8.1 Non-adherence to Anti-Fraud and Corruption Policies may facilitate serious financial and corporate governance weaknesses. It is a mandatory requirement that the Council adheres to the laws which are applied within the policy. i.e. Fraud Act, Bribery Act and the Theft Act etc. The Anti-Fraud, Bribery and Corruption Strategy is the umbrella document demonstrating the activities taking place to combat fraud and

corruption. Fraud and corruption exist in many formats and impacts (amongst other matters) upon the Council's finances, service delivery and our customers. A realistic Anti-Fraud, Bribery and Corruption Strategy helps to address all areas of prevention, detection and prosecution/sanction of potential and actual illegality.

- 8.2 Whilst the risk to the Council of contravening the legislation is low, it is extremely important that all employees are familiar with their legal responsibilities: serious criminal sanctions may be imposed for breaches of the legislation. Any person found guilty of a money laundering offence is liable for imprisonment (maximum of 14 years), a fine, or both however, an offence is not committed if the suspected money laundering activity is reported to the MLRO and, where necessary, official permission obtained to continue in the transaction.
- 8.3 The Failure to Prevent Fraud offence, introduced under the Economic Crime and Corporate Transparency Act 2023, imposes criminal liability on large organisations if they fail to prevent fraud committed by employees, agents, or subsidiaries intended to benefit the organisation. Coming into force on 1 September 2025, the offence shifts the burden onto organisations to demonstrate they had reasonable fraud prevention procedures in place. Failure to do so could result in prosecution, significant fines, and reputational damage. This law mirrors the approach taken with the UK Bribery Act and aims to foster a stronger anti-fraud culture across the corporate sector.

9 Financial Implications

There is no direct financial implication arising from this report

10 Timetable for Implementation

10.1 N/A

11 Background Papers

N/A

Appendices

- A. Anti-Fraud, Bribery and Corruption Policy.
- B. Anti-Money Laundering Policy.
- C. Fraud Sanction and Prosecution Policy.

Appendix A

Policy Statement

Anti-Fraud, Bribery and Corruption Policy

October 2025

Date published	October 2025
Approved by & date	Policy Committee 20 Oct 2025
Author	Paul Harrington
Service	Audit & Investigations
Directorate	Resources
Review date	October 2026

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1. Introduction

- 1.1 Reading Borough Council (the Council) is committed to safeguarding public funds and maintaining the highest standards of integrity. It is resolute in its efforts to prevent and combat fraud and corruption, whether originating internally or externally. The Council expects all Members, Officers, and staff to uphold the highest ethical standards by adhering to the Seven Principles of Public Life, the Council's Anti-Fraud, Bribery and Corruption Policy, relevant codes of conduct, internal policies and procedures, and applicable legislation.
- 1.2 The Council places great trust in the honesty and integrity of its Members and employees. It also expects external parties, including suppliers, contractors, and claimants, to act with the same level of integrity in their dealings with the Council. Fraud, corruption, and other forms of misconduct will not be tolerated, regardless of the source. The Council is committed to preventing, deterring, and detecting all forms of fraud and corruption, and will take appropriate action where such activity is identified, including referral to the police and other relevant authorities.
- 1.3 This policy outlines the Council's approach to addressing fraud, bribery, corruption, and dishonest conduct, both within the organisation and in its interactions with external parties.

2. Scope

- 2.1 This policy applies to all actual or suspected instances of fraud, bribery, corruption, or dishonest conduct involving the Council. It covers both internal and external cases and applies to elected Members, Council employees, agency and temporary staff, contractors, volunteers, and service users.

3. Definitions: Fraud, Bribery, Corruption and Dishonesty

- 3.1 The *Fraud Act 2006*, which came into force on 15 January 2007, does not provide a single definition of fraud. However, it establishes a general offence of fraud that can be committed in three distinct ways:
 - By false representation,
 - By failing to disclose information when legally required to do so,
 - By abuse of position.
- 3.2 The Act also introduces offences related to obtaining services dishonestly and the possession, creation, or distribution of articles intended for use in fraudulent activity.

- 3.3 The *Bribery Act 2010*, effective from 1 July 2011, sets out two general offences:
- Offering, promising, or giving a financial or other advantage,
 - Requesting, agreeing to receive, or accepting such an advantage.
- 3.4 Additionally, the Act creates a corporate offence for failing to prevent bribery carried out on behalf of an organisation. In essence, bribery involves giving or receiving something of value with the intention of influencing the actions of the recipient in favour of the provider. All staff must be aware of their responsibilities under this legislation.
- 3.5 The Council defines *corruption* as the act of giving or obtaining an advantage through illegitimate, immoral, or unethical means that conflict with the duties of employees or councillors or infringe upon the rights of others.
- 3.6 *Dishonesty* is a core element of fraud. A person is considered dishonest if they knowingly act in a dishonest manner. Additionally, even if the individual does not perceive their actions as dishonest, they may still be deemed dishonest if their conduct would be considered so by the standards of ordinary, decent people.

4. Failure to Prevent Fraud

- 4.1 The *Economic Crime and Corporate Transparency Act 2023* introduced a new corporate offence of *failure to prevent fraud*, which takes effect from **1 September 2025**. This legislation is intended to hold large organisations accountable where they benefit from fraudulent acts committed by employees or associated persons.
- 4.2 Reading Borough Council falls within the scope of this legislation as a “large organisation,” defined as meeting at least two of the following criteria:
- More than 250 employees
 - Annual turnover exceeding £36 million
 - Total assets exceeding £18 million
- 4.3 The offence applies when fraud is committed by employees, agents, subsidiaries, or other “associated persons” acting on behalf of the organisation, with the intention of benefiting the organisation or its clients. Importantly, the benefit to the organisation does not need to be the primary motive, fraud committed for personal gain that also benefits the organisation may still trigger liability. There is no requirement for senior management to have known about or authorised the fraudulent activity.
- 4.4 For the purposes of this offence, an “associated person” includes any employee, agent, or subsidiary of the organisation, as well as any individual or entity providing services on its behalf.

- 4.5 Companies within the Council's supply chain are not automatically considered associated persons unless they are delivering services *for or on behalf of* the Council. This includes, for example, employees of Council-owned subsidiaries or contractors delivering services such as housing repairs, highways maintenance, leisure, or outreach programmes. However, providers of goods or services *to* the Council, such as commercial cleaners, external legal advisors, valuers, accountants, or engineers, are not considered associated persons under this legislation.
- 4.6 Organisations can defend against this offence by demonstrating that they had *reasonable procedures* in place to prevent fraud, or that it was not reasonable to expect such procedures given the circumstances.
- 4.7 In practical terms, this means all Council employees, contractors, and associated persons must remain alert to potential fraud risks. Departments are expected to implement and follow robust fraud prevention procedures, provide regular fraud awareness training, and maintain strong internal controls. Any suspicions of fraudulent activity must be reported immediately through the appropriate channels, as failure to act could expose the Council to legal liability.

5. Rules and Procedures

- 5.1 The Council has various procedures and rules to ensure that the day-to-day operations and activities are properly controlled and are an important part of the internal control framework. These include: -
- Council Constitution including Financial Regulations.
 - Contracts Procedure Rules.
 - Code of Conduct for Councillors.
 - Officers' Code of Conduct; and
 - Scheme of Delegation.
- 5.2 Individual Services will have also introduced their own measures designed to control their activities e.g. schemes of delegation, working manuals, procedures etc.
- 5.3 Executive Directors need to ensure that staff have access to these rules and regulations and that staff receive appropriate training.
- 5.4 Reports of incidents involving elected Members will be passed to the Monitoring Officer to be dealt with in accordance with the *Arrangements for Dealing with Allegations of Misconduct*.
- 5.5 Failure to comply with the rules and regulations may result in formal action being taken. In the case of employees, this would be through the Council's disciplinary process, and for Members the appropriate political Group disciplinary processes.

- 5.6 It is the responsibility of the Monitoring Officer to report complaints about Councillor Conduct to the Standards Committee. The terms of reference of the Standards Committee, and the procedure for dealing with complaints about Members, are in Article 9 of the Council's Constitution.
- 5.7 The Audit & Governance Committee complements the work of the Standards Committee in relation to its role in promoting high ethical standards and providing oversight of the Council's governance arrangements and systems of internal control.

6. Behaviour of Members and Employees

- 6.1 The Council is resolute that the culture and tone of the Authority is one of honesty and opposition to fraud and corruption. The Council expects Members (elected and/or co-opted) and employees (including agency staff, consultants and contractors) to lead by example in ensuring effective opposition to fraud and corruption. This includes ensuring adherence to legislation, local rules and regulations, national, professional and local codes of conduct and that all procedures and practises are beyond reproach.
- 6.2 The Secretary of State has specified the general principles¹ which are to cover the conduct of Members and co-opted Members. The Council has developed its working behaviour around these principles.
- 6.3 The Council's Codes of Conduct for Members and employees set out an approach to work that is honest, fair, accountable and, as far as possible, transparent. Members and employees must act in line with the codes at all times.
- 6.4 The Council's employees are a vital element in its stance against fraud and corruption and they are positively encouraged to raise any concerns that they may have.
- 6.5 All information supplied will be dealt with fairly and confidentially. The aim will be to avoid revealing the names of persons who supply information.
- 6.6 Executive Directors, in consultation with the council's statutory Officers (Head of Paid Service, Monitoring Officer and Section 151 Officer), are expected to deal firmly and quickly with those who are corrupt, who seek to corrupt, who defraud, or who seek to defraud the council. Cases involving staff will usually lead to disciplinary action, which may result in dismissal. Where there is prima facie

¹ seven principles of public life identified in the First Report of the Committee on Standards in Public Life (the *Nolan Committee*)

evidence that a criminal offence has been committed it is the policy of the Council to refer the case to the Police for investigation and prosecution.

- 6.7 There is a need to ensure that any reporting process is not misused and, therefore, any abuse, such as raising unfounded malicious allegations, may be dealt with as a disciplinary matter.
- 6.8 In relation to complaints involving Members, the Corporate Investigations Team will consult the Monitoring Officer on whether or not the complaint falls within the scope of the Members' Code of Conduct and if so, what further steps (if any) should be taken.

7. Prevention of Fraud and Corruption

- 7.1 A key preventative measure against fraud and corruption is an adequate internal control framework covering all the Council's systems, both financial and non-financial, which support the delivery of services. The corporate rules and procedures referred to in paragraph 5.1 form part of this framework. The operation and adequacy of the internal controls in individual systems is the responsibility of Executive Directors and is subject to regular review by both Internal and External Audit.
- 7.2 A further preventative measure against fraud and corruption exists at the recruitment stage to establish, as far as possible, the previous record of potential employees in terms of their propriety and integrity. Staff recruitment is therefore required to be in accordance with the Council's Recruitment and Selection Policy, which requires written references to be obtained and identity documents to be checked.
- 7.3 When recruiting for posts that involve work with children or vulnerable adults, or where otherwise deemed appropriate, the screening process must include assessment and checks by the Disclosure and Barring Service.
- 7.4 All employees are required to report receiving any gift or hospitality to their manager who should decide if the gift is acceptable or should be declined. It must be recorded in a register maintained by the directorate. The type of hospitality offered and the person/organisation offering it must also be recorded in the register maintained by the Directorate.
- 7.5 Employees are required to declare their personal interests in accordance with the Officers Code of Conduct.
- 7.6 Members are required to declare their personal and prejudicial interests in accordance with the Code of Conduct for Members and voting Co-opted Members and to act in accordance with the code.

Data Matching

- 7.7 The Council will undertake data matching exercises in accordance with Data Protection legislation for the purposes of identifying and reducing fraud and corruption.
- 7.8 Regular data matching files and Real Time Information (RTI) are received from the Department for Work and Pensions (DWP), and the information is used to identify any incorrectness of a Housing Benefit or Council Tax Support claims.
- 7.9 We are required by law to participate in the National Fraud Initiative (NFI) data matching exercises for the purposes of preventing and detecting fraud. These exercises are directed by the Cabinet Office and at present there are two data matching exercises:
- i. A two-yearly national match to government, local government and other public sector records for which we supply payroll, housing benefit, council tax reduction scheme, creditors, licensing and housing register data; and
 - ii. An annual local match of council tax and electoral register data.
- 7.10 The use of data by the Cabinet Office in data matching exercises is carried out with statutory authority under Part 6 of the Local Audit and Accountability Act 2014. It does not require the consent of the individuals concerned under the General Data Protection Regulation (GDPR) and Data Protection Act 2018.

Probity Audits

- 7.11 Probity audits will be included in the Internal Audit Plan, as time allows, aimed specifically at identifying potential irregularities or providing assurance that they do not exist.

Fraud Warnings

- 7.12 The Corporate Investigations Team will be the focal point for any fraud warnings on potential external threats or attacks that have occurred in other organisations and will take appropriate action to identify or prevent similar incidents occurring at this Council. This includes processing the Intelligence Bulletins published by the National Anti-Fraud Network.

Whistleblowing

- 7.13 Our approach to whistleblowing enables employees (through the Staff Whistleblowing Policy), Councillors and members of the public to express any concerns they have about illegal or illegitimate practices involving the council. The whistleblower can raise their concerns without fear of victimisation, discrimination or disadvantage.
- 7.14 Employees are encouraged to raise concerns through their immediate line manager or Assistant Director in accordance with the Staff whistleblowing policy. Concerns can be reported by sending an email to Whistleblowing@reading.gov.uk. Further information on whistleblowing can be found here: [Whistleblowing - Reading Borough Council](#).
- 7.15 The Council's Whistleblowing Policy also seeks to reassure individuals that they will be protected from possible reprisals if they make disclosures in good faith.
- It is the duty of all individuals to report a suspicion of financial irregularity, either via their manager, or by another method identified above. Such disclosures will be treated in accordance with the Whistleblowing Policy.**
- 7.16 Contractors with the Council are also encouraged to raise genuine concerns as part of their contract terms and conditions.
- 7.17 Members of the public are encouraged to report genuine concerns through the designated channels. Examples are dedicated on-line forms, email addresses, and postal mail addressed to the Investigations Team or Chief Auditor. More information can be found on the Council's website (<http://www.reading.gov.uk/fraud>). Members of the public can also report fraud whilst contacting the Council either by phone or in person for other reasons and systems in place to ensure all reports of fraud are recorded and acted on.
- 7.18 The Council also has a Corporate Complaints Policy ([Complaints, comments and compliments - Reading Borough Council](#)) through which complaints can be made on a wide range of subjects. These can reveal suspicions of dishonesty.

8. Detection and Investigation of Fraud and Corruption

- 8.1 The preventative measures described in the previous section significantly reduce the risk of fraud and corruption but cannot eliminate it entirely. The operation of the internal controls in a system may alert employees to potential fraud. However, many frauds are discovered by chance or 'tip off'.

- 8.2 Financial Regulations require Executive Directors to notify the Chief Auditor immediately of any suspected fraud, theft, irregularity, improper use or misappropriation of the Council's property or resources. Under the Code of Conduct, employees are expected to report any impropriety or breach of procedure to the appropriate manager. Reporting cases in this way is essential to the Anti-Fraud, Bribery and Corruption Policy and to ensure that:
- all suspected cases of fraud and corruption are investigated properly.
 - the fraud response plan is carried out properly.
 - there is a standard process for dealing with all suspected cases of fraud and corruption; and
 - people and the Council's interests are protected.
- 8.3 The Corporate Investigations Team will consult with Executive Directors to decide on the type and course of investigations. Human Resources staff will also be consulted and involved, where appropriate, in investigations, particularly where they may lead to disciplinary action. This will include referring cases to the Police where necessary. Investigation Officers may also seek informal advice from the Police in the early stages of an investigation. Care will be taken to ensure that internal disciplinary procedures are followed, but do not prejudice any criminal case.

9. Sanctions

- 9.1 When an investigation's findings support the suspicion that fraudulent or corrupt activity has occurred, action will be taken in accordance with the *Fraud Response Plan*, which requires all types of sanctions – disciplinary, civil and criminal – to be considered.
- 9.2 Any disciplinary action against employees will be taken in accordance with the Council's *Employee Disciplinary Rules and Procedures*. For elected Members, sanctions used for breaches of the Members Code of Conduct will be taken in accordance with the *Members Complaints Procedure*.
- 9.3 Where fraud or impropriety has been perpetrated by organisations/ individuals with whom the Council has a contractual relationship, the Council will take action, including where appropriate, terminating the contract, publicising findings and bringing civil recovery proceedings.

10. Redress

- 10.1 The Council will seek to recover any losses fraudulently obtained from it and, where necessary, the costs incurred in doing so.
- 10.2 We will consider all means available to recover these amounts including possession orders, compensation claims, civil litigation, making an application for recovery from an employee's pension fund and general debt recovery.
- 10.3 The Council will also take advice to enable the use of investigatory powers available under the Proceeds of Crime Act and the use of restraint and confiscation orders.
- 10.4 Other forms of redress to recover losses, (such as making a claim against our insurance cover), or to prevent further fraudulent activity by the perpetrator, (such as notifying their professional body); will also be used wherever appropriate.

11. Training and Awareness

- 11.1 The Council recognises that an important aspect of its Anti-Fraud, Bribery and Corruption Policy is the general awareness and responsiveness of employees throughout the Council. To facilitate this, appropriate provision will be made through online fraud awareness training and bribery and corruption training provided by Learning and Development and communications. Training on specific fraud topics will also be provided to those Members and employees most likely to encounter that type of fraud such as procurement, commissioning, collusion and bid rigging.
- 11.2 The investigation of fraud and corruption is carried out in consultation with Services by the Council's Corporate Investigations Team whose skill base in investigative techniques is maintained by appropriate training.
- 11.3 In addition, the Council will seek via appropriate publicity to increase and maintain the general public's awareness of the facilities available to report concerns about fraud and corruption.
- 11.4 **Managers should ensure that staff are adequately trained to carry out their duties and are aware of how to comply with the Council's policies.**

12. Review of the Policy and its Effectiveness

- 12.1 The Council has an array of measures and procedures to assist in combating fraud and corruption. It is determined to keep pace with any future developments in preventative and detection techniques and to be able to respond to any future government incentives for the detection of fraud. The Anti-Fraud, Bribery and Corruption Policy and its effectiveness will be the subject of regular review.

Appendix A – Fraud Response Plan

1. The Council's Financial Regulations require managers to notify the Chief Auditor immediately of all actual or suspected instances of fraud, attempts at bribery and financial irregularities.
2. For staff who suspect or discover fraud, concerns should be immediately reported to the Chief Auditor and/or Corporate Investigations Manager, who will decide what further action is appropriate.
3. The aims and objectives of the Fraud Response Plan are to:
 - Prevent further losses of funds or other assets where fraud has occurred.
 - Minimise the risk of inappropriate action or disclosure taking place which would compromise an investigation.
 - Ensure there is a clear understanding over who will lead any investigation and to ensure managers, HR, Internal Audit are involved as appropriate.
 - Establish and secure evidence necessary and ensure containment of any information for disciplinary, civil and / or criminal action.
 - Maximise recovery of losses.
 - Ensure appropriate and timely action is taken against those who are suspected of fraud.
 - Identify the perpetrators and take appropriate action with any disciplinary, civil and / or criminal action; and
 - Minimise any adverse publicity for the Council.

Notifying suspected fraud

- 3 The Council relies on its employees, its agents and the public to help prevent and detect fraud and corruption. Often employees are the first to realise there is something seriously wrong internally, as they are in positions to be able to spot any possible cases of fraud or corruption at an early stage.
- 4 Council employees and Members must report any concerns they may have regarding fraud, bribery and corruption, whether it relates to dishonest behaviours by council employees, Members or by others.
- 5 The action taken when a suspected case of fraud, bribery, or corruption is first found might be vital to the success of any investigation that follows, so it is important that employees' actions are in line with the information given in this document. Members, service users, suppliers, partner organisations and members of the public are encouraged to report concerns about fraud and corruption

- 6 Whilst you can remain anonymous, it does help if your details are provided as concerns expressed anonymously are often much more difficult to investigate. For example, we may need to contact you to obtain further information or verify the information supplied.

Investigation process

- 7 Any suspicion of fraud will be treated seriously and will be reviewed in accordance with legislation, local policy and processes.
- 8 Suspected fraud will be investigated in an independent, open-minded and professional manner with the aim of protecting the interests of both the Council and the suspected individual(s).
- 9 Where necessary the Council will work in co-operation with other organisations such as the Police, Department for Work and Pensions, Home Office, His Majesty's Revenue and Customs, UK Borders Agency, NHS Counter Fraud Authority and other Local Authorities.
- 10 Investigations into suspected fraud or corruption will be conducted in a professional manner in accordance with the Police and Criminal Evidence Act 1984 (P.A.C.E.) and local protocols to ensure any actions are carried out both fairly and lawfully.
- 11 If sufficient evidence is established, the case will be reviewed to decide on the appropriate course of action to be taken.

Confidentiality

- 12 Details of any investigation are strictly confidential and will not be discussed with anyone other than the relevant management representatives.
- 13 If the media becomes aware of an investigation and attempts to contact employees or Members, no disclosure of the alleged fraud and investigation can be given. All matters relating to statements to the media will be dealt with through the Council's communications team.

Summary

- 14 This Fraud Response Plan, in conjunction with the Anti-Fraud, Bribery and Corruption Policy, provides a framework for preventing and investigating fraud, corruption and bribery against the Council. It is imperative that awareness of this plan is promoted both across the Council and externally.
- 15 The plan will be reviewed every two years and following any major fraud or changes in legislation.

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Appendix B

Policy Statement

Anti Money Laundering Policy

October 2025

Date published	September 2025
Approved by & date	Policy Committee 20 October 2025
Author	Paul Harrington
Service	Audit & Investigations
Directorate	Resources
Review date	October 2026

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1. Introduction

- 1.1 Although local authorities are not directly covered by the requirements of The Proceeds of Crime Act 2002 and the Money Laundering Regulations 2017, guidance from CIPFA indicates that they should comply with the underlying spirit of the legislation and regulations.
- 1.2 Reading Borough Council (the Council) is committed to the highest possible standards of conduct and has, therefore, put in place appropriate and proportionate anti-money laundering safeguards and reporting arrangements.
- 1.3 This policy includes the appointment of a Money Laundering Reporting Officer (MLRO) to comply with legislation and to oversee the reporting of suspicious activity and money laundering to the National Crime Agency.

2. Scope of the policy

- 2.1 This policy aims to maintain the high standards of conduct that currently exist within the Council by preventing criminal activity through money laundering and to enable the Council to comply with legal obligations.
- 2.2 This policy applies to all employees, whether permanent or temporary, Members of the Council, contractors and anyone providing a service for the Council. Its aim is to enable employees and Members to respond to a concern they have in the course of their work for the Council and places a duty upon them to report suspicious activity and money laundering to the MLRO.
- 2.3 Individuals who have a concern relating to a matter outside of work should contact the Police.

3. Definition of money laundering

- 3.1 Money laundering describes offences involving the integration of the proceeds of crime, or terrorist funds, into the mainstream economy. Such offences are defined under the Proceeds of Crime Act 2002 (POCA) as the following 'prohibited acts':
 - Concealing, disguising, converting, transferring, or removing criminal property from the UK (s327 POCA).
 - Becoming involved in an arrangement which an individual knows or suspects, facilitates the acquisition, retention, use or control of criminal property by or on behalf of another person (s328 POCA).
 - Acquiring, using, or possessing criminal property (s329 POCA).
 - Doing something that might prejudice an investigation e.g., falsifying a document (s333 POCA).

- Failure to disclose one of the offences listed in a) to c) above, where there are reasonable grounds for knowledge or suspicion (s330-332 POCA); and
 - Tipping off a person(s) who is or is suspected of being involved in money laundering in such a way as to reduce the likelihood of or prejudice an investigation (s333 POCA).
- 3.2 Provided the Council does not undertake activities regulated under the Financial Services and Markets Act 2000, the offences of 'failure to disclose' and 'tipping off' do not apply. However, the Council and its employees and Members remain subject to the remainder of the offences and the full provisions of the Terrorism Act 2000.
- 3.3 The Terrorism Act 2000 made it an offence of money laundering to become concerned in an arrangement relating to the retention or control of property likely to be used for the purposes of terrorism or resulting from acts of terrorism.
- 3.4 Although the term 'money laundering' is generally used to describe the activities of organised crime, for most people it will involve a suspicion that someone they know, or know of, is benefiting financially from dishonest activities.
- 3.5 Potentially very heavy penalties (unlimited fines and imprisonment up to fourteen years) can be handed down to those who are convicted of one of the offences detailed in 3.1.

4. Requirements of the money laundering legislation

- 4.1 The main requirements of the legislation are:
- To appoint a Money Laundering Reporting Officer (MLRO).
 - Maintain client identification procedures in certain circumstances.
 - Implement a procedure to enable the reporting of suspicions of money laundering; and
 - Maintain record keeping procedures.

5. The Money Laundering Reporting Officer (MLRO)

- 5.1 The Council has designated the Chief Auditor as the Money Laundering Reporting Officer.
- 5.2 **The key requirement on employees is to promptly report any suspected money laundering activity to the MLRO.** (See 7. Reporting Procedure for Suspicions of Money Laundering, below for further guidance).

5.3 The MLRO can be contacted at:

Address:

Paul Harrington, Chief Auditor. Audit, Investigations & Insurance, Directorate of Resources, Reading Borough Council, Civic Offices, Bridge Street, Reading, RG1 2LU

Email: antifraud@reading.gov.uk

Telephone No: 07515 187387

5.4 In the absence of the Chief Auditor the Corporate Investigations Manager is authorised to deputise.

6. Client identification procedures

- 6.1 Although not a legal requirement, the Council has client identification procedures which must be followed when council land or property is being sold. These procedures require individuals and, if appropriate, companies to provide proof of identity and current address.
- 6.2 If satisfactory evidence is not obtained at the outset of a matter, then the transaction must not be progressed, and a disclosure report must be submitted to the Money Laundering Reporting Officer.
- 6.3 All personal data collected must be kept in compliance with the Data Protection Act 2018 and the General Data-Protection Regulation (UK).

7. Reporting procedure for suspicions of money laundering

7.1 Where you know or suspect that money laundering activity is taking place or has taken place or become concerned that your involvement in a matter may amount to a prohibited act under the Act, you must disclose this as soon as practicable to the MLRO. The disclosure should be within “hours” of the information coming to your attention, not weeks or months later. Your disclosure should be made to the MLRO using the disclosure report, the report must include as much detail as possible including:

- Full details of the people involved.
- Full details of the nature of their/your involvement.
- The types of money laundering activity involved.
- The date(s) of such activities.
- Whether the transactions have happened, are ongoing or are imminent.
- Where they took place.
- How they were undertaken.
- The (likely) amount of money/assets involved; and
- Why, exactly, you are suspicious.

7.2 Along with any other available information to enable the MLRO to make a sound

judgment as to whether there are reasonable grounds for knowledge or suspicion of money laundering, and to enable them to prepare their report to the National Crime Agency (NCA), where appropriate. You should also enclose copies of any relevant supporting documentation.

- 7.3 If you are concerned that your involvement in the transaction would amount to a prohibited act under sections 327 – 329 of the Act, then your report must include all relevant details, as you will need consent from the NCA, via the MLRO, to take any further part in the transaction - this is the case even if the client gives instructions for the matter to proceed before such consent is given. You should therefore make it clear in the report if such consent is required and clarify whether there are any deadlines for giving such consent e.g., a completion date or legal deadline.
- 7.4 Once you have reported the matter to the MLRO you must follow any directions the MLRO may give you. You must NOT make any further enquiries into the matter yourself: any necessary investigation will be undertaken by the NCA. Simply report your suspicions to the MLRO who will refer the matter on to the NCA if appropriate. All members of staff will be required to co-operate with the MLRO and the authorities during any subsequent money laundering investigation.
- 7.5 Similarly, at no time and under no circumstances should you voice any suspicions to the person(s) whom you suspect of money laundering, even if the NCA has given consent to a particular transaction proceeding, without the specific consent of the MLRO; otherwise, you may commit a criminal offence of “tipping off”.
- 7.6 Do not make any reference on a client file to a report having been made to the MLRO – should the client exercise their right to see the file, then such a note may tip them off to the report having been made and may render you liable to prosecution. The MLRO will keep the appropriate records in a confidential manner.

8. Consideration of the disclosure by the Money Laundering Reporting Officer (MLRO)

- 8.1 Upon receipt of a disclosure report, the MLRO must note the date of receipt on their section of the report and acknowledge receipt of it. They should also advise you of the timescale within which they expect to respond to you. The MLRO will consider the report and any other available internal information they think relevant, for example:
 - reviewing other transaction patterns and volumes.
 - the length of any business relationship involved.
 - the number of any one-off transactions and linked one-off transactions; and
 - any identification evidence held.

- 8.2 The MLRO will undertake such other reasonable inquiries they think appropriate in order to ensure that all available information is considered in deciding whether a report to the NCA is required (such enquiries being made in such a way as to avoid any appearance of tipping off those involved). The MLRO may also need to discuss the report with you.
- 8.3 Once the MLRO has evaluated the disclosure report and any other relevant information, they must make a timely determination as to whether:
- there is actual or suspected money laundering taking place; or
 - there are reasonable grounds to know or suspect that is the case; and
 - whether they need to seek consent from the NCA for a particular transaction to proceed.
- 8.4 Where the MLRO does so conclude, then they must disclose the matter as soon as practicable to the NCA on their standard report form and in the prescribed manner, unless they have a reasonable excuse for non-disclosure to the NCA (for example, if you are a lawyer and you wish to claim legal professional privilege for not disclosing the information).
- 8.5 Where the MLRO suspects money laundering but has a reasonable excuse for non-disclosure, then they must note the report accordingly; they can then immediately give their consent for any ongoing or imminent transactions to proceed.
- 8.6 In cases where legal professional privilege may apply, the MLRO must liaise with the Council's Legal Department to decide whether there is a reasonable excuse for not reporting the matter to the NCA.
- 8.7 Where consent is required from the NCA for a transaction to proceed, then the transaction(s) in question must not be undertaken or completed until the NCA has specifically given consent, or there is deemed consent through the expiration of the relevant time limits without objection from the NCA.
- 8.8 Where the MLRO concludes that there are no reasonable grounds to suspect money laundering then they shall mark the report accordingly and give their consent for any ongoing or imminent transaction(s) to proceed.
- 8.9 All disclosure reports referred to the MLRO and reports made by them to the NCA must be retained by the MLRO in a confidential file kept for that purpose, for a minimum of five years.
- 8.10 The MLRO commits a criminal offence if they know or suspect, or have reasonable grounds to do so, through a disclosure being made to them, that another person is engaged in money laundering, and they do not disclose this as soon as practicable to the NCA.

9. Training

- 9.1 Officers considered likely to be exposed to suspicious situations, will be made aware of these by senior management and provided with appropriate training. Additionally, all employees and Members will be familiarised with the legal and regulatory requirements relating to money laundering and how they affect both the Council and themselves.
- 9.2 Notwithstanding the paragraphs above, it is the duty of officers and Members to report all suspicious transactions whether they have received training or not.

10. Reading Borough Council procedures

- 10.1 Although the relevant Regulations relating to money laundering do not, in many cases directly apply to local authorities, guidance from CIPFA states that local authorities should comply with the requirements of these Regulations. All members of staff and those acting on behalf of the Council must follow the Council's Anti-Money Laundering Policy, published on the Council's website.
- 10.2 This Policy sets a limit on payments to the Council in the form of cash; place a duty on members of staff who suspect money laundering activity to report this to the Money Laundering Reporting Officer; and require that officer to make appropriate reports to the National Crime Agency.
- 10.3 The Money Laundering Reporting Officer. The officer nominated to receive disclosures about money laundering activity within the Council. In the absence of the Chief Auditor, the Corporate Investigations Manager is authorised to deputise.

Procedures

- A. No payment to the Council will be accepted in cash if it exceeds £5,000¹.
- B. Any employee who suspects money laundering activity must make a Disclosure Report reporting their suspicion promptly to the Money Laundering Reporting Officer (MLRO), or to the MLRO's deputy if appropriate, using the Money Laundering Reporting Procedure.
- C. The employee must follow any subsequent directions of the MLRO or deputy and must not themselves make any further enquiries into the matter.
- D. The employee must not disclose or otherwise indicate their suspicions to the person suspected of money laundering.
- E. The MLRO or deputy must promptly evaluate any Disclosure Report, to determine whether it should be reported to the National Crime Agency (NCA).
- F. The MLRO or deputy must, if they so determine, promptly report the matter to NCA on their standard report form and in the prescribed manner.

¹ limit is detailed in the Council's Constitution (6.5.6 page 167)

- G. The MLRO or deputy will commit a criminal offence if they know or suspect, or have reasonable grounds to do so, through a disclosure being made to them, that another person is engaged in money laundering and they do not disclose this as soon as practicable to the NCA.

11. Conclusion

- 11.1 Given a local authority's legal position with regard to the legislative requirements governing money laundering, the Council believes that this Policy represents a proportionate response to the level of risk it faces of money laundering offences.

12. Review

- 12.1 This policy will be reviewed every three years or as required by legislation.

Appendix 1 – Report to MLRO Template

CONFIDENTIAL

To: The Money Laundering Reporting Officer
(MLRO) Audit & Investigations
Reading Borough Council
Civic Offices
Bridge Street
Reading

RG1 2LU

From officer reporting suspected activity:

Name:	
Position:	
Service:	
Email address:	
Telephone numbers:	

Do not discuss the content of this report with anyone, especially the person you believe to be involved in the suspected money laundering activity you have described. To do so may constitute a tipping off offence.

Details of suspected offence:

Name(s) and address(es) of person(s) involved: (Please also include date of birth, nationality, national insurance numbers - if possible) (If a company please include details of nature of business, type of organisation, registered office address, company registration number, VAT registration number)
Nature, value, and timing of activity involved: (Please include full details e.g., what, when, where, how.)

Nature of suspicions regarding such activity:
Has any investigation been undertaken (as far as you are aware)? Yes / No
If yes, please include details below:
Have you discussed your suspicions with anyone else? Yes / No
If yes, please specify below, explaining why such discussion was necessary:
Have you consulted any supervisory body guidance re money laundering (e.g., the Law Society)? Yes / No
If yes, please specify below:
Do you feel you have reasonable grounds for not disclosing the matter to the FCA (e.g., are you a lawyer and wish to claim legal professional privilege)? Yes / No
If yes, please set out full details below:
Are you involved in a transaction which might be a prohibited act under the Proceeds of Crime Act, and which requires appropriate consent from NCA? Yes / No
If yes, please enclose details below:
Please detail below any other information you feel is relevant:

FOR COMPLETION BY THE MONEY LAUNDERING REPORTING OFFICER

Date report received:	
Date receipt of report acknowledged:	

Consideration of Disclosure - Action plan

Are there reasonable grounds for suspecting money-laundering activity?
If there are reasonable grounds for suspicion, will a report be made to NCA? Yes / No
If yes, please confirm date of report to NCA:
Details of liaison with NCA regarding the report:
Is consent required from the NCA for any ongoing or imminent transactions that would otherwise be prohibited acts? Yes / No
If yes, please confirm full details:

Date consent received from NCA:	
Date receipt of report acknowledged:	
Date consent given by you to employee:	
Date consent given by you to employee for any prohibited act transactions to proceed:	

If there are reasonable grounds to suspect money laundering, but you do not intend to report the matter to the NCA, please set out below the reason(s) for non- disclosure:

Other relevant information:
Signed: Dated:

Appendix C

Policy Statement

Fraud, Sanction & Prosecution Policy

September 2025

Date published	September 2025
Approved by & date	Policy Committee XXXX/XXXX
Author	Paul Harrington
Service	Audit & Investigations
Directorate	Resources
Review date	September 2026

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1. Introduction

- 1.1. Reading Borough Council (the Council) takes its responsibility to protect public funds seriously and expects its business to be conducted to the highest ethical and legal standards. The Council does not tolerate fraud, theft or corruption. Where there is evidence of fraud, theft or corruption against the Council, those responsible, whether internal or external to the Council, will be held accountable for their actions using the full range of sanctions available. The use of sanctions is governed by this policy that sets out appropriate action to take.
- 1.2. This Policy forms part of the Council's wider anti-fraud framework (it includes matters of fraud, bribery, corruption, theft and related offences). Its objectives are:
 - To ensure sanctions in relation to fraud or similar crimes are applied fairly and consistently.
 - To ensure sanctions are applied in an efficient and cost-effective way;
 - To set out the range of sanctions available;
 - To ensure the sanction decision making process is robust, transparent and fair;
 - To make it clear that the Council will not tolerate fraud.
- 1.3. The Council will investigate allegations of fraud, theft or corruption in line with the Council's Fraud Response Plan. Following an investigation, a range of factors will require consideration before deciding on appropriate sanction, including the individual circumstances of each case, the impact on the individual and the wider community, and the seriousness of the offence.

2. Sanction Options

- 2.1. Where there is evidence of fraud, theft or corruption, the following options will be considered:
 - No further action;
 - Referral to professional bodies;
 - Disciplinary action;
 - Civil proceedings;
 - Criminal prosecution;
 - Sanctions as alternatives to prosecution.
- 2.2. The Council will consider any of the above options and parallel sanctions may be pursued.

2.3 No further action

- 2.3.1 The Council may consider, following an investigation, closing a case without taking any further action. This may occur where there is no evidence of fraud or misconduct, or where it is not in the public interest to take action.

2.4 Referral to professional bodies

- 2.4.1 Where there is adequate evidence that a person or entity has breached professional duties or responsibilities, the Council will refer the matter to the relevant professional body.

2.5 Disciplinary action

- 2.5.1 In the event that an allegation is made against a Council employee, the Corporate Investigations Team (CIT) will consult with the Council's Human Resources Service and appropriate action will be taken following the Disciplinary Policy.
- 2.5.2 The investigating officer may be a member of CIT or may be appointed through the HR Disciplinary process. Sanctions may include warnings or dismissal and alongside this, additional sanction options will be considered including referral to professional bodies, civil proceedings and criminal prosecutions.
- 2.5.3 If during the course of an investigation or disciplinary action, the employee suspected of fraud, theft or corruption chooses to resign, the Council will continue to pursue referral to professional bodies, civil proceedings or criminal prosecution where appropriate.
- 2.5.4 In the event of an allegation against a Councillor in relation to fraud, theft or corruption against the Council, this will be reported to the Monitoring Officer, who will agree the action to be taken with the Chief Executive. Depending on the circumstances of the case, criminal proceedings may also be considered.

2.6 Civil proceedings

- 2.6.1 The Council may take civil proceedings where appropriate. Regardless of whether or not any sanction action is taken, the Council will seek, where appropriate, to recover any overpaid, misused or unfairly gained monies.
- 2.6.2 The following measures may be considered in the pursuit of financial recovery:
- Recovery of money through appropriate legal proceedings.
 - Legal action such as freezing / restraint orders to preserve evidence and assets.

2.6.3 There will be overpayments which are not due to fraud, and the Council will determine appropriate recovery in these cases.

2.7 Criminal prosecution

2.7.1 Where the Council considers it 'expedient for the promotion or protection of the interests of the inhabitants of their area', Section 222 of the Local Government Act 1972 empowers the Council to prosecute or appear in legal proceedings and, in the case of civil proceedings, institute them in their own name.

2.7.2 Furthermore, Section 223 of the Local Government Act 1972 allows a 'Local Authority to authorise any member or its staff to prosecute or defend designated matters in magistrates' court'.

2.7.3 In the most serious of cases, the Council will consider the prosecution of those suspected to have committed fraud or theft. Where the Council considers there is sufficient evidence (based on the Code for Crown Prosecutors) to indicate a criminal act has taken place, a decision will be made whether to undertake a criminal prosecution utilising the Council's Legal Services (or contracted legal representatives) the police or another law enforcement partner (such as DWP or HMRC). This decision will be made by the Chief Auditor, the Head of Legal & Democratic Services, and the relevant Director/Assistant Director (or delegated appropriately).

2.7.4 Before a decision is taken whether or not to prosecute, the Council will be guided by the Council's Enforcement Policy and the Code for Crown Prosecutors and will only initiate legal action if, following legal advice, it has satisfied the following two tests:

- **Evidential Test** – the evidence must be:
 - Clear, reliable and admissible in court; and
 - Strong enough for a realistic chance of prosecution. i.e. to prove a case 'beyond reasonable doubt'.
- **Public Interest Test** – the prosecution is in the public interest, taking into account:
 - Seriousness and / or monetary value of the offence;
 - Cost and proportionality of the prosecution;
 - Age and health of the suspect;
 - Culpability of the suspect;
 - Circumstances of and harm caused to the victim; and
 - Impact on the community.

2.7.5 Where a case has been referred to the Police to investigate, the final decision as to whether or not to pursue the case will be taken by the Police and the Crown Prosecution Service.

2.7.6 The Council will conduct the investigations in accordance with the Criminal Procedure and Investigations Act 1996 and the Police and Criminal Evidence Act 1984 and other relevant legislation and codes of practice. Criminal proceedings may be brought for a suspected offence under the following legislation:

- The Theft Act 1968 (as amended);
- The Fraud Act 2006;
- Local Government Finance Act 1992;
- Housing Act 1996;
- Prevention of Social Housing Fraud Act 2013;
- Council Tax Reduction Scheme (Detection of Fraud and Enforcement) Regulations 2013;
- Forgery and Counterfeiting Act 1981;
- Computer Misuse Act 1990;
- Identity Documents Act 2010;
- The Bribery Act 2010;
- Road Traffic Regulation Act 1984;
- Any other relevant provision in law.

2.7.7 Any criminal proceedings where appropriate will include action to recover money or assets, via civil routes, court compensation, via the Proceeds of Crime Act 2002, or the Prevention of Social Housing Fraud Act 2013.

3. Sanction as alternatives to prosecution

3.1. Simple cautions

3.1.1 A Simple Caution (previously known as a Formal Caution) may be offered as an alternative to prosecution for some less serious offences or for first time offences to a business or individual where there is a realistic prospect of conviction, and where that business or individual has admitted the offence. Where a Simple Caution is declined, it is likely that a prosecution will be instituted.

3.1.2 The Local Government Finance Act 1992 allows the Council to consider financial penalties as alternatives to prosecution, and these should always be considered

3.1.3 However, in serious cases of fraud or where repeat offending occurs, the option to prosecute offenders will be kept under review.

3.2 Civil penalties

- 3.2.1 Regulation 13 Council Tax Reduction Schemes (Detection of Fraud and Enforcement) (England) Regulations 2013 and Schedule 3 Local Government Finance Act 1992 permit 'billing authorities' to impose financial penalties where a person fails to report a material fact affecting their council tax liability or where a person fails, without good reason, to correct an error.
- 3.2.2 The Head of Revenue & Benefits will make the decision about the imposition of any Civil Penalties.
- 3.2.3 All penalties will be recovered by adding the debt to a person's Council Tax liability for the current year and recovered only once that annual liability has been settled in full.

3.3 Administrative penalties

- 3.3.1 Regulation 11 Council Tax Reduction Schemes (Detection of Fraud and Enforcement) (England) Regulations 2013, provide for Administrative Penalties to be offered to persons as alternatives to prosecution. The legislation allows for Administrative Penalties amounting to 50% of the gross reduction can be offered. In all such cases of fraud the Council will seek to recover the excess award as well any penalty.
- 3.3.2 The Council's Head of Revenue & Benefits will make the decision about the offer of any Administrative Penalties on advice from SAFS. The Head of SAFS will arrange for the administrative penalty to be offered to the person liable for it and any cooling off period required by legislation.

3.4 Parallel sanctions

- 3.4.1 It is preferable for the appropriate sanctions to proceed simultaneously, but it is not necessary for anyone to await the result of another before concluding. However, due consideration must be given to all proceedings to ensure that one does not impact improperly upon another. The decision to run parallel sanctions will be determined on a case-by-case basis.

4. Partnerships

- 4.1 Where appropriate, the Council will work in partnership with other organisations such as the Police, other local authorities, Social Housing Providers, NHS Counter Fraud Authority, Department for Work and Pensions, His Majesty's Revenue and Customs, UK Borders Agency and the Home Office, to bring joint proceedings or assist the other organisation to bring its own proceedings.

5. Recording Decisions

- 5.1 For an effective regime of sanctions to be successful accurate records of all convictions, penalties and cautions must be maintained. This will enable the correct decisions to be made taking full account of the defendant's background.
- 5.2 All sanctions will be recorded by both CIT and the Council, and copies of all documents used to consider and issue the sanction should be retained, in accordance with the relevant retention policies.
- 5.3 In the case of prosecution, all cases that result in successful convictions will be reported to the Police for recording on the Police National Computer (PNC) central databases.

6. Publicity

- 6.1 It is the Council's intention to positively promote this Policy, as well as the outcome of any prosecutions, to deter others from fraudulent activity and reassure the public that the Council acts against those committing fraudulent and or corrupt acts.
- 6.2 Consideration will be given to whether the outcome of any case should be reported to the community via various media channels. Publicity, where appropriate, will ensure the profile of counter fraud activity remains at a level which will contribute to ensuring the key objective of preventing fraud is met.

7. Review

- 7.1 This Policy will be kept under regular review to ensure compliance with current legislation and best practice.

Policy Committee

20 October 2025



Reading
Borough Council
Working better with you

Title	Update to the Council's Advertising Policy
Purpose of the report	To make a decision
Report status	Partly open to the public and part exempt - see reasons below
Executive Director/ Statutory Officer Commissioning Report	Emma Gee, Executive Director Economic Growth and Neighbourhood Services
Report author	Martin White (Consultant in Public Health) / Amanda Nyeke (Public Health & Wellbeing Manager)
Lead Councillor	Councillor Rachel Eden, Lead Councillor for Education & Public Health
Council priority	Promote more equal communities in Reading
Recommendations	<ol style="list-style-type: none"> 1. That the content of the paper is noted, particularly the trend towards local authorities taking action to protect the health of people living in lower income neighbourhoods. 2. To agree the adoption of an amendment to the Reading Borough Council Advertising Policy as set out at Appendix 2 for all Council sold advertising opportunities within the borough, including through any Council letting or leasing arrangements. 3. Note that subject to adoption of the amended Reading Borough Council Advertising Policy, there will be a phased implementation, that is, as and when existing contractual and property arrangements come up for renewal

The annexe to this report contains exempt information within the meaning of the following paragraph of Part 1 of Schedule 12A of the Local Government Act 1972, as amended by the Local Government (Access to Information) Act 1985 and by the Local Government (Access to information) (Variation) Order 2006:

3. Information relating to the financial or business affairs of any particular person (including the authority holding that information)

And in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information because:

there is prejudice to the Council's Best Value duty if commercial information is shared with the market and which may tend to distort competition

1. Executive Summary

- 1.1. This paper proposes an update to the Council's Advertising Policy which implements its Health in All Policies approach. The proposed Policy update would introduce restrictions on the advertising and promotion of High Fat, Salt and Sugar (HFSS) products across

Council-owned and contracted advertising spaces. It aims to reduce exposure to unhealthy food marketing and encourage the promotion of healthier alternatives. This aligns with best practice already adopted by several local authorities including Barnsley, Bristol, Greenwich, Haringey, Merton and Southwark, Enfield, Bedford, Medway and Transport for London (TfL), with Wokingham Borough Council currently adopting a more extensive approach.

- 1.2. Evidence shows that HFSS products are disproportionately marketed in low-income communities, contributing to health inequalities and poor dietary outcomes. By updating its Advertising Policy, Reading Borough Council can take a proactive step toward creating healthier environments, supporting residents to make healthier choices, and reducing inequalities in health and life expectancy.

2. Policy Context

- 2.1. Reading Borough Council's current Advertising Policy was adopted in 2016. This proposed amendment directly supports the Council Plan 2025–28, which commits to promoting more equal communities. It aligns with the objective to “reduce inequalities in health and life expectancy through its Public Health service” and the ambition to embed health and wellbeing considerations across all policy areas. It may also be seen as an extension of high quality care that demonstrates good leadership and governance establishing good system partnership work that prevents local people from becoming ill before their time.
- 2.2. This Policy update reflects a Health in All Policies (HiAP) approach, which is currently being co-produced with officers across all Directorates. The aim is to embed structural and procedural changes that prioritise prevention, reduce health inequalities and strengthen the good work the Council is already doing around the building blocks of health: environment; housing; transport; worthwhile employment and the food we eat.
- 2.3. The relationship between HFSS products and the obesity epidemic is well established. Council policy has a critical role to play in addressing the commercial determinants of health and preventing premature illness. This proposal builds on national policy direction to act on public health, including the 10 year plan for the NHS which focuses on preventing sickness, not just treating it and local government devolution which emphasises a HiAP approach.
- 2.4. This proposal is further strengthened by recent national developments. The UK Government has confirmed its commitment to implementing restrictions on junk food advertising, reinforcing the direction of travel toward healthier food environments. This national policy shift, welcomed by the Association of Directors of Public Health (ADPH), provides a strong mandate for local authorities like Reading to take bold action. It signals that our proposed Policy is not only evidence-based and locally relevant but also aligned with national priorities and supported by public health leadership across the country. More detail about the pressing local need is outlined below.
- 2.5. Reading's current Advertising Policy, adopted in December 2016, consists of two parts:
 - **Part 1:** Advertising on Council-owned assets (e.g. roundabouts, street light standards, vehicles and the Council's website).
 - **Part 2:** Contracted out advertising arrangements, secured by third-party commercial agents and or partner organisations on Council assets, where the Council has no direct commercial relationship with the advertising party and/or their commissioning agent and the licensee will own the advertising asset.

The proposed changes would introduce specific restrictions on HFSS advertising across both parts of the Policy, aligning Reading with best practice from other local authorities and supporting a whole systems approach to healthy weight.

- 2.6. The Council has license agreements with advertising companies across a range of locations. These include large digital displays, bus shelters, lamp post banners, and roundabouts. The details of these agreements, including revenue and contract end

dates, are commercially sensitive and have therefore been included in **Table 1: Current Advertising Licenses** in **Confidential Financial Annex**

2.7. Proposed Policy Changes

2.8. The current Advertising Policy includes tighter restrictions for Part 1 where the Council is directly issuing a license for the advertiser onto its asset, such as a roundabout or lamp post. Part 2 generally refers to standards imposed by the Advertising Standards Agency. Neither part of the Policy includes specific restrictions on HFSS food promotion.

2.9. It is proposed that the following restrictions would apply to the revised Policy:

2.10. Table 2 Current and Proposed Policy Restrictions

Category	Part 1	Part 2	Policy change?
Political parties or lobbying	Not permitted	Not permitted	No
Gambling and betting services	Not permitted	Permitted with industry guidance displayed	No
Pay-day loans	Not permitted	Not permitted	No
Smoking related products	Not permitted	Not permitted	No
Alcohol	Not permitted	Permitted with industry guidance displayed	No
Advertising with overtly sexual tone	Not permitted	Not permitted	No
Adverts mocking groups of citizens	Not permitted	Not permitted	No
High fat, salt, sugar products	Not permitted	Not permitted	Yes

2.11. Part 1 of the Advertising Policy also reserves the Council the right to consider placements on a case by case basis.

2.12. Rationale for the Change

2.13. Recent public health data profiles from the Department of Health and Social Care Fingertips, a large public health data collection managed by the Office for Health Improvement and Disparities, and a recent rapid Joint Strategic Needs Assessment for the review of the Reading Health and Wellbeing Board, show the scale of problem. It highlights the challenge to the health of local people in terms of the drivers and health outcomes of the obesity epidemic at a local level.

2.14. The environment in which we live and work has positive and negative effects on our health and wellbeing. A feature of the urban environment in Reading is food outlets and the choices they provide. Meals eaten outside of the home tend to be associated with higher calories and larger portion sizes which can make it more challenging to eat healthily. The neighbourhood food environment is an important modifiable determinant of dietary behaviour and obesity.

2.15. In 2024, Reading had 136.9 fast food outlets per 100,000 population, based on a total count of 244 which is worse than 95% of local authorities and worse than the national rate.

2.16. The availability of fast food in our environment is one factor within a complex system that is associated with a range of negative health outcomes and contributes to the obesogenic nature of the environment for some neighbourhoods. Fast food is more

abundantly available in the most deprived areas of England where obesity in children and adults and the associated health conditions, such as type 2 diabetes, hypertension, and heart disease are most prevalent. Current work on the commercial determinants of health provides strong evidence that shows how HFSS products are marketed with greater intensity in areas with higher levels of deprivation.

- 2.17. The rapid Joint Strategic Needs Assessment found that in 2023/24, around 6 out of 10 adults (18+ yrs) in Reading that is 61.6%, were overweight or obese, equivalent to around 86,400 people. Since 2015/16, there has been a relative increase of 9.1% in the prevalence of overweight and obesity, larger than seen nationally (5.9%), however it remains similar to the England average of 64.5%. The percentage of adults (16+ yrs) who reported eating 5 or more portions of fruit and vegetables in Reading was 28.7%. This was the 4th lowest percentage in the South East and the figure has fallen year on year since 2020/21.
- 2.18. The picture in the early life course for children is also a cause for concern. In 2023/24, 21.9% of reception age pupils were overweight or obese, with Reading having the third highest proportion compared with its statistical neighbours. 36.7% of Year 6 pupils are overweight or obese which is higher than the South East average. There is also variation in obesity prevalence between the poorest and richest communities in Reading as illustrated in the graph below.

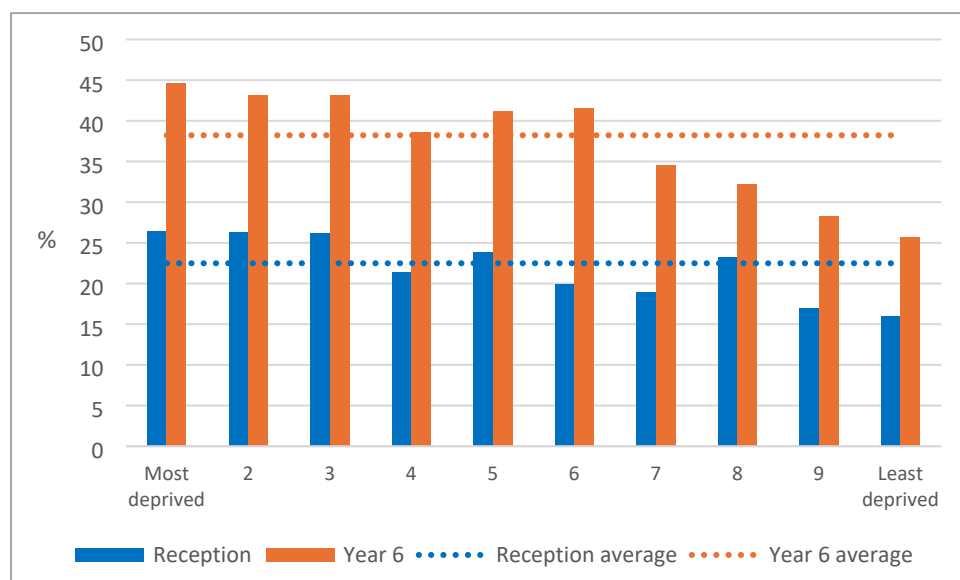


Figure 1 Prevalence of excess weight (overweight or obese) in Reading among Reception and Year 6 children (2021/22 - 2023/24)

- 2.19. These figures underscore the urgent need for action and the public health, moral and political case for action is clear. HFSS products are marketed more intensively in lower income areas, reinforcing unhealthy behaviours and widening health inequalities. Tackling the commercial determinants of health, such as advertising, is a recognised lever for change.
- 2.20. **Health and Economic Benefits**
- 2.21. Excess weight (Obesity and overweight) is estimated to cost the UK £126 billion annually, including healthcare, social care, productivity losses, and reduced quality of life ([Frontier Economics for Nesta, 2025](#)). Productivity losses alone account for £30.8 billion, with individuals in the least affluent areas facing 21% higher costs than those in the most affluent.
- 2.22. According to the Obesity Healthcare Goals ([GOV.UK, 2025](#)), the NHS spends over £11.4 billion annually on obesity-related care.

- 2.23. In Reading, where approximately 86,400 adults are overweight or obese, the local share of national costs is estimated at £726 million per year. Of this, the direct cost to Reading Borough Council, primarily through adult social care, is estimated at £72.6 million annually. This estimate is based on proportional modelling using national data from Frontier Economics (2025) and GOV.UK's Obesity Healthcare Goals and reflects the significant financial impact of obesity on local services.
- 2.24. A 2022 economic modelling [study](#) of Transport for London's (TfL) 2019 Healthier Food Advertising Policy focussing on swapping out high fat, salt, and sugar (HFSS) products with healthier alternatives across the Transport for London (TfL) network found:
- Significant health improvements and cost savings
 - Reduced health inequalities
 - Support healthier choices and no increase in costs for individuals or the public sector
 - It represented a highly effective and equitable public health intervention
 - Sustained advertising revenues, with TfL reporting a £2.3 million increase in the first year
 - Strong evidence for scaling such policies to other regions or nationally
- 2.25. The Policy led to positive outcomes including:
- 94,867 fewer individuals with obesity in Greater London (4.8% reduction)
 - 49,145 fewer overweight individuals (1.8% reduction)
 - 2,857 fewer new cases of type 2 diabetes
 - 1,915 fewer cardiovascular disease (CVD) cases
 - Greater positive impact on more deprived groups, contributing to reduced health inequalities.
- 2.26. It is possible that reductions in obesity, diabetes and cardiovascular disease could be higher than reported, as the study did not consider any decreases in childhood obesity which would have likely occurred. The study also showed that the Policy which had been in place since 2019 was expected to save £218 million in NHS healthcare and social care costs over the lifetime of the population.
- 2.27. The TfL example demonstrates that advertisers can adapt by promoting healthier products or shifting to alternative sectors, maintaining commercial viability while supporting public health.
- 2.28. The proposed Policy change offers a cost-effective, evidence-based intervention that supports healthier choices, reduces inequalities, and aligns with Reading's strategic priorities. It is not a ban on brands or businesses, but a shift toward responsible advertising that protects residents' health.

Examples of adverts used before and after Policy implementation



Examples of adverts before (above) and after (below) implementation of the Healthier Food Advertising Policy, based on real-life examples.



3. The Proposal

- 3.1. It is proposed that Reading Borough Council updates its Advertising Policy to include explicit restrictions on the promotion of High Fat, Salt and Sugar (HFSS) products across all Council-controlled advertising spaces.
- 3.2. This change would apply to both:
 - **Part 1:** Direct Council-issued licenses for advertising on assets such as roundabouts, lamp posts, vehicles, and the Council website.
 - **Part 2:** Advertising managed by third-party agents on Council assets, where the Council does not have a direct commercial relationship with the advertiser.
- 3.3. This update would bring Reading in line with best practice adopted by other local authorities and demonstrate a clear commitment to a Health in All Policies approach with a Licensing Policy that accounts for the impact of its decisions on the health of the local population, particularly neighbourhoods which are exposed to the higher intensity promotion of these potentially harmful products.
- 3.4. The proposed healthier food Advertising Policy represents an important step in Reading Borough Council's commitment to creating healthier environments. It would also support the borough's Whole Systems Approach to Healthy Weight. This also supports the ambitions of the Reading Food Strategy and complements the collaborative efforts of the Reading Food Partnership with its shared vision to foster a local environment that enables sustainable access to affordable, healthy, nutritious food, while fostering an environment conducive to encouraging healthy choices.
- 3.5. It should be noted that the revised Policy is not intended to ban brands or businesses, but rather to encourage the advertising of products that support healthier choices and do not contribute to poor health outcomes for our residents.

4. Contribution to Strategic Aims

- 4.1. This proposal supports the Council's strategic aims to promote more equal communities in Reading and to safeguard the health and wellbeing of Reading's residents.

4.2. The proposed healthier food Advertising Policy supports key priorities in Reading Borough Council's Council Plan:

- **A Healthier Life** - by reducing exposure to high fat, salt, and sugar (HFSS) advertising and encouraging healthier choices.
- **A Great Start in Life** - by creating healthier food environments for children and families, especially in areas of deprivation.
- **A Safer Community** - by tackling the commercial drivers of poor health and reducing inequalities to build fairer, more resilient communities.

5. Environmental and Climate Implications

5.1. There are no direct environmental or climate implications arising from this proposal. However, a ban advertising HFSS products may lead toward people adopting more sustainable diets that would benefit the environment

6. Community Engagement

6.1. Not applicable

7. Equality Implications

7.1. An Equality Impact Assessment has been completed and is attached as Appendix 1.

7.2. The assessment concludes that the proposed amendments to the Council's Advertising Policy are likely to have a positive impact across a wide range of groups and the wider community. No negative impacts have been identified.

7.3. It supports efforts to reduce health inequalities, and contributes to creating healthier environments for children, care-experienced individuals, and those with long-term health conditions.

7.4. Monitoring will be carried out through annual reviews of advertising contracts and community health feedback to ensure the Policy continues to promote equity and inclusion.

8. Other Relevant Considerations

8.1. None.

9. Legal Implications

9.1. Section 111 of the Local Government Act 1972 provides that local authorities (subject to any certain statutory restrictions) have the power to do anything calculated to facilitate, or is conducive or incidental to, the discharge of any of their functions.

9.2. The Council has the legal authority to regulate advertising on its properties and platforms. As detailed in the report, there is evidence that exposure to HFSS advertising contributes to unhealthy dietary preferences and increased calorie intake, exacerbating obesity and related disease. Local authorities may rely on such evidence to justify restrictions in advertising as a proportionate response to a legitimate public health aim.

9.3. The Council has various agreements with third parties for the use of advertising space. These agreements restrict certain types of advertising covered by this Policy but not all. In the acknowledgement of contracts and property arrangements already in place, the Policy will only come into effect for all new or renewals of leases and advertising contracts that are let from 1st November 2025. All current advertising providers within the borough will however be contacted and encouraged to adopt the new Advertising Policy in advance of their contract renewal date, particularly those with several years left on their license.

9.4. As implementation will be phased, it will be possible to monitor the commercial impact of the Policy and agree any revisions as appropriate.

- 9.5. The Policy follows the Advertising Standards Agency guidelines and TfL's approach to remove any ambiguity amongst advertising agencies that could render the media estate unviable.

10. Financial Implications

- 10.1. See section 2.20.
- 10.2. Initial discussion with one of the existing digital large format licensees indicates that imposing a HFSS restriction should not have significant impact on revenue. They have however urged caution on any restrictions relating to alcohol, which would have a greater impact on revenue.
- 10.3. The proposed update to the Council's Advertising Policy is expected to have a positive long-term financial impact by contributing to the prevention of obesity-related illness and reducing demand on public services. This expected financial impact is currently not quantifiable.
- 10.4. While the Policy may affect advertising revenue in the short term, evidence from Transport for London's and other local authority's HFSS advertising restrictions shows that revenues were sustained and even increased following implementation. The Council will monitor the financial impact as contracts are renewed and adjust as needed. The financial impact of this proposal will be monitored and reported as part of the Council's revenue budget monitoring process.

11. Timetable for Implementation

- 11.1. Subject to approval, the updated Policy will be implemented in stages depending on the stage of the current licenses.
- The contract for the new bus shelter and FSU tender will be released this autumn and the specification has stated to assume that the Policy will have a HFSS restriction.
 - Changes to the existing licenses for the two large format digital displays will need to be negotiated as the agreed license fee is related to expected advertising revenue and the cost of the installations.
- 11.2. Sponsorship licenses will incorporate the new Policy at the point of license renewal, as outlined above in Table 1.

12. Background Papers

- 12.1. There are none.

Appendices

1. Equality Impact Assessment (EqIA)
2. Proposed revised Advertising Policy. Please note that the proposed change is highlighted
3. Financial Annexe (confidential)

Equality Impact Assessment (EqIA)

For advice on this document please contact Clare Muir on 72119 or email Clare.Muir@reading.gov.uk.

Please contact the Project Management Office at pmo@reading.gov.uk for advice and/or support to complete this form from a project perspective.

Name of proposal/activity/Policy to be assessed: **Healthier Food Advertising Policy**

Directorate: Economic Growth and Neighbourhood Services/Communities & Adult Social Care (DCASC)

Service: Public Health

Name: Amanda Nyeke

Job Title: Public Health and Wellbeing Manager

Date of assessment: 11 September 2025

Version History

Version	Reason	Author	Date	Approved By
1.0	Initial draft	Amanda	11/09/2025	

Scope your proposal

- What is the aim of your Policy or new service/what changes are you proposing?
-

To update Reading Borough Council's Advertising Policy to restrict the promotion of High Fat, Salt and Sugar (HFSS) products and encourage healthier food advertising.

- Who will benefit from this proposal and how?
-

Residents of Reading, particularly those in more deprived communities, will benefit through reduced exposure to unhealthy food advertising and improved support for healthier choices. Children and families will benefit from healthier environments that support early years development. There will however be benefits for all Reading residents.

- What outcomes does the change aim to achieve and for whom?
-

The Policy aims to reduce health inequalities across Reading, improve dietary behaviours, and contribute to health outcome and healthier weight outcomes for all residents, especially those most affected by the commercial promotion of HFSS products.

- Who are the main stakeholders and what do they want?
-

Public Health team, Food Partnership, Council leadership, and local communities and residents. Stakeholders seek and will benefit from healthier environments, improved weight outcomes (linked to obesity rates), and equitable health outcomes.

Assess whether an EqlA is Relevant

How does your proposal relate to eliminating discrimination; advancing equality of opportunity; promoting good community relations?

The Policy promotes equal access to healthier food environments and aims to reduce health inequalities that disproportionately affect deprived and minoritised communities whereby HFSS advertising is more prevalent.

- **Do you have evidence or reason to believe that some groups may be affected differently than others (due to race, disability, sex, gender, sexuality, age, religious belief or due to belonging to the Armed Forces community or care experience)? Make reference to the known demographic profile of the service user group, your monitoring information, research, national data/reports etc.**

Yes - national and local data show that HFSS advertising is more prevalent in deprived areas, which often have higher proportions of ethnic minority residents and children at risk of obesity.

However, no groups will be negatively impacted by the Policy.

- **Is there already public concern about potentially discriminatory practices/impact or could there be?**

No, there is no known public concern about discriminatory impact, but the Policy responds to broader concerns about health inequalities.

If the answer is **Yes** to any of the above, you need to do an Equality Impact Assessment.

If **No** you **MUST** complete this statement.

An Equality Impact Assessment is not relevant because:

X

Completing Officer

X

Lead Officer

Assess the Impact of the Proposal

Your assessment must include:

- **Consultation**
- **Collection and Assessment of Data**
- **Judgement about whether the impact is negative or positive**

Think about who does and doesn't use the service? Is the take up representative of the community? What do different minority groups think? (You might think your Policy, project or service is accessible and addressing the needs of these groups, but asking them might give you a totally different view). Does it really meet their varied needs? Are some groups less likely to get a good service?

How do your proposals relate to other services - will your proposals have knock on effects on other services elsewhere? Are there proposals being made for other services that relate to yours and could lead to a cumulative impact?

Example: A local authority takes separate decisions to limit the eligibility criteria for community care services; increase charges for respite services; scale back its accessible housing programme; and cut concessionary travel.

Each separate decision may have a significant effect on the lives of disabled residents, and the cumulative impact of these decisions may be considerable.

This combined impact would not be apparent if decisions are considered in isolation.

Consultation

How have you consulted with or do you plan to consult with relevant groups and experts. If you haven't already completed a Consultation form do it now. The checklist helps you make sure you follow good consultation practice.

[Consultation manager form - Reading Borough Council Dash](#)

Relevant groups/experts	How were/will the views of these groups be obtained	Date when contacted
Reading Food Partnership	Through partnership meetings and feedback	To be planned
Public Health team	Internal workshops and Policy development sessions	To be planned
Whole Systems Obesity Network?	To be consulted via strategic groups and engagement	To be planned

Collect and Assess your Data

Using information from Census, residents survey data, service monitoring data, satisfaction or complaints, feedback, consultation, research, your knowledge and the knowledge of people in your team, staff groups etc. describe how the proposal could impact on each group. Include both positive and negative impacts.

(Please delete relevant ticks)

- Describe how this proposal could impact on racial groups
- Is there a negative impact? No

Positive impact as national data shows HFSS advertising is more prevalent in areas with higher proportions of ethnic minority residents, and areas experiencing high levels of deprivation although across Reading too. Reducing this exposure supports better health outcomes.

-
- Describe how this proposal could impact on Sex and Gender identity (include pregnancy and maternity, marriage, gender re-assignment)
 - Is there a negative impact? No

Positive impact, as the Policy supports healthier environments for all genders and family structures, including pregnant individuals and parents.

-
- Describe how this proposal could impact on Disability
 - Is there a negative impact? No

Positive impact by contributing to healthier environments and supporting wellbeing for people with long-term conditions and disabilities.

- Describe how this proposal could impact on Sexual orientation
 - **Is there a negative impact?** No
-

No specific impact identified. The Policy is inclusive and does not discriminate based on sexual orientation.

- Describe how this proposal could impact on age
 - **Is there a negative impact?** No
-

Positive impact, particularly for children and young people through reduced exposure to unhealthy advertising and support for early years development.

- Describe how this proposal could impact on Religious belief
 - **Is there a negative impact?** No
-

No specific impact identified. The Policy does not conflict with religious beliefs or practices.

- **Describe how this proposal could impact on the Armed Forces community (including reservists and veterans and their families)**
 - **Is there a negative impact?** No
-

No specific impact identified. The Policy is inclusive and does not disadvantage veterans, reservists, or their families.

- Describe how this proposal could impact on care experienced young people and adults.
- **Is there a negative impact?** No

Positive impact as the Policy contributes to healthier environments and supports vulnerable groups who may be disproportionately affected by poor diet and health outcomes.

Make a Decision

If the impact is negative then you must consider whether you can legally justify it. If not you must set out how you will reduce or eliminate the impact. If you are not sure what the impact will be you **MUST** assume that there could be a negative impact. You may have to do further consultation or test out your proposal and monitor the impact before full implementation.

(Delete numbers below which don't apply)

1. No negative impact identified - Go to sign off

Conduct stakeholder engagement, ensure inclusive messaging, and monitor implementation through contract renewals. Actions will be reviewed annually.

- How will you monitor for adverse impact in the future? Annual review of advertising contracts and feedback from community health surveys.
-

Annual review of advertising contracts, feedback from community health surveys, and engagement with strategic groups to assess equity and inclusion.

X

X

Completing Officer

Lead Officer

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APPENDIX 2

READING BOROUGH COUNCIL ADVERTISING AND SPONSORSHIP POLICY - PART 1

1. Introduction
 - 1.1 Reading Borough Council wishes to generate revenue from hosting advertising and sponsorship content on council assets, whilst, at the same time, providing opportunities for local companies to promote their businesses. These assets include roundabouts, street light standards, vehicles and the council's website as well as publications and events.
 - 1.2 This document is intended to set out a policy for hosting this advertising and sponsorship, aimed at maximising the revenue raised whilst at the same time encouraging local businesses to participate, and ensuring that the content is appropriate and reflects positively on the borough and the reputation of the council. It is also designed to provide guidance for contractors and prospective sponsors and advertisers regarding what is and is not considered acceptable to the council.
2. Detail
 - 2.1 The council has a presumption in favour of permitting advertising and sponsorship whenever possible. However, there is a need to ensure that the process of accepting and displaying advertising and sponsorship does not conflict with policy or operational objectives.
 - 2.2 Such broader objectives can include the need to generate revenue through promoting certain services provided by the council. In this case it would not be appropriate to display advertising for 'competing services'. What constitutes a competing service will change from time to time and should, therefore, be judged on a case-by-case basis. The expectation, however, is that most advertising and sponsorship from local and other businesses will generally be acceptable.
3. General guidelines - Advertising
 - 3.1 The basic principles underpinning the council's policy on advertising are the rules and guidelines laid out by the Advertising Standards Authority (ASA) www.asa.org.uk and those of the British Codes of Advertising and Sales Promotion, www.asa.org.uk/asa/codes/cap_code, together with the Code of Recommended Practice on Local Authority Publicity, <https://www.gov.uk/government/publications/recommended-code-of-practice-for-local-authority-publicity>
 - 3.2 These principles hold that advertisements should be:
 - Legal, decent, honest and truthful
 - Created with a sense of responsibility to consumers and to society
 - In line with the principles of fair competition
 - 3.1 The council will not take a 'white listing' approach (i.e. defining permitted advertising) but will instead assume that advertising is permitted unless it falls into a number of prohibited categories, as defined in more detail below.
 - 3.2 Any advertising must comply with all and any relevant regulations and must not conflict with the council's aims and priorities as set out in the Corporate Business Plan.
 - 3.3 Reading Borough Council also takes note of the Consumer Protection from Unfair Trading Regulations 2008, which seek to protect consumers from unfair, misleading

or aggressive marketing practices and requires all advertisers to comply absolutely with the letter and the spirit of these regulations.

- 3.4 Political organisations will not be allowed to advertise on council assets. Reading Borough Council actively encourages the engagement of citizens and community groups in policy-setting and other democratic processes, but it does not encourage and will generally not permit advertising from what might broadly be called 'lobby groups', which is in conflict with Council policies or priorities. This applies to lobby groups which may be very local and temporary in nature, perhaps centred on a particular planning decision; or those that are national or international and more permanent.
- 3.5 Equally, it would not be appropriate to display advertising which in some way touched on socially contentious issues or which contained messages which could be regarded as contentious. The council reserves the right to decide whether an issue is or is not contentious and if the advertising may or may not be displayed.
- 3.6 Advertising for gambling, betting services or so-called pay-day loans will not be permitted.
- 3.7 Advertising of Smoking related products including Tobacco, e-cigarettes and vaping paraphernalia will not be permitted.
- 3.8 Advertising of Alcohol related products will not be permitted.
- 3.9 Advertising of food and drink products with a High Fat, Salt and Sugar content, as defined by the government's Nutrient Profiling Model will not be permitted.
- 3.10 Any content or advertising which has an overtly sexual 'tone', which features partial or complete nudity or which appears to promote or give undue publicity to illegal or inappropriate behaviour or lifestyles will also be excluded. The council reserves the right to determine what behaviour it considers inappropriate.
- 3.11 Advertisements that the council considers mocking of groups of citizens or that contains innuendo or subtext which could cause offence will not be accepted, regardless of tone.
- 3.12 In addition to the categories listed above, there may also be some specific controls and policies associated with individual placements, which will be considered on a case by case basis.
4. Disclaimer notice
 - 4.1 Acceptance of advertising or sponsorship does not imply endorsement of products and services by Reading Borough Council. In order to make this clear, all Reading Borough Council publications which include advertising or sponsorship should carry the following disclaimer:

“Whilst every effort has been made to ensure the accuracy of advertisements or sponsorships contained in this publication, Reading Borough Council cannot accept liability for errors and/or omissions. We will not accept any responsibility for claims made by advertisers or sponsors and their inclusion in (name of publication) and this should not be taken as an endorsement by Reading Borough Council.”

GENERAL GUIDELINES - SPONSORSHIP

5. Definition

- 5.1 For the purposes of this policy, sponsorship is defined as: “an agreement between Reading Borough Council or its agent(s) and the sponsor, where we receive either money or a benefit in kind for an event, campaign, or initiative from an organisation or individual which in turn gains publicity or other benefits.”
6. Objectives
- To ensure that our position and reputation are adequately protected in sponsorship agreements
 - To ensure that we adopt a consistent and professional approach towards sponsorship
 - To ensure best value is obtained and provided in sponsorship arrangements - including any
 - arrangements made where we receive either money or a benefit in kind
 - To protect members and individual officers from allegations of inappropriate dealings or relationships with sponsors
7. Principles
- 7.1 We and/or our agent(s) will actively seek opportunities to work with both local and national organisations by identifying sponsorship opportunities of mutual benefit and which are in keeping with our strategic priorities and core values.
- 7.2 We welcome all opportunities to work in such partnerships. We will not, however, put ourselves in a position where it might be said that such a partnership has or might have or may be thought to have:
- Influenced the council or its officers in carrying out its statutory functions in order to gain favourable terms from the council in any business or other agreement
 - Aligned the council with any organisation which conducts itself in a manner which conflicts with our values
- 7.3 We will not, therefore, be able to entertain agreements for sponsorship which is in conflict with the council advertising and sponsorship policy.
- 7.4 We retain the right to decline sponsorship from any organisation or individual or in respect of particular products which we, in our sole discretion consider inappropriate.
- 7.5 We will agree with the sponsor, either directly or through our agent(s) the nature and content of the publicity and will retain the right to approve all advertising material. We have a strong corporate identity and materials must not detract from this.
8. Procedures
- 8.1 Before seeking sponsorship, council officers must consider this policy document and follow the guidelines provided. All sponsorship bids shall be approved by [Head of Communications and the relevant Director and Lead Councillor]. Sponsorship agreements must be referred to Legal Services for review prior to signing. It is recommended that all potential sponsors are referred to this policy. Before agreeing to any sponsorship opportunity all financial costs must be identified including the sponsorship

equivalent value of any sponsorship in kind.

9. Disclaimer notice

- 9.1 Acceptance of sponsorship does not imply endorsement of products and services by Reading Borough Council. In order to make this clear all publications carrying sponsorship should carry the following disclaimer:

“Whilst every effort has been made to ensure the accuracy of advertisements contained herein, Reading Borough Council cannot accept any liability for errors and omissions nor can the council accept any responsibility for claims made by advertisers and their inclusion in (name of publication) should not be taken as an endorsement by Reading Borough Council.”

READING BOROUGH COUNCIL ADVERTISING POLICY: PART 2

Part 2 shall apply to all contracted out advertising arrangements on Council assets that are secured by third party commercial agents and or partner organisations.

For Clarity such arrangements are those where the Council has no direct commercial relationship with the advertising party and or their commissioning agent.

1. Introduction

- 1.1 Reading Borough Council wish to generate revenue from the hosting of advertising displays on Council assets. The ability of Council services to generate and sustain income is an integral part of budget planning and serves to protect the future financial health of the Council.
- 1.2 Commercial advertising directly contributes towards the following objectives of the Council's Corporate Plan:
 - Providing infrastructure to support the economy
 - Remaining financially sustainable to deliver service priorities
- 1.3 The Council has an obligation to ensure that the use of its assets achieve demonstrable best value.
- 1.4 This supplementary policy provides guidance to third party advertising contractors regarding what is/is not, considered acceptable by the Council. This document sets out a policy for advertising arrangements, aimed at permitting the Council's commercial partners scope to achieve their commercial objectives, whilst in so far as is reasonably practicable, protecting the reputational interests of the local authority.

2. Detail

- 2.1 The Council has a presumption in favour of advertising whenever and wherever possible. However, there is a need to ensure that any advertising displayed on Council assets does not through association cause reputational damage to the Council.

3. General guidelines for contracted out advertising:

- 3.1 The basic principles underpinning the Council's policy on advertising are the rules and guidelines laid out by the Advertising Standards Authority (ASA) www.asa.org.uk and the Outdoor Media Centre's (OMC / Outsmart) Charter - "Standard of Best Practice".
- 3.2 These principles hold that advertisements should be:
 - Legal, decent, honest and truthful
 - Created with a sense of responsibility to consumers and to society
 - In line with the principles of fair competition
- 3.3 The Council does not take a 'white listing' approach (i.e. defining permitted advertising) but instead assumes that advertising is permitted unless it either fails to meet the requirements of, or falls into a number of prohibited categories as defined in sections 3.4 - 3.11 below.
- 3.4 Advertising must comply with all and any relevant regulations.
- 3.5 Political organisations will not be allowed to advertise on Council assets.

- 3.6 Advertising from Lobby Groups, promoting issues/agendas which are in conflict with Council policies or priorities, will not be permitted.
- 3.7 Advertising of 'pay-day loan' companies will not be permitted.
- 3.8 Any content which has an overtly sexual 'tone', which features complete nudity or which appears to promote or give undue publicity to illegal or inappropriate behaviour or lifestyles will not be permitted.
- 3.9 Advertisements mocking of groups of citizens or that contain innuendo or subtext which could cause offence will not be permitted.
- 3.10 Advertising of Smoking related products including Tobacco, e-cigarettes and vaping paraphernalia will not be permitted.
- 3.11 Advertising of food and drink products with a High Fat, Salt and Sugar content, as defined by the government's [Nutrient Profiling Model](#) will not be permitted.
- 3.12 Advertisements for gambling/betting industry associated products and services upon Council owned assets must display suitable 'industry adopted' cautionary messages, such as 'when the fun stops, stop' or other as may be adopted from time to time.
- 3.13 Advertisements for alcohol industry associated products and services upon Council owned assets must display suitable 'industry adopted' cautionary messages, such as 'Drink Responsibly' or other as may be adopted from time to time.
- 4. Disclaimer notice**
- 4.1 Acceptance of advertising does not imply endorsement of associated products and services by Reading Borough Council.
- 5. Procedures**
- 5.1 Council officers must consider this policy document and follow the guidelines provided in respect of all commercial agreements, licences and or contracts featuring advertising rights.
- 5.2 All new advertising arrangements shall be;
- Approved by the relevant service Director and Lead Councillor.
 - Able to demonstrate attainment of value for money (VFM).
 - Referred to Legal Services for review prior to signing.
 - Subject to the obtaining of required statutory consents.

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

Document is Restricted

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