



Ministry of Housing,
Communities &
Local Government

The proposed reorganisation of Local Government in Northamptonshire



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Scope of the consultation

Topic of this consultation:	This consultation seeks views on the proposal that Government has received from seven of the eight Northamptonshire councils (the exception being Corby Borough Council) for local government reorganisation. It covers the following areas: <ul style="list-style-type: none"> • Whether the proposals will improve local government in Northamptonshire • Whether there is a good deal of public support for the proposals • Are the proposed new council areas a credible geography • Whether all options have been fully considered
Scope of this consultation:	This consultation relates only to local government in Northamptonshire
Geographical scope:	These proposals relate to England only.
Impact Assessment:	An Impact Assessment has not been prepared for this consultation as it will only affect local government in Northamptonshire and so there will be no regulatory, economic or social impacts.

Basic Information

To:	The Secretary of State is required to consult any local authority that is affected by the proposals (but which has not submitted them), and any such other persons as he considers appropriate. Corby Borough Council is therefore specifically invited to respond to this consultation, as well as the other Northamptonshire councils and councils neighbouring Northamptonshire, public service partners (eg health providers, the Police etc), and certain representatives of business and the voluntary sector. We also welcome the views of others interested in the proposal, including residents, businesses and those in the voluntary sector.
Body/bodies responsible for the consultation:	This consultation is conducted by the Ministry of Housing, Communities and Local Government. Full details of the proposal submitted by the Northamptonshire councils are available at www.futurenorthants.co.uk
Duration:	This consultation will last for eight weeks closing on 25 January 2019.
Enquiries:	For any enquiries about the consultation please contact Craig Bowdery, Senior Policy Advisor – craig.bowdery@communities.gov.uk or 0303 444 6810

<p>How to respond:</p>	<p>You may respond by completing an online survey at: https://www.surveymonkey.co.uk/r/SWTGHD8</p> <p>Alternatively you can email your response to the questions in this consultation to Northamptonshire.consultation@communities.gov.uk</p> <p>Hard copies of this consultation document are available at public libraries in Northamptonshire and at the councils' public offices</p> <p>If you are responding in writing, please make it clear which questions you are responding to.</p> <p>Written responses should be sent to: Governance Reform and Democracy Ministry of Housing, Communities and Local Government 2 Marsham Street London SW1P 4DF</p> <p>When you reply it would be very useful if you confirm whether you are replying as an individual or submitting an official response on behalf of an organisation and include:</p> <ul style="list-style-type: none">- your name,- your position (if applicable),- the name of organisation (if applicable),- an address (including post-code),- an email address, and- a contact telephone number
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Introduction

1. Residents in Northamptonshire are currently served by a two-tier system of local government. Northamptonshire County Council is responsible for services such as adults and children's social care, maintaining roads and libraries, and the seven district and borough councils are responsible for rubbish collection, housing and planning and environmental health.
2. An independent inspection report has found that Northamptonshire County Council has failed to meet what is known as its 'Best Value' duty – that is, it has failed to ensure that public funds have been spent responsibly and has therefore not been able to spend within its budget. Based on his findings, the independent inspector reached the conclusion in March 2018 that Northamptonshire County Council was not able to put in place a recovery package quickly enough to avoid negatively impacting upon residents. He therefore recommended that local government in the county should be reorganised: instead of the current two-tier system of the county council and district/borough councils, there should be single tier authorities being responsible for delivering all of the local government services to its residents. The inspector's recommendations are discussed later in this document.
3. The Government accepted the report's recommendations in full, including those concerning restructuring. An invitation to submit proposals for the restructuring of local government was issued to the eight principal councils in Northamptonshire on 27 March 2018. This invitation specified what the proposals could include, as well as guidance on what they should seek to achieve.
4. Having received the invitation, the eight councils worked collectively to consider what is best for their residents. They held a public consultation to help inform their proposal and commissioned professional advisers with specific expertise in this area to consider a business case for any new councils. Using the findings from this work and the views of local people, seven of the eight councils (Corby Borough Council being the exception) submitted to the Secretary of State their proposal for how local government in the county could be reformed.

This Consultation

5. The Local Government and Public Involvement in Health Act 2007 requires that before a proposal for local government reorganisation can be implemented, the Secretary of State must first consult any council affected that has not submitted the proposal (namely Corby Borough Council), as well as any other persons that he considers appropriate. We are keen to hear from public service providers and local stakeholders in Northamptonshire – including health providers, business groups and the voluntary sector. In order to further help inform the Secretary of State's decision, we also welcome representations from any persons interested, including local residents, businesses and those in the voluntary sector.
6. This consultation seeks views on the following questions:

- Is the councils' proposal likely to improve local government and service delivery across Northamptonshire? Specifically, will it give greater value for money, generate savings, provide stronger strategic and local leadership and create more sustainable structures?
- Taken in the round, do you support the proposal from the councils?
- Do the unitary councils proposed by the councils represent a credible geography?
- Is there a different reorganisation which would, in your view, have complied with the Secretary of State's invitation and which would have been preferable to the reorganisation proposal put forward by seven of the eight councils in Northamptonshire? If you consider there would have been, please give your reasons.
- Do you have any other comments with regards to the proposed reorganisation of local government in Northamptonshire?

The independent inspection of Northamptonshire County Council

7. Following concerns regarding the financial management of Northamptonshire County Council, on 9th January 2018 the Government appointed Max Caller CBE to undertake an independent review of the authority and its Best Value duties. In the final report published on 15th March 2018, Mr Caller recommended that *“the problems faced by NCC are now so deep and ingrained that it is not possible to promote a recovery plan...that could bring the council back to stability and safety in a reasonable timescale.”* He recommended that *“a way forward, with a clean sheet, leaving all the history behind, is required”*. It was Mr Caller’s recommendation that local government in Northamptonshire should be reorganised into two unitary councils – one covering the area of Daventry, Northampton and South Northamptonshire and another covering Corby, East Northamptonshire, Kettering and Wellingborough.
8. In response to the inspection report, the Secretary of State announced to Parliament on 27th March 2018 that he was minded to appoint Commissioners to intervene in the running of Northamptonshire County Council and assume responsibility for strategic financial management of the organisation. At the same time, the Secretary of State announced that an invitation would be issued to the county council and the seven district and borough councils to come forward with proposals for the creation of unitary councils in place of the existing two-tier structure.
9. Further details and the documentation relating to the intervention into the governance of Northamptonshire County Council can be found online here: <https://www.gov.uk/government/collections/inspection-into-the-governance-of-northamptonshire-county-council>

The Government's invitation to the councils

10. On 27th March 2018, an invitation to develop proposals for the creation of new single-tier (unitary) authorities was issued to the following councils:

- Corby Borough Council
- Daventry District Council
- East Northamptonshire Council
- Kettering Borough Council
- Northampton Borough Council
- Northamptonshire County Council
- South Northamptonshire Council
- Borough Council of Wellingborough

11. Currently, Northamptonshire is served by a two-tier system of the County Council and the seven district and borough councils. Functions are split between the two tiers, with the responsibilities for the district and borough councils including rubbish collection, housing and planning and environmental health, while the County Council's responsibilities include those for adults and children's social care, maintaining roads and libraries. Where an area is served by a unitary authority, that council has responsibility for all local government services in that area.

12. The invitation explained that under Part 1 of the Local Government and Public Involvement in Health Act 2007 ('the 2007 Act'), the Secretary of State was inviting the councils to make proposals for the restructuring of local government in the county. The councils were invited to submit what the 2007 Act refers to as a 'combined proposal'. The 2007 Act specifies that the Secretary of State may invite councils to make one of the following types of proposal:

- | | |
|---------------------|--|
| Type A – | a single tier of local authority covering the whole of the county concerned |
| Type B – | a single tier of local authority covering an area that is currently a district, or two or more districts |
| Type C – | a single tier of local authority covering the whole of the county concerned, or one or more districts in the county; and one or more relevant adjoining areas |
| Combined proposal – | a proposal that consists of two or more Type B proposals, two or more Type C proposals, or one or more Type B proposals and one or more Type C proposals |

13. The Government's invitation to the councils was for them to submit a combined proposal, each council being able to submit such proposal or two or more councils being able to submit a joint proposal. Accordingly, it was not open to the councils to submit a proposal for a single unitary council covering the whole of Northamptonshire. This reflected the recommendation of the independent inspector that a clean start and break from the past was required.

14. The invitation permitted proposals that included one or more districts from outside of Northamptonshire to be included. Such a proposal would necessitate a change in Police force boundaries as a district, or a county in which there are no district councils (i.e. a unitary county) cannot be divided between more than one police area. Northamptonshire Police currently serves the entirety of the existing county and does not serve any districts outside Northamptonshire. Since 2010, it has been Government policy not to advocate compulsory police force boundary changes or mergers. Instead, the Home Office has encouraged police forces to work collaboratively with each other and with partner organisations across force boundaries.
15. To enact any change in police force boundaries, an order is required under section 32 of the Police Act 1996. A request to amend boundaries would only be considered where it is supported by a robust business case and has sufficient public support, including from the relevant Police and Crime Commissioners. The business case would need to clearly demonstrate that it is in the interest of the economy, efficiency, and effectiveness of the force and that it would not have a detrimental impact on public safety. Police boundaries can also be amended in a structural change order under section 7 of the 2007 Act. Any change using the 2007 Act would be subject to the same tests at the 1996 Act.
16. The invitation specified that any councils responding to the proposal should have regard to the Secretary of State's guidance that was attached to the invitation. This guidance is as follows:

Guidance from the Secretary of State for councils submitting proposals:

1. A proposal should seek to achieve for the area concerned the establishment of a single tier of local government, that is the establishment of unitary authorities:
 - a. which are likely to improve local government and service delivery across the area of the proposal, giving greater value for money, generating savings, providing stronger strategic and local leadership, and which are more sustainable structures;
 - b. which command a good deal of local support as assessed in the round overall across the whole area of the proposal; and
 - c. where the area of each unitary authority is a credible geography consisting of one or more existing local government areas and having a population that at a minimum is substantially in excess of 300,000.
2. The following matters should be taken into account in formulating a proposal:
 - a. A proposal should describe clearly the single tier local government structures it is putting forward, and explain how, if implemented, these are expected to achieve the outcomes described in paragraph 1 above.
 - b. The need for evidence and analysis to support a proposal and any explanation of the outcomes it is expected to achieve, including evidence of a good deal of local support.
 - c. The report "Northamptonshire County Council Best Value Inspection: January – March 2018", in particular the inspection team's recommendation on the preferred way forward involving "the 2 unitary (West and North) model".

- d. The wider context for any unitary authorities in Northamptonshire around plans for growth. This includes authorities' potential contributions to the Cambridge-Milton Keynes-Oxford corridor; and the potential for agreement between authorities and the Government to unlock ambitious housing delivery, above the level proposed in the Government's Local Housing Need assessment.
 - e. That there should be extensive local consultation about any proposal before it is made, seeking the views by appropriate means of residents, stakeholders and partners including local enterprise partnerships, health bodies, businesses, and other organisations including voluntary organisations. The means of seeking views may include professionally led open consultation questionnaires, representative household surveys, surveys of parish and town councils, workshops, telephone interviews with other major stakeholders, and inviting written submissions.
17. Paragraph 1 of the guidance reflects the criteria that was announced to Parliament on 28 February 2017 for assessing unitary proposals. In response to a Parliamentary Question, the then Minister for Local Government, Marcus Jones MP, stated the criteria against which proposals for local government reorganisation would be assessed: namely that any proposal made by one or more councils in an area for reorganising that area's local government will be considered, and a judgement in the round will be reached "as to whether the proposal, if implemented, is likely to improve the area's local government, commands a good deal of local support in the area, and whether the area itself is a credible geography for the proposed new structures".
18. The guidance to the councils also specifically referred the proposed area of each unitary authority having a population that at a minimum is substantially in excess of 300,000. The view on unitary council size is informed by research on council size and effectiveness that was carried out for the department in *Population size and Local Authority performance*¹ and research for the County Councils Network in 2016² into lessons learnt from previous local authority reorganisations. The impact of population size varies across services, and between measures of performance for the same service. The services which are most influenced by population size (in descending order of importance) are Leisure & Culture; Benefits; Housing; Environment; Social Services; Education. The review of the two previous phases of unitarisation highlights that the reorganisations of the 1990s created relatively small unitary councils which face a number of challenges directly related to their size. Very specifically, the review identified that, at the time it was written, the proportion of children's services in the first wave of unitary councils that were inadequate was 21% whilst it was 0% for the large 2009 unitaries.

¹ *Population Size and Local Authority performance*, Andrews, Boyne and Martin – Department for Communities and Local Government, November 2017

² *Learning the Lessons from Local Government Reorganisation, An Independent Study*, Phil Swann – Shared Intelligence, October 2016

The councils' proposal

19. The councils submitted a proposal to the Secretary of State on 31st August 2018. It was formally endorsed by Full Council meetings of seven of the eight councils prior to submission, with Corby Borough Council voting to not formally support the proposal. The full proposal document is available at www.futurenorthants.co.uk. This includes supporting material in the form of a report from PriceWaterhouse Coopers (PwC) and a report from Opinion Research Services (ORS). The proposal is for the creation of two unitary councils, one covering the north of Northamptonshire and another covering the west of the county, as shown below:

West unitary		North unitary	
Existing district/borough	Population	Existing district/borough	Population
Daventry	82,008	Corby	70,706
Northampton	228,687	East Northamptonshire	92,766
South Northamptonshire	91,301	Kettering	100,753
		Wellingborough	79,389
Total population:	401,996	Total population:	343,614

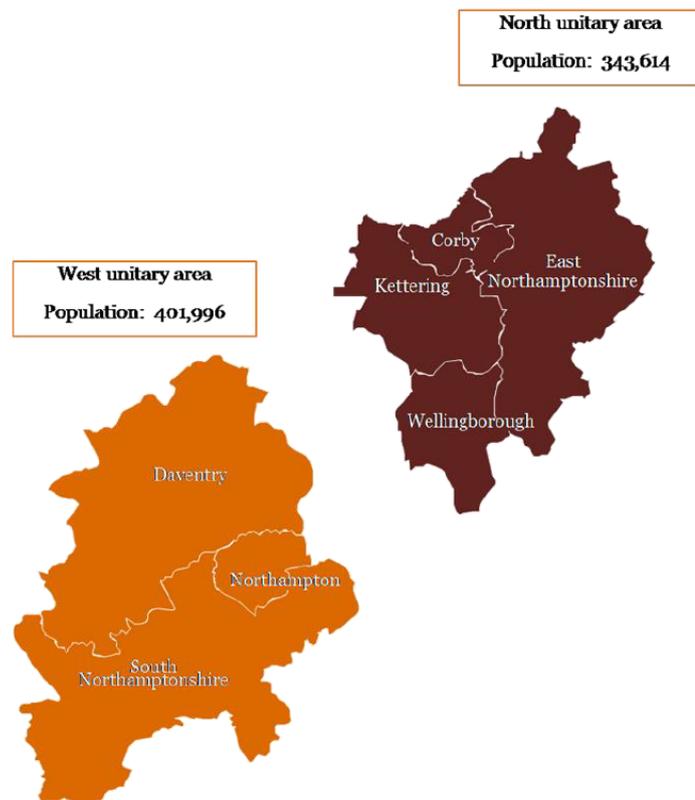


Figure 1: Proposed unitary areas

20. To help inform the development of the proposal, the eight Northamptonshire councils collectively commissioned a public consultation exercise called ‘Future Northants’. Full details of the consultation are available online at www.futurenorthants.co.uk.

21. The Future Northants consultation document, and the councils’ proposal, outlined a number of options for Northamptonshire and the councils’ view on each. This is reproduced in the italic script in the table below:

Option	Consideration
<i>No change</i>	<i>Maintaining the existing two-tier system would not solve the current problems.</i>
<i>Establish a single unitary authority based on the whole Northamptonshire county boundary</i>	<i>Establishing a single unitary authority based on the existing county boundary, would not deliver a recognisably “new start”. Furthermore, the option of a single unitary council is expressly ruled out in the Government’s invitation letter.</i>
<i>Create three unitary authorities</i>	<i>Establishing three unitary authorities would not meet the population requirement. Northamptonshire has a total population of around 740,000 and under a three unitary council structure, at least one authority would have a population level of less than 300,000.</i>
<i>Create two unitary authorities based on a single authority for Northampton Borough, and a single authority for the other areas around it</i>	<i>This would also not meet the Government’s population test – the population of Northampton Borough is only 228,687.</i>
<i>Create two unitary authorities based on groupings of existing West and North districts or Boroughs</i>	<i>The option for two unitary authorities covering West and North would deliver two credible geographic units, both with populations in excess of 300,000.</i>
<i>Mergers with some neighbouring councils (outside Northamptonshire)</i>	<i>Current legislation dictates that unitary authorities cannot span more than one Police Authority. In Northamptonshire, the County has a Police Authority co-terminus with its boundaries. Hence, without a change to the law, a unitary council covering part of Northamptonshire cannot merge with another authority outside the county. It would not be possible to effect a change in the law within the timescales for submission of our proposals [see MHCLG footnote³]</i>

³ A county or district (including a unitary authority) cannot be divided between more than one police area. Police area boundary changes are possible in the interests of force effectiveness. The Home Office’s policy is that boundary changes would only be considered where it is supported by a robust business case and has sufficient public support, including from the relevant Police and Crime Commissioners. The business case would need to clearly demonstrate that it is in the interest of the economy, efficiency, and effectiveness of the force and that it would not have a detrimental impact on public safety.

22. The Northamptonshire councils' consultation considered that only one option met the terms of the invitation - the two unitary option based on the West/North groupings detailed above. The eight councils jointly commissioned Opinion Research Services (ORS) to carry out a consultation exercise. ORS advised the councils that the Government's requirement that 'a good deal of local support as assessed in the round across the whole area of the proposal' was satisfied.

23. The councils' proposal explains that:

"The consultation commissioned by the councils has demonstrated widespread public support for the restructuring of local government in Northamptonshire, although the specific proposal for two unitaries received varying degrees of support. The quantitative consultation showed overwhelming support for reducing the number of councils and for unitary authorities in principle. The representative residents' survey found majority support for two unitary councils, both across the county and in the proposed West and North Northants areas. The open questionnaire supported the principle of unitary councils and showed widespread support for two unitary councils in North Northants (except in Corby); but there was majority opposition to two unitary councils by respondents in West Northants (who preferred three unitaries). Six of seven focus groups and two business forums supported the proposal for two unitary councils. The two parish and town council forums supported unitary authorities in principle, with one supporting two unitary councils while the other strongly supported three. The submissions supported unitary councils, but they were divided on the appropriate number."

24. The guidance issued with the invitation required the councils to have regard to certain issues, including their plans relating to growth in the context of the Cambridge-Milton Keynes-Oxford growth corridor. The councils' proposal argues that under the current system, the delivery of housing and employment (a district council function) is being compromised by challenges relating to the funding of the supporting infrastructure (currently a county council function), which has been exacerbated by the financial challenges at the County Council. The proposal states that *"having the two new unitary areas could offer more coherent geographic units to engage with the economic growth agenda and [that]...A greater ability to join up infrastructure delivery with housing and commercial development is a key advantage for the new unitary authorities, which should also bring together functions in a way that allows resources to be focused, enabling a more strategic direction of effort"*.

25. The councils' proposal details how they consider it meets the Government's criteria for assessing unitary proposals which was reflected in the guidance attached to the invitation. You can read the full proposal [here](#).

26. The eight councils also commissioned Pricewaterhouse Coopers (PwC) to carry out an analysis of the current position and make an assessment of whether the proposal would meet the Government's 'improve local government' criteria. PwC have found that without further action, reorganisation alone will not meet the financial challenges facing local government in Northamptonshire.

27. PwC found that *“reorganisation does offer the chance of a “new start” and could be used as an opportunity to drive transformation in the way that local government services are delivered to residents across Northamptonshire ... [reorganisation] could also be a platform from which to build a programme of local public service reform in which there is a drive to much more integrated service provision between local public sector bodies”*.
28. Initial modelling from PwC suggests that the councils’ proposal could deliver an annual saving of £6 million for the West unitary area, and £6.1 million for the North area from the year 2021/22 onwards. Their initial modelling also suggests that £14.9 million of transition costs will be incurred in the proposed West unitary area, and £15.0 million in the North area, totalling £29.9 million of transition costs occurring in 2019/20.
29. The councils’ proposal argues that local government reorganisation alone won’t address all of the issues created by the failings at Northamptonshire County Council. It describes a *“vision of reorganisation as a building block from which to launch transformed local government services and wider public service reform”*. The councils’ proposal identifies four main areas of challenge:
- Beginning with a clean sheet, leaving all the history behind
 - Transition
 - Transformation and public sector reform
 - Infrastructure
30. The Government, in the context of any unitary proposal, is supportive of the work of the councils to explore all options for service delivery and maximising their income opportunities, and is of the view that any new councils that are created will be able to deliver improved and more sustainable services for the residents of Northamptonshire than currently. The Government also agrees that reorganisation alone will not address the challenges facing local government in Northamptonshire, which is why Commissioners have been appointed to assume control over strategic financial management at the County Council and is confident that they will move the council into a better financial footing and ensure it is ready for any reorganisation.
31. As noted above, the eight councils in Northamptonshire jointly commissioned Opinion Research Services (ORS) to carry out a consultation exercise. The report described and analysed the range of views that had been expressed, and in particular contained the responses to an open question, a number of which contained views which opposed the proposal.

What happens next?

32. The Secretary of State has not yet considered the merits of the proposal or made any judgement on whether or not it should be implemented. He will consider the proposal carefully, along with all the responses he receives to this consultation, together with all representations he receives and reach a decision on whether or not to implement the proposal with or without modification. This consultation will be open for eight weeks until 25 January 2019.
33. The Secretary of State has the options of implementing the proposal, with or without modification, take no further action or to seek advice from the local government Boundary Commission for England. To make this judgement, the Secretary of State will use evidence from the councils' Future Northants consultation, responses to this consultation, evidence presented with the councils' proposal (namely the ORS and the PwC reports), and all other relevant information.
34. As explained in para 17 the Government's approach is that proposals for reorganising an area's local government are judged on the extent that a proposal, if implemented, would be likely to improve the area's local government, command a good deal of local support in the area, and whether the area itself is a credible geography for the proposed new structures.
35. The Secretary of State's judgement will consider whether the councils' proposal will meet these criteria and whether the aims of the invitation could be better achieved if the proposal was modified in any way; and whether any other issues have been raised that would justify not proceeding with the proposal.
36. It is anticipated that a decision will be taken in time to make any necessary legislation in Spring 2019. If any new councils are to be created, they would therefore come into being on 1 April 2020.

Consultation questions

This consultation seeks views on the Northamptonshire council's proposal and in particular on the following questions:

Is the councils' proposal likely to improve local government and service delivery across Northamptonshire? Specifically, will it give greater value for money, generate savings, provide stronger strategic and local leadership and create more sustainable structures?

Taken in the round, do you support the proposal from the councils?

Do the unitary councils proposed by the councils represent a credible geography?

Is there a different reorganisation which would, in your view, have complied with the Secretary of State's invitation and which would have been preferable to the reorganisation proposal put forward by seven of the eight councils in Northamptonshire? If you consider there would have been, please give your reasons.

Do you have any other comments with regards to the proposed reorganisation of local government in Northamptonshire?

About this consultation

This consultation document and consultation process have been planned to adhere to the Consultation Principles issued by the Cabinet Office.

Representative groups are asked to give a summary of the people and organisations they represent, and where relevant who else they have consulted in reaching their conclusions when they respond.

Information provided in response to this consultation, including personal data, may be published or disclosed in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 2018 (DPA), the EU General Data Protection Regulation, and the Environmental Information Regulations 2004).

If you want the information that you provide to be treated as confidential, please be aware that, as a public authority, the Department is bound by the Freedom of Information Act and may therefore be obliged to disclose all or some of the information you provide. In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Ministry of Housing, Communities and Local Government will process your personal data in accordance with the law and in the majority of circumstances this will mean that your personal data will not be disclosed to third parties. A full privacy notice is included at Annex A.

Individual responses will not be acknowledged unless specifically requested.

Your opinions are valuable to us. Thank you for taking the time to read this document and respond.

Are you satisfied that this consultation has followed the Consultation Principles? If not or you have any other observations about how we can improve the process please contact us via the [complaints procedure](#).

Annex A

Personal data

The following is to explain your rights and give you the information you are be entitled to under the Data Protection Act 2018.

Note that this section only refers to your personal data (your name address and anything that could be used to identify you personally) not the content of your response to the consultation.

1. The identity of the data controller and contact details of our Data Protection Officer

The Ministry of Housing, Communities and Local Government (MHCLG) is the data controller. The Data Protection Officer can be contacted at dataprotection@communities.gov.uk

2. Why we are collecting your personal data

Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters.

3. Our legal basis for processing your personal data

The Data Protection Act 2018 states that, as a Government department, MHCLG may process personal data as necessary for the effective performance of a task carried out in the public interest. i.e. a consultation.

3. With whom we will be sharing your personal data

Once data has been analysed and consultation is concluded, it will then be stored within Parliament Libraries with redacted information. Therefore no personal data will be shared post consultation.

4. For how long we will keep your personal data, or criteria used to determine the retention period.

Your personal data will be held for two years from the closure of the consultation

5. Your rights, e.g. access, rectification, erasure

The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right:

- a. to see what data we have about you
- b. to ask us to stop using your data, but keep it on record
- c. to ask to have all or some of your data deleted or corrected
- d. to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at <https://ico.org.uk/>, or telephone 0303 123 1113.

6. Your personal data will not be sent overseas

The Data you provide directly will be stored by Survey Monkey on their servers in the

United States. We have taken all necessary precautions to ensure that your rights in terms of data protection will not be compromised by this.

7. Your personal data will not be used for any automated decision making.

8. Your personal data will be stored in a secure Government IT system.

Survey Monkey will be used through the MHCLG internal systems, therefore data will be stored here throughout with secure, limited access.