Malvern Hills Trust

Annual Meeting of the Board

Thursday 12 November 2026 at 7.00 pm

Hampton Suite
Colwall Park Hotel
Colwall
Malvern, WR13 6QG

Malvern Hills Trust
Annual Meeting of the Board
Hampton Suite, Colwall Park Hotel, Colwall, Malvern WR13 6QG
Thursday 12 November 2026 at 7 pm

Meeting at which the Trust's accounts for the year to 31 March 2026 will be approved and the auditors for the year ending 31 March 2027 are to be appointed.

Levy payers are entitled to vote on the appointment of the Auditors (agenda item 13). Should you wish to vote please show a copy of your Council Tax bill on arrival at the meeting venue and you will be issued with a voting card.

Ben Hayes from Wenn Townsend will be present at the meeting.

Agenda

Introduction

1. Election of Chair — Pages 5-6
2. Election of Vice Chair — Pages 7-8
3. Apologies for absence
4. Outgoing Chair's report 2025/26
5. Chair's Announcements
6. Declarations of Interest
   6.1. Potential conflict of interest of a trustee on the Malvern Hills Bill
7. Public Comments

Trustees' Annual Report and Accounts

8. Public Questions on the Accounts
9. To approve the Risk Management Strategy for 2026 — **Paper A** Pages 9-27
10. Reserves Policy and Going Concern — **Paper B** Pages 28-34
11. To receive and approve the Trustees' Annual Report and Accounts for the year ended 31 March 2026 available from the Trust's office or online here: COMPLETE FINAL DRAFT PUBLISHED 22.10.26
    Paper C Page 35
12. To resolve to authorise the Chair to sign the letter of representation and the subsequent events statement
    Confidential Paper D Page 2-6
13. Appointment of Auditors for 2026-27 — **Paper E** Page 36

Appointment of Committees — **Paper F** Pages 37-38

14. Appointment of Committees
    - 14.1. Land Management
    - 14.2. Finance, Administration & Resources
    - 14.3. Governance
    - 14.4. Staffing

15. Appointment of Board members to other bodies
    - 15.1. Castlemorton Common Co-ordinating Committee (2 representatives)
    - 15.2. Recreation Advisory Panel (4 representatives)
    - 15.3. Wildlife Panel (4 representatives)
    - 15.4. Malvern Hills National Landscape
    - 15.5. Malvern Spa Association

Confirmation of Previous Board Meetings

16. To confirm the Minutes of the Ordinary Board meeting held on 10 September 2026 and the Special Board meeting held on 8 October 2026
    Pages 39-53
    Confidential pages 7-19
17. Matters arising from previous Board meetings not otherwise on the agenda
    - 17.1. Authorisation of additional expenditure on mediation

Items for Decision

18. Meetings Schedule for 2027 **Paper G** Pages 54-55
19. Urgent Business

Other Committee Business for Decision

20. **Finance and Administration Committee** Pages 56-62
    - 20.1. Committee approval of the minutes of the meeting held on 24 September 2026
    - 20.2. Board adoption of the minutes of the meeting held on 24 September 2026
    - 20.3. Chair of Committee - updates and questions
    - 20.4. Resolutions (none)
21. **Governance Committee** Pages 63-65
    - 21.1. Committee approval of the minutes of the meeting held on 22 October 2026
    - 21.2. Board adoption of the minutes of the meeting held on 22 October 2026
    - 21.3. Chair of Committee - updates and questions
    - 21.4. Resolutions (none)
22. **Staffing Committee** Pages 66-70
    - 22.1. Committee approval of the minutes of the meeting held on 29 October 2026
    - 22.2. Board adoption of the minutes of the meeting held on 29 October 2026
    - 22.3. Chair of Committee - updates and questions
    - 22.4. Resolutions
        - **To approve the Safeguarding Policy unchanged**
        - **To note the changes required by law to the Prevention of Bullying and Harassment Policy.**

Items for Information

23. Malvern Hills Bill (verbal update)
24. Management accounts to the end of September 2026 **Paper H** Pages 71-80
25. Date of Next Meeting - Thursday 21 January 2027

Confidential items

Resolution to exclude the public for discussion of items 26-30 on the agenda on the grounds that publicity would be prejudicial to the public interest by reason of the exempt or confidential nature of the business to be transacted (matters relating to individuals).

CONFIDENTIAL

26. Matters arising from the confidential minutes of the previous Board meeting not otherwise on the agenda
27. Matters arising from the confidential minutes of the committee meetings not otherwise on the agenda
28. Disciplinary Committee Confidential page 20
    - 28.1. Committee approval of the minutes of the meeting held on 22 October 2026
    - 28.2. Board adoption of the minutes of the meeting held on 22 October 2026
29. Property Matters **Paper I** Confidential page 21
30. CEO Appraisal and Salary Review

Malvern Hills Trust

NOMINATION FORM: CHAIR OF THE BOARD

To be completed by nominator and seconder

We, the undersigned wish to nominate David Core as Chair of the Board of Malvern Hills Trust for the year 2026/27. If the nominee is not elected as Chair, we wish to nominate him as Vice-Chair.

	SIGNATURE	PRINT NAME
NOMINATED BY		John Michael
SECONDED BY		Simon Baggaley

TO BE COMPLETED BY NOMINEE

I agree to be nominated for the role of Chair of the Board of Malvern Hills Trust. I have read the role description. I understand the responsibilities of the role and have attached a statement in support of my nomination. If I am not elected as Chair, I agree to stand for election as Vice-Chair.

	SIGNATURE	PRINT NAME
NOMINEE		**David Core**

Please delete as appropriate

Please return this completed form to the office, for the attention of the Secretary to the Board, no later than 3.30 pm on Thursday 22 October 2026

Malvern Hills Trust is the working name of Malvern Hills Conservators. Registered charity no.515804. Vat No. GB 275 8803 21

Statement in support of nomination to the role of Chair of the Board of Malvern Hills Trust

Name: David Core

I have now been a trustee for seven years. In that time, I have built a good understanding of the Trust's governance, finances, and operations. Having served at various times as chair of FAR and Governance committees, and as Vice Chair of the Board for the last three years, I have much practical experience of managing meetings, encouraging positive contributions from all trustees.

With only one year left to serve as a trustee I believe I am well placed to contribute further to the Trust as Chair of the Board. However, there are clearly divisions within the Board that we must work together to address. I am prepared to engage with all trustees to help understand and bridge the divisions that currently limit the effectiveness of the Board, and to understand how we can best modernise the Trust's governance through new legislation.

Malvern Hills Trust

Nomination form: Vice-Chair of the Board

To be completed by nominator and seconder

We, the undersigned wish to nominate..John Raine.....as Vice-Chair of the Board of Malvern Hills Trust for the year 2026/27.

	SIGNATURE	PRINT NAME
NOMINATED BY		MALCOLM VICTORY
SECONDED BY		FRANCES VICTORY

TO BE COMPLETED BY NOMINEE

I agree to be nominated for the role of Vice-Chair of the Board of Malvern Hills Trust. I have read the role description. I understand the responsibilities of the role and have attached a statement in support of my nomination.

	SIGNATURE	PRINT NAME
NOMINEE		John Raine

Please delete as appropriate

Please return this completed form to the office, for the attention of the Secretary to the Board, no later than 3.30 pm on Thursday 22 October 2026.

Statement in support of nomination to the role of Vice-Chair of the Board of Malvern Hills Trust

Name: John Raine

I have been serving as a Board Member since 2013.

I have always appreciated and greatly enjoyed my association with the Trust – an organisation whose staff I have long regarded as doing really excellent work in managing and maintaining our wonderful hills.

Indeed, as I see things, the Trust's staff team do terrific work; especially so, given the fairly lean organisational resources at their disposal. And I look forward to a time when the Board, too, is able to operate with an equivalent sense of unity and shared commitment. Building and maintaining a stronger sense of shared goals and priorities among the Board membership would always be a key priority for me, were I to be elected to a leadership role among the trustees.

Annual Meeting of the Board
Risk Management Strategy for 2027
12 November 2026

Background information
The Charity Commission: Charities and Risk Management (CC26).

Minutes of Governance Committee meeting on 22 October 2026 and Staffing Committee meeting on 29 October 2026 (when available).

Annual review of risk registers
The Trust's Corporate Risk Strategy and Parliamentary Bill Risk Register are living documents, which are constantly under review. They are brought to the Board for a full review on an annual basis. The last annual review was at the Annual Meeting on 13 November 2025.

Red flags on the risk register have been considered by Finance, Administration and Resources Committee (FAR) and the Board throughout the year. The Board has missed the opportunity to receive some verbal reports due to busy agendas and so the intention is to provide short written reports for information at FAR and Board meetings.

An updated version of the Corporate Risk Strategy is provided at Annex 1 and the Parliamentary Bill Risk Register at Annex 2, for approval. The two documents perform different functions: one covers corporate risk and other is project-related. There has been some alignment between the two as requested in November 2025 but the two documents do not cross refer.

A workshop was held on 12 October to give an opportunity for a general discussion of risks and any movement. Trustees also contributed collective thinking on strengths, weaknesses, opportunities and threats with the result provided at Annex 3.

All Trustees should read the Charity Commission's Charities and Risk management guidance CC26: https://www.gov.uk/government/publications/charities-and-risk-management-cc26

Since the workshop, Governance Committee and Staffing Committee have considered risks pertinent to their areas of work. The CEO has reflected on the various discussions by adding or refining scores and responsibilities in the Corporate Risk Strategy. Risk scores throughout the document have been adjusted according to discussion with trustees and the colour coding from Very Minor risk to Major/extreme risk adjusted accordingly. Strategic risks have been allocated to a committee for tracking unless purely operational.

New required controls in the Corporate Risk Strategy are highlighted in the document in red, which are reflective of proactive approaches and not necessarily heightened risks. Additions or controls approved at the Annual Meeting in 2025 or before are retained in black text. Text superseded since the 2025 exercise is shown in red strikethrough.

Continuing major risks include:

- 2.1 Breaches under charity law
- 2.4 Changes to local government ward boundaries
- 3.1 Loss of reputation
- 3.2 Adverse publicity, loss of confidence, loss of influence, impact on staff morale
- 3.5 Impact of local campaigns by groups or individuals diverting organisational focus
- 4.5 Loss of key staff

- 5.4.1 Grant funding being reduced by unilateral changes to existing agreements made by Rural Payments Agency.

The proposal is to elevate the likelihood of corporate risk of the following as marked by a 'c' for change in the 'proposed risk score Nov 2026' column:

- 1.1 The charity lacks direction, strategy and forward planning. This is since the Land Management Plan is going through a refresh, being at the end of its term. Also, since the business plan is near end of its term and an interim review wasn't undertaken in 2026/27, in consultation with the Board. In mitigation, development of an interim business plan for 2027/28 is a priority.
- 1.9 Risk of disputes. Failure of a trustee mediation process contributes to this increased likelihood, along with breaches of the Trustee Code of Conduct and the Trustee and Staff Protocol, even though the latter was updated in 2026.

Risks that have reduced in likelihood include:

- Failure to comply with requirements of audit and the preparation and filing of annual accounts (2.2). Work with the new auditors appointed in November 2025 is going well. This is a proposed change to the risk score.
- In 4.2 electrical certification on our buildings is up to date until 2031. There is no proposed overall change in risk score in this grouping.
- Likelihood of public injury from unsafe trees (4.8) is lower due to our extensive tree safety inspections and numerous staff being trained in 2026 to identify unsafe trees. There is no proposed overall change in risk score in this grouping.

Parliamentary Bill Risk Register

Prior to the workshop, the GCO was asked to amend the scoring system within the Risk Register for the Parliamentary Bill to use the same numbering 1 – 5 (previously scored 1 – 6) as the corporate risk schedule. There is therefore no direct read across to the previous versions of the document.

The direction of travel of the risk is shown in column 6 and amendments to the wording are shown in red.

Conclusions

Some corporate risks previously considered at a moderate level have increased to major, suggesting that additional control measures are needed.

Changes to local government ward boundaries continue to present an issue in relation to the conduct of the Trust's elections. The recent confirmation that local government reorganisation in Worcestershire will go ahead has the potential to have a major impact on the Trust's election arrangements, in the absence of the Malvern Hills Bill obtaining Royal Assent.

Recommendation:

1. That the Board approves the Corporate Risk Management Strategy, accepting three changes in risk score in 1.1, 1.6, 1.9 and 2.2.

2. That the Board approves the Parliamentary Bill Risk Register.

Deborah Fox
CEO
2 November 2026

NATURE OF RISK	CURRENT CONTROLS	REQUIRED CONTROLS	RESPONSIBILITY Board/Committee	RESPONSIBILITY CEO/Manager(s)	LIKELIHOOD (1-5)	IMPACT (1-5)	PROPOSEDRISK SCORE NOV 2026	CHANGE	COMMENTS FOR EDI
1. GOVERNANCE									
1.1 Charity lacks direction, strategy, and forward planning	Current Land Management (LMP) and Business Plans (BP) adopted. These are reviewed and updated annually to take account of changing circumstances.	LMP 2021 - 2026 . End of term full review 2026. Conduct an internal and external consultation to inform the refresh. BP 2022 – 2027. Interim plan to be drafted for Board approval by end March 2027. Key performance indicators proposed.	Land Management Committee / FAR	CEO / CM	2	3	**9**	C	Board approved removal of the need for an interim review of the Business Plan in May 2025 and approved a revised timetable for refresh of the LMP in May 2025. Delays in the Interim business planning and end of the LMP may have increased likelihood.
1.2. Trustee body lacks relevant skills, knowledge, commitment, or capability Loss of Trustees with key skills and knowledge	All new trustees asked to complete skills audit form.	All trustees to complete a skills audit and submit to SttB. To update skills audit if anything changes substantially.	Governance Committee	SttB	1	3	**6**	NC	Newly appointed trustees have ~~not~~ all completed a skills audit.
	All Board members are given appropriate induction and training. Attendance log maintained.	Continue to identify areas where further trustee training required. Review effectiveness of training through feedback reports.	Governance Committee	SttB	1	3	**6**	NC	Induction for newly appointed and elected Trustees was offered in 2025. Note there was no change score in 2025 version.
	Skills requirements are identified to nominating bodies when requesting appointment of a trustee.	Implementation of proposed governance changes would provide mechanism for appointing at least some trustees with relevant knowledge and skills.							Refer also to Risk Register for the Parliamentary Bill.
	Workshops are used to both allow topics to be further explored and to re-enforce training.	Provide workshops as and when needed.	All committees	Various					Examples of workshops provided in 2026: Land Management Plan and Risk Registers.
	Charity employs suitably qualified and experienced staff to provide relevant knowledge and support.	Retention of a chartered surveyor.	Staffing Committee	CEO		4	**8**	NC	Land and Property Manager commenced in post in February 2025. Note this is not a change in risk level, the score was incorrectly stated as 4 in 2025.
		Pursue updated Act with improved mechanism for prompt replacement of trustees.	Governance Committee	CEO/ GCO		3	**6**	NC	No change indicator provided in 2025.
	External professional advice is sought where necessary.		FAR	CEO					
1.3. Trustee body is influenced by a dominant few including Board failing to appropriately scrutinise committee decisions	All trustees are encouraged to regularly attend and take part in Board meetings.	All trustees to provide availability to SttB	All committees	SttB	2	3	**9**	NC	There have been instances where trustees have not provided availability for meetings or provided holiday dates.
	Committee papers are circulated to all trustees and they are able to attend committee meetings and contribute at the Chair's discretion whether or not they are a committee member.								
	Chairs to ensure all trustees in attendance at meetings have the opportunity to contribute.								
	All trustees encouraged to attend training to make them aware of the law and their obligations as charity trustees.								
	Officers provide the Board with relevant information and advice to ensure no ultra vires decisions taken.								
	Minutes and papers are added to Board Members intranet								
	Chair's Workshops (non-decision making) provide opportunity for open debate and to build relationships between trustees.								
	Terms of reference for committees agreed by Board are set out in Governance Handbook. With limited exceptions, committees make recommendations which have to be confirmed by the Board.								
	Quorum for Board meetings set at 10 - over 1/3rd of Board members.								
	Code of Conduct (revised 2024) provides a framework for good practice.		Governance Committee						
1.4. Trustee/s has conflict of interests	Conflict of Interest policy in place (reviewed and updated in 2026).	Review and update Conflict of Interest Policy in 2026.	Governance Committee	StB / FAM	2	3	**9**	NC	
	Trustees asked to complete a register of interests and to update it regularly.	Chair to remind trustees to do this at Board meetings.	All committees						Reminder at each board meeting needs to be maintained.
	All meetings have an agenda item under which trustees are reminded to declare any interests in agenda items.								
	Board members requested to submit an annual Disclosure of Related Party Transactions.	Trustees to respond promptly to annual request.							Trustees reminded to provide annual Disclosure of Related Party Transactions to FAM in June/ July 2026.
	Trustees provided with training on conflicts of interest and are encouraged to seek advice if they are unsure when a conflict exists.	Implementation of proposed governance changes would provide longer term mitigation and/or control. Currently some Board members have an inherent conflict of loyalty because of the method of appointment.							
	The Board has adopted a Code of Conduct and training is provided to highlight requirement for trustees to act only in best interests of MHT.	Repeated reminders issued if needed.							The board adopted a revised Code of Conduct in March 2024.
	Register of interests maintained on Trustee's intranet.								
1.5. Trustee body is unduly influenced by local government or other external bodies	Conflict of Interest policy includes provisions for dealing with the potential conflicts of loyalty.	Continue to make clear that Trustees are not representing their political party when on the Board and must act in the best interests of the charity.	All committees	StB	3	3	**12**	NC	Induction for newly appointed and elected Trustees was offered in 2026.
	All Board and Committee meetings have an agenda item under which trustees are reminded to declare any interests in agenda.		All committees						
	Code of Conduct and training highlight the requirement for Board members to act only in best interests of the charity.	Trustees to read and sign the Code of Conduct and engage in training.	Governance Committee						Induction for newly appointed and elected Trustees was offered in 2026.
Risk of board or committees being inquorate due to exclusion of conflicted members		Currently no mechanism (other than changing standing orders to reduce quorum) is available address this risk.	All committees	StB	3	3	**12**	NC	Note change indicator was incorrectly stated in 2025.
		Implementation of proposed governance changes would provide longer term mitigation and/or control of risk. (The Board is currently composed of a high proportion of trustees appointed by local authorities). Maintain a watching brief.							
1.6. Trustee body has poor structure and/or obscured lines of delegation.	Terms of Reference and scheme of delegation for Board, Committees and chairs are fully defined in Governance Handbook.	Periodically review terms of reference and scheme of delegation, at no more than 5-year intervals. ~~Delegated authorities on budget amended (board meeting 23/07/2024).~~	Governance Committee	SttB	1	3	**6**	NC	Scheme of delegation regularly updated. .
	A new Staff and Trustee Protocol was adopted by the Board in May 2024. The Protocol was updated in 2026.	The Protocol Working Group to continue to monitor application of the Protocol.	Staffing Committee	Protocol Working Group					

NATURE OF RISK	CURRENT CONTROLS	REQUIRED CONTROLS	RESPONSIBILITY Board/Committee	RESPONSIBILITY CEO/Manager(s)	LIKELIHOOD (1-5)	IMPACT (1-5)	PROPOSEDRISK SCORE NOV 2026	CHANGE	COMMENTS FOR EDI
	Trustees to be mindful of their strategic role	Chairs to remind trustees of difference between strategic and operational responsibilities.	All committees	SttB					
		Trustee and staff protocol developed and adopted as a new procedure (board meeting 09/05/2024) and updated in 2026.							
		Trustee training to be provided.							
1.7. Poor reporting to Trustees	Regular updates given on ongoing work at Committee/Board meetings and via email and written updates.		All committees	CEO / SttB/ CM /FAM	1	3	**6**	NC	A new traffic light system was introduced for reports to LMC in 2025/26 and fewer month by month operational reports.
	Staff provide papers, presentation and reports to committees & board, together with verbal updates, site meetings, workshops and written updates by E-mail, on intranet etc,			All managers					
	Trustees given training to help identify what information they require and are able to request clarification and additional information.	Health and safety training for trustees to be provided regularly.	Staffing Committee	CEO					In 205/26 H&S training was provided in-person in April 2026. Training slides on the role of the employer in creating a working environment that is free from bullying and harassment to trustees were placed in the members area of the website in 2026.
	The Board can request additional information from external experts where needed.	Professional communication specialists retained.	FAM						
	HR Dept provides workshops on the role of the employer in creating a working environment that is free from bullying and harassment.	Presentation on how to create a working environment that is free from bullying and harassment is in the Members' area of the website. Further training to be scheduled.	Staffing Committee						
	Trustees are also able to access updates on Trust website, social media and in the Trust's Annual Report.	Trustees to utilise the Members' area of the website more.	All committees	SttB					The SttB made considerable improvements to the Members' area of the website in 2025/26.
Decisions of board not followed up	Actions generated by meetings are logged in minutes and followed up by staff. Updates reported back to Board / Committees. Opportunity for trustees to follow up in the "Matters arising" part of the agenda.		All committees	CEO / SttB					
1.8. Potential for ultra vires decision making	New trustees given induction including upon the powers and duties of trustees, highlighting the need to act within those powers. Appropriately qualified officers provide papers for trustees on items for decision, including background information, identified risks and options.			SttB	2	4	**12**	NC	There were a number of newly nominated trustees and elected trustees in 2026 that were offered training sessions. The next election year is in 2027 when additional resources would be needed.
Risk of actual or perceived lack of impartiality or conflict of interest by senior staff in advising or interacting with trustees, leading to loss of confidence in governance assurance and decision-making integrity	Senior managers are required to complete a related party disclosure form. The Staffing Handbook requires professionalism at all times.	~~Governance and Staffing Committee to consider appropriate controls.~~	Governance Committee / Staffing Committee	CEO					The Board resolved in 2026 not to add further controls.
Provision of sufficient information to Trustees to enable appropriate decisions to be made	Powers and duties of Board are summarised at the start of the governance handbook, which is provided to all trustees.			SttB					
	Policies and guidelines (e.g. land acquisition, easements) set out information to be provided to enable decisions to be taken.	Regularly review existing policies and identify those to be updated.	LMC	L&P					
	Trustees given training to help identify what information they require.		Governance Committee	SttB					There were a number of new nominated and elected trustees in 2026.The next election year is 2027 when additional resources would be needed.
	Auditors provide independent review to ensure that the charity is compliant with its legal obligations and relevant financial regulations.		FAR	FAM					
	External advice from legal and other relevant professionals (i.e. HR advisor and GDPR advisor) is sought where required.	To fully understand the new implications of the Data (Use and Access) Act for Charities. This Act amends existing legislation, for example the UK General Data Protection Regulation (GDPR).	FAR	CEO					CEO and SttB attended VWV training on new implications of the Data (Use and Access) Act for Charities in Sept 2025.
1.9 Internal Disputes	Governance Handbook, Code of Conduct and Charity Commission guidance set out requirements to act collaboratively in decision making.	Trustees to use opportunities for workshops to discuss contentious issues in an non-decision making forum.	All committees	SttB	4	4	**20**	C	The Board updated the Trustee and Staff Protocol in 2026. Mediation initiated but ended in September 2026.
		The Protocol Working Group to continue to monitor application of the Protocol.	Staffing Committee	Protocol Working Group					
		A reconciliation process to commence. ~~be offered. to petitioner trustees.~~							
1.10 Impact of airborne infections on governance	Monitoring regulation and advice from Government on airborne respiratory infections			CEO	1	2	**4**	NC	
2. COMPLIANCE									
2.1. Breaches under charity law	Staff and Trustees are provided with training on current Charity Commission guidance and relevant legislation.		Board / Governance Committee	SttB	4	3	**15**	NC	Not an election year in 2026 – no additional resources should be required.
	MHT adheres to charity law and Charity Commission guidelines. Professional advice sought if lawfulness of any activities is in doubt.	Trustees to heed Charity Commission guidance as notified in 2026.	Governance Committee	SttB					~~Increased budget for legal services in 2026/27.~~
	Trust's solicitors issue regular updates on charity law and guidance. Where relevant the Board are updated and policies and procedures are reviewed and amended.		Governance Committee	CEO/ SttB					~~CEO and SttB attended VWV training on new implications of the Data (Use and Access) Act for Charities in Sept 2025.~~
	Trustee Exchange attended by some Chairs and Senior Staff and relevant updates fed through to Governance Committee and Board.	Attendance of Trustee Exchange by CEO and Chair or other trustee in April 2026.	Governance Committee	CEO					Trustee Exchange attended by CEO and a trustee in April 2026.
2.2 Failure to comply with requirements for Audit and the preparation and filing of annual accounts	Annual audit carried out in accordance with SORP. Accounts lodged with Charity Commission in timely manner.	Repeat the annual cycle: audited accounts to be signed off at Annual Meeting in November ~~2025 and then in~~ 2026.	FAR	FAM	1	3	**6**	C	Risk has dropped back with ~~new FAM now established and~~ new Auditors in 2026/27.
2.3 Failure to comply with Malvern Hills Acts	New Board members given induction, including the powers and duties of trustees and highlighting the need to act within those powers.	Will be an Election year in 2027 so additional resources should be deployed.	Governance Committee	SttB	2	3	**9**	NC	Newly nominated and elected trustees received requisite information and induction training in 2026.
	Copies of the Malvern Hills Acts provided to all trustees and also available on Trust website.								
	Powers and duties of Board are summarised at the start of the Governance Handbook, which is provided to all trustees.	Full review of Governance Handbook at end of year 2026/27.							
	Any review of a policy document checked to ensure complies with the Acts.								

NATURE OF RISK	CURRENT CONTROLS	REQUIRED CONTROLS	RESPONSIBILITY Board/Committee	RESPONSIBILITY CEO/Manager(s)	LIKELIHOOD (1-5)	IMPACT (1-5)	PROPOSEDRISK SCORE NOV 2026	CHANGE	COMMENTS FOR EDI
2.4 Changes to Local Government ward boundaries - there is no flexibility under the Trust's Acts if electoral boundaries change and it will struggle to operate.	Legal advice on the effect of the changes and conduct of Trust elections obtained. Consultation with officers at MHDC to ensure election can be conducted in accordance with the Acts.	Continue to liaise with MHDC over administrative procedure in place for election in 2027.	Board	GCO	3	4	16		Significant change anticipated in the formation of South Worcestershire Council necessitating a new risk although will be delayed by one year.
	Suitable clear public information about electoral areas is provided for the Trust election.	Returning Officer holds a de-brief with MHDC following any by-election.		CEO / Admin Asst				NC	Note no change status included in 2025 version.
	Adequate insurance cover is in place to cover the Returning Officer role for Trust elections.			FAM	1	4	8		
	Seek to implement long-term solution via changes to Acts via Private Bill.			GCO					Refer also to Risk Register for the Parliamentary Bill.
2.5 Breach of general legislation or regulations	Staff and Trustees receive appropriate training to ensure they are aware of all relevant legislation and regulations.	Maintain awareness of any changes to the law and regulations relevant to the charity's operations.	Governance Committee	SttB	1	4	8	NC	
	LMP & BP include references to all relevant legislation and how it applies to MHT.		LMC	CM					
2.6. Breach of H&S legislation	External H&S advisor appointed to monitor compliance with Health and Safety procedures, check appropriate policies are in place and advise of changes in legislation. Advisor makes annual inspections.	Now that a new H&S policy is in place, over next 12 months, define new procedures and systematically update risk assessments. HSWG to develop a new H&S schedule and policy.	Staffing Committee	CEO / staff that are supervising / All Staff	2	4	12	NC	The new Health and Safety Statement and Policy was approved by Board in January 2026.
	H&S policy in place and Reportable Incident procedures are followed.	Regularly review H&S processes and policy in light of any statutory or regulatory changes.							H&S advisor provides regular updates.
	Relevant policies on e.g. risk assessment, tree safety etc in place. Staff tree safety identification training.	Policies and procedures be reviewed, updated and Board informed.							HSWG received an annual tree safety update in Sept 2026.
	H & S issues reported as standing item to Staffing Committee and to Board.								
	A near-miss or 'safety alert' system is in place	Staff to report a change in activity as a near miss to aid monitoring e.g. a volunteer task cancelled due to adverse weather conditions.							Near-miss reporting is now regular and is considered by the Health & Safety Working Group and Staffing Committee.
	H & S procedures and risk assessments regularly reviewed and updated in light of current legislation and advice.	H&S advice is for MHT to check *implementation* of policies also.							External fire risk compliance assessment undertaken in 2026.
	Organisation obtains updates on all H & S regulations that apply to its activities.	Board to adopt a key performance indicator.							H&S advisor provides regular updates.
	All staff undertaking operations where there is a legal training requirement are provided with relevant certificated training.								An Admin Asst now has additional responsibilities for H&S and monitors training requirements.
	Current electrical safety and gas certification for buildings are in place.	Continue to provide fire safety / extinguisher training for staff.							Fire marshal training attended by relevant staff in March 2026.
2.7. Breach of protected area/wildlife/environmental legislation	Relevant bodies were consulted on, and made input into, the Land Management Plan 2021-26.	Deliver the public consultation for LMP 2026-2031.	LMC	CM	1	4	8	NC	External consultation took place throughout 2026 and report made to Board in Sept 2026.
	Staff, Board and user groups notified of any new designations and are kept appraised of any new discoveries/ developments that might lead to further designations on MHT land	Assess and evaluate resource implications of any new designations.		CM					
	Accurate mapping/recording and flagging of protected status land within our land holding identified in LMP and Geographical Information System (GIS).			L&P					Additional capacity retained in 2026/27 that resulted in widening ~~will be required if we are to widen~~ application of GIS mapping.
	Ongoing liaison with statutory protective organisations Natural England (NE), Forestry Commission (FC), Historic England (HE), Environment Agency (EA) etc.	Aim to gain improved liaison with RPA and NE.		CM					
	All staff and contractors undertaking work on MHT land are appraised of all designations, schedules, protected species etc.			CM					
	Utility companies operating on Trust land are alerted to seek all consents from Trust and relevant external bodies.			L&P					
	Professional staff with relevant qualifications, experience and training are employed by the Trust.			FAM					
2.8. Breaches of General Data Protection Regulations. (GDPR)	Policies on data handling and retention periods established and processes for Subject Access Requests set up. Training for staff undertaken.	Review and monitor updates to UK legislation. Staff to review internal DSAR handling process before end of March 2027. Training needs analysis to be undertaken with Data Protection Officer.	FAR	CEO/FAM	1	4	8	NC	Staff reviewed internal DSAR handling process in autumn 2024.
	External Data Protection Officer and GDPR advisor appointed 2020 and ongoing.	Ensure GDPR compliance is included where relevant in all policies (e.g. Code of Conduct).		CEO & FAM					GDPR gap analysis conducted every three years. Annual compliance review took place in Oct 2026.
	Review of data policies and processes undertaken annually by external DPO	Annual Data Protection Report generated following review with external DPO.		CEO & FAM					Privacy Policy and Data Retention periods reviewed in 2026/27.
	Audit of all data held undertaken 2020.	Review application of retention policies Staff and Trustees to be given refresher training.		CEO					Additional training and review will be needed in election year 2027.
	Personal data that is handled is kept to minimal levels.	Could potentially apply holds on data although need a legal basis to retain data beyond our procedural timescales - treat on a case by case basis.		CEO / FAM / SttB					
		Exit process for staff / trustees to be reviewed to ensure data which is subject to GDPR is deleted.							

NATURE OF RISK	CURRENT CONTROLS	REQUIRED CONTROLS	RESPONSIBILITY Board/Committee	RESPONSIBILITY CEO/Manager(s)	LIKELIHOOD (1-5)	IMPACT (1-5)	PROPOSEDRISK SCORE NOV 2026	CHANGE	COMMENTS FOR EDI
	Use of separate MHT email addresses for all Trustees to be used for Trust business.	Trustee personal details only to be posted in Members' area following advice from Data Protection Officer. Trustees to check their email accounts regularly.		SttB					
	DVLA audit MHT's handling of data relating to vehicles and owners.			FAM					
3. EXTERNAL RISKS									
3.1. Loss of reputation	Information about the Board's activities is freely available on its website, including papers for meetings and minutes.		All committees	CEO / SttB	3	4	16	NC	This is an important aspect of transparency, since vocal individuals make ongoing public criticisms. Web pages were provided on FAQ on governance change proposals were updated in September 2026.
	The Trust deals promptly and accurately with questions from the public in a spirit of openness and transparency.			CEO / FAM / Admin Assts					The Complaints Procedure approved by the Board on 10 Sept 2026 gives the Trust 30 calendar days to respond to a complaint.
	Trustees and Staff work to ensure compliance with the Malvern Hills Acts, Charity Law and Charity Commission guidance.			All Staff					
	Meetings of the Trust open to the public except where exempt information is discussed.			SttB					
	Regular press releases are made to ensure the public are aware in advance of any significant activities the Trust plans to carry out and the reasons for them.	As well as press releases, occasional advertorials put across the Trust's perspective and advertise key activities.							Annual Meeting is advertised in Malvern Gazette.
		Seasonal newsletters distributed to local residents.							Printed seasonal newsletters were introduced in Winter 2025/26.
									The Board adopted a new communications strategy in Jan 2025.
	Uptake of press releases and feedback is monitored.	Monitoring of key performance indicators on overall media sentiment and share of voice.							Annual reports on communications metrics are now provided to FAR/ the Board
	The Trust's Social Media pages are regularly updated and monitored by authorised staff.			CEO					
	Social media policy in place covering staff and trustees' use of Social Media. Statements and press releases are only issued through the office to ensure consistency and accuracy.	A need for core briefings for trustees when resources allow.	FAR						
	Website kept under regular review and updated to provide readable current information across platforms and formats.	Transfer to a new web platform in 2026.							Issues with transfer to new platform acknowledged.
	Website platform and accessibility was reviewed internally in 2026/27.	Full website review by end March 2027.	FAR						
	Events programme to facilitate engagement with the community and stakeholders and inform them of important aspects of the Trust's work.	CEO to update FAR and Board regularly. Consider long term resourcing implications.	FAR						
3.2. Adverse publicity, loss of confidence, loss of influence, impact on staff morale	Public and local media are informed in advance of significant planned works, meetings, and activities.		FAR	CEO	3	4	16	NC	Note no committee allocated responsibility or change indicator included in 2025 version.
	Wherever appropriate communications include explanation that the Trust is a charity and the relevant Acts governing the Trust's operation, to reduce public misconceptions of the Trust.								
	Social media used to better publicise and explain our work.								
	Leaflets are produced and distributed to members of the public to explain about the Trust and its work. (~~Levy payer leaflet,~~ Good Neighbour Guide~~, Annual Report~~).								
	Complaints policy in place to deal promptly with complaints from members of the public.	Monitor complaints and regularly brief/update staff and trustees on contentious issues and appropriate responses.							
	Staff are alerted to issues at an early stage and able to contribute towards their resolution.								
Public misinformed about the Trust	News sources and social media are monitored for misinformation about the Trust and corrections of fact issued promptly wherever appropriate.	Consider long term resourcing implications.							Refer also to Risk Register for the Parliamentary Bill.
	Where appropriate engage directly with stakeholders to correct misinformation.	Trustees and Staff to clarify topics of misinformation that are being put about by groups or individuals, and issue clarifying statements by direct means and public platforms	Chair / Vice Chair	CEO					
3.3. Impact of demographic changes and the impact of known development e.g. SWDP	Weekly monitoring of planning applications in order to comment on applications which impact on the Hills and Commons.		LMC	L&P	2	3	9	NC	
	Monitoring of progress of all Local Authority strategic planning e.g. Minerals plan, SWDP, Neighbourhood Plans and contribute to public consultations as appropriate.		LMC	L&P					
3.4. Impact of Government policy, changes in legislation and regulations	Update Staff training in employment law, health and safety, Equalities Act etc.		Staffing Committee	CEO	2	4	12	NC	
	Trust is in receipt of regular updates from professional advisors and monitors relevant publications. Trustees and management consider any changes which occur and respond accordingly.		All committees	All managers					HR advisor provides regular updates to be considered at Staffing Committee. Note committee responsibility not included in 2025.
Including ongoing uncertainty in relation to any changes to Agri-Environment schemes	Monitor development of proposals for future Agri-environment schemes.	Make contingency arrangements for operational areas that may be impacted.	LMC	CEO / CM					Malvern Hills Bill would reduce dependence since it opens up fundraising options and provides the option to make graziers' work easier.
	The Trust liaises with Natural England over changes to Agri-environment schemes, protected species / habitats and SSSI legislation.	Make further efforts to ensure improved liaison (including site visits) with NE staff and others.	LMC	CM					
	Timely applications are submitted for all available schemes.		LMC	CM					
	Liaising with statutory bodies over any changes to Scheduled Monuments, listed buildings or related legislation.		LMC	CM / L&P					

NATURE OF RISK	CURRENT CONTROLS	REQUIRED CONTROLS	RESPONSIBILITY Board/Committee	RESPONSIBILITY CEO/Manager(s)	LIKELIHOOD (1-5)	IMPACT (1-5)	PROPOSEDRISK SCORE NOV 2026	CHANGE	COMMENTS FOR EDI
3.5 Impact of local campaigns by groups or individuals diverting organisational focus	Local press is monitored for reports of projects or campaigns conflicting with the MH Acts.								
	Provide appropriate and robust response through all appropriate media channels setting out the Trust's position. Chair trustees and staff briefed on any new upcoming issues.								
	Meetings held with relevant-partners/stakeholders to ensure the Trust's position is clear.	Further promote wider understanding of MHT's duties and objects with outside organisations and the wider public through a programme of public engagement.		CEO	**4**	**3**	**15**	NC	New communications strategy approved in January 2025.
	Trustees and staff refer such items to the standing procedures for dealing with persistent and vexatious complaints.	Review public education and stakeholder communication processes to reinforce messages and public information about the charity's objects.							
~~Charities~~ Work diverted and funds expended on issues being repeatedly raised or through vexatious complaints	Public education and stakeholder communication processes reviewed on a rolling basis.	Board to develop and implement communications strategy to reinforce messages and information about priority areas of the charity's work.							New communications strategy approved in January 2025.
	Policies or Board decisions on individual issues are adhered to.								Abusive, vexatious and /or persistent Complainant Policy revised in 2022.
4. OPERATIONAL RISKS									
4.1. Contract and supply	Terms and conditions for major contracts are reviewed and professional advice is taken where required.			CEO & Managers					
	Procedures/thresholds in place for obtaining quotations for larger contracts. Level at which quotations/tenders must be obtained is specified in Accounting Policies and Procedures Manual.			CEO / FAM					
	Full tender process set out in Accounting Policies and Procedures Manual.		FAR		2	2	**6**	NC	
	Ensure those who tender are appropriately qualified /certified and carry relevant insurance. Tenders checked for required certification and declarations.			CEO / Managers					
	Tender process includes trustees in vetting and authorisation of major contracts.								
	Anti-bribery Policy in place.								
	Contracts monitored and reviewed.								Last provided to FAR in Sept 2026.
	Large contracts re-tendered regularly every three years.								
	Trustees are provided with list of major annual contracts over £1,000 (with any significant clauses highlighted).			FAM					Last provided to FAR in Sept 2026.
4.2. Capacity and use of physical resources	Ensure funding available for necessary improvements to buildings, purchase of new machinery etc.		FAR	CEO					
Suitability of buildings for their use impacting on operations	Suitability and use of lower shed reviewed 2019/20.			CEO & FAM					No further progress in 2026.
	Manor House 2nd floor improvements implemented.	No longer looking to implement the proposals.	LMC	L&P	2	3	**9**	NC	
	Building maintenance and inspection programme in place.			L&P					
Plant machinery obsolescence impacting on operations/safety	Replacement policy in place and programme updated as part of Business Plan 2022-2027 with costings identified for major items e.g. vehicles, plant. The plan is reviewed and updated annually.	Include a forward plan of equipment needs/replacements in 2027/28 budget,		OM					
	Updated Electrical Certification for all buildings until 2031.		Staffing Committee	L&P					This is part of health and safety considerations.
4.3. Security of Assets	Adequate security measures for buildings and other infrastructure.	Security measures for Top Shed is to be reviewed.	FAR						Additional security options would be considered as part of any building redevelopment programme.
	Asset register maintained and regularly reviewed.			L&P					External fire risk assessment undertaken in 2026. Implementation of compliance measures thereafter. Visits from H&S Advisor in April and Sept 2026.
	Routine inspections of buildings undertaken annually.				1	3	**6**	NC	Reviewed annually.
	Fire Risk Compliance Assessments updated in 2026.	~~With training from the retained H&S advisor, internal updates will be made on an annual basis with an external assessment due in 2029. This requires staff training.~~	Staffing Committee						
	Annual review of insurance cover.			FAM					Conducted annually.
	Cyber security system upgrade and online backups implemented 2021. Firewall and antivirus systems upgraded 2022.	Regular training for all staff in GDPR and cybercrime. Needs to be organised by end of 2026/27.		FAM					Training for all staff in GDPR and cybercrime on 02/10/2024.
4.4. Employment issues	Human Resource advice available through HR consultant who provide regular updates in newsletters. Additional advice taken from others e.g. ACAS when required.	Changes to Staff Handbook are reviewed by Staffing Committee prior to adoption. A staff survey in 2026/27.	Staffing Committee	CEO / FAM					Employee engagement survey undertaken in 2025 and a plan of action is in place, including reflecting staff ideas in improvements.
	Management kept up to date on relevant legislation and good practice, including training as required.	Regular Senior Management Team meetings.							
	Staff Handbook and Induction programme provided for new staff.								
H&S	Regular Health and Safety at Work advisory information obtained.								External Health and Safety Advisor was formally appointed in 2024 and has since made numerous advisory visits.
Breaches of employment law	Staff Handbook reviewed on regular basis. Staff notified of any changes to Handbook.		Staffing Committee	CEO and All Managers					
	HR Advice available through retained consultant.								
Adequacy of staff training	Training budget maintained and training plans produced for all staff, reviewed at annual appraisals.		Staffing Committee						
Training costs	Training provision and register of needs monitored at annual reviews				1	3	**6**	NC	
Staff Morale	Managers operate 'open door' policy. Staff consulted on any significant changes.	Have points of contact (POC) so that staff can discuss any matters of concern with a trustee.							
	Annual reviews include consideration of job satisfaction.								
	Regular staff meetings undertaken involving all staff.	Invite POCs to every other All Staff meeting.							
	Pay benchmarking completed 2022 and 2025.	Review additional options - i.e. use of sabbaticals and work placements.	FAR						Pay benchmarking ~~was~~ to ~~be~~ considered during the budget setting for 2026/27.
Lack of capacity to cover staff absences	Duality of 'Key function' roles undertaken 2019.	Make better use of and optimise volunteer roles within the organisation.							

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Disputes	Clear disciplinary and grievance procedure within Staff Handbook.	Trustee Disciplinary Policy to be updated in 2026. HR Dept to provide workshops on the role of the employer in creating a working environment that is free from bullying and harassment.	Governance Committee / Staffing Committee	CEO and all Managers					
4.5. Loss of key staff	Exit interviews are undertaken with feedback where relevant to Staffing Committee/Board.	~~Full review of organisations skills need required.~~	Staffing Committee	Senior staff	3	4	**16**	NC	Model patrols were captured and electronic files simplified.
Expected loss or Retirement of staff	Handover periods.	Wherever possible recruit early so as to allow overlap and knowledge transfer with outgoing post holders.							
	Retirement of skilled operational staff.	Work towards succession given ~~anticipated~~ retirements in Ranger Team in 2026.							
Unexpected Loss of expertise very specific to the organisation causing impact on operational service delivery	Duality of 'Key function' roles undertaken 2019. Staff structure and organisational needs to be considered in the Business Plan.	Undertake further review of staff capacity and skills range within individual staff teams in light of potential unexpected loss of staff.							
Succession and contingency planning	Key staff insurance in place.	Continuation of insurance provided through HR Dept.							
4.6. Volunteers:	Role descriptions in place for volunteers.		Staffing Committee	CEO / CM	1	3	**6**	NC	Note have updated committee responsibility
	Wider development of volunteering roles identified in Business Plan.	Further develop and fill range of volunteering roles within MHT with relevant procedures, induction, and training.							
Loss of volunteers, failure to make appropriate use of volunteers, lack of training and support	Improvements to Lower Shed identified to provide better volunteer use and functionality.	Implement improvements according to latest thinking.							
	Volunteers invited to events programme, volunteer social events and offered other training opportunities through the year.	Recruit and train further volunteers to provide spare capacity for certain job roles - e.g. warden and field staff functions.							
Safety of volunteers	Risk assessments undertaken for all Volunteer tasks.								
	Volunteers provided with uniform and PPE.								
	Safeguarding Policy in place and reviewed 2025.	Safeguarding Policy to be reviewed regularly.							Safeguarding Policy updated in 2025.
Risk of Volunteers overstepping role	Induction and regular liaison and updates from staff provided.			All managers					
4.7.1 Health Safety	External H & S consultant engaged to review and advise on H & S processes and policies.	Maintain ongoing review and update of H & S systems to include: H & S Policy and Organisational Risk Assessment. Appointed Persons and Advisors. Update COSHH listing and COSHH Risk Assessments.	Staffing Committee	CEO	2	3	**9**	NC	Health and Safety advisor appointed in spring 2024 provides a regular newsletter and access to training opportunities.
H & S Policy training and internal systems	Regular updates of H & S legislation received from external advisors.								
	Incident Forms produced and monitored.								
	Regular fire alarm testing and PAT testing of electrical appliances.								
	Regular maintenance of equipment under Provision and Use of Equipment Regulation compliance is undertaken								
	On-going Staff training to refresh skills and safety awareness.			CEO & responsible persons identified in H&S policy					
	COSHH listing undertaken.								
	Lone Working Policy in place.	Review lone worker policy in Staff Handbook regularly ~~in 2025~~.							
	Site and Activity Risk Assessments in place for all regular locations and activities. Risk Assessment training updated 2022.	Tree felling procedures to be reviewed in light of potential insurance endorsement for additional works.							
	Safeguarding Policy reviewed 2025.	Review and update safeguarding policy regularly ~~for 2025~~.	Staffing Committee						Updated committee responsibility.
	Appropriate numbers and proportions of staff trained in First Aid. Certification dates are monitored, and training updated as required.	MHT has extended level of First Aid at Work trained staff among Field Staff team.	Staffing Committee						Most recent training in Oct 2026.
4.7.2 Risk to staff of contracting airborne infections in the course of their employment	Adherence to Government Guidelines relating to airborne infections,	Continue to update and implement precautions in light of any change in Government Guidance or circumstances.		CEO	2	3	**9**	NC	
	Public counter precautions and other procedures in place to reduce risk of airborne infection.								
4.8. Wider Safety: public, property, and environment	Hill-fire risks are identified and taken into account in habitat and access management.	Refresh of Land Management Plan to include a Fire Plan.	LMC / Staffing Committee	CEO / CM	3	3	**12**	NC	No change in likelihood due to proactive operational adjustments and liaison with fire and rescue services.
	Regular review with HWFRS of procedures for fire management on the Hills, access and emergency response planning in coordination with other emergency services.	Regular meetings with Hereford and Worcester Fire and Rescue Service.		CEO / CM					ArgoCat training exercise to be held in 2026/27. Lantra wildfire training will be held in the Malvern Hills in January 2026.
Possibility of disputed liability for repair, continuing access restrictions and the risk of claims from affected residents.	Public access provision (paths, bridges, gates, stiles etc) are regularly monitored and maintained to standard.	.		L&P / OM / CM					
Risks between public user types	Guidance on cycling on the Hills prepared and distributed. Cycle paths waymarked. Cycling off permitted paths monitored and identified unauthorised routes taken out of use.	Increase signage, patrols and education on footpaths required as a result of reported walker/cyclist conflicts.		CM					
Injury to public from quarries etc	Ongoing monitoring and review of safety at quarry sites. Program of quarry safety fencing checks and repairs undertaken at least once a year.			OM					
	Liaison with West Mercia Police / HWFRS/ MHDC and NE to support public safety efforts at Gullet Quarry.	In 2027/28 conduct an external review of water safety.		CM					West Mercia Police undertook patrols in summer 2026.
	Safety provisions at Gullet Quarry reviewed and improved with emergency service input.			CM					
	External H & S consultant undertakes site visits, inspections and reviews and recommends any changes to practices.			CEO					The Advisor visited in April 2026; and Sept 2026, when managers undertook an emergency scenario.
Tree safety	Annual tree inspections in accordance with Tree Safety Policy.	Increased survey, monitoring and works on Ash Dieback Disease (ADD) trees to continue 2026.		CM					
Animal health	Staff maintain awareness of regulatory notices issued by authorities (eg relating to animal health (eg Avian Flu) and required safety procedures are adopted / implemented.			All manager					
Risks to public from livestock	Presence of livestock is communicated to the public via onsite signage, newspaper column, website and social media.	Stockwatch bulletins (ongoing).		CM					
	Measures in place to require graziers in contractual relationship with MHT not to graze diseased, dangerous or unruly livestock.			CM					

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4.9. Tree health - safety and cost implications	Staff/volunteers trained to identify signs of disease.		LMC	All trained staff/ CM/LMC	3	3	**12**	NC	
	Monitoring of spread of all key tree diseases is undertaken, including liaison with other bodies and review of national status reports.	Maintain a watching brief on ash dieback disease and acute oak death/ sooty bark disease. ~~New monitoring of acute oak decline at Old Hills in 2024.~~							
	Liaison with Forestry Commission (FC) regarding spread of disease.			CM					
	Continue to monitor all updates on Ash Dieback Disease (ADD), best practice issued by FC and other arboricultural advisory bodies								
	New disease threats identified and mitigation measures in place.								Note no change status included in 2025 version.
	Contingency fund against major tree disease established and being reviewed annually at least.		FAR	FAM					
	Tree safety inspection policy and monitoring carried out in accordance with that policy.	An annual update will be supplied to the Health and Safety Working Group.	Staffing Committee	CM					Update provided to HSWG in Sept 2026. Staff received tree safety identification training.
	Management plan compiled, implemented and regularly reviewed with extra surveys being undertaken by staff to monitor current spread of ADD in order to minimise risk to third parties.			CM					
	When disease found amongst trees on MHT land, safety assessment carried out and action determined.	Watching brief.		CM					Staff competency training in basic tree survey in Aug 2026.
4.10 Inappropriate numbers of livestock Risk of poaching, under grazing, not meeting SSSI conditions and increased need of mechanical management	10 year Countryside Stewardship (CS) or Higher Level Stewardship schemes in place provide continuity of funding to support grazing. 10 year CS scheme secured for Southern Hills from 2020, and for Castlemorton from Jan 2022.		LMC	CM	3	3	**12**	NC	No change indicator provided in 2025. Defra's administrative issue over stewardship for commons caused considerable concern in 2026 but is now resolved.
	Grazing agreements / licences set out numbers of livestock units which graziers should deliver.	Monitor requirements of grazing effort and capacity requirements of new Environmental Land Management Scheme.							
	Regular liaison with commoners, graziers and statutory agencies undertaken.								
	Grazing levels and site condition regularly monitored by Conservation staff.								
	The governance review includes proposals for changes to the Acts to enable grazed commons to be secured, to ensure future viability of grazing. Whilst progress on this is awaited, investigate what other practical options are available to secure the common.	-							See also Parliamentary Bill risk register.
4.11. Disaster, recovery and planning	IT recovery plan in place. Improved monitoring of IT systems via IT consultants.	Business Continuity Plan to be further developed to cover major IT and GDPR issues.	FAR	CEO / FAM	1	5	**10**	NC	
	Important documentation / archives held on site in fireproof storage.	Scope a project to further digitise records by end of March 2027 for implementation in 2027/28.							
Destruction of property (fire/flood etc) resulting in inability to operate	Internal and off-site Data Backup in place.	Consider options for server update by early 2027.							Microsoft server 2016 will no longer have security from early 2027.
	Staff have VPN to enable remote working								
	Insurance cover in place and regularly reviewed.	Review in light of any changes to operational scope.							
4.12. Information technology	Programme of hardware and software upgrades implemented including remote working access	Monitor and provide additional IT capacity in light of changing working practices/Government guidance or restrictions.	FAR	CEO / FAM	2	4	**12**	NC	Undertake a full technical review of our contract with Wavenet in autumn 2026.
		Wavenet software sweeps to continue e.g. annually.							
Meeting operational needs	Improved capacity in use of GIS.	Provide update training to staff on IT systems they are using.		L&P					
Keeping up to date	Key staff to have smart phones for effective communications and safety								
Technical support	Technical support provided by independent external experts								
	GDPR appropriate retention policy in place.			CEO					
Data protection	Insurance in place to cover loss of data and cybersecurity breaches.			FAM					
	Electronic filing system set up on the server.	Update electronic filing system in line with current and future GDPR requirements.							
	Electronic filing system set up on the server.	Update electronic filing system in line with current and future GDPR requirements.							
5. FINANCIAL									
5.1. Expenditure levels increasing beyond expectations	Process for authorising unbudgeted expenditure set out in the Accounting Policies and Procedures manual		FAR	FAM	3	3	**12**	NC	Downgraded from a major risk in 2025.
	Board and FAR briefed on expected inflation linked cost/income changes.			CEO / FAM					
	Business Plan in place includes 5-year budget planning of all major projects and capital expenditure	Review capital item/project costs as set out in Business Plan and Land Management Plan.		CEO / FAM					
Planned projects/ replacement of machinery costs increasing beyond expectations	Project list and maintenance works re-prioritised.			L&P / OM					
	Delayed projects rescheduled.			L&P / OM					
	Car park income normally monitored against budgets on a monthly basis~~, but frequency increased.~~			FAM					
5.2. Car park takings falling below expected income Inflation rate rise and cost of fuel, impacting on car park takings	Parking charge increase considered as part of annual budgeting.	Conduct a review of car parking infrastructure and services in 2027/2028.	FAR	L&P	3	3	**12**	NC	Downgraded from a major risk in 2025. Parking meter provision is currently satisfactory. Car parking income received has reduced in 2026/27 but likelihood arguably stays the same.
	New suite of meters with card payment was installed 2019 with required registration plate input.								
5.3. Grant funding reducing uncertainty over future funding mechanism of existing AgriEnvironment grant sources	Availability largely determined by external factors, not under MHT control. Maintain liaison with NE and others over new agri-environmental grant schemes	Monitor changes to agri-environment schemes and possible new sources of grant funding.		CM	2	4	**12**	NC	This section was incorrectly formatted in 2025 but there is not change in risk score.
	Business Plan identifies possible income streams.	Explore possible further diversification of income streams.	FAR	CEO / FAM					Fundraising Plan in development in Autumn 2026 with a dedicated Fundraising Group.
	Reserves maintained in Stewardship funds to bridge future transition periods. Contingency planning undertaken 2019 against loss of income due to changes in Countryside Stewardship Scheme funding.	Implementation of proposed governance changes would enable to Trust to access a wide variety of income streams currently unavailable		CEO / CM					New ELMS system becoming clearer. Countryside Stewardship schemes will continue. Existing schemes renewed/ extended where appropriate.
	Grant-funded budgets are separately identified as restricted or designated funds.								
	Availability of new grant funding schemes is monitored by staff.								
	Wherever possible agree payment schedules for all significant payments, e.g. levy & grants.	.							
5.4. Delays to income payments	Ensure requests for payments are made on a timely basis.		FAR	CM / FAM	3	3	**12**	NC	
	Receipt of funds against schedule are monitored.								
	Regular monitoring and reporting to Board/FAR of arrears of payment from RPA for Higher Level Stewardship and CS scheme.	Further contingency planning may be required against loss of income from existing agri-environmental grant streams.							

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5.4.1 Grant funding being reduced by unilateral changes to existing agreements made by Rural Payment Agency	Appeal and or object if Government agencies decide to change payment schedules midstream on any current grant arrangements. Bad debts provisions.		LMC / FAR	CM FAM	3	4	**16**	NC	RPA rates in some schemes increased but uncertainty still exists on how MHT land might fit eligibility.
5.5. Impairment of Financial Assets Risk of capital assets degrading faster than write off period Value of investment portfolio being negatively impacted by market volatility	Periodic review of accounting policy on write off periods.	Undertake further review of residual values of assets and amend write-off policy / levels where required.	FAR	FAM	3	3	**12**	NC	Rows 288-291 split out from 292
	Investment managers adopting broad spread across international portfolio to minimise risks.								
	Monthly reports on investment performance required from Investment managers during periods of volatility	Continue to regularly monitor investment.							
	Funds that may be required at short notice from Land Purchase fund switched to shorter term lower risk category of investment.								
	Requirements of any new grants are fully identified and necessary monitoring is undertaken			All managers	2	3	**9**	NC	Note this line split out with own risk score.
5.6. Not meeting conditions for existing grants	Conservation Team monitor to ensure conditions of existing grants are being met.			CM	2	4	**12**	NC	Note this line split out with own risk score.
	Regular liaison with grant providers.	Where possible revise agreements to minimise vulnerability to MHT from third parties creating a liability for MHT to any breach of grant conditions.		CEO & CM					
	Fraud policy in place.		FAR	CEO / FAM					
5.7. Fraud through bank accounts	Accounting Policies and Procedures Manual sets out accounting/finance controls	.	FAR	CEO / FAM	1	4	**8**	NC	
	Training on electronic fraud prevention being sourced through IT providers								
	Two signatories are needed on cheque and BACS payments.								
	Procedures checked and approved by auditors.								
	Risk of collusion perceived as higher in small organisation.	Accounting Policies and Procedures Manual reviewed in 2026 ~~2023/2024~~							
5.8. Collusion of staff on financial transactions	Internal payment authorisation reviewed and updated in 2019.		FAR	FAM	1	4	**8**	NC	
	Clear division of duties between staff ordering and paying for goods/services.								
	Detailed references taken on appointment of finance staff.								
	Annual review of financial controls undertaken with auditors.								
	Specialist advice is taken on VAT when required.								
5.9. Failing to make use of tax breaks	Relevant advice taken from auditors when required.		FAR	FAM	1	3	**6**	NC	
	Review of distribution of funds on accounts, guarantee levels and banking licences undertaken 2022.		FAR						
5.10. Loss of deposits through failure of bank	Bank deposits split between multiple providers with £85k limit (but up to £100K max with authorisation in any one FSC guaranteed bank).		FAR	FAM CEO / FAM	1	3	**6**	NC	
	Major capital reserves currently held in investments via Investment Managers.								
	Board has adopted a medium risk investment policy, which provides a framework within which the Trust's Investment Managers must operate. It was reviewed in January 2023. Adopted flagstone platform with security Increasing interest rates on cash deposit accounts								
5.11. Poor investment returns	Normally, quarterly reports received from Investment Managers and reconciled. Investment Managers report to trustee meeting every 6 months and additionally twice yearly in a meeting with CEO, Chair of FAR and Chair. More frequent (monthly) reports on investment performance required from Investment managers during period of volatility		FAR	CEO / FAM	2	4	**12**	NC	Downgraded from a major risk in 2025.
	MHT pension provision reviewed (with professional advice) in 2015- 2017 and a strategy agreed to manage the provision of pensions for employees of the Trust and discharge the existing pension deficit.	Review deficit repayment programme as advised at each valuation.	FAR						
5.12. Pension commitments increasing	Trustee training workshops on the background to current pension deficit, calculations and plan for discharge of deficit.		FAR	FAM / SttB	2	3	**9**	NC	Annual SORP based pension deficit showed significant reduction from 2022 to 2023.
	Valuations received from WCC actuary every 3 years. Contributions are set to ensure deficit is cleared over 15 year period.	Triennial review was in autumn 2025.		FAM					
	Annual SORP based pension deficit included in accounts with note explaining difference between this and triennial valuation.								
	LGPS rules monitored annually with attention to any which might affect termination deficit.			FAM					
	Since 2011, MHT has not been linked to any other employer in a group the scheme so there is no risk of group liabilities being allocated to MHT.								
5.12.1 Other employers defaulting within Worcestershire pension fund Other employers in LGPS cannot pay their contributions/take on an inappropriate level of risk /contributions take them too close to limits of their available expenditure resulting in increase in liabilities. Risk category allocated by WPF = amber	Analysis is performed by WPF to understand the strength of an employer's covenant when setting the terms of admission agreements (that may require bonds) and in setting the term of deficit recovery periods after actuarial valuations with the aim of keeping employer contributions as stable and affordable as possible.	Continue to engage with WPF through employers' forum to keep up to date with the fund position.	FAR	FAM	3	2	**8**	NC	
	WPF requires contingent assets, bonds or other guarantees when admitting organisations deemed to pose some risk, to provide greater security against outstanding liabilities, including some given by local authorities.								

NATURE OF RISK	CURRENT CONTROLS	REQUIRED CONTROLS	RESPONSIBILITY Board/Committee	RESPONSIBILITY CEO/Manager(s)	LIKELIHOOD (1-5)	IMPACT (1-5)	PROPOSEDRISK SCORE NOV 2026	CHANGE	COMMENTS FOR EDI
Other WPF employers ceasing to exist without prior notice				FAM					
5.13. Cash takings fraud	Meters are emptied and cash counted by 2 members of staff. Takings are reconciled back to meter readings and discrepancies (rare) investigated.			FAM	2	1	**3**	NC	Second part of content previously in wrong cell.
	Car park meter system with card payment facility installed 2019.	.							
	Auditors carry out detailed check of banked takings and card remittances against meter readings.								
	Payment methods at machines reviewed early 2023 and cash payment reinstated at 3 machines								
	Ticket machines fitted with anti-theft mechanism.	Review cash holding/handling procedures and in-transit security.							
5.14 Theft of cash from property	Procedures set out in Finance and Accounting Manual for collection and transfer of cash to bank by staff.		FAR	CEO / FAM	2	1	**3**	NC	
Security of card payments compromised	Increasing use of card payments decreases cash takings.	Obtain a separate network id for handheld payment divides to increase security.							Advice from Data Protection Officer received in October 2026.
	Policy is reviewed annually.								
5.15. Adequacy of free reserves -Insufficient free reserves to absorb unexpected expenditure, significant income reductions or other financial shocks without materially affecting MHT's ability to deliver it's objectives	Board approved Reserves Policy reviewed annually.	Report any forecast material departure from the free reserves target/range to FAR and Board, together with proposed corrective action.	FAR	FAM	1	4	**8**	NC	This section (5.15-5.18 revised for overall clarity and making the distinction between reserves and liquidity a bit clearer. It was originally titled 'Reserves policy and level and scores haven't been altered at this stage.
	Target level of free reserves established by the Board.								
	Annual budget recognises and looks to free reserves policy.								
	Quarterly monitoring of free reserves against monthly management accounts.								
5.16 Cashflow and liquidity - insufficient liquid funds to meet obligations as they fall due, resulting in operational disruption and/or the need to realise investments or use reserves unexpectedly	Cash and readily accessible balances monitored regularly.	Report any forecast material liquidity pressure to FAR committee.							
	Timing of significant income receipts and expenditure commitments considered in cash management.								
	Appropriate level of funds maintained in readily accessible accounts.								
	Cashflow requirements considered as part of budget and financial forecasting.								
	Net assets note prepared quarterly to ensure GF DF RF liquidity is also being managed.								
5.17 Financial reporting error - material error in accounting records, management information, statutory accounts or regulatory returns	1 x FCA and 1 x AAT qualified finance team.								
	Recent change to auditor, which has been beneficial.								
	Monthly management accounts.								
	Documented and regularly updated procedures manual.								
	Regular FAR committee meetings.								
5.18 Finance system - Key person dependency (or strengthen the one in 4).	Sage, payroll, VAT, banking, year end etc. are covered by two members of staff but both have quite specific roles and availability.	Ensure duplication of existing tasks.							
	Some segregation of duties where practical in a small organisation.								

RISK MANAGEMENT STRATEGY 2026/27				Version 2.0 10 October 2026
Explanation of Scoring				
	Value	**Likelihood**	**Impact**	
	1	**Remote**: may only occur in exceptional circumstances	**Insignificant:** • no impact on service • no impact on reputation • complaint unlikely • litigation risk remote	
	2	**Unlikely:** expected to occur in a few circumstances	**Minor:** • slight impact on service • slight impact on reputation • complaint possible • litigation possible	
	3	**Possible:** expected to occur in some circumstances	**Moderate:** • some service disruption • potential for adverse publicity - avoidable with careful handling • complaint probable • litigation possible	Litigation probable could not be a moderate risk.

	4	**Probable:** expected to occur in many circumstances	**Very Serious:** • service disrupted • adverse publicity not avoidable (local media) • complaint probable • litigation probable	
	5	**Highly Probable** expected to occur frequently and in most circumstances	**Major Disaster:** • service interrupted for significant time • major adverse publicity not avoidable (national media) • major litigation expected • resignation of senior management and/or board • loss of beneficiary confidence	
RISK FACTOR IS CALCULATED AS:	**RISK FACTOR = (LIKELIHOOD x IMPACT) + IMPACT**			
	FINAL SCORE VALUES		**Major/extreme risk 15+**	
			Moderate risk 8-14	
			Minor risk 4-7	
			Very Minor risk 1-3	

EXPLANATION OF TEXT COLOURS –

Black is as Nov 2025

Red is amendments or additions (Nov 2026)

NC means no change in risk level

CEO – Chief Executive Officer

Sttb – Secretary to the Board

OM – Operations Manager

L&P – Land and Property Manager

FAM – Finance and Administration Manager

GCO – Governance Change Officer

CM – Conservation Manager

CCO – Community and Conservation Manager

Admin. Asst – Administration Assistant

Risk Register for the Parliamentary Bill: V2.4 Oct 26							
Potential Risk Impact: 1 (least serious) to 5 (most serious) Likelihood of occurrence score: 1 (remote) to 5 (almost certain)	Impact 1-5	Likelihood 1-5	Impact score Likelihood x impact	Direction of risk in last 12 months	Detail of Risk as identified	Potential mitigation	Risk owner (See below for abbreviations)
Governance							
Resignations create a change in balance of trustees in favour of the Bill	5	5	25	↑	1. Trustees feel unable to continue due to behaviour at meetings 2. The Trust has no control over appointment of trustees	Work on morale building amongst trustees and promote the reasons why the Bill is needed more effectively to stakeholders	Board
Operational							
Risk of unforeseen consequences arising from the redraft	3	2	6	→	In modernising the Acts and making changes we overlook some issue of interpretation that wasn't intended or foreseen.	The point of the consultation and the Parliamentary process is to test the draft Bill	Staff/PA
Loss of key staff during the progress of the Bill	5	4	20	↑	Loss of expertise would be a serious threat to keeping costs on track Staff have considerable detailed technical and legal understanding of the problems with the Acts, the background to proposed changes and further work needed, and an existing working relationship with the Parliamentary Agent	Governance Change Officer appointed Bring new staff involved in the Bill up to speed as quickly as possible. Provide support for staff to try to mitigate impact of trustee behaviour	Staff/Board
Failure to manage the Bill process effectively	4	1	4	→	This is now primarily in the hands of Parliament The project timescales may drift and key milestones could be missed	Continue to track project against milestones and budgets Maintain good communications with the Parliamentary Agent and identify slippage at an early stage	Staff/Board
Impact of major contentious easement application	1	5	5	→	Opponents of the Bill could seek to use this to generate support		Staff/Board
Key stakeholder/Government Department or Agency or Parliamentary lawyer raises concerns.	3	2	6	→	Influential Body raises concerns about provisions in the Bill	This is of less concern now that we have seen responses from all significant bodies and they appear manageable	Staff/PA
Failure to progress through Parliament due to factors outside our control.	5	5	25	↑	Factors outside Trust control eg insufficient Parliamentary time to progress the Bill, delay in committee being appointed, prolonged correspondence with House lawyers, members delay progress, committees give latitude to petitioners to make their cases, etc. There have already been significant delays in the Lords due to the unprecedent intervention by a peer on the carry over motion.	Ensure we are following how the process progresses and take appropriate action as identified. It is difficult to mitigate delay other than by asking House Authorities to seek to find early dates for forthcoming stages. In readiness for those stages, work will include briefing supportive Peers and MPs, preparing statements in support of the Bill, asking peers and MPs to garner support from colleagues and be ready to prepare counter arguments to amendments tabled by opponents.	PA

Potential Risk Impact: 1 (least serious) to 5 (most serious) Likelihood of occurrence score: 1 (remote) to 5 (almost certain)	Impact 1-5	Likelihood 1-5	Impact score Likelihood x impact	Direction of risk in last 12 months	Detail of Risk as identified	Potential mitigation	Risk owner (See below for abbreviations)
Inadvertent failure to follow due procedures	5	1	5	→	There are multiple stages in the Parliamentary process and some key requirements that must be met	Parliamentary Agents should ensure this does not happen	PA
Financial							
Escalation of costs	4	5	20	→	Could continue to rise, depending on number of petitions in House of Commons and how much time the Commons give the petitioners. Cost estimate has risen from £306K to £557,572. Trust has to seek further permission from the Charity Commission to raise legal costs limit.	Manage costs rigorously Apply for an extension in good time. Legal team have undertaken a considerable amount of work pro bono.	Staff/Board
Projected costs exceed available funds	4	4	16	→	Costs may escalate to an extent that they would exceed ability of the Trust to fund internally, either through reserves or borrowing from the LPF	Manage costs rigorously Explore external funding options	Staff/Board/PA
Failure to meet loan repayments	3	1	3	→	If we have insufficient income we may find loan repayments problematic	Ensure forward budgeting of this item	Staff/Board
Political							
Some trustees fail to accept their obligation as charity trustees to adhere to the principle of collective responsibility.	5	5	25	↑	Trustees opposed to decisions made by the Board publicly expressing their disagreement to the Bill, or to key elements of the Bill	All Trustees briefed on their duties as Trustees during induction. This is a breach of the MHT Code of Conduct and Charity Commission guidance. Any Trustees who find themselves unable to agree with the collective decisions should consider resigning from the Board. Trustees in this position are conflicted and are exclude from discussions of the Bill. Charity Commission have now opened a compliance case.	Board
Significant pressure/opposition affects Board resolve to pursue a Bill Reputational risk to MHT Impact on staff and Board morale	5	5	25	↑	Particular groups influence MPs and Peers eg by mobilising misinformation campaigns Misinformation (either by word of mouth, meetings, social media etc) about the effect of the governance changes skewing public opinion	1 Internal comms - ensure there is a clear understanding among board members of our position and reasons for it (Singing from one hymn sheet). 2 Increase external communications - put plan in place 3 Increase targetted communications. Increase positive output to media. Use tailored comms for the different groups and anticipate concerns likely to be raised. 4 Monitor social media channels and respond as appropriate 5 Reputational Risk addressed in main Risk Register	Staff/Board

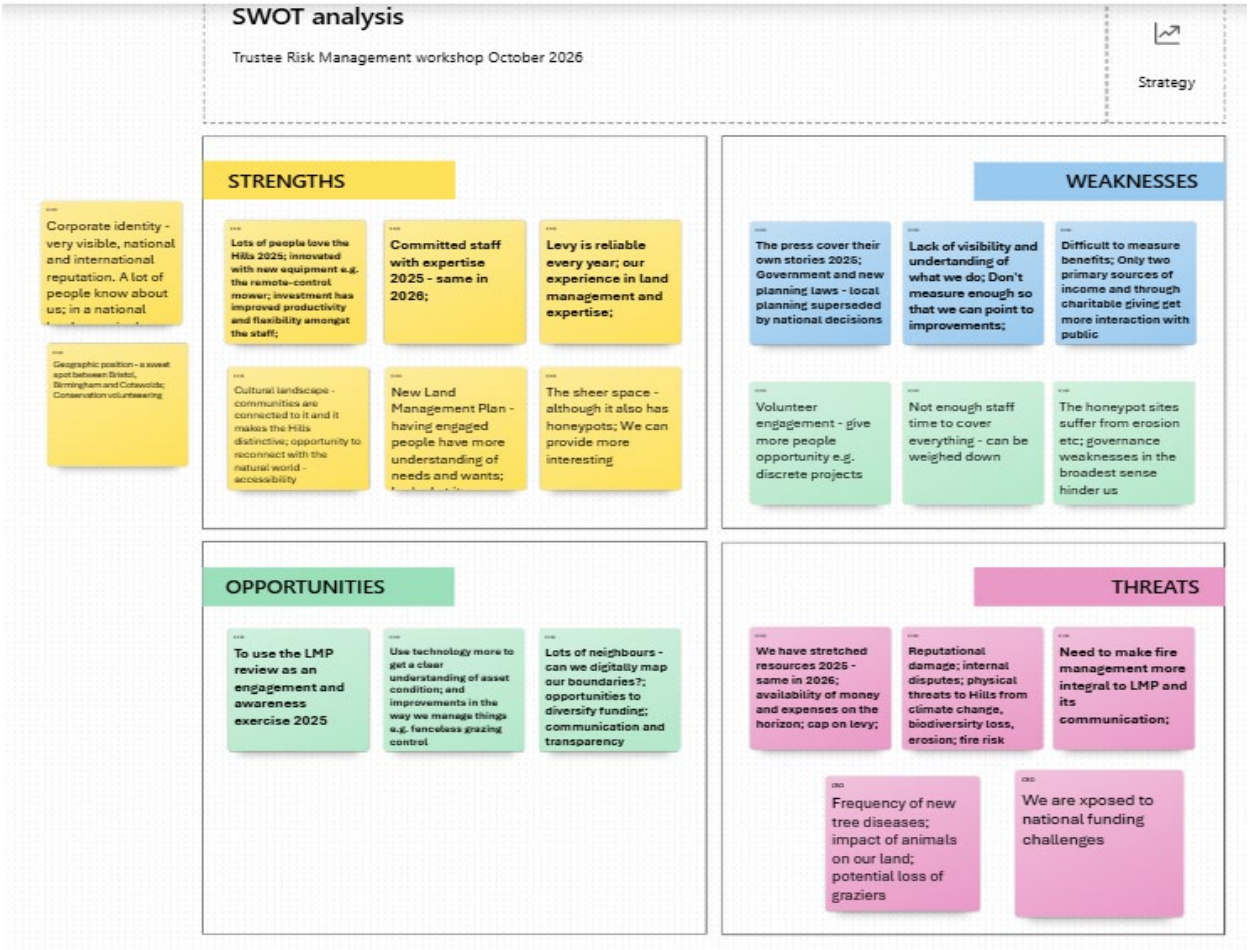
Potential Risk Impact: 1 (least serious) to 5 (most serious) Likelihood of occurrence score: 1 (remote) to 5 (almost certain)	Impact 1-5	Likelihood 1-5	Impact score Likelihood x impact	Direction of risk in last 12 months	Detail of Risk as identified	Potential mitigation	Risk owner (See below for abbreviations)
Interest groups and petitioners apply pressure during the Parliamentary process and either cause Trust to withdraw the bill /water down important provisions or cause significant delay to the progress of the Bill	5	5	25	↑	Petitions against the Bill as it goes through Parliament possibly leading to key measures being amended or rejected during the Parliamentary process MPs or Peers have opportunities to suggest amendments to the Bill Petitions at committee stage Objections of any nature cause delays to the process: the Bill not being enacted in time for the 2027 elections	As above plus third party comms via influential advocates, briefing local politician, Parliamentary plan, good PR etc., seek advice from an experienced Parliamentary PR Advisor Be prepared to negotiate Know where our red lines are Anticipate the contentious areas and prepare suitable rebuttals Attempt to negotiate with petitioners Develop relationships with MPs and Peers willing to assist passage of the Bill PA and Board to proactively seek to move Bill on where appropriate	Board/PA
Failure to identify Peer to support Third Reading carry-over debate in HoL if required	5	1	5	→	If there is a third reading/carry over debate, Promoter of Bill needs to arrange for a peer to move it.	Identify possible Peers at an early stage, brief and keep them well informed	Staff/Board
Failure to gain the support of an MP to move stages in the Commons	5	4	20	→	Local MPs influenced by pressure from people to oppose Bill.	Identify possible candidates, brief and keep them well informed as soon as possible. Seek support of government departments.	Staff/Board
Bill amended significantly against the Trust's interests during the Parliamentary Process.	5	4	20	↑	Both Houses have the power to amend the Bill (or reject it).	Ongoing liaison with and advice from the Parliamentary Agent Careful review of impacts of any changes made	Staff

Risk Ranking

1 to 7	Manageable Risk: Overall rating is 7 or less. Content to carry these risks. Monitor and track any change.
8 - 18	Material Risks: Overall rating is 8 - 18. Concerned about these risks. Need to be managed as a priority.
19 - 25	Significant risk: Overall rating is 19 or above. Most concerned about these risks which are significant and should be reviewed regularly.
Arrows: ↓→↑	The direction of travel of risk.

Annex 3 SWOT analysis October 2026

Nb. '2025' means the issue was identified in last year's annual exercise and the situation remains the same in 2026/27.



Ordinary meeting of the Board
Reserves Policy and Going Concern

12th November 2026

Background Papers

1. Review of Reserves Policy – FAR paper D 4th June 2026.
2. Draft Trustees' Annual Report and Accounts year ended 31st March 2026 – FAR Paper B 24th September 2026

The 9th July Board meeting resolved to increase the free reserves level from £350k to £375k and a comprehensive paper was presented explaining the reasons for the reserves levels as applicable to MHT was discussed by FAR.
The free reserves narrative in the statutory accounts for sign off in the 12th November 2026 meeting reflect the changes to the policy and the free reserves calculation.

The numeric calculations for reserves levels contained in this paper reflect the revised policy and the prior year adjustment regarding the presentation of the Land Purchase Loan.
The calculations include the position at y/e 31st March 2026 as presented in the statutory accounts as well as the revised workings for 30th June 2026 and new workings for 30th September 2026 per the management accounts presented later in this pack.

The auditors require a going concern review covering 12 months from date of signing. This is also contained in the paper, using actual results APR26-SEP26 combined with budgets as prepared OCT26-MAR27 and forecast estimates for APR27-DEC27.

Charity Commission guidance on reserves is set out in CC19.
https://www.gov.uk/government/publications/charities-and-reserves-cc19/charities-and-reserves

In setting MHT's reserves policy, the trustees follow the six steps recommended in CC19, which are:

1. Understanding the nature of the funds held
2. Identifying functional assets
3. Understanding the financial impact of risk
4. Reviewing sources of income
5. Impact of future plans and commitments

These considerations inform the sixth and final step of agreeing an appropriate reserves policy.

The reasons for holding reserves depend on the activities carried out by the charity. In MHT's case, the following reasons for holding reserves were identified:

- To fund working capital. Levy payments from MHDC and some grant payments are received in arrears, so reserves are needed to fund expenditure incurred prior to receipt of the funds

- To purchase vehicles and other equipment
- To fund expenditure arising from unexpected events
- To invest in future projects.

References

1. **Reserves Policy and going concern – as per statutory accounts y/e 31st March 2026**
2. **Comparison of Reserves levels – updated for statutory accounts changes and revised Reserves policy calculation**
3. **Going Concern Assessment**

Reserves policy and going concern *(lifted directly from the statutory accounts)*

Malvern Hills Trust's (MHT's) free reserves are defined as those funds which the charity has available to spend on its charitable objectives.
The free reserves are calculated by starting with the total unrestricted funds value from the accounts. To comply with accounting rules the amount of the pension deficit is included as part of the unrestricted funds shown in the accounts, although it is a liability that will not crystallise, as the deficit to be repaid is part of a different calculation under the triennial valuation of the scheme. This deficit value is therefore added back when calculating the free reserves.
The introduction of the new loan arrangement from the Land Purchase Fund has resulted in a further adjustment to the calculation, recognising that the full loan balance does not need to be considered as immediately unavailable, for the purposes of the free reserve calculation, but that the following 12 months interest and capital payable should be reflected.
The net book value of fixed assets (not available as cash) and the value of committed (designated) funds are then deducted, to come to the free reserve total.
The FAR Committee and Board have considered the position in detail during meetings since the year end and in conjunction with the auditor.

The level of free reserves required will vary from time to time depending on MHT's overall financial position, the economic climate, the security of income from grants and other sources (in particular from parking revenue), the expected levels of planned expenditure and the risks of unplanned costs.
In setting the policy, the trustees have ensured that the loan repayments, loan interest and contributions required under the defined benefit pension scheme, including those to cover the actuarial deficit, can be met from projected cash flows.

MHT's trustees' policy is to aim to maintain the free reserves level above £350,000 as at 31 March 2026. The policy was first adopted in June 2018 and is reassessed annually. This threshold was revised to £375,000 on 9 July 2026. This level has been set by the trustees taking into account the following factors:

- The need to hold funds to maintain the viability of MHT in case of unexpected events leading to uninsured costs,
- The need to provide protection against the risk of a significant drop in grant or other income or unexpected delays in receipts,
- To fund everyday essential expenditure in the event that income streams are unexpectedly interrupted,
- To fund unplanned costs arising from tree diseases,
- The need to provide working capital for MHT, both for day to day work and for future (possibly grant-funded) development,
- The need to provide a degree of protection against fluctuations in investment income.

Free reserves have been reviewed regularly throughout the year during the appropriate meetings. At 31 March 2026 total funds of the charity were £4,297,221 (2024/25 £4,275,183). This included restricted funds of £3,151,833 (2024/25 £3,104,588 restated) and committed designated funds of £1,235,091 (2024/25 £1,118,634). Details of all the designated funds are given in note 20 to the financial statements and restricted funds details are in note 22.
The level of free reserves as defined above was £500,208 made up of the following:

	£
General fund excluding net book value of assets	(125,912)
Add back Land Purchase loan balance	238,492
Less loan interest & capital in the next 12 months	(14,018)
	98,562
Add back free designated funds:	
Unrestricted Gifts	445,153
Pond Works	6,725
Promotion & Preparation of the Bill	(51,563)
RPA	1,331
	500,208

The total of the free reserve was lower than the March 2025 figure (£627,968), the principles of calculation have been modified slightly since the 2025 value was prepared.
The overall free reserve remains higher than the target minimum of both £375,000 and £350,000 being the new and prior levels as set by the Board.
The trustees have carried out a going concern review and concluded that the Trust is a going concern and that they expect the organisation to continue operating and paying liabilities as they fall due for at least twelve months from when the accounts are signed.

Comparison of Reserves levels

Reserves levels over the last 3 years:

Policy	> 350,000 > 375,000			> 350,000			> 350,000		
	DRAFT SUBJECT TO SIGN OFF 31/03/2026			BEFORE PYA 31/03/2025			31/03/2024		
General Fund Total	57,297			371,961			479,130		
Remove NBV of GF assets (vehicles and equipment + office equipment)	183,211			161,649			144,047		
General Fund excluding NBV of assets	-125,912			210,312			335,085		
Add back Land Purchase Loan Balance	238,492			N/A			N/A		
Less Loan capital and interest payable in next 12 months	-14,018			N/A			N/A		
	98,562			210,312			335,085		
All designated Funds:	**Free**	**Not free**	**Total**	**Free**	**Not free**	**Total**	**Free**	**Not free**	**Total**
Gift fund	445,153		445,153	406,903		406,903	389,386		389,386
HLS		87,247	87,247		79,081	79,081		112,078	112,078
Countryside Stewardshep	1,331	557,952	559,283		380,838	380,838		200,437	200,437
Tree disease fund		33,570	33,570		33,570	33,570		35,865	35,865
Ash dieback		44,530	44,530		61,515	61,515		90,869	90,869
Fundraising			0			0	10,000		10,000
Modernisation of Acts:									
Other costs		38,377	38,377	7,252	63,000	70,252		40,186	40,186
Promotion & preparation of the bill	-51,563		-51,563		16,287	16,287		-14,342	-14,342
Election expenses		14,276	14,276		5,000	5,000		0	0
Dog Campaign		1	1	3,501		3,501	3,501		3,501
Car park repairs			0			0	4,369		4,369
Boundary commission advice			0		12,276	12,276		12,276	12,276
Designated fixed assets		57,489	57,489		10,411	10,411		12,704	12,704
Marketing & comms			0		25,000	25,000		0	12,704
Track & tree bad weather			0		14,000	14,000		0	12,704
Pond works	6,725		6,725		0	0		0	12,704
	500,208			**627,968**			**742,341**		
	142.92%			*179.42%*			*212.10%*		
	133.39%								

Reserves levels for Q1 and Q2 year ended 31st March 2027:

Policy

	> 375,000 SUBJECT TO AUDIT SIGN OFF 30/09/2026			> 375,000 SUBJECT TO AUDIT SIGN OFF 30/06/2026		
General Fund Total	46,893			140,990		
Remove NBV of GF assets (vehicles and equipment + office equipment)	158,410			170,000		
General Fund excluding NBV of assets	-111,517			-29,010		
Add back Land Purchase Loan Balance	296,507			296,507		
Less Loan capital and interest payable in next 12 months	-21,548			-21,548		
	163,442			245,949		
All designated Funds:	**Free**	**Not free**	**Total**	**Free**	**Not free**	**Total**
Gift fund	379,754		379,754	379,763		379,763
HLS		89,560	89,560		88,076	88,076
Countryside Stewardshep	1,331	638,428	639,759	1,331	604,019	605,350
Tree disease fund		33,570	33,570		33,570	33,570
Ash dieback		25,245	25,245		33,019	33,019
Modernisation of Acts:						
Other costs	-1,035		-1,035		31,306	31,306
Promotion & preparation of the bill		26,324	26,324	-220		-220
Election expenses		14,276	14,276		14,276	14,276
Dog Campaign	1		1	1		1
Designated fixed assets		115,464	115,464		120,766	120,766
Pond works	6,725		6,725	6,725		6,725
Tractor x2 profit on disposal	27,690		27,690			
	577,908			**633,549**		
	154.11%			*168.95%*		

For further detailed information regarding the policy revision, please see background paper (1)

Going Concern

Part of charity trustees' responsibilities when preparing annual accounts is to prepare them on the going concern basis.

Under auditing standards, the auditors carry out a rigorous going concern review. As part of that, they need to see financial forecasts for a period of at least 12 months from the date of signing the accounts and to have evidence that the trustees have actively considered whether the charity is a going concern.

Definition of going concern

To be a going concern, there is an assumption that the charity will continue to operate, i.e. that there is an intention to continue in operation and there is no need or requirement to liquidate the organisation. This means that the trustees expect the organisation to continue operating and paying liabilities as they fall due for at least twelve months from when the accounts are signed.

Assessment of going concern

In order to allow trustees formally to assess whether MHT is a going concern, the following is considered in this paper:

- Assessment of financial uncertainties in the next 12 months and how they will be covered
- Position as per the final Statutory Accounts as at 31st March 2026
- Approved budget for the 12 months ended 31st March 2027
- Rework of general fund including ACTUAL results for Q1/Q2 plus BUDGET results for Q3/Q4 of y/e 31st March 2027
- Forward financial forecasts of general fund to 31st December 2027 (9 months)

Financial uncertainties in the next 12 months

The following are the key financial uncertainties that have been identified, that the charity may face in the next 12 months:

1. Parliamentary Bill

a) Preparation and promotion of the Bill:

The Charity Commission have authorised the Trust to spend charity funds on the preparation and promotion of a private bill. The expenditure is currently capped at £503,472. The Trust's case for the Bill was put to a Select Committee over 19 days of public hearings in January to March 2026. The Committee also heard the concerns of a cross section of individuals and organisations who had petitioned against the Bill. The Committee made certain amendments to the Bill but found that, with those amendments the Bill was "expedient and necessary".

If the Bill was allowed to complete its passage unhindered it is anticipated that the Trust would remain within budget.

Notwithstanding the conclusions of the Select Committee, it is apparent that a number of individuals intend to continue to try to change the Bill or prevent its passage and this is likely to result in further funds having to be allocated to ensure that the Trust's governance can be updated.

An internal loan from the Land Purchase fund capped at £306,000 has partially funded these costs and is being repaid over 25 years with interest.

At 30th September 2026 the remaining authorised budget available for promotion & preparation of the bill is £88,201, and the balance on the designated fund is £-1035, as such the difference (£89,236) is assumed to come from the general fund during the remainder of 26/27, as shown in the following predicted results.

Due to time delays, it is unlikely that all this cost will be in 26/27, some will be in 27/28.

b) Other bill related costs (not related to preparation and promotion):

Other costs relating to the Parliamentary Bill which primarily are staff support for the process but also include a public consultation and some legal support not associated with the promotion of the bill are being born via a designated fund. The total budget is £201,958 and at 30th September 2026 £26,324 remains available on that fund with £49,149 budget remaining, as such the difference (£22,825) is assumed to come from general fund during the remainder of 26/27, as shown in the following predicted results.

Due to time delays with the Bill, it is unlikely that all of this cost will be in 26/27, some will be in 27/28.

The same considerations apply as to paragraph a) above - if the Bill proceeds unchallenged, the Trust should remain within budget, but further funds may have to be allocated if this is not the case.

A board meeting will be needed to look at the remaining funding requirements of the Parliamentary Bill as a whole.

2. Governance costs

We are still experiencing some notable governance related costs (mostly legal and professional) that are treated as general fund costs. Inevitably this was hard to budget for but the 26/27 budget was set at a reasonably high level to accommodate this. It is very difficult to predict what will continue into 27/28 but it will be included in the budget in due course. Actual costs are closely monitored.

3. Contingent liabilities

As noted in the statutory accounts there are 2 contingent liabilities disclosed. At the time of writing we are unable to reliably estimate any financial effect.

Position at 31st March 2026

The final accounts for the year ended 31st March 2026 are available on the website and in the office. This is a long document and not reproduced here.

Forecasts through to December 2027

The table in Appendix A presents the general fund results as follows:

Column 1: Actual results APR26-SEP26; Column 2: Budgeted results OCT26-MAR27 from the approved 26/27 budget (modified only where we have new reliable information); Column 3: Forecast results APR27-DEC27 using a combination of actual and budgeted 26/27 data as a starting point.

The review is only considering general funds. Any designated or restricted funds that require transfer to or from general fund have been considered for the period OCT26-DEC27 and shown in the forecast. Other restricted and designated funds, not considered are generally self funding.

The calculation that follows the table applies the formula for free reserves calculation to the general fund positions, up to DEC27.

There are of course a few assumptions in this model as noted.

It is important to remember that our 27/28 budget process that will be prepared during NOV/DEC26 and finalised in JAN27 will also determine the levy setting as required to meet our operational needs next year, subject to a maximum levy of £898,452.

SEE APPENDIX A

Summary

Whilst the Trust continues to face a number of financial challenges over the period to December 2027 the calculations demonstrate that free reserves will still be available 12 months from signing the statutory accounts.
It is possible and acceptable, as covered at the FAR meeting in June 2026, for free reserves to fall below the desired minimum as long as it is short term and a plan is in place to rectify the position.

Recommendation:

1. That the Board approve the assessment that the Trust is a Going Concern.

Deborah Fox
CEO
Nicky Gutteridge
Finance & Administration Manager
30th October 2026

Paper C
For decision

Ordinary meeting of the Board

Year ended 31st March 2026 Trustees Annual Report and Financial Statements

12th November 2026

The Trustees' Annual Report (TAR) and Financial Statements for year ended 31st March 2026 are presented for approval by the board of Trustees.

Background:

The year end accounts were prepared ready for audit scrutiny in c. May 2026 and the auditors were both on site and remotely carrying out their work from June 2026 onwards.

The accounts were presented at the FAR committee meeting on 24th September 2026. At that meeting the detail was discussed and questions invited. This draft was subject to a few small narrative amendments that could not be finalised until the very last moment as up to date sign off information is required. These final narrative changes were sent to FAR Trustees on 8th October with responses required by 16th October. Thereafter the final document was produced, and final auditor review was carried out.

The accounts have been available on the website since 22nd October 2026.
(https://www.malvernhills.org.uk/event/annual-meeting-of-the-board/)
Should there be the need to make any changes up to the meeting date on 12th November 2026, those will be verbally announced at that meeting.

The Audit Partner Ben Hayes will attend the 12th November 2026 meeting.
If you have specific questions on the accounts for the Finance team or the auditor, please send those questions ahead of time as the meeting itself will present certain limitations in access to data and time available.

MHT staff and trustees would like to take this opportunity to thank Ben Hayes and his team at Wenn Townsend for their excellent work, support and timely assistance throughout the audit process this year.

Recommendation:

1 That the Board approves the Trustees' Annual Report and Financial Statements as presented, authorising the Chair to sign the Balance Sheet and Trustees Annual Report on their behalf.

Nicky Gutteridge FCA
Finance and Admin Manager
30th October 2026

Paper E
For Decision

Ordinary meeting of the Board
Appointment of Auditors for year ended 31st March 2027

12th November 2026

Wenn Townsend have carried out the 2025/26 audit, after appointment following the audit tender process in February 2026.

The quoted fee was £11,750 for year ended 31st March 2026 and is subject to annual inflationary increases only, unless the scope of the work changes significantly.

Recommendation:

That Levy Payers approve the re-appointment of Wenn Townsend as Auditors for the financial year 2026/27.

Nicky Gutteridge FCA
Finance and Admin Manager
30th October 2026

Annual Meeting of the Board

Proposed Committee Membership and Other Bodies Representation

12 November 2026

Background Paper:
Standing Order 4

Members of the standing committees of the Board are appointed each year at the Annual Meeting. The composition of the committees is proposed by the current (2025-26) Chair and Vice-Chair of the Board and of the relevant committee, taking into account the preferences of Board members and their skills, interests and attendance records.

Chairs and Vice-Chairs met to consider applications on 26 October 2026.

Regarding MHT representation on Other Bodies, expressions of interest are invited for the two vacancies on the Wildlife Panel and one on the Malvern Spa Association. There are three candidates for two vacancies on Castlemorton Commons Co-ordinating Committee (4Cs) and two candidates for the one position to represent the Trust on the Malvern Landscapes Joint Advisory Committee. Elections will therefore be required.

Recommendations:

1. That the Board carry out an election to choose two representatives for 4Cs and one for the Malvern National Landscape Joint Advisory Committee.
2. That the Board consider and approve the Proposed Committee Membership and Other Bodies Representation for 2026-2027.

Alison Marlow
Secretary to the Board
29 October 2026

Malvern Hills Trust

Applications for Membership of Committees and External Bodies 2026-27

For Annual Meeting of the Board – 12 November 2026

Land Management **Quorum: 5**	**Finance, Administration & Resources** **Quorum: 5**	**Governance (7)** **Quorum: 4**	**Staffing (7)** **Quorum: 4**
1. David Baldwin 2. Richard Bartholomew 3. Mark Driscoll 4. David Edwards 5. Chris McSweeny 6. David Mead 7. John Michael 8. David Reynolds 9. Felicity Robinson 10. Peter Rogers 11. Chris Rouse 12. John Stock	1. Simon Baggaley 2. Robert Berry 3. Jenny Burford 4. David Core 5. Allan Cottam 6. David Fellows 7. Richard Fowler 8. Lucy Hodgson 9. Andrew Myatt 10. John Raine 11. Frances Victory 12. Malcolm Victory	1. Richard Bartholomew 2. Robert Berry ~~3.~~ David Core 4. Mark Driscoll 5. David Fellows 6. Lucy Hodgson 7. John Raine	1. David Baldwin 2. Richard Bartholomew 3. Lucy Hodgson 4. John Michael 5. John Raine 6. John Stock 7. Frances Victory

Outside bodies

Recreation Advisory Panel (4)	**CCA (2)** *Election required*	**Wildlife Panel (4)**	**Malvern Landscapes (1)** *Election required*	**MSA (1)**
1. David Baldwin *2.* David Fellows 3. Chris McSweeny 4. John Raine	1. Chris Rouse 2. David Edwards 3. David Fellows	1. Mark Driscoll 2. Felicity Robinson *3. Vacancy* 4. *Vacancy*	1. Frances Victory 2. David Fellows	*1. Vacancy*

Malvern Hills Trust

Ordinary Meeting of the Board
Colwall Park Hotel, Colwall, Malvern, WR13 6QG
Thursday 10 September 2026 at 6.30 pm (open session starting at 7.30 pm)

Present: John Michael (Chair), David Baldwin, Paul Bennett, Robert Berry, Jenny Burford, David Core, Allan Cottam, Mark Driscoll, David Edwards, David Fellows, Richard Fowler, Lucy Hodgson, Chris McSweeny, Andrew Myatt, Cynthia Palmer, John Raine, David Reynolds, Felicity Robinson, Peter Rogers, Chris Rouse, John Stock, Frances Victory, Malcolm Victory.

In attendance: CEO, Secretary to the Board, Finance and Administration Manager, Land and Property Manager, Conservation Manager, Operations Manager, 22 members of the public.

The open session of the meeting followed confidential session on this occasion. Proceedings commenced at 7.37 pm.

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9. Apologies for absence

Simon Baggaley, Richard Bartholomew, David Mead.

10. Chair's announcements

10.1 Seven members of the public had asked to give a Public Comment at this meeting. The Trust wished to give all those wanting to speak the opportunity to do so. Given time constraints, there would not be individual responses to each comment on this occasion, but written replies would be provided.

10.2 The Charity Commission had written to all Trustees setting out expectations regarding their conduct. The Trust had published the letter on its website in the interests of transparency.

10.3 Malvern Environment Protection Group had held a public meeting about the Malvern Hills Bill on 5 September. The Trust's request to speak had been refused. The CEO and Vice-Chair had attended to listen to people's concerns but had not been allowed to answer questions from the audience.

10.4 The CEO and Trustee John Raine had held a productive meeting about the Bill with Baroness Therese Coffey.

10.5 The press had been promoting the Trust's campaign on livestock worrying. A lamb had recently had to be put down due to injury and this was not an isolated incident.

10.6 The Chair was looking forward to presenting medals at the Malvern Hills Challenge on 12 September.

A trustee interjected at this point to state that they and some other Trustees did not believe the Charity Commission to be the regulator of Malvern Hills Trust.

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11. Declarations of interest

All those present who were Malvern Hills District Councillors (Paul Bennett, Mark Driscoll, Chris McSweeny, John Michael, Frances Victory, Malcolm Victory) declared an interest in the item on the Guarlford and Madresfield review[1].

12. Public Comments

Public comments were received from Malcolm McCrae, David Smallwood, Graeme Crisp, Philip Stubbings, Catherine Swire, Anthony Madigan and Andrew Pitt; these are attached at Schedule 1.

A trustee asked whether responses to comments would be circulated to Trustees in advance of being sent out. The Chair said that they would be copied to Trustees at the same time. The arrangement was purely to save time in the meeting.

13. Confirmation of Previous Board Meeting

Andrew Myatt reported that he had proposed amendments to the open minutes, which had been circulated to Trustees. He gave some examples of points that he considered inaccurate. The Chair said that he had accepted a few, factual amendments as proposed by Mr Myatt, but that he didn't necessarily agree with his other suggestions. He reminded Trustees of what constituted good minutes (meeting detail, attendances, quorum, agenda items, decisions, votes, actions and corrections) and what did not (verbatim dialogue, heated debates, personal opinions, off-topic discussion and appended documents). He asked the Board to take a balanced view as to whether the minutes as produced by the SttB were an accurate representation of the meeting, or whether they wished to vote for Mr Myatt's changes.

It was proposed by Andrew Myatt, seconded by David Fellows, that the draft open minutes of the Board meeting held on 9 July 2026 be amended to incorporate the changes put forward by Mr Myatt. There were 10 votes in favour, 12 against and one abstention. The proposal was therefore not carried.

On the proposal of Frances Victory, seconded by John Stock, it was RESOLVED, with 12 in favour, nine against and two abstentions, to approve the open minutes of the meeting held on 9 July 2026, as received in the Board papers. Andrew Myatt asked for his vote against to be recorded, together with the reason, which was that the minutes were not an accurate and reliable record of the meeting.

14. Matters arising from the previous meeting

Minute 5 – Confirmation of previous meeting minutes

Andrew Myatt referred to his statement that he would provide evidence of bias in the minutes. Accordingly he had produced a document, which the SttB had circulated. He said he had analysed 40 sets of minutes and had found that those prior to 2024 showed slight bias, while those since early 2024 showed strong bias.

[1] Since the meeting ran out of time, this agenda item did not take place.

He alleged that an analysis of meeting transcripts would show the bias to be even higher. He proposed that in order for the Board to be able to have trust in its minutes, which he did not have, a bias and unreliable minutes working group of Trustees should be established.

David Edwards left the meeting at 8.20 pm.

A number of trustees disagreed with the suggestion of bias in the minutes, all of which had been agreed by the Board. Andrew Myatt proposed that a discussion about the 'unreliable minutes' should be included on the agenda for the Special Board Meeting.

15. Trustee Mediation Proposal

The Board received a paper prepared by the Chair of Governance Committee and the SttB on the proposed Trustee Mediation process. The Chair of Governance reported that there had not been formal cover for the initial expenditure on the process, which had been within the CEO's authorisation limit. The paper requested retrospective approval for this, along with approval of £10k for further activities and for delegation of the management of the process to four Trustees. Since the paper had been prepared, the Trustees representing the 'Unaligned' group of Trustees, Robert Berry and Andrew Myatt, had withdrawn from the process. They were asked whether they wished to comment on their reasons for withdrawing, but Mr Berry said that the confidentiality agreement signed by all parties still applied, and so he would not be commenting. Mr Berry informed the meeting that since there would be no mediation, the proposed £10k budget would not be required.

On the proposal of Robert Berry, seconded by Andrew Myatt, it was RESOLVED, with 13 in favour, seven against and two abstentions, to remove the approval of a £10k budget for mediation from the list of recommendations.

On the proposal of David Core, seconded by Malcolm Victory, it was RESOLVED, with 13 in favour and nine abstentions, retrospectively to approve expenditure of £3,840 for Phase 1 of the mediation process, including preparation by the mediator and a meeting on 18 August 2026.

And, that if mediation were to take place:

- A mediation process would be pursued in accordance with the agreement prepared by the mediator;
- Responsibility for pursuing the mediation process would be delegated to Robert Berry, David Core, Andrew Myatt and John Raine;
- Petitioner trustees would be able to participate in further discussion of Bill matters resulting from the current stakeholder engagement and mediation processes, including access to additional legal advice that might be sought.

16. Tractor Purchase

The Board received a paper from the Operations Manager, proposing the purchase of a new tractor to replace on the two tractors disposed of in April 2026. The appendix to the paper explained the requirements and brands considered, which had led to the recommendation to purchase a John Deere Compact 4066R for the

sum of £45,100. The Finance and Administration Manager (FAM) asked the Board to decide on a preferred funding split, with 50% of the purchase being funded by General Fund and the remainder from either Capital Land Management or the Unrestricted Gift Fund.

Questions from Trustees were invited. A Trustee asked how much was available in the Gift Fund; the FAM referred them to the Management Accounts, which always included a statement of the Gift Fund balance. Another Trustee asked a question on a change in balance of the Fund that they had noticed between the May accounts and the most recent accounts. The FAM said she did not have the information in front of her and said she would respond separately to the Trustee. There were various comments from Trustees on the model chosen and operational issues; it was pointed out that Trustees were being asked vote on the purchase of a tractor and how it would be funded. In answer to a question, the FAM said she had a slight preference for using the Unrestricted Gift Fund rather than Capital Land Management.

On the proposal of Lucy Hodgson, seconded by Mark Driscoll, it was RESOLVED, with 12 in favour, six against and four abstentions, to approve the purchase of the John Deere Compact 4066R tractor as detailed in the Board paper.

On the proposal of Lucy Hodgson, seconded by David Core, it was RESOLVED, with 11 in favour, one against and 10 abstentions, to fund the purchase of the tractor 50% from Stewardship Fund and 50% from the Unrestricted Gift Fund.

17. Urgent Business

17.1 Bin review

The Land and Property Manager (LPM) gave a verbal update on work undertaken over the last year to review waste management arrangements across Trust land. A range of investigations and trials had been completed, including monitoring bin usage, reviewing locations, assessing waste types, testing alternative bin designs and collection methods, and gathering staff feedback.

Restricted-opening bins had reduced misuse and waste volumes, and larger wheeled bins had reduced manual-handling requirements. However, the external contractor involved in the wheeled-bin trial had been unable to continue the arrangement due to health and safety concerns arising from offensive waste.

The Board noted the wider implications of bin provision for staff wellbeing, manual-handling risk, operational efficiency, vehicle access, waste-disposal costs and the deployment of Ranger and field staff resources. The LPM advised that a limited trial of a specialist dog-waste collection service was being considered before longer-term recommendations were brought forward.

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Evidence gathered to date indicated that the current number of bins across the Hills was unlikely to represent a sustainable long-term solution, and that a smaller, targeted network of bins at key locations was likely to be more practical, safer and more sustainable.

A trustee observed that the Japanese Suzuki truck had been purchased to assist with bin collections and wondered if this had been forgotten. The LPM said that the trucks were regularly used by the Rangers and Field Team.

A trustee asked why a bin had been removed from West Malvern. The LPM said that a vehicle had reversed into it.

A trustee asked if the Trust was gathering data from users and looking at the cost benefit of different options. The LPM confirmed this and offered to engage with the trustee ahead of the final recommendations being produced.

18. Land Management Committee

18.1 **Approval of the minutes of the meeting held on 2 July 2026**

On the proposal of Felicity Robinson, seconded by Mark Driscoll, it was RESOLVED unanimously to approve the minutes of the Land Management Committee held on 2 July 2026, subject to the correction of a date.

18.2 **Adoption of the minutes of the meeting held on 2 July 2026**

On the proposal of Felicity Robinson, seconded by John Stock, it was RESOLVED unanimously to approve the minutes of the Land Management Committee held on 2 July 2026.

18.3 **Chair of Committee updates**

The Committee Chair reported that the development of the new Land Management Plan (LMP) was on track. She thanked trustees who had attended the recent workshop.

18.4 **Resolutions**

None – dealt with at the Board meeting of 9 July 2026.

19. Governance Committee

19.1 **Approval of the minutes of the meeting held on 16 July 2026**

On the proposal of Lucy Hodgson, seconded by Robert Berry, it was RESOLVED unanimously to approve the minutes of the Governance Committee meeting held on 16 July 2026.

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19.2 **Adoption of the minutes of the meeting held on 16 July 2026**

On the proposal of David Core, seconded by Allan Cottam, it was RESOLVED unanimously to adopt the minutes of the Governance Committee meeting held on 16 July 2026.

19.3 **Chair of Committee updates**
None

19.4 **Resolutions**

On the proposal of David Core, seconded by Lucy Hodgson, it was RESOLVED, with 16 in favour and three abstentions, to approve the proposed changes to the Governance Handbook as listed in the Board papers for this meeting.

On the proposal of David Core, seconded by Lucy Hodgson, it was RESOLVED, with 18 in favour and one abstention, to add a new provision to the Governance Handbook to specify that when an amendment to a resolution is proposed, a vote on the amendment will be taken before the substantive resolution. If necessary, the Chair will adjourn the meeting to allow for the amended resolution to be prepared in writing.

On the proposal of David Core, seconded by Mark Driscoll, it was RESOLVED, with 15 in favour and four abstentions, to approve the revised Conflicts of Interest Policy and Procedure, as amended in the Governance Committee meeting.

On the proposal of David Core, seconded by Lucy Hodgson, it was RESOLVED, with 18 in favour and one abstention, to approve the revised Complaints Policy and Procedure.

20. Management Accounts to 30 June 2026

The Board received the accounts and accompanying notes from the FAM. She reported that the July accounts were also now ready and would shortly be published on the Board Member area of the website. FAR would be considering the draft accounts for the 2025-26 financial year at its meeting on 24 September.

The FAM drew particular attention to the following points:

- G1- The levy accounted for 42% of total income to the end of the first quarter; the figure remained the same at the end of July.
- G2 - Car park income was noticeably under-budget due to the on-going road closure at British Camp, where income was down 20% on last year. The FAM was monitoring this closely but didn't propose to alter the budget.

- G9 – the legal and professional fees budget had been split into land, staff and governance for the sake of clarity. The FAM expected to reduce the overall budget for 2027-28.
- G10 - The NJC pay award had been agreed and staff would receive an increase of 3.3 % with their September salaries, backdated to 1 April 2026. This line was currently showing as under-budget; it would catch up due to the pay award but with recruitments having been delayed it was likely that it would remain under-budget at year end.
- G11 – The FAM referred to a public comment on the interest payments on the Bill loan and pointed out that these were disclosed in the statutory accounts. They appeared in management accounts as a total.
- Restricted – there had been a final drawdown on the land purchase fund loan of £66k at the end of June.
- The FAM responded to a question raised earlier in the meeting about the difference in reported reserves levels across reports and confirmed that the difference was the value of a tractor.
- A trustee asked about the level of spending on graziers. It was confirmed that this was in the region of £100k per annum, but that most of that was covered by countryside stewardship grants.

21. Benchmark report on Key Performance Indicators (KPIs)

The Board received a paper from the CEO, which had been deferred from the last meeting. She reported that over 80 KPIs had been listed in the 2022 Business Plan; many of these had been achieved, while others hadn't because they were unfunded. Questions from trustees were invited.

- A trustee queried the inclusion of the value of the Hills in the calculation of the reserves levels and said that it should be categorised as capital. The FAM agreed that this was not a KPI, but rather a statement of fact. She reminded the meeting that a free reserve calculation was carried out every quarter.
- A trustee said that what was required was a fully costed business plan; they would be happy not to have KPIs at all, but if they were to be used, there needed to be reference to spending on frontline services.
- A trustee expressed concern that there was no KPI on health and safety. The CEO said she was happy to include one if the trustee would suggest it. She pointed out that the indicators in the paper were high level and that committees would receive more detail of KPIs in their area. A trustee noted that it was not possible to affect most of the indicators listed and suggested that therefore there was no point having them.

22. Land Management Plan Consultation responses summary

A paper was received prepared by the Conservation Manager and the Community and Conservation Officer. The CM went through the paper, explaining that this marked the end of the consultation process. There had been five stages, with stages 3-5 included in this report. The next stage would be the drafting of the Plan, to go out for comment.

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The Trust had held 'meet and greet' sessions to discuss the new Plan and these had been well attended. Land management issues only had been discussed; it was clear that people really welcomed the opportunity to attend these events and give feedback. The Trust had been pleased by the desire of local groups to help it achieve what it aimed to achieve.

Staff had also held one to one meetings with around a dozen invited local and national organisations and again there had been lots of offers of help and sharing of expertise.

The Vice-Chair of Land Management Committee thanked the CM for all his work on the consultations, commenting that he had attended a couple of meet and greets and had much appreciated the opportunity to hear people's views. Concerns about climate change had been at the top of the list for all consultations and what impact that had on land management.

23. Governance updates

Item deferred due to lack of time.

24. Land and Property updates

Covered under item 17 – nothing further to report.

25. Trustee Exchange feedback

Item deferred due to lack of time

26. Red flags on the risk register

No report due to lack of time

26.1 **Risk Management Workshop**

The CEO announced that the annual workshop would be arranged.

27. Date of next meeting

Thursday 12 November 2026 at 7 pm – Annual Meeting

The meeting closed at 10 pm.

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Public Comments

Malcolm McCrae

At the Board meeting in May I asked a number of questions concerning the Chair and Vice Chair's knowledge of and subsequent actions in relation to misinformation contained in the evidence presented to the House of Lords Select Committee in support of the Trust's draft Private Bill. As no response was forthcoming at the meeting or subsequently, at the last Board meeting in July I made a further request for answers together with a query about the validity of the Chair's statements in the press that the Trust had qualified as a Charity since 1804. The only responses made to-date are the insults contained in the draft minutes of the last Board meeting.
When can I expect this type of behaviour by the Chair and Vice Chair to cease and proper answers made to legitimate concerns raised levy payers under this agenda item.

David Smallwood

There is considerable disagreement about the cost of the Bill. The Trust quotes one figure, those opposed to the Bill quote a much higher amount.
The main reason is that actual costs and budgeted costs have been muddled together.
Budgeted costs
The budgeted costs are those that you as Trustees have approved. A total of **£705,430** comes from the papers for today's meeting
However, you must include the interest payment of nearly £451,000 because you have approved the loan scheme and therefore it is part of the budgeted costs. You may repay some of the loan early, but that has nothing to do with the budget.
That takes the total budget to over **£1,156,000**
And, you have no budget to deal with the large number of petitions which will be submitted to the House of Commons.
Actual costs
The actual costs are what you have spent. A total of £562, 284 is taken from the papers for today's meeting.
You have also made the first two interest payments on the loan, but these amounts are not itemised separately in your accounts, so we don't how much they are.
Grey areas
There are other costs which the opponents of the Bill believe should be included.

- The cost of the Charities Act scheme which failed. £145,000
- Public relations. Over, £22,000 spent and further £15,000 budgeted for.
- Legal advice dealing with conflicted Trustees and Cynthia Palmer's bullying claim, nearly £22,000
- A mediation budget of £10,000 is being requested today and an additional £3840 has already been spent.

If you add together what has been spent and what is budgeted to be spent, it comes to almost £1.4 million.
In conclusion

Myth Busters 5 on the web site is an example of how the Trust misleads the public over the cost of the Bill
I quote:
"The Trust will be spending over £1 million on the Bill.
This is not true. The budget for legal costs is currently £503,472".
There is no mention of interest payments, no mention of the budget of £202,000 from your "Other Costs" fund, and no mention of any of the other costs which would have never been incurred if were not for the Bill.
You are selectively publishing information in order to disguise the truth.
So I have one question: So far as Myth Busters is concerned, who is responsible, who gave the final approval for what is published on the web site?

The SttB said that a short response had been prepared for Mr Smallwood, but she would not be answering the question about the web site, because that was operational. Mr Smallwood demanded an answer and told the CEO to 'look him the eyes'. The CEO said that she was happy to take responsibility for the website content as communications lead. She added that she wished to register that she was being harassed by Mr Smallwood and that harassment from him had been consistent in Public Comments.

Graeme Crisp

The arrangements for today's meeting of the Board do not conform to standing orders. Additionally they do not conform to the Trust's governing documents. All meetings of the Board are supposed to be open to the public unless a motion is passed by the board to exclude the public. That motion needs to include the reason that the public are to be excluded.

Philip Stubbings

On the 24 April 2025 I submitted an SAR to the MHT Board. In due course I received a response from the CEO informing me that they only held 3 pieces of data in respect to me and that these were in respect to applications for parking tickets. I subsequently responded saying that I didn't accept that and asking for my request to be revisited.

On 15 July 2026, I submitted a 2nd SAR and received a response saying that as I had already previously submitted an SAR it was presumed that I was asking for copies of data only from the date of the previous request. I subsequently replied stating that as my initial request had not been complied with I was seeking copies of all data held on me.

On the 27 August I received an email from the CEO confirming receipt of my (2nd) request and an explanation as to how it was being dealt with and an assurance that I would be kept up to date as to progress.

Some 2 days later I received a further email from the CEO informing me that because of the scope of my request involving a large amount of data that MHT were applying the

extension that affords an additional 2 months to the standard deadline to respond to such requests and that I would be kept up to date as to progress.

Given the failure by MHT to properly deal with my initial SAR and it took a second one to start taking it seriously - no doubt realising what would happen if they didn't. It is clear to me that MHT is not only a dysfunctional organisation and needs to come up to speed as soon as possible, but also, an organisation that cannot be trusted to provide accurate and honest information to those seeking it.

I would therefore welcome an assurance from the MHT Board that they intend to rectify this situation.

Catherine Swire

Since the MHT meeting in July, I can report no progress on the repair to this principal access route to the hills. The fissure has collapsed further, and now, although only a thin layer of tarmac remains in places over crumbling earth - with cars nevertheless now also using the track - an accident pedestrian or vehicular is inevitable.

I was away for a lot of the summer in part because of the distress caused in trying to get into our home, the impossibility of access to older family and ill friends and the very risk of wild fire - the fire station and ambulance service are now being approached by us directly to get a fairer assessment of the situation and our risks.

Immediately after return, on August 10th a serious accident where a man's foot was run over, including ambulance and police occurred - as a direct result of the backing up that results daily from the road closed sign. (The road should be closed now except to residents and Google Maps should be notified) . I know one of the parties involved so have heard direct statements about this. On 21st an ambulance was again called to an accident in the same place. The barriers have fallen several times leaving pedestrians open to the large hole and jagged railings. The young often go up this track drunk at night. Barrier restoration seems to depend on us hauling them up again or monitoring them for the Trust - neither is reasonable. My daughter and son both live at the house and struggle to get out of it now, they have pressing and responsible daily work outside the home.

We have had a ruling from our complaint to the ombudsman for the Council, through a neighbour, that responsibility for the collapse and lead response lies with the Trust. We also have had a letter from the Trust refusing both responsibility and accountable timescale - it seems to us and to everyone consulted this cannot in any scenario be fair. It has been hard to see a way forward but we are advised legally the County Council takes precedence and so are reporting MHT to the Charity Commission for dereliction of charitable duty on two counts - and reluctantly seeking legal advice.

I predict that if the Trust continues to ignore its responsibility to repair this track and negotiate more openly with the council we are likely looking at another death on the hills as a result of the collapse over this year. The fact that a neighbour interviewed the

surveyor staying at the Malvern Hills Hotel to quote for repair and that the cost quoted was well under a tenth of what the Trust has spent on abstract conflict in reorganising its structure against the will of many of its trustees and residents in Malvern only strengthens the power of our complaint. The key to MHT is the word Trust. As a resident on the hills for over twenty years the Trust's failure to respond intelligently to the fact we are at risk, our cars have been damaged and we cannot get access to our own house has broken it.

Anthony Madigan

I was at the public meeting held by the Malvern Environmental Protection Group on 5 September in Christ Church. While I wasn't converted, it was a decent attendance for a meeting on a warm Saturday afternoon.

I have two asks and two matters of record to make, and I don't need a response on any of them today.

The resident who lives close to the track up to St Ann's Well spoke on Saturday about the real access problems they're having. It was raised at the last Board meeting, and something has clearly gone wrong there. Civil engineering issues are never straightforward, we only need the example of the Wells Road to know that, but communication is the easiest problem to fix. Whatever the underlying issues getting in the way of resolution, a good flow of information about this and similar works in progress would be helpful all round.

The update on the Bill's progress made at the meeting on Saturday seemed accurate as far as it went. What it did not cover was all the important areas of the Bill that the Select Committee examined and upheld, and there was little detail on any of the changes that have been recommended as part of a healthy process of scrutiny.

It was a protest meeting, and it was never their job to share information that undermines their arguments. But there is a real information gap that makes it easy for selective truths to take hold. Sure, the Select Committee's report was hard on the Trust in some places, and those aspects were widely quoted locally. But the main findings of the report for all levy payers were that the case for the Bill had been made, that with amendments the clauses of the Bill are "expedient and necessary", and that it could go to the next stage. I suggest that most people in Malvern don't know that and they should.

So I would ask the Board to look hard at communicating in plain English for the benefit of all levy payers, on the channels people use, what the Select Committee (in this case) supported and what it changed. There's no such thing as overcommunication in this space.

Now, I want to put on record two examples of things that were said on Saturday that the report does not support, and I would encourage anyone to check with the Select Committee report itself rather than take my word, or anyone else's word, for it.

An extract from the Committee's proceedings was read out to argue that the Trust is a public body and not properly a charity. Paragraph 136 addresses the argument that a body cannot both be a charity and levy people who have no choice about paying, and the Committee's settled answer is that there is no incompatibility.

It was also said that the Bill's general power would let the Trust sell easements to developers. Paragraphs 90 and 173 of the report say the opposite. That power expressly cannot be used to acquire or dispose of land, to grant any interest in land, to borrow money, or to erect any building or fencing. An easement is an interest in land. It cannot be granted under that power.

The more that people have ready access to useful information, the harder it is for misunderstandings and their related fears to take hold. Everyone in Malvern should be able to understand the reality of the Bill and the process so they can make up their own minds about what they hear. The Trust can definitely play its part in doing that.

Andrew Pitt

When asked at the last Board meeting how much more money he was prepared to sanction to be spent on the Bill, the Chair replied ‘watch this space’ or words to that effect, and stated that there would be a meeting in August when Trustees and The Public would learn what funds Officers considered to be necessary to continue to support the Bill through Parliament.

It is therefore clear Officers have engaged in work to understand the additional costs.

The Trust must now fund activity related to the ‘take note’ debate even before the Bill gets to a third reading, where it appears certain Peers will table amendments, again requiring Parliamentary Agent time and expense. Also there are costs related to the passage of the Bill through the Commons, where, if it gets that far, it is sure to face a record number of petitions ~ this time not just from private individuals, but other statutory authorities, thus incurring yet more expense.

Therefore can I learn what the Chair thinks this Bill is going to cost us all in the end?

Can the Chair please tell us what risk analysis work he has undertaken in respect of ensuring he does not allow his Board to blindly throw good money after bad? If he has done this work, has he shared it with the Board, will he now share it with the Public?

Finally, there is an increasing likelihood that this Bill will not survive its passage through Parliament. So will the Chair please give us all a personal assurance today, if at any point he considers the Board is proposing to throw good money after bad, he will step down as Chair and resign as a nominated trustee from Malvern Hills District Council*?*

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Malvern Hills Trust

Special Meeting of the Board
Council Chamber, Malvern Hills District Council, Avenue Road, Malvern, WR14 3AF
Thursday 8 October 2026 at 7 pm

Present: John Michael (Chair), Simon Baggaley, David Baldwin, Richard Bartholomew, Paul Bennett, Robert Berry, Jenny Burford, David Core, Allan Cottam, Mark Driscoll, David Edwards, David Fellows, Richard Fowler, Chris McSweeny, David Mead, Andrew Myatt, Cynthia Palmer, Jeremy Owenson, John Raine, Chris Rouse (arrived 7.06 pm), John Stock, Frances Victory, Malcolm Victory.

In attendance: CEO, Conservation Manager, Land and Property Manager.

1. Apologies for absence

Lucy Hodgson, David Reynolds, Felicity Robinson, Peter Rogers, Secretary to the Board.

2. Chair's Announcements

- The Chair welcomed new trustee Jeremy Owenson, who was attending his first meeting following his appointment by Malvern Hills District Council.
- It had originally been intended to hold two consecutive special board meetings on the same evening, but due to the anticipated length of debate at each of those, the second meeting had been deferred to a future date.
- Trustees were reminded to conduct the forthcoming debate in a respectful and orderly manner.
- In the absence of the Secretary to the Board, the Conservation Manager and the Land and Property Manager were in attendance to take notes.

3. Declarations of Interest

None. The Chair asked whether any trustee intended to record the meeting. He noted that Trust meetings were covered by Part VA of the Local Government Act 1972. Once the meeting moved into confidential session, trustees would need to approve any private recording. Andrew Myatt said that he was making an audio recording on a personal device. He was doing so because, in his view, there was evidence of bias in Board minutes. He pointed out that there was no standing order that prevented him from making a recording.

Chris Rouse joined the meeting at 7.06 pm.

On the proposal of Andrew Myatt, seconded by Robert Berry, it was RESOLVED, with 12 in favour, eight against and three abstentions, that Andrew Myatt be permitted to record the meeting.

Andrew Myatt asked whether this procedure would be required at future Board meetings. The CEO said it would apply when the Board entered confidential session.

4. Date of Next Meeting

12 November 2026 at 7 pm

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5. Confidential

On the proposal of Robert Berry, seconded by Richard Fowler, it was RESOLVED with 22 in favour and one abstention, to exclude the public from the meeting for items 6-8 on the agenda on the grounds that public would be prejudicial to the public interest by reason of the exempt or confidential nature of the business to be transacted (legal privilege/matters relating to individuals).

The meeting moved into confidential session at 7.10 pm

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Paper G
For Decision

Annual Meeting of the Board
Proposed Meeting Dates for 2027
12 November 2026

The attached draft schedule of dates for Board and Committee meetings in 2027 is attached for the Board's consideration.

2027 will be an election year, which means that there will have to be an extra Board meeting in October so that the outgoing Board can sign off the Trustees' Annual Report and Statutory Accounts for 2026-27. This also means that the meeting of FAR to consider and recommend them has to be brought forward to the very beginning of September.

There are two other particular points to draw to your attention:

- Easter falls very early in 2027 and best efforts have been made to take account of this when suggesting meeting dates;
- It is suggested that Staffing and Governance Committee meetings could take place on the same day, Staffing in the afternoon and Governance in the evening. There is some overlap in committee membership and staff required to attend and this would be a way of reducing the number of meeting attendance days for trustees.

Recommendation:

That the Board consider and approve the Schedule of Meetings for 2027.

Alison Marlow
Secretary to the Board
3 November 2027

Malvern Hills Trust

Board and Committee Meeting Dates 2027

Board Meetings (meetings at 7 pm)
Thursday 21 January
Thursday 11 March
Thursday 13 May
Thursday 8 July
Thursday 9 September
Thursday 21 October (To approve the Trustees' Annual Report and Accounts and appoint the Auditors)
Thursday 18 November (Annual Meeting - *New Board*)

Finance, Administration & Resources Committee (FAR) (meetings at 6 pm)
Thursday 10 June
Thursday 2 September
Thursday 9 December

Land Management Committee (meetings at 6.30 pm)
Thursday 18 February
Thursday 1 July
Thursday 2 December

Staffing Committee (meetings at 3.30 *or* 4 pm)
Thursday 14 January
Thursday 29 April
Thursday 7 October

Governance Committee (meetings at 6.30 pm)
Thursday 14 January
Thursday 29 April
Thursday 7 October

Last updated 2 November 2026 by Alison Marlow

Malvern Hills Trust

Finance, Administration and Resources Committee
Park View Community Room, Malvern Town Council, Victoria Park Road, Malvern WR14 2JY
Thursday 24 September 2026 at 6.00 pm

Present: David Core (Chair), Simon Baggaley, Robert Berry (arrived 6.10 pm), Jenny Burford, Richard Fowler, Andrew Myatt, John Raine, Frances Victory, Malcolm Victory.

In attendance: Chris Rouse, CEO, Secretary to the Board, Finance & Administration Manager, Ben Hayes FCA of Wenn Townsend, four members of the public.

1. **Apologies for absence**
   Allan Cottam, David Fellows, Lucy Hodgson, John Michael.

2. **Chair's communications**
   None.

3. **Declarations of interest**
   None.

4. **Public comments**
   There was one comment from David Smallwood, attached at Schedule 1 with the Trust's response.

5. **Matters Arising from the minutes of the meeting held on 4 June 2026**
   5.1. **Minute 5.1.2 – MHT Investment Portfolio**
   The Finance and Administration Manager (FAM) reported that the investment report structure changes requested by Trustees at the last meeting had been actioned by RBC Brewin Dolphin; Trustees would be able to see these in the report provided for this meeting.
   5.2. **Minute 10 – Policy Review**
   - The FAM reported that the Vehicle Replacement Policy had been due for review at this meeting but was not yet ready. She was in discussions with the Operations Manager about it and it was planned to bring a new policy to FAR in December. She assured the meeting that there was no detriment to vehicle replacement, pointing out that two tractors had been purchased recently.
   - There had been a long discussion about the Reserves Policy at the previous meeting and queries about the percentage of free reserves accounted for by the Unrestricted Gifts Fund. In the light of this, the FAM reminded Trustees that they could choose to designate a fund for a particular purpose, but it would remain as a 'free' reserve because they would retain the power to remove that designation.

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Robert Berry joined the meeting at 6.10 pm

5.3. **Minute 11.1 – GDPR and Records Retention**

The Secretary to the Board and CEO reported back on research carried out on whether trustees might retain confidential charity information after leaving the Board. Charity Commission good practice had been researched and the Data Protection Officer consulted. It was confirmed that obligations with respect to confidentiality continued indefinitely. Good practice was for trustees to return documents and records to the Trust on leaving. It could be lawful to retain information if the ex-trustee was preparing and defending a legal claim, but only if a legal case was a reasonable possibility. Trustees were strongly discouraged from retaining Trust information in personal email accounts on or personal devices. The Trust had responsibilities for the holding and processing of personal data with which it would be very difficult to comply if ex-trustees did this. If there was a genuine reason to preserve governance records for evidential purposes, these should be retained by the Trust within its own records management process rather than by individual trustees. The DPO recommended that the Trust adopt a formal trustee information and records policy, aligned with GDPR principles.

A trustee asked for the advice to be provided in writing.

6. **Final Management Accounts for year ending 31 March 2026, subject to audit sign off**

The Chair welcomed Ben Hayes FCA, representing the Trust's new auditors for 2025-26, Wenn Townsend.

The Finance and Administration Manager (FAM) reminded the meeting that trustees had so far considered two versions of the end of year accounts; there were three further adjustments to be included following the audit visit in June. These were:

- Itemisation of the robocutter grant on a 'straight in, straight out' basis; the auditor had recommended showing it on a restricted line;
- Accrued income for a legacy; this had not yet been received and final information was not yet available, but the Trust was in a good enough position to recognise £50k of legacy income in these accounts. Should the money be received before the signing off the accounts in November and the difference found to be material, the accounts might be amended; if not, it would probably be recognised in the March 2027 accounts;
- The auditor had raised a question on the presentation of the Bill loan capital at the end of 2025. The Trust had sought and followed advice on this from the previous auditors at the time; the presentation as recommended by Wenn Townsend was a definite improvement. The loan balance for March 2025 was now shown as a reduction on General Fund because the Restricted Fund still stood. This did impact the free reserves calculation and this had therefore been modified.

7. **Draft Trustees' Annual Report and Statutory Accounts for year ending 31 March 2026**

The Committee received the draft Report and Accounts. The FAM recorded her thanks to Ben Hayes and his team who had provided exceptional support. She had particularly appreciated the extensive work done on planning and preparation at the start of the audit process; this had worked very well. The Chair recorded a vote of thanks to Wenn Townsend on behalf of the Committee. The FAM drew attention to the following points:

7.1. The Annual Report narrative had been drafted by officers and shared with the Chair and Vice-Chair of FAR, and with the auditors for compliance purposes. There would be some amendments to the wording, which had to be correct and up to date on the date of signing; areas where this was the case were highlighted in the document. The FAM thanked those trustees who had provided substantive comments in advance; this was most helpful. She had replied directly to trustees ahead of the meeting.

7.2. The FAM highlighted that the Accounts had been presented in the confidential papers for this meeting, since they remained in draft, but once finalised they would of course be published ahead of the Annual Meeting.

7.3. A clean audit report was expected from Wenn Townsend.

7.4. For accounting periods after 1 January 2026, the Trust would be required to follow a new Statement of Recommended Practice (SORP), which might mean that the presentation of next year's report would change slightly.

7.5. The FAM referred to the legacy mentioned earlier. There was a small amount of extra narrative regarding legacies, but this did not represent a change of accounting policy.

7.6. Trustee David Fellows who was unable to be present had sent queries in writing and asked for his query on note 4 of the statutory accounts to be shared with the Committee. He was concerned that the levy was treated as charitable income as well as grants. The FAM said that under Charity SORP it was made very clear that income from charitable activities could include earned income, contractual payments from public authorities, performance related grants, and charges for goods and services undertaken in furtherance of the Charity's purposes. Wimbledon and Putney Commons Conservators, who also raised a levy, had an identical note 4 to MHT. The FAM offered to share her full response to Mr Fellows with any trustee who wished to see it.

7.7. There was significant detail on the local government pension scheme, which was a requirement, as was the format in which it was presented.

7.8. There was a narrative for every restricted fund and every designated fund, together with details of all the transfers.

Substantive questions on the accounts were invited from trustees

A Trustee asked about the presentation of the Land Purchase Fund loan and its treatment in the free reserves calculation. There was a technical discussion. The

auditor confirmed that the accounts were transparent and that no material concerns had been identified, noting that the reserves presentation involved an element of judgement. The Committee requested that the final wording provide a clear and prudent explanation of the position.

Ben Hayes (BH) was asked to comment on the format to the Trustees' Annual Report from the auditors' point of view. He reported that it was a transparent document and in line with best practice and confirmed that he was happy to give the committee positive reassurance on the quality of the information therein and on the work of the FAM and her team.

Trustees were concerned that they were being asked to recommend a document for approval that remained incomplete. A vote was taken on whether they were prepared to do so, proposed by Malcolm Victory and seconded by John Raine. There were four in favour, four against and one abstention. The Chair indicated that he was prepared to use his casting vote but instead asked concerned trustees to recommend another way forward.

It was suggested that the accounts should be finalised on the basis of the current accounting treatment, subject to any material developments, and that the final narrative updates should be circulated to and agreed by the Committee before the accounts were recommended to the Board. The FAM said that feedback could be accepted by email, but that 25 October would be the final cut-off date[1]. Committee members indicated that they would be prepared to support a resolution subject to that amendment.

On the proposal of David Core, seconded by Simon Baggaley, it was RESOLVED unanimously to recommend, subject to final narrative updates being circulated and agreed by the Committee, that the Board approve the Trustees' Annual Report and Statutory Accounts for sign off at the November meeting.

8. **Auditors' Draft Report to Management**

The Committee received Wenn Townsend's draft Report to Management for the year ended 31 March 2026. BH went through the paper, reporting that the audit was substantially complete, with only routine finalisation matters outstanding. Key risks had been addressed satisfactorily, no material uncorrected items were identified, and the principal accounting and control observations had been appropriately dealt with. Overall, the process had gone as well as could be expected.

BH referred to the Charity SORP changes due in 2027, advising that the Trust would fall into tier 2 and that the changes wouldn't make that much difference. The changes offered the Trust an opportunity to refresh the format of the Trustees' Annual Report if it wished to, but there was no requirement to do so.

The Committee was pleased to hear that the transition to the new auditors had gone smoothly and recorded its thanks to Wenn Townsend and to the FAM and her team.

[1] The deadline was subsequently brought forward to 16 October, due to 22 October being the date for publication of the final accounts on the web site.

9. **GDPR**

The Committee received a paper from the CEO. She drew trustees' attention particularly to her request that they consider options as to how to digitise the Trust's extensive archive of paper records. Some of these were currently stored in fire proof cabinets; there was also an attic full of maps and other interesting information. The Trust needed to find a secure location to store this information and for a digital format to be created. The Land and Property Manager had previously had involvement in a similar project and would make enquiries about costs and project stages. The CEO cautioned that there was no budget or project in place in the current financial year and no likelihood of capacity amongst existing staff to do the work; someone would need to be brought in.

The Chair said that the Trust held much interesting and significant information beyond the minute books (which was its main obligation to keep and make available) and that it was important to make this information accessible, especially to staff. A trustee added that the Committee needed to see a project plan before it could decide whether to support it.

A trustee referred to their request for records retention regarding the notifiable incident of 2 May 2025, which the Trust did not recognise as a valid Records Preservation Request (RPR). The trustee said that it was clear that the Trust did not have a procedure for handling requests for information and data retention. The CEO pointed out that a RPR was usually a hostile approach made by a solicitor when a legal case existed and that the trustee could just have asked for assurance that this was happening without resorting to a formal process. It was noted that the trustee had previously asked if information was being retained and had been assured that it was.

Some trustees were not happy that the Data Protection Officer (DPO) habitually provided advice to the Trust verbally and it was suggested that the DPO should be asked to put their advice on the RPR in writing. The CEO said she had previously asked for advice in writing and the DPO had declined to provide it. The Trust had researched alternative providers, but they would have been much more expensive.

10. **Risk Management red risks**

The CEO highlighted the following:

- Wildfires had posed a major risk to Trust land during the hot summer, with the Trust losing a hectare of land in May due to a wildfire logged as man-made. Trust representatives had met with a national lead on wildfires and the incident commander at Malvern Fire Station on 17 August, at which they had been assured that, given the low number of fires despite on-going problems with barbecues and camp fires, Trust staff must be doing a good job. The Conservation Manager had put in a bid for funding to hold Lantra wildfire training on the Hills and had just heard that this had been successful.

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A trustee asked whether there were any plans for fire breaks; the CEO said not, but the Trust was working on a new fire plan to sit alongside the Land Management Plan. Another trustee queried whether the Trust should be changing its practices on for example mowing and wood for insect homes, in the light of climate change; the CEO said that the Trust looked to Natural England for advice in this area.

- The formation of South Worcestershire Unitary Authority, if it eventually did go ahead, would have implications for the Trust's governance, especially if the Malvern Hills Bill did not go through.

11. **Policy Review**

11.1. **Data Protection Policy**

Deferred to the December meeting.

12. **Reports for Information**

12.1. **Review of Contracts**

The Committee received for information details of all rolling contracts worth in excess of £1,000. It was noted that Wenn Townsend needed to be added to the list.

12.2. **Risk Management Strategy**

The CEO reported that a risk management workshop was to be held online on 15 October; only eight trustees had attended the in-person equivalent in 2025 and it was hoped that attendance would be higher for an online meeting. A virtual whiteboard would be used to allow trustees to contribute effectively. The CEO hoped at the workshop to touch on the first stages of a review of the Interim Business Plan and to discuss a SWOT analysis.

12.3. **Investment Managers' Report**

The Committee received for information an investment update from RBC Brewin Dolphin dated 31 August 2026. The FAM confirmed that they would be invited to a FAR meeting once a year, in June, but that if trustees had any queries on the report, she would pass them to the investment managers.

13. **Urgent Business**

None.

14. **Date of Next Meeting**

Thursday 10 December 2026

The meeting closed at 8.10 pm.

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Schedule 1

Public Comment – David Smallwood

In Paper D (3) you state: "The Trust received an information request under the Environmental Information Regulations (EIR) on 9 September 2026. It is unclear legally whether the Trust is bound by the regulations."

However, in your Governance Handbook, changes to which were approved as recently at the last Ordinary Board Meeting, you state in Section 5 - Exempt Information, "MHT is subject to the parts of the Local Government Act 1972 conferring rights of attending meetings and access to information and also to the Environmental Information Regulations."

Why are you contradicting yourselves by that claiming the position is unclear, when your Governance Handbook is perfectly clear and you are bound to follow it?

Response from the CEO

This issue did come up for the Trust when a request was made under the EIR previously. At that time, the ICO was asked to determine whether the Trust is subject to the EIR or not, but they never responded to us. We always answer in the spirit of EIR if we receive a request. We are clear that we are not subject to the Freedom of Information Act, but there's some ambiguity about EIR, and we should probably change the Governance Handbook to reflect this.

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Malvern Hills Trust
Ordinary Meeting of Governance Committee
Park View Community Room, Victoria Park Road, Malvern WR14 2JY
Thursday 22 October 2026 at 6.30 pm

Present: David Core (Chair), Richard Bartholomew, Robert Berry, Mark Driscoll, David Fellows, Lucy Hodgson, John Michael, John Raine.

In attendance: CEO, Jenny Burford, Richard Fowler, Andrew Myatt, Cynthia Palmer, Peter Rogers, Chris Rouse, one member of the public.

1. **Apologies for absence**
   John Michael (non-voting), Secretary to the Board.

2. **Chair's announcements**
   - A *Take Note* debate on the Malvern Hills Bill was due to take place in the House of Lords on 29 October. A Trustee asked whether the Board had formally accepted the recommendations of the Select Committee and it was confirmed that it had not yet agreed a position.
   - The Trust had received a letter from the Information Commission (ICO) giving their view that it was inconclusive as to whether or not the Trust was subject to the Environmental Information Regulations 2004 (EIR). This had broadly been the Trust's position anyway and staff did respond to any EIR requests received in the spirit of them. It was noted that it had taken the ICO about two years to respond to an enquiry about the Trust's status; the reason for the delay was unknown. A Trustee said that they had requested further supporting information from the Secretary to the Board (SttB).

3. **Declarations of interest**
   None.

4. **Public comments**
   None.

5. **Matters Arising from previous meetings**
   5.1. **16 July 2026, Minute 5.1 –** ***Whistleblowing rights for trustees***
   Deferred to the January meeting.
   5.2. **16 July 2026, Minute 7.3 –** ***Compliments Policy***
   Item taken under agenda item 8.

6. **Changes to the Governance Handbook and Standing Orders**
   Section 5 of the Governance Handbook on Exempt Information would be checked and updated in the light of the letter from the ICO.

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7. **Policy Review**

7.1. Access to Information Policy

A paper was received from the SttB presenting a new policy for consideration. Questions were invited from trustees.

- One trustee questioned the need for the policy, stating that if trustees required information it should be made available to them. They alleged that a 'cloak and dagger' culture existed at the Trust. The CEO countered that she was not aware of any such culture and it wasn't one she espoused. Another trustee thought that the proposed document was useful, because it set out expectations and expectations affected culture.
- A trustee was concerned about the proposed three year revision period, but it was pointed out that if there were any changes required by legislation or other significant factors, the review would be brought forward.
- A trustee in attendance suggested that the policy should be deferred in the light of the letter from the ICO and that legal advice should be sought. The trustee also expressed concern that the procedure for access to information covering trustees gave officers the ability to override the statutory rights of trustees without there being any appeal process.
- There was a discussion about the status of the Trust and why it was not subject to the Freedom of Information Act, when it might be subject to EIR. There was a suggestion that the policy be recommended for approval subject to any amendments that might come up following further reflection on the ICO correspondence. However, it was agreed that it would be better to defer the decision to the next meeting to allow for advice to be sought and for the policy to be amended appropriately.

7.2. Risk Register (Governance)

There had been a recent online trustee workshop on the complete Risk Strategy. The risks allocated to Governance Committee were tabled for information. The CEO said that a number of controls on governance risks centred around trustee training and noted that it was essential that this training be provided.

- A trustee in attendance queried the scoring mechanism between the corporate risk strategy and the Bill risk register, saying that they should be the same. The CEO pointed out that one was a strategy, while the other was a project, and so it was not necessary for them to be the same; however, streamlining work had already been done. The CEO did not want arbitrarily to change the scoring in a report format that had been in use by the Board for some years and thereby risk causing alarm.
- A trustee in attendance referred to a red risk where the control appeared to be the use of lawyers to address the risk. They did not

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think that getting information from lawyers did address a risk. The CEO said that professional advice and regular updates on charity law were important and that professional advice was only sought if lawfulness on any activities was in doubt. She invited suggestions on other controls. It was suggested that the likelihood was lower than 'red'. The Chair recommended that this particular query be taken offline for further discussion.

- A trustee said that the Board was verging on crisis due to its split concerning the Malvern Hills Bill and suggested that the risk register did not imply this. The CEO pointed out that the risk of internal disputes had been raised to red and said the change would be highlighted in her report to the Annual Meeting in November.
- The Chair thanked trustees for various comments made, observing that an on-going review process was helpful, and encouraging any further feedback to the CEO.

8. **Compliments and Complaints – tracking and reporting**
   The CEO reported that the Board had agreed in principle that compliments and complaints should be tracked, but at the moment was there no compliments policy. Both compliments and complaints allowed the Trust to learn and improve. Plans to track compliments and complaints were in their early stages. Management could provide trustees with periodic summary reports. The CEO said she would welcome suggestions of any good practice trustees had experienced elsewhere. A trustee supported the creation of a simple compliments policy and a log of the type of compliments received. Another trustee suggested the use of Trustpilot for tracking. A trustee in attendance asked if the CEO's newsletter to staff could be shared with trustees; the CEO said this would not be appropriate, because it was operational, but she was happy to share compliments as discussed.

9. **Trustee Training**
   - It was planned to run Prevention of Bullying and Harassment training for newer trustees who had not yet had the chance to attend.
   - The SttB would be circulating a report by the CEO and Mark Driscoll on their attendance at Trustee Exchange earlier in the year.
   - Trustees were invited to consider what training they might find helpful.

10. **Urgent Business**
    None.

11. **Date of Next Meeting**
    Date in January 2027 to be confirmed. It was suggested that it would be helpful to schedule a meeting before the January Board meeting.

The meeting closed at 7.30 pm.

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Malvern Hills Trust

Ordinary Meeting of Staffing Committee
Guesten Suite, Lyttelton Well, Church Street, Malvern WRE14 2AY
Thursday 29 October 2026 at 4.00 pm

Present: Frances Victory (Chair), David Baldwin, Richard Bartholomew, Lucy Hodgson.

In attendance: CEO, Secretary to the Board, Finance and Administration Manager, Andrew Myatt, Chris Rouse.

Absent: John Stock

Before the meeting opened, a trustee in attendance raised a point of order, complaining that papers had not been circulated five clear days in advance (they had been circulated on Thursday 22 October) and that an attachment was missing. The Secretary to the Board said that she had cleared the date of circulation with the Committee Chair.

1. **Apologies for absence**
   Simon Baggaley, David Core (non-voting), John Michael (non-voting) John Raine.

2. **Chair's announcements**
   - A new Ranger Team leader had recently been appointed along with a new member of the Field Staff team.

3. **Declaration of interests**
   None.

4. **Public Comments**
   None.

5. **Matters arising from the Minutes of the meeting held on 16 April 2026**
   None.

6. **Staffing Matters**
   The Committee received a paper from the CEO. She went through the paper, highlighting the following points:
   - Work on the Employment Engagement Plan continued, with staff feedback being collected on an on-going basis.
   - David Core had attended the most recent All Staff meeting in his role as one of the Trustee Points of Contact and had provided feedback on decisions made by the Board at the Special Meeting on 8 October, to reassure staff. The meeting had also been a good opportunity to share positive Land Management Plan feedback with staff. A member of staff said they'd had the opportunity to demonstrate the remote-control mower to partners of the Malvern Hills National Landscape..

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- The CEO was concerned about low staff morale following feedback on less than positive interaction with trustees in staff appraisals and staff meetings. She invited suggestions from the Committee as to how low morale might be addressed. There were still plans to conduct another staff survey, but this would need to be done in-house due to cost. A trustee in attendance asked what was causing the low morale. The CEO said that staff felt that trustees didn't trust them and didn't really understand what they did; also, there was overreach into operations. Until recently, the problem had been confined to officers working in governance, but it had now spread to outdoor and conservation staff.
- The new Ranger Team Leader was leading on relaunching the volunteer programme. Committee members were interested to learn more about this. A trustee asked whether volunteers were recruited for specific tasks. The CEO explained that there were two conservation volunteer days a week during the spring and autumn months; the work of these volunteers was particularly valuable because they could access areas that machinery couldn't. There was less volunteer work during the summer and indeed volunteer tasks had had to be cancelled this year due to the heat. A trustee in attendance commented that field-based volunteer work by trustees was very valuable. A trustee asked how trustees knew what the volunteer tasks were. The CEO explained that this could be done by applying to become a volunteer. The Trust didn't publish a schedule of tasks because this might encourage people to turn up who were not registered volunteers. The SttB was asked to circulate a link to the volunteers' page on the website so that trustees could find out more.

7. **Changes to the Staff Handbook**
   None.

8. **Health and Safety Update**
   The Committee received the CEO's health and safety report. She highlighted the following points:
   - The main challenge of recent months had been coping with heatwaves and dry spells of weather. This had had a major impact on operations, with large number of calls to the office from people worried about their property's proximity to standing vegetation. There had been a fire at Happy Valley in early May, a vehicle fire in Townsend Way and another small fire, but otherwise problems had been confined to the usual challenges of barbecues on the Hills; nothing had got out of hand. There had been a week when the fire service had urged people not to mow due to the risk of igniting vegetation; the Trust had followed this advice, which had been unpopular with some members of the public. A trustee asked whether there was a way of highlighting to the public all the work done during the summer to prevent fires and the CEO said that there would be some information in the forthcoming Autumn/Winter Newsletter. The Trust would be producing a fire plan as part of the new Land Management Plan.
   - A trustee in attendance observed that the land at Happy Valley had recovered in three weeks and asked whether the Conservation Manager had taken the

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opportunity to review the value of controlled burning. The CEO said that the Trust had ceased the practice some years previously. The vegetation might have recovered, but ground nesting animals had died instantly and there were also nesting birds that were lost. The impact of the fire would be assessed in the fire plan.

- The Health and Safety Working Group (HSWG) oversaw a rolling action log. Members had reviewed the annual summary of tree safety and had noted the presence of sooty bark disease. When found, this might need to be removed by a contractor.
- The Health and Safety Advisor (HSA) had done his customary sixth-monthly visits to the Trust. The first meeting had focused on operations, while for the second, senior staff had taken part in an emergency scenario, comprising a member of staff having an accident in a Trust vehicle when the CEO was away. The HSA's feedback was that their approach had been level-headed and competent. The HSA had supported the Trust with advice on dealing with heatwaves; it had been helpful to have an external perspective on this.
- The CEO was pleased to report that recent fire assessments had identified great improvements at Top Shed, Manor House, and St Ann's Well, due to the pragmatic, inexpensive measures implemented.
- The Bin Review continued. The HSWG had held a useful discussion at its September meeting about the provision of dog waste bins. The Trust was not required to provide these and it was noted that organisations such as Forestry England and Wyre Forest had removed them completely. The CEO had held two useful meetings with Malvern Wells Parish Council where it had been agreed that organisations needed to work together to find a solution, because waste had to go somewhere. Staff safety and manual handling requirements were of paramount importance.
- The CEO said that the number of reported incidents was higher than she would like. She noted the four instances of work-related stress and incidents due to the heat, alongside incidents arising from normal day-to-day work on the Hills. A trustee commented that they were grateful that all these incidents *were* being reported, because of the potential for learning. Another trustee recommended that the member of staff responsible for the completion of RIDDOR reports might benefit from attending accident and investigation training. It was noted that the KPI for RIDDOR reports was that there should be zero; there had been two in the previous financial year, but none so far this year. The CEO explained that notifiable accidents remained on the reporting schedule until the regulatory investigation was complete. A trustee asked whether the Trust had to be notified if the emergency services attended an accident on Trust land. The CEO said not; the reported incidents involving members of the public were only there because the Trust knew about them, perhaps because a Ranger had helped at the scene. They needed to be reported in case of a claim. A trustee asked whether the recent vandalism of water bowsers was a police matter; the CEO thought this had been reported the problem had been addressed via the installation of locks.

- The CEO summarised her report by stressing that all incidents were used as an opportunity to learn. The HSWG received the full dossier and had the opportunity to review and comment. Next steps priorities included the development of the procedures to sit under the Health and Safety Policy and the creation of a risk assessment to protect workers from stress at work. The CEO explained that a procedure was being drafted for each main hazard, which would inform a list of competencies and lead to a risk assessment. It was hoped that the drafts would be ready by January 2027.
- Lucy Hodgson, Trustee for Safeguarding and Wellbeing, reported that she had recently completed annual safeguarding training in her role as a school governor. The SttB was asked to check whether this training was sufficient to cover Mrs Hodgson's role at the Trust. Mrs Hodgson said that she would welcome some training on stress and wellbeing.

9. **Staffing Risk Register**

The Committee received, for information, a copy of the risks from the Risk Register that had been allocated to Staffing Committee. The CEO explained that the full Register was being updated ahead of the Annual Meeting in November. She expected that the impact scores of these risks would remain the same and the likelihood scores mainly the same.

- The potential for internal disputes score had been raised to four, which trustees at the recent Risk Management workshop had agreed was appropriate. Trustees were asked to suggest any possible control measures. A trustee asked whether the Staff Trustee Protocol was working and the staff present thought not, although it was noted that the Points of Contact worked well. It was further noted that due to staff turnover, membership of the Protocol Working Group needed a refresh.
- A trustee referred to the red risk of loss of key staff. The CEO said that actually this hadn't changed and was always high. The Committee considered that the risk was significant, given what had been reported at this meeting. A trustee commented that the morale of staff *and* trustees had been adversely affected by the poor behaviour of certain trustees and members of the public, and they expressed a hope that the Board could make it clear that such behaviour was unacceptable and enforce discipline. The fact that the Board was split on the Bill did not mean that it was not possible to be courteous to the staff. A trustee in attendance insisted that trustees were required to be 'unwaveringly analytical' and that they were there to apply due diligence, which might be uncomfortable for trustees and staff. However, there was a difference between asking the right questions and doing so in an insulting or mocking manner. The SttB reminded the meeting that trustees were expected to provide not just challenge but also support to the organisation and its staff. A trustee commented that a Board meeting was not a time to accuse staff of not doing their job, especially not in front of members of the public.

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10. **Policy Review**

The Committee received a paper from the SttB. She apologised for omitting the attachment. Hard copies of the draft Stress and Wellbeing Policy were tabled for committee members and it was agreed that the policy would be discussed in detail at the next meeting.

10.1. Policies in the Staff Handbook

- None for this meeting.

10.2. Other Policies

- **Safeguarding**. The SttB reported that she had reviewed the Safeguarding Policy and was recommending that it be approved unchanged. It was agreed to recommend that the Board do so.
- **Prevention of Bullying and Harassment**. New provisions of the Employment Act 2025 were due to come into force on the day after this meeting, requiring employers to take *all reasonable steps* to prevent harassment of staff by third parties and *all reasonable steps* to prevent sexual harassment. There was concern about what this meant in practice and the SttB was asked to do further research to find some relevant examples that could be included in the policy. It was however noted that the changes were required by law and must be made. The SttB recommended that the Chair could highlight the new requirements at the November Board meeting, and that the Policy could be presented to the January meeting. A trustee recommended adding a reference to the Protection from Harassment Act 1997 to the policy. The CEO expressed concern about the increasing burden of regulation, observing that the Trust did not have the capacity to deal with it. It was suggested that the CEO research the approach being taken by similar organisations.
- **Stress and Wellbeing**. A trustee in attendance suggested that officers had gone into the drafting of this policy 'blind' and should be consulting HR and lawyers. The CEO and SttB both objected to this analysis. It was noted that the SttB held relevant qualifications and that the Trust was responding to concerns raised in the employee engagement survey and discussed with HR and the HSWG.

11. **Staff Training Update**

Nothing further to report.

12. **Urgent Business**

None.

13. **Date of next meeting**

Thursday 14 January 2027 (provisional)

The meeting closed at 5.30 pm

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Ordinary meeting of the Board`

Management accounts to 30th September 2026 (Q2)

12th November 2026

The management accounts for the first 6 months (Q2) of the financial year are presented for Trustees' information.

As normal, a reserves review will be carried out quarterly and this is the end of the second quarter.

Policy

	> 375,000 SUBJECT TO AUDIT SIGN OFF 30/09/2026
General Fund Total	46,893
Remove NBV of GF assets (vehicles and equipment + office equipment)	158,410
General Fund excluding NBV of assets	-111,517
Add back Land Purchase Loan Balance	296,507
Less Loan capital and interest payable in next 12 months	-21,548
	163,442

All designated Funds:	Free	Not free	Total
Gift fund	379,754		379,754
HLS		89,560	89,560
Countryside Stewardshep	1,331	638,428	639,759
Tree disease fund		33,570	33,570
Ash dieback		25,245	25,245
Modernisation of Acts:			
Other costs	-1,035		-1,035
Promotion & preparation of the bill		26,324	26,324
Election expenses		14,276	14,276
Dog Campaign	1		1
Designated fixed assets		115,464	115,464
Pond works	6,725		6,725
Tractor x2 profit on disposal	27,690		27,690
	577,908		
	154.11%		

There is free reserves headroom in the policy at the 30th September 2026 but as usual this relies on the unrestricted gift fund but also now the 25 year term on the internal loan.

Nicky Gutteridge FCA
Finance and Admin Manager
30th October 2026

Balance Sheet as at 30th September 2026

** Opening balances adjusted for audit subject to sign off **

	£	£	NOTES
Fixed Assets			
Heritage assets	1,470,109		
Other land and buildings	204,041		
Improvements to capital assets	48,801		
LM vehicles & equipment	266,041		
Office equipment	7,831		
Investments	1,405,758		**B1**
		3,402,581	
Current Assets			
Livestock	31,452		
Investments	354,568		**B2**
Debtors & accrued income	354,871		
Deposits and Cash	745,849		**B3**
VAT Asset	0		
		1,486,740	
Current Liabilities			
Creditors : Short Term	169,641		
Payroll Taxation	20,688		
Wages/Pension	7,250		
VAT Liability	6,841		
		(204,421)	
Current Assets less Current Liabilities:		1,282,319	
Total Assets less Current Liabilities:		4,684,900	
Long Term Liabilities			
FRS 102 pension liability		(147,000)	**B4**
Total Assets less Total Liabilities:		**4,537,900**	
Capital & Reserves			
General fund	*343,400*		**B5**
General fund - Loan Capital	*(296,507)*		**B5**
General Fund	46,894		**B6**
Designated funds	1,357,332		
Restricted funds	3,280,674		
FRS 102 pension	(147,000)		**B4**
		4,537,900	

General fund income and expenditure versus budget for the 6 months ended 30th September 2026

** Opening balances adjusted for audit subject to sign off **

	Actual 6 mnths £	Budget 6 mnths £	Variance £	*Budget Annual £*	NOTES
Income					
Levy	402,850	402,850	(0)	*805,700*	G1
Grants	7,725	11,725	(4,000)	*23,450*	G2
Car park takings	267,767	307,642	(39,875)	*523,949*	G3
Donations & legacies	3,316	6,000	(2,684)	*12,000*	
Rents and licences	10,328	9,310	1,018	*18,620*	
Ice cream concessions	1,350	1,400	(50)	*2,800*	
Wayleaves	424	3,000	(2,576)	*6,000*	
AONB contribtions	1,561	3,123	(1,561)	*6,245*	
Sundry income	1,406	4,120	(2,714)	*8,240*	
Investment income	10,414	12,000	(1,586)	*24,000*	
Profit on disposal of fixed assets	31,144	4,000	27,144	*8,000*	G4
Total income	**738,285**	**765,170**	**(26,885)**	*1,439,004*	
Land management expenses					
Contract labour	4,871	4,861	(10)	*11,900*	
Drainage	2,178	500	(1,678)	*1,000*	
Vehicle and equipment expenses	12,385	11,000	(1,385)	*22,000*	
Hire of plant and equipment	1,375	500	(875)	*1,000*	
Waste Management	7,967	11,600	3,633	*23,200*	
Tree work	20,550	117	(20,433)	*33,000*	G5
Grass cutting	3,927	3,086	(841)	*4,400*	
Purchase of materials and tools	3,711	4,250	539	*8,500*	
Protective clothing	320	1,750	1,430	*3,500*	
Field consultancies	0	3,000	3,000	*6,000*	
Conservation volunteers	62	600	538	*1,200*	
Water testing	225	250	25	*500*	
Gardening	1,163	0	(1,163)	*0*	G7
Management plan	1,916	750	(1,166)	*1,500*	G6
Tracks and paths	0	5,280	5,280	*11,500*	
LM miscellaneous	0	3,275	3,275	*6,550*	
Total land management expenses	**60,649**	**50,819**	**(9,830)**	*135,750*	
Visitor services expenses					
Car park meter expenses	15,328	13,850	(1,478)	*27,700*	
Car park passes	1,332	1,500	168	*3,000*	
Car park repairs	0	500	500	*1,000*	
Rangers' vehicle expenses	10,501	6,750	(3,751)	*13,500*	G8
Rangers' uniform and tools	1,006	2,250	1,244	*4,500*	
Rangers' phones	803	400	(403)	*800*	
Total visitor services expenses	**28,970**	**25,250**	**(3,720)**	*50,500*	
Communications and public engagement expenses					
Leaflets	572	1,000	428	*2,000*	
Annual report	0	300	300	*600*	
Newsletters	2,057	600	(1,457)	*1,200*	
Campaigns	0	500	500	*1,000*	
Signs, display and information boards	443	1,000	557	*2,000*	
Events programme	375	375	0	*750*	
Exhibitions	0	500	500	*1,000*	
Other PR expenses	0	350	350	*700*	
Fundraising expenses	120	125	5	*250*	
Communications support and engagement	11,866	12,000	134	*24,000*	
Total communications and public engagement expenses	**15,432**	**16,750**	**1,318**	*33,500*	
Administration and governance expenses					
Rates	7,993	4,950	(3,043)	*9,900*	G9
Buildings maintenance	1,534	5,500	3,966	*11,000*	
Electricity and gas	3,373	5,300	1,927	*10,600*	
Telephones	2,893	2,900	7	*5,800*	
Depreciation	33,915	35,500	1,585	*71,000*	
Insurance	22,126	19,500	(2,626)	*39,000*	G12
Office equipment	2,456	3,000	544	*6,000*	
IT	8,706	9,250	544	*18,500*	
Website	5,252	3,250	(2,002)	*6,500*	G11

General fund income and expenditure versus budget for the 6 months ended 30th September 2026

** Opening balances adjusted for audit subject to sign off **

	Actual 6 mnths £	Budget 6 mnths £	Variance £	*Budget Annual £*	NOTES
Legal and professional fees incl H&S	32,928	48,600	15,672	*97,200*	G10
Governance costs	959	3,150	2,191	*6,300*	
Subscriptions	2,953	2,650	(303)	*5,300*	
Bank and investment charges	1,661	2,100	439	*4,200*	
Postage	1,548	2,000	452	*4,000*	
Stationery, printing and recycling	2,123	2,360	237	*4,720*	
Cleaning	2,642	3,000	358	*6,000*	
Travelling expenses	268	400	132	*800*	
Miscellaneous exps	953	500	(453)	*1,000*	
Newpaper ads	0	500	500	*1,000*	
Total administration and governance expenses	**134,281**	**154,410**	**20,129**	***308,820***	
Staff costs					
Basic salaries	330,390	355,550	25,160	*711,100*	G13
Employer's NI	31,601	37,150	5,549	*74,300*	G13
Pension contributions	70,858	70,251	(607)	*140,508*	G13
Group life assurance	2,115	2,400	285	*4,800*	
Training - staff	4,083	6,500	2,417	*13,000*	
Recruitment	838	1,250	412	*2,500*	
Total staff costs	**439,885**	**473,101**	**33,216**	***946,208***	
Total ALL expenses	**679,218**	**720,330**	**41,112**	***1,474,778***	
Surplus for the period before transfers	**59,067**	**44,840**	**14,227**	***(35,774)***	
Transfers from other funds	30,253	1,058	29,195	*27,616*	G14
Transfers to other funds	(99,723)	(13,783)	(85,940)	*(32,713)*	G14
Surplus for the period after transfers	**(10,403)**	**32,115**	**(42,518)**	***(40,871)***	G15
General fund brought forward	57,297	312,696	(255,399)		G15
General fund carried forward	**46,893**	**344,811**	**(297,917)**		

Malvern Hills Trust - Designated Funds Income and Expenditure for the 6 months ended 30th September 2026

NOTES	D3	D1A	D1B									D2	D4	D5			
** Opening balances adjusted for audit subject to sign off **																	
Codes	Unrestricted Gifts £	Modernisation of Acts other costs £	Preparation & Promotion of Private Bill £	Dog campaign des fund £	Election exps des fund £	Tree disease des fund £	Ash Dieback fund £	CS Southern £	CS North & Central £	HLS Chase End £	HLS Old Hills £	Grazing reserve £	Designated Fixed Assets £	Tractor profit x 2 £	Pond works £	Basic Payment Scheme £	Total £
4020 - Stewardship annual grants	0	0	0	0	0	0	0	24,736	104,607	3,252	3,680	0	0	0	0	0	136,274
4200 - Donations	25	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	25
4250 - Legacies	(24)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	(24)
4310 - Land rentals	0	0	0	0	0	0	0	375	2,879	0	0	0	0	0	0	0	3,254
Income total	**1**	**0**	**0**	**0**	**0**	**0**	**0**	**25,111**	**107,486**	**3,252**	**3,680**	**0**	**0**	**0**	**0**	**0**	**139,529**
5000 - Contract labour	0	0	0	0	0	0	(19,285)	0	(3,528)	0	0	0	0	0	0	0	(22,813)
5025 - Hire of plant and equipment	0	0	0	0	0	0	0	0	(4,000)	0	0	0	0	0	0	0	(4,000)
5040 - Grass cutting	0	0	0	0	0	0	0	0	(3,200)	0	0	0	0	0	0	0	(3,200)
5055 - Field surveys/research	0	0	0	0	0	0	0	0	(1,100)	0	0	0	0	0	0	0	(1,100)
5100 - Graziers	0	0	0	0	0	0	0	(7,250)	(31,200)	(1,264)	(2,025)	0	0	0	0	0	(41,739)
Land management expenses total	0	0	0	0	0	0	(19,285)	(7,250)	(43,028)	(1,264)	(2,025)	0	0	0	0	0	**(72,852)**
Visitor services total	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**
6075 - Legal fees Governance based	0	0	(15,473)	0	0	0	0	0	0	0	0	0	0	0	0	0	(15,473)
6090 - Legal fees Land based	0	0	0	0	0	0	0	0	(1,678)	0	0	0	0	0	0	0	(1,678)
6140 - Travelling expenses	0	(441)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	(441)
Adminstration costs total	**0**	**(441)**	**(15,473)**	**0**	**0**	**0**	**0**	**0**	**(1,678)**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**(17,591)**
7000 - Basic salaries - field staff	0	0	0	0	0	0	0	0	(1,200)	0	0	0	0	0	0	0	(1,200)
7010 - Basic salaries - office based staff	0	(8,569)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	(8,569)
7021 - Employer's NI - field staff	0	0	0	0	0	0	0	0	(175)	0	0	0	0	0	0	0	(175)
7030 - Employer's NI - office based staff	0	(1,102)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	(1,102)
7040 - Pension contributions - field staff	0	0	0	0	0	0	0	0	(120)	0	0	0	0	0	0	0	(120)
7050 - Pension contributions - office based staff	0	(1,941)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	(1,941)
Salaries total	**0**	**(11,613)**	**0**	**0**	**0**	**0**	**0**	**0**	**(1,495)**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**(13,108)**
Surplus/(deficit) for the period before transfers	**1**	**(12,053)**	**(15,473)**	**0**	**0**	**0**	**(19,285)**	**17,861**	**61,285**	**1,988**	**1,655**	**0**	**0**	**0**	**0**	**0**	**35,978**
4600 - Transfers from other funds	0	0	66,000	0	0	0	0	0	0	0	0	0	65,400	27,690	0	0	159,090
8100 - Transfers to other funds	(65,400)	0	0	0	0	0	0	0	0	0	0	0	(7,425)	0	0	0	(72,825)
Surplus/(deficit) for the period after transfers	**(65,399)**	**(12,053)**	**50,527**	**0**	**0**	**0**	**(19,285)**	**17,861**	**61,285**	**1,988**	**1,655**	**0**	**57,975**	**27,690**	**0**	**0**	**122,243**
Designated funds brought forward	445,153	38,377	(51,563)	1	14,276	33,570	44,530	99,818	459,465	6,289	19,569	60,060	57,489	0	6,725	1,331	1,235,089
Designated funds carried forward	**379,754**	**26,324**	**(1,035)**	**1**	**14,276**	**33,570**	**25,245**	**117,678**	**520,750**	**8,276**	**21,224**	**60,060**	**115,464**	**27,690**	**6,725**	**1,331**	**1,357,332**

Malvern Hills Trust - Restricted Funds Income and Expenditure for the 6 months ended 30th September 2026

NOTES	R1	R3	R3	R2	R2	R2								
** Opening balances adjusted for audit subject to sign off **														
Codes	Capital Outlay d'chgd £	Parliamentary fund £	Lands Maintenance fund £	Land Purchase (1992) fund £	Loan Capital Land Purchase £	Land Purchase 2 fund £	Restricted Gift fund £	Picnic bench donations £	Tree donation scheme £	Foothill Grasslands CSMT £	Urban Tree Challenge fund £	Access for All £	Handgate (DEFRA) £	Total £
4015 - Other grants	0	0	0	0	0	0	0	0	0	0	0	1,975	0	1,975
4020 - Stewardship annual grants	0	0	0	0	0	0	0	0	0	732	0	0	0	732
4350 - Easements and application fees	0	13,143	0	0	0	0	0	0	0	0	0	0	0	13,143
4500 - Income from investment portfolio	0	8,521	3,337	4,672	0	3,346	0	0	0	0	0	0	0	19,875
4510 - Bank interest receivable	0	0	0	2,870	0	0	0	0	0	0	0	0	0	2,870
Income Total	**0**	**21,664**	**3,337**	**7,542**	**0**	**3,346**	**0**	**0**	**0**	**732**	**0**	**1,975**	**0**	**38,596**
5000 - Contract labour	0	(2,940)	0	0	0	0	0	0	0	0	0	(1,350)	0	(4,290)
5045 - Purchase of materials	0	0	0	0	0	0	(298)	0	0	(30)	0	0	0	(328)
Land management total	**0**	**(2,940)**	**0**	**0**	**0**	**0**	**(298)**	**0**	**0**	**(30)**	**0**	**(1,350)**	**0**	**(4,618)**
Visitor services total	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**
6010 - Buildings maintenance	0	(840)	0	0	0	0	0	0	0	0	0	0	0	(840)
6115 - Investment manager's charges	0	(822)	(320)	(659)	0	(381)	0	0	0	0	0	0	0	(2,182)
8000 - Depreciation - other land and buildings	(1,388)	0	0	0	0	0	0	0	0	0	0	0	0	(1,388)
8005 - Depreciation - impt's to land and buildings	(12,061)	0	0	0	0	0	0	0	0	0	0	0	0	(12,061)
Adminstration costs total	**(13,449)**	**(1,662)**	**(320)**	**(659)**	**0**	**(381)**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**(16,470)**
Surplus/(deficit) for the period before transfers and investment gains	**(13,449)**	**17,062**	**3,017**	**6,883**	**0**	**2,965**	**(298)**	**0**	**0**	**702**	**0**	**625**	**0**	**17,507**
8110 - Investment gains or losses	0	51,523	20,037	42,532	0	14,037	0	0	0	0	0	0	0	128,129
4600 - Transfers from other funds	9,239	0	0	6,033	66,000	0	0	0	0	0	0	0	0	81,272
8100 - Transfers to other funds	0	(8,277)	0	(71,182)	(7,985)	0	0	0	0	0	(10,623)	0	0	(98,067)
Surplus/(deficit) for the period after transfers	**(4,209)**	**60,308**	**23,054**	**(15,734)**	**58,015**	**17,002**	**(298)**	**0**	**0**	**702**	**(10,623)**	**625**	**0**	**128,841**
Restricted funds brought forward	1,727,160	522,016	202,785	193,048	238,492	242,876	4,693	5,291	684	(0)	10,623	3,619	547	3,151,833
Restricted funds carried forward	**1,722,950**	**582,324**	**225,839**	**177,314**	**296,507**	**259,878**	**4,395**	**5,291**	**684**	**702**	**(0)**	**4,244**	**547**	**3,280,674**

Notes to the Management Accounts 6 months (Q2) ended 30th September 2026

** Opening balances subject to audit sign off **

General Funds

G 1 SEP26 year to date levy amount per management accounts is 6/12ths of the total for 2026/27.

To summarise:	£
General Fund Income year to date	738,285
Designated Fund Income year to date	139,529
Restricted Fund Income year to date	38,596
Total Income year to date	916,409
6/12 Annual levy (prorata actual total)	402,850
Levy % as a proportion of total income year to date	**44%**

Statutory accounts information:

	25/26*	24/25	23/24	22/23	21/22	20/21	19/20
Total Levy	739,100	697,070	663,800	595,300	566,950	534,850	519,250
Total all income	1,803,596	1,636,872	1,441,202	1,273,061	1,395,317	991,187	1,415,335
Levy % as total of GF DF and RF (all funds)	40.98%	42.59%	46.06%	46.76%	40.63%	53.96%	36.69%
			Average over 7 years 19/20-25/26				43.95%

** Per stat accounts assuming sign off 12.11.26*

GF = general funds DF = designated funds RF= restricted funds

G 2 Grant Income comprises:

	£
25/26 WCC Countryside Contribution (6/12ths)	7,725
	7,725

No other general fund grants have been secured this year so far.
At the year end the Castlemorton grant will be calculated and income recognised.

G 3 We are quite notably under budget across this income stream which is being monitored and analysed.
We are under budget to date on car park takings and pass sales (annual and residents). The worst months affected were MAY26 and JUN26 and fortunately there was almost no shortfall in SEP26 suggesting that the situation is improving now. It is being closely monitored.
The dry summer and successive heatwaves has had a negative affect on visitors to the carparks this year.
British Camp carpark income is of greatest concern due to the long term road closure (A449) but also shorter term Jubilee Drive, the latter has reopened and is much improved. As can be seen below this too is now showing improvements.

British Camp pass sale numbers			
Percentage reduction on same quarter last year			
25/26 Q3	25/26 Q4	26/27 Q1	26/27 Q2
23%	24%	20%	11%

G 4 The sale of a series of assets at auction including 2 tractors generated a large profit on sale as the assets were fully written down in the accounts.
In MAR26 the Board agreed to roll the profit into the purchase of the new asset (which per budget was the Reform tractor), there was subsequent agreement that the unrestricted gift fund be used for the purchase of the John Deere 5120M tractor in MAY26.

In SEP26 the Board agreed the purchase of a second 4066R John Deere tractor and that was to be funded 50% stewardship 50% unrestricted gift fund. As at 30.09.26 that tractor is still to be purchased as there have been some delays in the invoicing.

G 5 Treework for 25/26 that did not start until 26/27 could mean that the overall total budget may be exceeded when we reach year end. The costs are usually experienced in the winter months and that can span the year end. We have the benefit of 2 x designated tree disease funds and recent information has also identified a new tree disease, Sooty Bark. The use of the tree disease funds will be considered where appropriate.

G 6 Budget is pro rata but actuals are front end for the LM Plan.

G 7 There was no gardening budget set for 26/27 but the reality has been that we have needed this to resume which it has with a new supplier. Whilst we don't have the budget line it is being carefully monitored alongside the overall LM budget total.

G 8 Ageing vehicles in the fleet are making them more costly.

G 9 We may receive an insurance refund against a water leak cost that was unbudgeted but this is still in progress.

G 10 Legal and professional fees comprises:

		£
LAND BASED *(* £9,750)*		
Health & Safety general	1,545	
Land and property based	9,907	
		11,451
STAFF BASED *(* £2,350)*		
Staff welfare	79	
HR support	1,350	
		1,429
GOVERNANCE BASED *(* £36,500)*		
GDPR & Information requests	995	
Governance and general other charity based	9,977	
Mediation	3,200	
Audit y/e 31.03.27	5,875	
		20,047
TOTAL *(* £48,600)*		**32,928**

The * italics represent budget. Overall we are notably under at the moment.
Note that mediation budget was seperately approved at the SEP26 Board meeting.

G 11 The website budget was split between capital and revenue as it was not certain whether it would meet the definition for capitalisation. That decision will be taken at year end with the audit process, the cost is currently a revenue cost.

G 12 Excess over budget is mostly due to hire costs in trialling tractors, this will settle when the vehicles are in our fleet.

G 13 Salary costs are currently quite notably under budget predominently due to appointments for Ranger and Ranger Supervisor being delayed early in the year.

G 14 Transfers GF comprise:

	£
Annual 2nd repayment of loan interest to Land Purchase fund (which falls due each April) that is partly financing the Parliamentary Bill.	(6,033)
Recharge UTCF staff costs from GF to UTCF on completion of project as agreed 09.07.26	10,623
Depreciation on designated and restricted fund assets	7,425
Transfer interest earned on non restricted LP investment to general fund Q1& Q2	4,220
Final tranche of loan capital drawn for Parliamentary Bill	(66,000)
APR26 capital installment of loan repaid	7,985
Designation of 2x tractor profits	(27,690)
	(69,470)

G 15 The surplus after transfers is currenty ahead of budget, however as a result of the y/e 31.03.26 PYA the opening position now reflects the loan balance.

Designated Funds

D 1 There are 2 funds set aside as designated for the Parliamentary Bill. Other costs (D1A) has a total budget now set at £201,958, this was revised at the Board meeting 14.05.26 from £140,377. Promotion & Preparation of the Bill (D1B) has a budget currently set at £503,472 (Charity Commission approval on the additional £31,500 granted on 29.06.26 and the budget has been updated in the numbers below):

D 1A	OTHER COSTS this year	£
	Staff costs	11,613
	Travel costs	441
		12,053

		£
	OTHER COSTS OF BILL 2023/24	3,413
	OTHER COSTS OF BILL 2024/25	73,964
	OTHER COSTS OF BILL 2025/26	63,381
	OTHER COSTS OF BILL - TOTAL COSTS TO DATE	152,812
	Remaining budget (PER REVISED BUDGET AS AGREED 14.05.26)	***49,147***

D 1B	PROMOTION & PREPARATION OF BILL this year	£
	Sharpe Pritchard	15,473
		15,473

		£
	PROMOTION & PREPARATION OF BILL 2023/24	14,342
	PROMOTION & PREPARATION OF BILL 2024/25	190,354
	PROMOTION & PREPARATION OF BILL 2025/26	195,102
	PROMOTION & PREPARATION OF BILL - TOTAL COSTS TO DATE	415,270
	Remaining budget	***88,201***

The balance on the Land Purchase fund loan to help finance the Parliamentary Bill at 30.09.26 is £296,507.

D 2 The grazing reserve represents c. 1 year grazing costs and was established to ensure that vital grazing projects can continue should there be an issues with stewardship schemes or funding. This will allow time to seek alternative funding sources or review the strategy.

D 3 The unrestricted gift fund was used to purchase the new John Deere 5120M tractor in MAY26 as agreed at the Board meeting 09.07.26. Approval was also given at the 10.09.26 meeting for 50 % pf the new John Deere 4066R tractor to be funded by the unrestricted gift fund and 50 % by stewardship funding. This tractor purchase has not yet completed so the accounting transactions will be in Q3.

D 4 This is the carrying value of all assets purchased from designated funds or restricted funds. The main things are the Robocutter and the 5120M JD tractor.

D 5 The profit on the sale of 2 x tractors last year was agreed to be rolled forward into a new tractor purchase. The designated fund balance remains available at the moment.

Restricted Funds

R 1 The Capital Outlay Discharged fund is represented by the cost of land and the net book value of improvements to land and buildings, the original cost of which was funded from the Land Purchase or Parliamentary Funds. These assets can only be sold in very limited circumstances and any proceeds must be used for the purchase of land.

R 2 The Land Purchase Fund that was historically shown as LP1 and LP2 but now also includes LP Loan Capital, the latter clearly shows the capital balance on the loan that was made available to fund the Parliamentary Bill. The LP1 fund has been recompensed with the 1st and 2nd (of 25 years payable each April) annual interest from general fund as well as compensation payments on drawdown accordingly. The final £66k of the loan was drawn down in JUN26 for use on promotion and preparation of the Bill, and the capital repayments made to date (x2) are reflected in the movements between the LP 1 fund and the LP loan capital fund.

R 3 Investment income earned on these funds is shown throughout the year here, then transferred at the year end to general fund, this is in line with the conditions on these funds.

Balance Sheet

B 1 Quarterly investment portfolio update last carried out at 30.09.26. This covers all movements (including market value revaluation which is unrealised). Each in between month will just include cash transactions eg management fees or banked investment income.

B 2 Represents the Flagstone investments with > 3 months terms. This is considered and adjusted quarterly. Other more liquid Flagstone amounts are included under the deposits and cash header.

B 3 Includes all bank and cash including Flagstone amounts < 3 months term which are considered liquid. The Flagstone <> split is updated quarterly.

B 4 This is revised and updated annually, the value as stated is the 31st March 2026 value as provided by the fund actuary. The triennial valuation of the pension fund was last carried out at 31.03.25 and the next will be 31.03.28. This valuation is a separate exercise from that carried out each year to calculate the FRS 102 figure whose sole purpose is for disclosure in the annual accounts each year.

B 5 As a result of the prior year adjustment made in the 31.03.26 statutory accounts, the presentation of the Capital and reserves section of the balance sheet has been modified to show the breakdown of the general fund, part of which is the long term loan balance.

B 6 Reserves review is carried out quarterly but will also be done in interim months when accounts are produced for meetings with supporting notes. Headroom under the revised reserves policy (>£375k) and calculation as follows:

	Headroom %	Headroom £
31st March 2026 (>£350k)	142.9 %	£150,208
30th June 2026 (>£375k)	168.9 %	£258,548
30th September 2026 (>£375k)	154.1 %	£202,907