



# **ENTRUST Corporate Plan**

2024-2025

### 1. Introduction

### 1.1. Background & Context

The Landfill Communities Fund (LCF) is a tax credit scheme in England and Northern Ireland designed to compensate for the negative impacts of landfill sites on surrounding communities and the environment. The scheme also serves as a mechanism for engaging Landfill Operators (LOs) in improving the areas affected by their operations. Here's a broad overview of how it works and operates:

- LOs in England and Northern Ireland are mandated to pay landfill tax to HMRC for every tonne of waste disposed of in landfill sites.
- Under the Scheme, LOs can allocate a percentage of their Landfill Tax liability to fund community and environmental projects in areas close to landfill sites.
- In return for their contribution, LOs receive a tax credit. This credit is typically less than the total amount contributed, meaning that operators have a financial incentive to participate but don't completely offset their tax liability.
- Participation in the LCF isn't mandatory for LOs, but those who opt in work with registered funding organisations, known as Environmental Bodies (EBs).
- These EBs must be registered with Entrust and are responsible for distributing funds to projects that align with the objectives set out in the Landfill Tax Regulations 1996 (Regulations).
- While all LOs are eligible to fund projects through multiple EBs, many opt to channel their contributions through one EB.
- The scheme operates within a robust regulatory framework, established to ensure that funds derived from landfill taxes are used effectively to benefit communities and environments around landfill sites. These can include a variety of projects, from enhancing public amenities and restoring community buildings, to conserving biodiversity and refurbishing historical or religious landmarks.

At its heart, the intended purpose is to turn landfill tax credits into tangible benefits for local areas and the natural environment. With the clear guidelines and robust oversight provided by Entrust, the LCF consistently makes a positive impact in the regions where it operates.

### 1.2. Overview of Entrust

Entrust plays a key role in the LCF, serving as its regulatory body. Our responsibilities range from the registration of EBs to concluding their operations after project delivery. We provide guidance to EBs, approve their project proposals, and ensure they comply with the necessary regulations. Our core aim is to ensure that all projects funded by the LCF comply with the Regulations.

Since the LCF's establishment in 1996, we have worked with over 4,100 organisations, including LOs and HMRC, to successfully support in the delivery of approximately 62,000 community and environmental projects. The collective value of these projects exceeds £1.7 billion, highlighting our commitment to nurturing community and environmental development through the effective oversight of the LCF.

### 1.3. Vision & Mission

At Entrust, our aim, vision, mission, and values shape our identity and direct how we engage with stakeholders, staff, and the communities we support.

#### Aim:

Our overarching aim is to stand as an independent, credible, and professional Regulator that that ensures fairness in all interactions with our stakeholders. Moreover, we aim to enhance the comprehension of our stakeholders about the essential regulatory function we fulfil and the wideranging responsibilities we undertake.

#### Vision:

Our vision is clear and forward-looking. We aim to be a fair and transparent regulator, facilitating the delivery of LCF projects that benefit communities and the environment.

Our vision is to set the standard as a leading regulatory authority, supporting in the delivery of LCF projects that positively impact the well-being of communities and the environment.

#### Mission:

Our mission is centred on safeguarding the responsible and compliant utilisation of LCF funds. In pursuit of this mission, we are committed to delivering exceptional Value for Money (VfM) for all stakeholders, ensuring that these funds are used with optimal efficiency and effectiveness.

### Values:

- **1. Transparency**: We believe in maintaining transparency in all our activities, ensuring that our stakeholders are always kept in the loop.
- 2. Integrity: We act with integrity in our dealings with stakeholders, the sector and our staff.
- **3. Consistency**: We're consistent in our actions and approach, ensuring that stakeholders always know what to expect.
- **Support**: We are here to support, be it through promoting good practice, sharing vital information, or providing focused training where necessary.
- Pursuit of Excellence: We always pursue excellence in our work, delivering value for money to our stakeholders and ensuring that our work always meets the highest standards.

Entrust is firmly committed to its core principles, focused on continually making a positive difference in communities and the environment through the efficient regulation of the LCF. We will be reviewing and refreshing our Mission and Values in 2024.

### 2. Key Business Functions

Entrust has a clearly defined business structure which is designed to ensure we fulfil our role effectively and maintain the highest standards of accountability and transparency. Our commitment to the statutory obligations as outlined in the Regulations forms the bedrock of our operations.

This commitment is reinforced by the Terms of Approval (TOA) established with HMRC, which serves as a key guiding framework for our actions. Our annual Corporate Plan turns this into practical actions, helping us support HMRC in regulating the Fund and achieving our goals and Key Performance Indicators (KPIs) effectively.

### 2.1. Policy, Advice & Guidance

Project Registrations: Entrust's Registrations Team review all project applications to
ensure compliance with the Regulations. Projects are submitted via Entrust Online (EOL)
and must align with the specific criteria detailed in the Guidance Manual. Once an
application is received, the Registrations Team assesses it and provides a decision within
five working days.

If additional details are required, the applicant is contacted and asked to provide the relevant information. It's essential to highlight that any LCF expenditure on projects not registered with Entrust is deemed non-compliant. Furthermore, any subsequent material modifications to a project application require prior approval. All unsuccessful applications are raised at Entrust's review panel, which includes a representative from HMRC.

- Enrolment of EBs: Entrust's Registrations Team is also tasked with enrolling eligible
  organisations as EBs within five working days. Given this, we take a proactive approach
  in ensuring enrolments run smoothly, for example by improving the range of online
  guidance and training materials available online as well as providing bespoke training
  events when needed.
- Advice & Guidance: An important function of Entrust is to provide comprehensive advice and guidance to EBs to minimise the risk of non-compliance. To this end, we offer a range of guidance notes, documents, and examples of best practices. Central to this repository is the <a href="EB Guidance Manual">EB Guidance Manual</a>. This manual is periodically updated to reflect changes in policy, the Regulations, or to incorporate feedback from EBs. Whenever updates are made, EBs are promptly informed via email and through announcements on our website. By adopting this approach, we ensure that EBs have the necessary tools and knowledge to remain compliant and effectively utilise the LCF for the benefit of communities and the environment.
- Policy Development: Aligned with regulatory standards, we aim to create practical and well-informed policies. This means we base our policy development on robust evidence, which entails comprehensive research and thorough analysis before implementation. This evidence-based approach ensures our policies are effective and truly serve the needs of our stakeholders.

### 2.2. Compliance

We conduct compliance reviews of EBs and their projects, employing various approaches such as Project Site Visits (PSVs), desktop reviews, or EB visits. The regularity and focus of these reviews are guided by our EB and Project Risk Model. This model assigns a risk score to each EB or project based on factors like funding amount, unspent funds, the number of projects approved, and past compliance issues. Our risk-based strategy helps to ensure that our resources are targeted in the most cost-effective manner and that LCF monies are used in compliantly.

For the 2024/2025 period, we plan to enhance our compliance framework. This involves shifting from the traditional post completion project reviews in favour of a more blended and risk-based approach. Having reviewed our current process, this involves changing the distribution of compliance activity across EB reviews and the validation of individual projects to provide the best possible compliance coverage across the scheme. For instance, projects with higher risks will be reviewed during their development phase instead of only after completion.

### 2.3. Breach Management

It's important to recognise that any breach of the Regulations, or actions that might harm the scheme's reputation, may trigger Breach Management action.

In 2023/2024, we conducted consultations with EBs to get their feedback on how we manage breaches. The goal was to find ways to enhance our current framework. The modifications we are implementing in 2024/2025 are tailored to address each breach individually, ensuring a balanced, transparent, and accountable approach. We plan to continually review the effectiveness of this updated framework, making sure it's efficient and provides the clarity needed by EBs.

### 2.4. Corporate Support

Our corporate support team play an important role in ensuring that we operate efficiently and remain responsive to the needs of stakeholders.

- Communications: Our communications team works to ensure that all our messaging is clear, consistent, and aligned with our objectives. Whether it's internal communications, public announcements, or informational campaigns, we prioritise transparency and clarity to keep our stakeholders informed and engaged.
- **Stakeholder Engagement**: At the core of our operations is the commitment to build and maintain robust relationships with our stakeholders. We aim to stay aligned with their needs and expectations. Through regular consultations, forums, open communication, and surveys, we ensure we are in tune and responsive to what they require.
- IT Services: We continuously work to ensure that all systems are reliable, and accessible, so our team can perform their tasks efficiently and stakeholders can engage with us effectively. We're currently in the process of scoping out a full-spectrum redesign of our systems to make it easier for stakeholders to use and more suited to their needs in today's digital world.

### 3. Strategic Priorities

As the regulatory environment evolves, it's crucial to have clear strategic priorities in our corporate plan. These priorities act as a guide, aligning our short-term actions with our broader mission and vision, ensuring coherence and focus.

Having these priorities also enhances transparency for both internal and external stakeholders, building trust and setting clear expectations. Internally, they give our team a definitive direction, reinforcing a sense of purpose. Externally, they provide stakeholders with a clear understanding of our goals and approach, strengthening our relationships and showcasing our commitment to responsible, effective decision-making.

#### 3.1. Core Business Activities

### **3.1.1. Synopsis:**

Our first strategic priority focuses on our core regulatory duties. Understanding the unique needs of each stakeholder, we customise our regulatory approach, moving away from a generic, one-size-fits-all method. We provide clear and accessible guidance to all involved parties, equipping EBs with the knowledge to comply with Regulations. This strategy is key to not just fulfilling our duties but also effectively supporting our stakeholders.

#### 3.1.2. What's Involved:

### a) Adherence to Statutory Responsibilities:

Our primary goal is to consistently meet our statutory obligations, aligning all our actions with HMRC's guidance. These duties, outlined in the Regulations and supported by the TOA are the foundations of our operations. From our "coaching to compliance" ethos to our compliance and guidance activities, every aspect of our operations is shaped and influenced by these requirements.

#### b) Effective and Proportionate Regulation:

Recognising the diversity inherent in our stakeholder landscape, we understand that a one-size-fitsall approach would be inadequate. Instead, we take pride on customising our regulatory measures to suit the unique complexities and nuances of our stakeholders.

#### c) Comprehensive & Accessible Guidance:

We are dedicated to ensuring that our guidance is not only comprehensive in its scope, but also easily accessible, empowering EBs to operate effectively and compliantly within the overarching framework of the scheme. Instead of just providing vast amounts of data, we focus on making information clear and easily accessible. This involves various data presentation methods, online resources, and communication tools.

We also recognise that the effectiveness of guidance lies not only in its depth, but in its ability to be easily interpreted and applied in real-world scenarios.

We continue to develop our guidance manual and following the successful reduced of the administrative burden introduced in January 2024 we will continue to work with EBs on a framework of standards aim to clearly define the roles of Entrust and EBs; ensuring each organisation understands their role clearly and adds value to the operation of the LCF.

### 3.1.3. How We'll Deliver These Objectives:

### a) Adherence to Statutory Responsibilities:

**Outcome:** Maintain consistent adherence to our statutory and legal obligations.

### **Key Activities:**

- Ensure Business Functions are aligned with our Statutory Responsibilities: Continue to deliver the requirements set out in the Regulations, ensuring that we fully support HMRC in regulating the fund and delivering our annual objectives and KPIs.
- **Risk Mitigation and Financial Integrity:** Mitigate the risk of potential financial losses to the Exchequer by providing HMRC with independent assurance that LCF funds are spent in strict accordance with the necessary regulations.

### b) Effective and Proportionate Regulation:

**Outcome:** Deliver tailored regulatory practices that cater to the specific needs of the stakeholders we serve.

### **Key Activities:**

- Tailored Regulatory Approach: Develop a robust regulatory framework that not only aligns with best practices, but considers the needs of our stakeholders, recognising their unique circumstances, challenges, and goals.
- **Engagement and Collaboration:** Foster proactive engagement and collaboration with stakeholders to deeply understand their operational contexts and intricacies, ensuring that our regulatory approach is aligned with statutory requirements.

### c) Comprehensive & Accessible Guidance:

**Outcome:** Ensure stakeholders have easy access to clear and comprehensive guidance, enhancing their ability to operate within the LCF framework.

### **Key Activities:**

- Comprehensive and Accessible Guidance Development: Develop and simplify guidance materials that cover the breadth of the LCF while emphasising clarity and accessibility.
- **Website Accessibility Enhancement:** Ensure that any modifications to the website deliver simple user-navigation and accessibility to our guidance materials.
- Interactive Guidance Clarification: Host webinars and develop digital training materials to clarify any ambiguities in the guidance.

### 3.2. Enhancing Operational Efficiency

### **3.2.1. Synopsis:**

Our second strategic focus is on enhancing operational efficiency, with three key initiatives set to make a substantial impact in the next year. First up is finalising our IT modernisation with Microsoft Office 365, a move that promises to streamline our workflows, boost team collaboration, and enhance how we manage data. Next, we've moved to a new workspace, which is not only more cost-effective but also tailored to meet our team's needs better, promoting increased collaboration. Lastly, we're undergoing a major cultural shift, aiming to build a culture that champions inclusivity and innovation. This means fostering open communication, encouraging teamwork, and valuing creative contributions from all team members.

### 3.2.2. What's Involved:

### a) IT Modernisation Initiative:

We recognise the importance of modern technology. Keeping this goal in mind, we're set to complete the implementation and broad deployment of Microsoft Office 365. By utilising its suite of tools, like Microsoft Teams, Planner, To-Do, and SharePoint, we aim to not only modernise our internal operations but also enhance our capacity to meet the evolving needs of our stakeholders.

### b) Improving Our Workspace for Better Teamwork and Savings:

This change is focused on making our operations more efficient by boosting staff collaboration and promoting the sharing of knowledge and ideas between various departments. By encouraging staff to work in closer proximity, we're creating an environment conducive to open conversations and more rapid resolution of issues. This shift aligns with current workplace trends while responding to the changing needs and preferences of our team. Additionally, the new workspace is designed to be cost-effective, utilising space more efficiently, reducing excess costs, and optimising resource allocation.

#### c) Continuing to Develop a Strong Team & Culture:

We aim to foster a work environment where collaboration, inclusion, and innovation are key. The goal is to make every team member feel valued and capable of contributing to our collective vision. By encouraging open communication, teamwork, and creativity, we expect to create a more cooperative and welcoming workplace, where every individual feels heard and can share their skills and ideas in pursuit of our common objectives.

### 3.2.3. How We'll Deliver These Objectives:

### a) IT Modernisation Initiative:

**Outcome:** Enhanced operational efficiency and teamwork through the integration of Microsoft Office 365.

#### **Key Activities:**

- Streamline Workflows with Enhanced Tools: The full implementation of Microsoft Office 365.
- Provide Comprehensive Training on Microsoft Office 365: To ensure our staff are fully equipped, we plan to conduct training sessions.
- **Foster Collaborative Efforts:** Encourage cross-departmental collaboration through shared documents, collaborative workspaces, and virtual meetings.

### b) Relocating Our Office Space:

Outcome: Deliver a more dynamic and team-oriented workspace that promotes team interaction.

#### **Key Activities:**

- Managing Change and Communication: Our office relocation is a major shift. To handle
  this smoothly, we've developed a comprehensive plan that involves transparently
  communicating the reasons for our move, highlighting the benefits of the new office, and
  outlining the timeline of the transition.
- Technology Integration and Connectivity: To complement our new open-plan workspace, we've invested in Microsoft 365 to enhance communication and collaboration among staff. This upgrade includes advanced video conferencing facilities, improved Wi-Fi connectivity, and enhanced data management options, all designed to support our team's efficiency and connectivity in the new environment.

#### c) Strengthening Our Team and Culture:

**Outcome:** Create a work environment that is collaborative, inclusive, and innovative, where every team member feels valued and able to contribute.

#### **Key Activities:**

- Improving Communication: Focus on ensuring leaders are attentive to employees at all levels, valuing each person's contributions. Establish channels for open, two-way communication, such as routine team meetings, team-building activities, and workshops. Foster an environment where open discussions about projects, challenges, and new ideas are encouraged, making sure all voices are heard and valued.
- Collaboration Across Different Teams: Encourage projects that bring together employees from various departments. This combines different skills and perspectives, making our organisation more unified and effective.

### 3.3. Stakeholder Engagement

### **3.3.1. Synopsis:**

Our third strategic priority is built on three key elements. First, we are dedicated to actively seeking out and incorporating feedback from our stakeholders, a practice essential to enhancing our services. By listening and responding to their insights, we aim to continuously refine and improve our approach. Second, we are concentrating on defining clear roles and expectations for the various stakeholder groups within the LCF. This step is crucial for maintaining regulatory compliance and making our operations more efficient. Finally, we are in the process of redeveloping our website in 2024/2025. The aim of this update is to make guidance and up-to-date information more accessible, showcasing our commitment to clear communication and simplicity. Altogether, these initiatives are key to creating an organisation that is more responsive, transparent, and effective.

### 3.3.2. What's Involved:

### a) Listening to Stakeholders and Responding:

We want to hear from our stakeholders and act on their feedback quickly. Our goal is to keep improving, be open, and build trust with them. This will involve a mix of leveraging the functionality of Microsoft 365 (e.g. Forms) and using the data this provides us to make more informed decisions.

### b) Clear Roles & Expectations for Stakeholders:

We're working to set clear areas of responsibility among various stakeholder groups within the LCF. Through transparent communication about stakeholder roles, our aim is to promote regulatory compliance and make things run smoothly. At the same time, we remain committed to gathering insights from stakeholders, valuing their perspectives and incorporating their input into our decision-making process.

### c) Website Redevelopment:

We're looking to fully update our website to ensure that stakeholders can find our guidance easily and stay up to date with the latest information about the scheme.

### 3.3.3. How We'll Deliver These Objectives:

### a) Listening to Stakeholders and Responding:

**Outcome:** Create a culture of open dialogue between stakeholders and Entrust, built on mutual trust and transparency, and supported by robust feedback mechanisms.

#### **Key Activities:**

- i. **Open Dialogue:** Establish clear and accessible channels for stakeholders to provide constructive feedback, suggestions, and concerns.
- ii. **Prompt Responses:** Commit to timely responses to stakeholder feedback, addressing their viewpoints and showing that their input is valued.
- iii. **Transparency and Communication:** Regularly share updates with stakeholders about our work, demonstrating a commitment to improvement and transparency.

#### b) Clear Roles & Expectations for Stakeholders:

**Outcome:** Clear understanding about stakeholder roles, responsibilities, and expected behaviours within the LCF.

### **Key Activities:**

- Guidelines Documentation: We will collaborate with stakeholders to develop a userfriendly LCF lifecycle model that outline stakeholder roles, process steps, and key expectations in a straightforward manner.
- ii. Stakeholder Engagement Workshops: Conduct stakeholder workshops, webinars etc. to clarify stakeholder roles and responsibilities within the LCF. Work with ADEB to ensure that good practise is shared amongst all EBs.
- iii. Two-Way Communication: Foster open dialogue with stakeholders to not only provide information but also actively listen to their concerns and incorporate their perspectives into the process.

### c) Website Redevelopment:

**Outcome:** Create an easy-to-use, informative website that is the main source of information for stakeholders in our scheme.

#### **Key Activities:**

- i. **Developing Strategy:** Work with our chosen web development team to deliver the preferred platform.
- ii. Getting Feedback: Set up a clear way to collect feedback from different groups about the website. We'll carefully review their thoughts to improve the site and solve any problems they have. This will help make sure the website meets their needs and is a useful tool for sharing information.
- **iii. Adding More Resources:** We plan to include more helpful materials on the website, like training videos, graphics, and links, along with the current text and PDFs. This variety of content will help cater to different ways people like to learn.

### 3.4. Strengthening Our Compliance Framework

### **3.4.1. Synopsis:**

The fourth and final strategic priority involves refining our compliance procedures to better align with the requirement to ensure that LCF monies are spent compliantly in accordance with the Regulations.

#### 3.4.2. What's Involved:

### a) Evolving Our Compliance Approach:

In the coming year, we plan to improve our assurance process. We'll create new tools to make the process simpler and also reevaluate our compliance methods to ensure LCF funding is used correctly and efficiently.

### b) Enhancing Stakeholder Communication and Collaboration:

Next year, our goal is to work more closely with everyone involved in our compliance activities. We plan to achieve this by regularly talking with stakeholders, encouraging a cooperative atmosphere for exchanging information, getting feedback, and resolving any issues.

### 3.4.3. How We'll Deliver These Objectives:

### a) Evolving Our Compliance Approach:

**Outcome:** Ensure we have a compliance framework that's built around identifying and managing risks.

#### **Key Activities:**

- Allocation of Resources: By using risk-based models that we regularly review, we can
  adapt our approach depending on how risky a situation is. These models help us spot
  potential issues and use our resources most effectively. And by keeping these models upto-date, we stay prepared to address emerging challenges, making our regulatory efforts
  more dynamic and responsive; and
- Evidence Based Approach: Our commitment to transparency drives us to base all our compliance actions on solid evidence collected during compliance reviews. After conducting these inspections, we'll promptly provide comprehensive reports to EBs. These reports will clearly outline our findings and assessments, giving EBs a clear understanding of where they stand in terms of compliance. This timely sharing of information will help ensure that everyone involved is on the same page and can take any necessary actions promptly. This way, we build trust through openness and clear communication.

### b) Enhancing Stakeholder Communication and Collaboration:

**Outcome:** By actively incorporating stakeholders' perspectives, we aim to refine and optimise our compliance approach, ensuring the effective and accountable utilisation of LCF funds.

#### **Key Activities:**

Maintain Feedback Channels: Through online surveys, feedback forms, and interactive
sessions, stakeholders can provide input on their experiences with the assurance process
and the tools we use. This approach will enable us to understand their perspectives,
identify any challenges they face, and work together to refine our compliance approach.

### 4. Demonstrating the Value of the Fund

The LCF is a significant investment by the UK Government into the well-being of communities and the environment affected by landfill operations.

As the regulator of the LCF, we're uniquely positioned to ensure compliance with legal obligations and to showcase the Scheme's value to the public and the UK Government. Our aim is to provide clear, understandable data about the scheme's impact, making it easy for stakeholders to evaluate its performance and impact effectively.

In 2024/2025, we aim to expand our VfM reporting on the LCF, merging our 'VfM' and 'Economic, Community, Environmental Impact Model' (ECEIM) reports into a single document, 'The Value of the LCF'. This unified report will offer crucial insights into the Fund's economic, community, environmental, and social benefits. Additionally, we're building on our efforts from 2023/2024 to enhance the accuracy and quality of project information from EBs. This improvement will start from project registration and continue through monitoring and evaluating the outcomes post-completion.

### 5. Organisational Structure

### 5.1. Organisational Structure

As a regulator, our priority is to stay agile, efficient, effective, and adaptable. We are dedicated to constantly improving, seeking out new and innovative ways to enhance our work. By actively engaging with our stakeholders and valuing their feedback, we aim to work collaboratively, recognising and respecting each other's roles. This approach helps us maximize the positive impact of the LCF on communities and the environment, while also ensuring there's no financial loss to the Exchequer. To further this goal, we're committed to multi-skilling our team, preparing them to manage a variety of tasks and adapt to any challenges that come our way.

### 5.2. Our People

The Entrust leadership team is made up of experienced and knowledgeable professionals. Each team member brings a wide base of knowledge and skills to the table, helping us make smart decisions and strong strategies, which, in turn, help the organisation stick to its core principles and goals.

Backing up the leadership team, we have technical experts across various departments. The collaboration between leadership and these technical experts ensures that we can regulate the Scheme effectively while delivering VfM and uphold our commitment to excellence.

In recognising the well-being of our staff, we are also committed to implementing the 'Thriving at Work Standards'. As part of this process, we have developed company wide and individual support programmes to ensure that Staff are resilient and able to effectively manage the challenges presented to them. In 2024/2025 we will continue these programmes and ensure that the collective and individual needs of our staff continue to be met.

### 5.3. Our Board

The Entrust Board includes both Executive and Non-Executive Directors, bringing a wide range of expertise and perspectives to the table. Annually, they set forth the company's objectives, ensuring alignment with the broader mission and vision.

#### Composition of the Board:

#### **Non-Executive Directors:**

Chair: Antony Townsend

Gerry McCormack

Julian Atkins

Helen Venn

Peter Bayliss

#### **Executive Director:**

Chief Executive: Kate Shaw

The Board's proceedings are also observed by a representative from HMRC, ensuring transparency and alignment with regulatory standards.

#### Committees:

To ensure a comprehensive and detailed level of scrutiny, the Board is complemented by three subcommittees, each with its specific focus:

#### 1. General Purposes Committee:

Comprising all Board members, this committee convenes as needed. Its role is to address matters of general significance that require the collective insight of the entire Board.

### 2. Audit Committee:

Previously chaired by Gerry McCormack, this committee will be chaired by Peter Bayliss in 2024/2025. The committee itself oversees the company's financial reporting processes, ensuring accuracy, transparency, and compliance.

#### 3. Human Resources and Remuneration Committee:

Under the leadership of Julian Atkins, this committee's mandate is to oversee human resource strategies, policies, and practices, as well as to set and review remuneration structures and policies.

### 6. Risk Assessment & Mitigation

Our risk management strategy is built on strong procedures and anticipatory actions. We carefully tailor our project approval process to guarantee that all LCF-funded projects comply with the Regulations. Through providing timely advice and guidance, we proactively tackle potential registration issues.

We've also established an extensive, risk-based compliance inspection system. This system is grounded in compliance risk models that we regularly review and update. These models cover various factors, allowing us to concentrate our efforts on the areas with the highest risk. Our compliance reviews may involve thorough checks of financial records, office visits to EBs, desktop reviews, and Project Site Visits (PSVs). Our flexible approach ensures we stay responsive to changing situations. Regular reviews, guided by the EB Risk Model, ensure our risk management methods are both current and effective. Additionally, cohesive communication across departments helps us identify risks early and resolve them quickly.

### 6.1. Data protection and cyber security

At Entrust, we're aware of how vital it is to have strong processes, procedures, and protocols to protect against data loss from cyber-attacks and other challenges.

To ensure compliance with the Data Protection Act 2018 (DPA 2018), UK General Data Protection Regulation (UK GDPR), and the Privacy and Electronic Communications Regulations (PECR), we've implemented thorough measures. These steps are carefully crafted to secure the management of personal data that we collect for our regulatory responsibilities. This not only gives HMRC but also our stakeholders, the assurance they need about our data handling practices. As a Data Controller registered with the Information Commissioner's Office (ICO), and with our designated Data Protection Officer, we uphold stringent data protection standards.

- Aware of the potential impact on our business model, we consistently review our data security and Cybersecurity Risk Management framework. Our comprehensive cyber control regime includes several measures to minimise the effects of any attacks on our IT systems, such as: Ensuring IT Assurance is a standing item at our Audit Committee meetings,
- Providing key statistics to the Board on the operation of our defence against cyberattacks,
- Ensuring security patches are applied to all of our systems, when they are released by suppliers,
- Undertaking an annual penetration test of our systems by an independent, external IT security company,
- Undertaking an annual self-assessment of cyber security arrangements against the National Cyber Security Centre's (NCSC) guidance,
- Ensuring we remain Cyber Security Certificated by using an independent accreditation provider to assess our internal controls,
- Continually scanning and reviewing the changing cybersecurity landscape through our IT cybersecurity monthly meetings.

### 6.2. Sustainability and environmental responsibility

As a responsible organisation, Entrust is committed to reducing its environmental impact. Acknowledging the constraints faced as an SME, we nonetheless embrace the principle that even relatively small efforts can collectively contribute to a better environment.

Our recent initiatives include adapting to a hybrid working model and moving to a smaller, more costeffective, and flexible office space. Notably, we've taken the following actions towards our ecoconscious goals:

- Our new office setup is designed to be more energy efficient. We've implemented
  measures like energy-saving lighting and opted for second-hand purchases wherever
  possible during the relocation, demonstrating our commitment to reuse and recycle.
- Minimised waste by using recycled materials and championing upcycling, particularly in repurposing IT equipment.
- Decreased energy and water usage in our new office setup.
- Prioritised eco-friendly products and services for business needs.
- We've shifted towards digital communication to minimise paper waste.
- Promoted environmentally friendly travel alternatives for our staff, complementing our hybrid working approach.

We firmly believe that our collective actions, though modest, are significant steps towards safeguarding our environment for the future. By integrating these green strategies into our everyday operations, we're contributing to a healthier, more sustainable world.

# 7. Annual Resource Requirements

We're dedicated to providing VfM in everything we do. As we wrap up our 2024/2025 Corporate Plan, we're carefully evaluating our funding needs. This ensures that the resources we request from HMRC not only allow us to meet our legal and contractual duties but also offer VfM.

To fulfil both our statutory and contractual responsibilities, and to support the activities in this Plan, we've detailed our Resource Requirements for 2024/2025 in the table below:

Cost	Resource Requirements £k	
	2023/2024	2024/2025
Salary	905	869
Staff Support	45	47
Establishment Expenses	117	102
General Expenses	17	15
Professional Fees	21	25
Information Technology	41	38
Depreciation	5	0
Gross Operating Budget	1,151	1,096
Investment Income (Net)	(16)	(40)
Operating Budget	1,135	1,056
Capital Requirement	0	0
Adjustment to reflect the excess of income received in prior years	(24)	(150)
Resource Requirements	1,111	906

8.

### 9. Conclusion

The 2024/2025 Corporate Plan sets forth four key strategic priorities to shape our activities in the upcoming year. First, we're dedicated to excelling in our core responsibilities. This includes strict adherence to legal requirements, adapting to the diverse needs of our stakeholders, and providing clear and effective guidance about the scheme. Second, we're enhancing our operational efficiency. Our IT modernisation project, which includes rolling out Microsoft Office 365 and creating a more collaborative workspace, aims to improve team connectivity and inclusivity.

Third, we're committed to improving collaboration and information sharing. By actively engaging with stakeholders and gathering their insights, we're working to make our website more accessible and user-friendly. Lastly, we're focusing on advancing our compliance processes. By integrating innovative tools for better risk assessment, we aim to strengthen the level of assurance we offer to HMRC. With these strategic objectives, we are dedicated to ensuring the LCF continues to bring substantial benefits to communities and the environment.

# 10. Key Outcomes

As we work towards implementing these strategic priorities, we've pinpointed several key outcomes that involve a range of specific actions and measures. Tracking these measures will ensure that we will continue to effectively fulfil our statutory responsibilities.

### 10.1. Actions

Action		
A1.	Utilise pre-approval project visit and inspection criteria to allocate resources to areas of highest risk.	
A2.	Monitor compliant spending by inspecting at least one-third of active EBs using our risk-based compliance approach.	
A3.	Enhance the project risk model to identify high-risk projects that require site visits or reviews.	
A4.	Conduct mid-year contact with EBs to verify and update their details.	
A5.	Communicate with Directors, Trustees and main contacts of frozen EBs following six months of no communication from the main contact.	
A6.	Continue conducting Feedback Surveys for the Helpline, Compliance, and Satisfaction.	
A7.	Facilitate virtual meetings of the Information Networking Forum for EBs to meet and share ideas and best practice.	
A8.	Publish annual benchmarking data for EBs.	
A9.	Publish an annual Value of the LCF report, agreed with HMRC.	
A10.	Report on Statutory Annual Return (Form 4) data to HMRC, including annual benchmarking data and information on Admin Costs and Unspent Funds.	
A11.	Publish quarterly Non-compliance activity.	
A12.	Report on the Value of the LCF to HMRC	
A13.	Conduct quarterly reviews of the Entrust website to ensure all information is current and accurate.	
A14.	Undertake an annual penetration test of our systems by an independent, external IT security company.	
A15.	Conduct an annual self-assessment of cyber security arrangements against the National Cyber Security Centre's (NCSC) guidance.	
A.16	Ensure full compliance with all UK data protection legislation.	
A.17	Take appropriate action to comply with the "Thriving at Work" Standards.	

### 10.2. Measures

Measure		
M1.	Maintain downward pressure on EBs with administration costs above 7.5 per cent of annual project expenditure.	
M2.	Maintain sector level performance with administration costs below 7.5 per cent of annual project expenditure.	
M3.	Monitor EBs with unspent funds at year-end above 1.5 times income received in year.	
M4.	Maintain sector level performance with unspent funds at year-end below 1.5 times income received in year.	
M5.	Yearly reduction in the value of uncommitted funds held by EBs.	
M6.	Maintain the percentage of EBs using EOL.	
M7.	Increase survey return rates.	
M8.	Maintain satisfaction with our services.	
M9.	Increase the number of risk-based project site visits.	
M10.	Maintain the return rate for Form 9s from the baseline in 2023/2024.	
M11.	Retain our independent Cyber Security certification.	

# 11. HMRC Reporting Requirements

We report a wide range of information relating to the LCF and our own performance to HMRC and the schedule of formal reports that will be provided during 2024/2025 are set out below:

Timing/Frequency	Title
31 May 2024	Annual Chair's Statement of Assurance
30 June 2024	Statutory Annual Return (Form 4) Data including EB Administration Costs and Unspent Funds Reports and EB Benchmarking
31 August 2024	Value of the LCF Report
7 September 2024	Draft Corporate Plan and KPIs and 2025/2026 Resource Requirement
30 September 2024	Regulatory Improvements Report
By end December 2024	Annual Accounts submitted to Companies House
31 January 2025	Update to Corporate Plan and KPIs
Quarterly	Entrust Board papers
Monthly	TOA report
Monthly	KPI update
Ad hoc	Data requests

# 12. HMRC Key Performance Indicators (KPIs)

HMRC monitor our performance as the Regulator of the LCF and we agree a number of KPIs with them that encompass key targets. The KPIs agreed for 2024/2025 are proposed below:

Target 1	Achieve standards of service delivery and effectiveness acceptable to Stakeholders of a modern regulator	
1.1	Approve 100 per cent of eligible applications to enrol as an EB within five working days.	
1.2	Approve 98 per cent of eligible project applications within five working days.	
1.3	Conduct a customer satisfaction survey by 31 August 2024 and use the findings to improve EBs' level of satisfaction with our service with identified improvements included in an action plan developed by 31 December 2024.	
Target 2	Enhance the accountability and transparency of the LCF by reporting and publishing information about its operation	
2.1	Provide scheduled reports to HMRC.	
Target 3	Secure/increase the level of compliance with the Regulations	
3.1	During 2024/2025, inspect at least one-third of active EBs for compliant spending, focusing on areas of highest risk.	
3.2	Ensure that 99 per cent of LCF funds are reported through the 2024/2025 Statutory Annual Return (Form 4) by the due date of 28 April 2025.	
Target 4	Deliver value for money	
4.1	Publish 2023/2024 benchmarking data for EBs by 30 June 2024.	
Target 5	Report to HMRC by 31 July 2024 priority regulatory improvements to the Landfill Tax Regulations 1996. Implement agreed changes to guidance or regulation in accordance with agreed timescales	
5.1	Conduct targeted compliance interventions and if necessary, consultation exercises to identify issues and make recommendations supported with robust analysis and evidence.	