City of London Corporation Committee Report

Committee(s): Corporate Services Committee – for information	**Dated:** 09/09/2026
Subject: Comptroller & City Solicitors Department Business Plan 2026–2028: Quarter 2 progress report.	**Public report:** For Information
This proposal: • delivers Corporate Plan 2024-29 outcomes • summarises legal & elections service delivery to date • provides business enabling functions	All
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Michael Cogher – Comptroller & City Solicitor	
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Summary

This report provides an update on progress between 1st April 2026 and 30th August 2026 on the Comptroller & City Solicitors Department (C&CS) Business Plan 2026-2028.

The report details C&CS's role as an enabling service in support of Corporate Plan 2024-2029 outcomes and the operational deliverables of departments and institutions. It summarises the challenges, successes and current performance against the departments KPI's.

Recommendation(s)

Members are asked to:

- Note the report.

Main Report

Background

1. The C&CS Business Plan 2026-2028 (appendix 1) was approved by this Committee on 4th March 2026. Members noted that as part of our commitment to transparency and accountability, progress on the business plan objectives and performance measures would be reported to Committee twice a year at quarter 2 and quarter 4. This is the Quarter 2 report.

2. The C&CS Business Plan captures our collective aspirations for the Financial Year 2026-2027 and includes the necessary steps to ensure the service supports the delivery of the Corporate Plan 2024-2029 priorities. The plan tracks the monitoring of C&CS performance, service efficiencies and service delivery.

3. The C&CS Department is an enabling service that delivers legal and data protection advice, governance, and support to the City, its constituent departments and institutions. The Elections Service delivers electoral registration and elections in compliance with statutory requirements.

4. The outward facing C&CS service priorities are cross-cutting, being determined by the City's major corporate strategies, projects and programmes and by client department priorities and services in support of Corporate Plan goals and outcomes. Statutory requirements also determine the priorities at both strategic and operational levels.

5. The C&CS service priorities were developed by the C&CS Senior Leadership Team based on discussions with client service managers, knowledge of corporate and client priorities, incoming instructions from clients, issues raised via staff communication channels and by knowledge of the changes in sector priorities.

6. A key service objective and challenge is to deliver most of the legal advice and support in-house. This model delivers legal support at much lower cost compared to outsourcing to external firms and has been further supported by recruiting fixed-term lawyers with the necessary expertise on specific projects. Legal work is outsourced when the in-house team lacks the capacity to manage large volumes of work or lacks the necessary niche expertise, this has been a particular challenge in 2026.

Current Position

7. C&CS Progress to Quarter 2

Cross-cutting corporate and project work

This year there has been significant increase in complex cross-cutting corporate work, above business as usual, which has required substantial legal input across all C&CS teams and has created resourcing challenges in meeting client delivery expectations. Some of these major projects are listed below:

- Liverpool Street redevelopment
- Silk Street redevelopment
- The new City of London Police HQ
- Markets Redevelopment including the arrangements for the Barking site
- Museum of London project
- Barbican renewal project
- Tower Bridge in Motion project
- Ongoing major works to the City's bridges
- Restructure of the City Bridge Trust property portfolio

Public & Corporate Law

In addition to business as usual and in-depth involvement with the corporate projects detailed above, the Public & Corporate Law Team have led on significant ongoing corporate reviews which as with the cross-cutting projects have created resourcing challenges:

- Corporate Governance Review
- Housing Governance Review
- Lord Mayor's Show Review
- Income Generation workstream
- Intellectual Property Rights Review
- City Bridge Trust Governance Review
- Natural Environment Charities Review
- Corporate Charities Review.
- Education Review
- Significant judicial reviews in relation to Hamstead Heath ponds and cafes, and London Wall West which was successfully defended.

Litigation Team

The litigation work volumes have increased significantly in 2026, as summarised below:

- Employment Tribunal claims have increased by 46%.

- Employment advice volumes have increased by 20% compared to the same period in 2025/6, significantly on the Ambition 25 implementation, Barbican Settlement agreements, Establishment Committee, New Recognition policy with trade unions and SAM interviews to name a few.

- Housing Disrepair cases, possession cases and homelessness. There has also been an increase in work from the social housing refurbishment/repair work project stream.

- In general litigation, there has been an increase in police misconduct, fraud, LLP Review and Non-Domestic rates cases.

- An increase in work in proceeds of crime cases, bail challenge applications, judicial reviews for the police and homelessness.

Litigation successes

- Court of Appeal: A Judgement was given for the City in a significant Court of Appeal case concerning a non-domestic rate mitigation scheme. The non-domestic rate mitigation scheme was costing COL over £50m per year.
- Housing Court of Appeal case: The Court of Appeal dealt with three grounds of appeal dealing with the meaning of a deliberate act (making the applicant intentionally homeless). The Court of Appeal agreed that our decision was in line with the law. This case is now the leading case for clarifying the legal standard for assessing intentionality involving mental health issues.
- City of London Police: Legal Advice or Report Fraud launched January 2026 by CoLP. Providing advice that delivered a very complex procurement and contract executions in the history of the City of London Police under sustained political, financial and programme pressure (a certificate and award was given by CoLP)
- Community & Children Services: Service Charge Dispensation Order-unconditional dispensation granted. The decision meant that the City was no longer at-risk risk in relation to £2.4m service charges collected under the Hays agreement and can recover costs under the Reed agreement in future with confidence.
- Employment: There have been several significant Employment Tribunal settlements.

Property Team

As with other C&CS Teams the property team have delivered a significant input to corporate initiatives and projects. In addition to increases in instructions for to day-to-day asset management work, leases, licences, sale and purchase, rights of light etc there have been substantial increases in instructions for sales and headlease re-gearings that have created significant resourcing challenges exacerbated by a high staff turnover rate in the team.

Major property work has included:

- Salisbury square development that included main lease and framework document with HMCTS, City of London Police matters and commercial units
- Spitalfields Market – issue of over 100 leases and statutory notices within a struct timeframe
- Museum of London property matters including sale advice on Wheeler House/Eagle Wharf

- Wayleave Infrastructure Programme – over 100 wayleaves across operational properties

- Significant work on Project Shield and Project Michael

- Development Project at Goulston and Calcutta Street, a joint venture with The Prudential

- Worship Street Estate Disposal comprising a portfolio sale of 11 properties

- Heavy input in relation to the Puddle Dock Development

- Sale of Magistrates Court 1 Queen Victoria Street and the sale of Mayors and City County Court.

- UKPN project involving all funds including housing

- The Property Team have been central to the markets strategic review the work involved:

  Programme-wide legal advice alongside the commercial adviser on delivery and transaction structures including joint ventures, development agreements and other arrangements with public- or private-sector partners.

  Billingsgate - advice on and drafting of a binding collaboration agreement with LBTH, including development principles, governance, the parties' proportional interests and whether a public-public delivery entity is required.

  Smithfield - title review and regularisation, including easements and rights of way, together with advice on the TfL tunnel lease, access for inspections and repairs, repair liabilities and any lease variation required for future use.

  FBPS - title and infrastructure matters, including access, easements, covenants, service media, third-party rights, outstanding releases and surrenders, and the allocation of liabilities between the land and Barking Power Limited.

Contracts Team

Significant increase in the volume and complexity of work in addition to cross-cutting major projects all of which have delivered by the in-house team:

- London Councils complex contract and procurement work
- Barbican Renewal project. Multiple types of contracts/consultancies and related contracts
- Business Improvement Districts, multiple different types of contracts
- CoLP major new projects related to firearms training and shared spaces

- Increased complex work from DC&CS (sexual health project and challenges to procurement).

Elections

- Successfully delivered the Common Council By-Election in Coleman Street
- City Occupiers Database annual survey commenced
- City River Partnership business improvement district ballot conducted and the BID was established
- Ward Boundary Review working party project underway

Finance & service development

- The external income stream largely from legal property and planning work at period 4 July 2026 exceeded local risk budget target of £277k at £456k, with a forecast to exceed the annual income target of £840k. 2025/6 external income totalled £1.3m.

- Development of an in-house legal case management solution to replace the current procured Access Legal system is on track for implementation in December 2026 with forecast savings of £300k over the next five years compared to the estimated costs of external procurement of a system.

- The C&CS legal function secured further accreditation to the Law Society LEXCEL quality assurance standard following an external audit in June 2026 with a high level of compliance and several areas of good practice noted.

- An Internal audit review in July 2026 found that the processes for ensuring compliance with the Standing Orders for the procurement of external legal advice and the framework for commissioning legal advice are robust and deliver value for money, the audit resulted in a high level of assurance.

Key Performance Data

8. C&CS Key performance data to Q2 is summarised below.

C&CS KPI's			
	Target Annual	Target at Q2	Position at Q2
Percentage of clients rating the service as excellent	85%	N/A	No data at Q2. 2026 Client satisfaction survey to undertaken in Q3
Percentage of lawyer chargeable hours achieved against target	100 %	40%	25% at Q1 forecast 48% at Q2
LEXCEL Quality Assurance standard compliance	100%	100%	100% compliance - external audit June 2026

Elections activities delivered 100% lawfully in compliance with Electoral Commission requirements	100%	100%	On target
Percentage of staff who report good levels of engagement	55%	N/A	No data at Q2 - City staff survey to be undertaken in Q3

Strategic implications

C&CS has a key role in enabling the City of London Corporation to achieve strategic outcomes lawfully and will continue to engage with members, officers, and external stakeholders to ensure the successful delivery of strategic and operational priorities, and statutory duties.

Financial implications

C&CS Legal work is charged via a trading account. Client budgets are charged directly for the legal work commissioned which, combined with the external income stream largely from property and planning work, enables the service to flex the budget to fund the staffing resources required to deliver additional work volumes, and the increasing number of corporate projects at a lower cost than outsourcing this work and to return a zero-budget variance at the year-end.

Resource implications

The department has experienced significant increases in work volumes and work complexity in 2026, as detailed in section 7 of this report, and particularly in relation to cross-cutting corporate initiatives and projects. This has placed significant pressures on staff resourcing and service continuity with an increased reliance on agency staff. There are currently 14 agency lawyers in C&CS which constitute 31% of the staff establishment - 8 of these posts cover additional workloads with 6 covering vacancies that are either being recruited to or are difficult to recruit to. The use of agency lawyers has the positive impact of quick deployment to cover work volumes and complexity on a short-term basis, although it also creates the continuity risk of agency lawyers leaving at short notice.

Recruitment of permanent staff has been problematic. Permanent staff turnover is high at 10.1% for the rolling year and, given that the total C&CS establishment is 59, this has a disproportionate impact on a small department. Of the leavers, 25% have been at lawyer grades F-H which are critical to effective service delivery; 56% of leavers have been employed for under three years which is of concern and may relate to health and wellbeing issues; 35% of sickness absences relate to anxiety/stress or other psychiatric illnesses higher than the City average of 25%.

Legal implications

None.

Risk implications

The key risk to C&CS in 2026 is the sourcing of permanent staff to deliver services in-house and build a knowledge base of the City's complexities to improve continuity. This coupled with the increased volume and complexity of work in all areas of activity may lead to the

increased necessity to outsource work. The salaries offered by C&CS are competitive with other London local authorities but the level and complexity of much of the work undertaken by C&CS is not comparable being at a much higher and more complex level and dealing with external organisations of high calibre. This will continue to be a challenge, given the City of London Corporation current salary structures and reward systems.

Climate implications

None.

Security implications

None

Conclusion

9. C&CS continues to play a pivotal enabling role in supporting the City of London Corporation's strategic ambitions and statutory responsibilities. At quarter 2, performance across C&CS workstreams demonstrates clear progress albeit with resourcing challenges and risks across all areas of activity.

10. The department's continued focus on collaboration, and continuous improvement underpins effective service delivery. The Business Plan workstreams and performance measures reflect C&CS's cross-organisational role, working with departments and institutions to strengthen organisational capability, governance, and performance.

Appendices

- Appendix 1 - C&CS Business Plan 2026 - 2028.

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