

Meeting	Full Council
Date	28 th April 2026
Report Title	Keep Britain Tidy
Agenda Reference	20
Author(s)	Georgina Morgan-Denn, Chief Officer/Clerk & RFO

Officer's Recommendation:

1. Note the content of this report and the background to the concerns raised by ASH and communicated via the LGA and SBC.
2. Approve Option 2: that the Chief Officer writes to Keep Britain Tidy formally requesting full disclosure of its funding arrangements and confirmation of the steps being taken to address Article 5.3 compliance.

1. Introduction

The Local Government Association has written to Swindon Borough Council (SBC) alerting it to concerns raised by Action on Smoking and Health (ASH) regarding the environmental charity Keep Britain Tidy (KBT).

It has been reported that KBT has received at least £10 million from the Tobacco Manufacturers Association (TMA) via an intermediary, Clean Streets CIC. The Parish Council participates in the Great British Spring Clean, a national environmental campaign coordinated by KBT, in which the Council has taken part in this and previous years.

Officers have met with SBC to assess the position. This report sets out the background, the legal and compliance implications under Article 5.3 of the WHO Framework Convention on Tobacco Control (FCTC), and the options open to the Council.

2. Background

2.1

In April 2026, ASH issued a press release confirming that KBT has received significant tobacco industry funding since 2022, channelled via Clean Streets CIC, which ASH understands to be wholly funded by the Tobacco Manufacturers Association (TMA). This funding arrangement is reported to have significantly increased KBT's income during that period. Concerns have also been raised regarding transparency of disclosure in relation to this funding.

Additional commentary, including public reporting on professional and social media platforms (including LinkedIn), has highlighted concerns that tobacco industry funding has been used to support environmental and civic initiatives delivered through third-party organisations.

The matter came to the Council's attention via SBC, following notification from the Local Government Association (LGA). SBC noted that ASH is contacting councils directly and that media coverage is possible. SBC's legal, procurement, and communications teams are engaged, and there was a Swindon Clerks meeting with SBC on 17 April 2026 to review the position.

This Council participates in the Great British Spring Clean, a national campaign delivered by Keep Britain Tidy, involving community litter-picking and environmental improvement activity. Engagement with KBT therefore arises through participation in



this campaign rather than through any formal grant, sponsorship, or commercial partnership.

2.2 Article 5.3 of the WHO Framework Convention on Tobacco Control

The United Kingdom is a signatory to the WHO Framework Convention on Tobacco Control (FCTC). Article 5.3 requires that public authorities act to protect public health policies from the commercial and vested interests of the tobacco industry.

The implementation guidelines for Article 5.3 explicitly apply to local authorities and recommend that public bodies:

- Reject partnerships and non-binding agreements with the tobacco industry
- Avoid endorsement of or participation in tobacco industry–associated “social responsibility” activities
- Do not accept support, endorsement, or collaboration with tobacco industry-linked organisations
- Raise awareness of the tobacco industry’s use of third parties and front groups

2.3 Definition of the Tobacco Industry

Government guidance (DHSC) and ASH commentary indicate that organisations receiving tobacco industry funding via intermediaries should still be considered within scope of tobacco industry influence for Article 5.3 purposes.

ASH has stated that funding routed through third parties such as Clean Streets CIC does not remove the relevance of tobacco industry association. On this basis, organisations benefiting from such arrangements may be considered as working in support of tobacco industry interests for compliance purposes.

2.4 Indirect Engagement

The Council’s involvement with KBT arises solely through participation in the Great British Spring Clean campaign.

Several councils have indicated they were previously unaware of the funding arrangements now being reported. While indirect engagement and lack of prior knowledge are relevant mitigating factors, they do not remove the need to consider ongoing compliance responsibilities once concerns are identified.

The key consideration is whether continued participation in KBT-led activity constitutes continued association with an organisation potentially linked to tobacco industry funding.

2.5 Current Position

The Council’s engagement with KBT is limited to participation in the Great British Spring Clean campaign. There are no direct contractual, grant, or sponsorship arrangements with KBT.

At the time of writing, the Council has not been contacted directly by ASH, though ASH has indicated that direct engagement with local authorities is ongoing. Further guidance from national bodies is expected.

SBC continues to seek advice and will share further information as it becomes available. Officers will continue to monitor developments and liaise with SBC, the LGA, and any further guidance issued.

2.6 Options for consideration



Option	Description	Considerations
Option 1	Suspend participation in the Great British Spring Clean pending further guidance	Strongest compliance position but may reduce community environmental engagement activity
Option 2	Continue participation but write formally to KBT requesting disclosure of funding arrangements and clarification of Article 5.3 compliance	Maintains engagement while demonstrating due diligence and transparency
Option 3	Continue current participation unchanged pending further national guidance	Lowest disruption but carries potential reputational and compliance risk now the Council is on notice

2.7 Officer recommendation

Officers recommend Option 2.

Now that the Council has been formally made aware of potential funding concerns, it is appropriate to seek formal clarification from KBT. This approach ensures transparency, demonstrates due diligence, and creates an audit trail of the Council's response. It also allows continued participation in the Great British Spring Clean while the facts are clarified, avoiding premature withdrawal from community activity that may be disproportionate at this stage.

3. Recommendations

3.1 Note the content of this report and the background to the concerns raised by ASH and communicated via the LGA and SBC.

3.2 Approve Option 2: that the Chief Officer writes to Keep Britain Tidy formally requesting full disclosure of its funding arrangements and confirmation of the steps being taken to address Article 5.3 compliance.

4. Subject to Approval - Draft Letter to Keep Britain Tidy

Haydon Wick Parish Council

[Council Address]

[Postcode]

[Date]

Keep Britain Tidy

[Address if required]

Dear Sir/Madam,

Re: Funding transparency and Article 5.3 WHO Framework Convention on Tobacco Control

Haydon Wick Parish Council is writing to seek clarification regarding recent public concerns raised in relation to Keep Britain Tidy's funding arrangements.

The Council has been made aware, via the Local Government Association and Action on Smoking and Health (ASH), of reports that Keep Britain Tidy has received funding linked to the tobacco industry, including contributions reportedly channelled via third-party organisations.

*As a participating local authority in the **Great British Spring Clean**, the Council has engaged with Keep Britain Tidy solely in relation to this national environmental*



campaign. We do not hold any direct contractual, grant, or sponsorship arrangements with your organisation.

However, given the nature of the concerns raised, the Council is seeking assurance in relation to compliance with Article 5.3 of the World Health Organization Framework Convention on Tobacco Control (FCTC), which requires public bodies to protect public health policy from the commercial and vested interests of the tobacco industry.

In order to maintain appropriate governance and transparency standards, we would be grateful if you could provide clarification on the following points:

- 1. Whether Keep Britain Tidy has received any funding, directly or indirectly, from tobacco manufacturers or tobacco industry-associated bodies, including via intermediary organisations.*
- 2. If such funding has been received, what safeguards or governance arrangements are in place to ensure compliance with Article 5.3 principles.*
- 3. Whether Keep Britain Tidy considers itself compliant with the expectations set out in Article 5.3 implementation guidelines for public-facing organisations working with local authorities.*
- 4. What steps, if any, are being taken to ensure full transparency of funding sources for public sector partners.*

The Council values its involvement in community environmental initiatives, including the Great British Spring Clean, and would welcome reassurance that participation in such programmes remains consistent with public health policy obligations and best practice guidance.

We would be grateful for a response at your earliest convenience so that we may appropriately review our continued participation.

Yours faithfully,

Georgina Morgan-Denn

Chief Officer/Clerk & RFO

Haydon Wick Parish Council