

Item No. 23.	Classification: Open	Date: 11 December 2018	Meeting Name: Cabinet
Report title:		Capital Letters: Procurement of accommodation for homeless households	
Ward(s) or groups affected:		All wards; homeless households	
Cabinet Member:		Councillor Stephanie Cryan, Housing Management and Modernisation	

FOREWORD - COUNCILLOR STEPHANIE CRYAN, CABINET MEMBER FOR HOUSING MANAGEMENT AND MODERNISATION

The housing crisis and the impact of welfare reform has seen an increase in homelessness in Southwark which is placing significant demand on the council's homelessness service.

In Southwark we have over 2700 households living in temporary accommodation and we have identified a potential overspend of £4.7m in 2019/20 in the costs of providing accommodation. In September cabinet agreed our new Homelessness Strategy which highlighted the importance of working with neighboring boroughs to help both procure and reduce the costs of temporary accommodation.

Southwark has been working with other London Boroughs and with London Councils to create a new central company, Capital Letters, to procure accommodation for homeless households. It is hoped that by working together with a pan London procurement process that we can reduce the competition that currently exists between boroughs for securing accommodation and that we can stabilise costs. In time we also hope to increase both the supply and the quality of accommodation for homeless households.

Participating in the scheme will give the council access to additional government funding which will help alleviate some of the pressures on our budget.

Southwark has long been recognized as a leader in the field of homelessness prevention, selected as a trailblazer by the government for the new Homelessness Reduction Act and chosen to run a training academy for housing professionals across the UK. This proposal cements our growing reputation as a council willing to find new and innovative solutions to one of the most difficult challenges we currently face. More importantly we hope it will make a contribution to accommodating some of our most vulnerable residents and families at the sharp end of the housing crisis.

RECOMMENDATIONS

1. Approves Southwark Council's membership of 'Capital Letters', a new company established by a number of London boroughs to procure and to manage accommodation for homeless households.
2. Note that the company is to be financed at least initially by support grant from the Ministry of Housing, Communities and Local Government (MHCLG) for a period to be confirmed.

3. Note there are two separate levels of membership open to boroughs; 'A Membership' or 'B Membership' (the difference is explained further in paragraphs 19 – 27), and approves the council's involvement as an 'A' member.
4. Note the council's obligations as an A Member would be as follows:
 - To transfer a proportion of the council's procurement and housing management activities to the company; and
 - To transfer sufficient resources to the company to fulfil these activities. The majority of participating boroughs intend to meet this obligation through the secondment of existing posts.
5. Approve that formal incorporation by the Council into the company will be agreed by the Strategic Director for Finance and Governance in consultation with the Strategic Director for Housing and Modernisation and the Cabinet Member for Housing and Modernisation.
6. Notes that a separate 'Gateway 1 Procurement Strategy' report will be presented for approval in due course. This Gateway report would formally authorise the transfer of some procurement activities from the council to Capital Letters.
7. Notes that the gateway report will refer to a small proportion of the council's total procurement activity, at least during the company's first year of operation.
8. Notes the council's participation in the scheme is dependent on the secondment of officers from the Housing & Modernisation department, or the payment of staff in kind, where this is not covered by grant funding and that any decision for officers to undertake a secondment is voluntary.
9. That cabinet notes an evaluation report will be presented to cabinet within the first 12 months of operation, giving cabinet the opportunity to consider the council's continued level of involvement in Capital Letters.

BACKGROUND INFORMATION

10. The revenue monitoring report presented to cabinet in September 2018 set out the considerable pressures on temporary accommodation. The council has identified a potential overspend of £4.7 million in 2019-20.
11. London boroughs previously collaborated to reduce costs in this area through the 'Inter Borough Temporary Accommodation Agreement'. The agreement was approved by the London Councils Leaders' Committee in March 2010. It set maximum prices in each borough to prevent authorities from 'outbidding' one another. The success of this initiative led the MHCLG to provisionally allocate funding for further collaboration.
12. A number of options were put forward for consideration by the London Councils' Leaders Committee and the London Councils' Housing Directors Group. They decided to commission detailed proposals on the creation of a new company to centralise the procurement and management of accommodation for homeless households.
13. The proposals were developed by a working group including representatives

from MHCLG, the Greater London Authority and the 33 boroughs. The umbrella organisation London Councils is providing leadership and administrative support to the project.

14. The company is expected to start operating from June 2019 subject to sufficient boroughs deciding to participate. To date, seven boroughs have received approval from Cabinet or through delegated decision to join Capital Letters as “A” category Members:

- Bexley
- Brent
- Ealing
- Haringey
- Lewisham
- Tower Hamlets
- Waltham Forest

15. A further eight boroughs are known to be seeking or considering approval to join as “A” Members in the coming weeks. These include:

- Barking and Dagenham
- Southwark
- Westminster

KEY ISSUES FOR CONSIDERATION

Proposal

16. The proposal is to create a new company limited by guarantee to procure and manage leased and Private Rented Sector (PRS) accommodation on behalf of London boroughs. The company would initially be supported by a grant from MHCLG.
17. The accommodation procured through the company would be within London boundaries and could be used by boroughs as either temporary or permanent accommodation under a range of statutory duties. The distribution of procured accommodation between the company members and sharing of benefits will need to be formally agreed. Sharing of company costs over and above grant funding both during the initial period of grant funding and beyond will also need to be agreed.
18. The governance arrangements for the company and the business plan for operations will need to be finalised once members are confirmed.

Options

19. There are three options open to the council:

Join as an “A” Member

20. “A” Members would transfer a proportion of procurement to the company. The minimum requirement for A Membership is 50% of a council’s yearly leased and PRS procurement. To put this into context, a borough that procured 400 leased/PRS units in 2018/19 would have to procure 200 units through Capital

Letters in 2019/20.

21. "A" Members would also transfer an appropriate resource to procure this number of properties. This resource could be provided by seconding existing procurement staff to the company, or providing equivalent funding to Capital Letters.
22. "A" Members could leave the company with six months written notice. Detailed terms are still to be confirmed.
23. As an "A" Member, the council would have access to the highest possible amount of MHCLG grant funding for this initiative.

Join as a "B" Member

24. "B" Members would transfer some procurement to the company but less than the 50% threshold required for "A" Membership.
25. B Members could leave the company with three months written notice.
26. As a B Member, the council would only have access to a proportion of the MHCLG grant.
27. The council would possibly have an opportunity to become an "A" Member at a later date, on terms where details are still to be confirmed.

Do not join the company

28. The council could choose not to join the company at this point in time. As with paragraph 27, the council would possibly have an opportunity to join at a later date, although the benefits may not be as strong.
29. "A" Membership' is considered by housing officers to provide the strongest potential benefit to the council, and this is the level of membership that cabinet are being asked to approve.

Company structure and governance

30. The law firm Trowers & Hamlin have drafted Articles of Association for London Councils and a Members' Agreement. These documents have been included as appendices to this report (Appendices A and B).
31. The company would be established as a company limited by guarantee. This is a common approach for not for profit organisations. There would be no shareholders or dividends and all surpluses would be reinvested in the company. Participating boroughs would be limited liability members.

Members' guarantee (extract from the Articles of Association)

Each Member undertakes to contribute to the assets of the Company in the event of the Company being wound up while they are a Member of the Company or within one year after they cease to be a Member of the Company for payment of the debts and liabilities of the Company contracted before they cease to be a Member of the Company and of the costs charges

and expenses of winding up such amount as may be required not exceeding one pound.

Funding (extract from the Members' Agreement)

In the event that the Company requires additional finance from time to time, no Member shall be required to provide any such funding or to guarantee or provide any security or accept any other liability with respect to any borrowings by, or loan facilities made available to, the Company.

32. Capital Letters would be a 'Teckal' company. The company would be controlled by participating authorities but could be awarded contracts and services without the requirement for a competitive tender process involving external parties.
33. Notwithstanding point 32, the council would award services to the company in line with its standard internal procurement processes. A 'Gateway 1 Procurement Strategy' report would follow this Cabinet report, formally authorising the council to transfer a proportion of procurement and housing management activities to the company.
34. The company will be governed by a 'Member Board' and a 'Board of Directors'. The Member Board would consist of Councilors and would meet annually. The Board of Directors would consist of senior officers and would meet quarterly. It is envisioned that A Members would nominate a Director or Senior Officer to the Board. The number of directors and their nomination will need to be confirmed.
35. The two boards would report to the following bodies:
 - MHCLG
 - London Councils Leaders Committee (meets quarterly)
 - Chief Executives London Committee (meets quarterly)
 - London Housing Directors' Group (meets quarterly)
36. A number of additional groups have been established to ensure the company is ready to start operating from June 2019.
 - Steering group
 - Working group of interested boroughs
 - IT sub-group
 - Human Resources sub-group
 - Communications sub-group
37. The council would not be expected to have an involvement in the day-to-day running of the company, in terms of the company's HR, finance, legal or other support functions.
38. The council would be required to notify its insurance provider of the decision to join the company.

Resource implications

Financial

39. Capital Letters is supported by a grant from MHCLG, allocated from the 'Flexible

Homelessness Support Grant'. £37.8 million has been allocated until 2021-22.

Year	Funding
2018-19	£1.1 million
2019-20	£7 million
2020-21	£12.9 million
2021-22	£16.8 million
Total	£37.8 million

40. The council would continue to be responsible for the cost of placements made through the company, but the grant from MHCLG would be used to subsidise these costs. This subsidy would take two forms:

Incentive payments to landlords (for PRS properties only)

41. It is common for councils to offer an incentive payment for new landlords. This payment can amount to several thousand pounds for each property provided. Capital Letters would subsidise up to £1,500 of this cost (per landlord) on behalf of boroughs.

Leasing top up (for leased properties only)

42. There is often a shortfall between the cost of leasing a property and the amount that can be claimed back through Housing Benefit. Capital Letters would pay a 'top-up fee' of up to approximately £30 per week, per placement, funded from the MHCLG grant.
43. These subsidies will not be paid indefinitely. They are being offered as an incentive to encourage boroughs to join Capital Letters and are expected to be gradually phased out over the first three years of the company's life on a schedule still to be determined as part of their business planning process. It is hoped that authorities would then choose to remain members of the company regardless of subsidies. The council could decide to serve notice and withdraw from the company as and when the subsidies change.
44. There is one other element of the scheme anticipated to deliver financial benefit for participating boroughs. The council recoups the cost of temporary accommodation placements through a subsidy from central government. This subsidy is based on local Housing Benefit rates but is currently capped at 90% of the January 2011 rate. As an external company, Capital Letters would be able to claim 100% of the current rate.
45. The average cost reduction per TA placement is expected to be £53 per week. The table below sets out how this figure has been calculated.:

	In House	Per week Capital Letters	Saving
Average weekly rent	£292	£292	
Average Housing Benefit receivable	-£211	-£234	
Net cost to council	£81	£58	-£23 Additional housing benefit claimed
Grant subsidy (averaged per week)		-£30	-£30 Grant subsidy
Total cost to council	£81	£28	-£53 Average council saving per placement

46. This figure does not account for the contribution to overheads that the council would be required to make, as set out in more detail in paragraph 65. There is

therefore no saving being projected in the council's policy and resourcing strategy for 2019/20, although this will be continually reviewed.

47. The council could also transfer responsibility for housing management to the company but would incur additional fees. These have been provisionally calculated as £30 per unit, per week for rent collection and £46 per unit, per week for management. The council would have to complete a detailed financial analysis before deciding whether to transfer these responsibilities to the company. This financial analysis is expected to form part of the Gateway 1 Procurement Strategy report.

Financial Management

48. The council would continue to be responsible for the costs of placements made through the company. The establishment of the company will not alter the fact that a lack of temporary accommodation supply in London means rents are higher than Housing Benefit rates, creating significant shortfalls that councils have to cover.
49. The council would also continue to be responsible for the salaries of any seconded staff, or alternatively have to provide equivalent funding for these posts to the company. The council would also be required to make an additional contribution to the company's overheads.
50. However, the council would have to make those placements and pay those salaries regardless of whether it is a member of Capital Letters. If the council does choose to become a member of Capital Letters then the subsidy from the MHCLG grant and the ability to claim a higher rate of Housing Benefit should result in cost reductions, especially when extrapolated over a significant number of placements.
51. It is difficult to accurately forecast the exact cost reduction because any calculation involves a significant number of assumptions, unknowns and variables. These cost reductions will not have a significant impact on the overspend currently forecasted by the council but should make a positive difference.
52. The council would have to review its position as and when the subsidy rates change.

Procurement

53. The council uses various forms of temporary accommodation, including:
 - Nightly paid (short term) agreements with landlords
 - Leased (long-term) agreements with landlords
 - Empty council properties (for example, those awaiting regeneration)
54. The council also procures rented properties from private landlords (PRS). These properties are offered to individuals and families to prevent or relieve their homelessness, negating the need for temporary accommodation.
55. Capital Letters would only procure leased or PRS accommodation, in line with boroughs attempts to limit the prevalence of the more expensive but less secure

nightly paid agreements.

56. This means the majority of procurement will continue to be handled in-house after joining Capital Letters. Paragraphs 57 – 59 set out how the council has arrived at this conclusion.
57. At the end of October 2018, the council had 3,053 households in temporary accommodation. 2,646 of these households were being assisted under homelessness legislation. The majority were accommodated using nightly paid agreements, which fall outside the scope of Capital Letters.
58. In 2017/18, the council acquired approximately 400 units of leased or PRS accommodation. Capital Letters will use the equivalent figure for 2018/19 as a benchmark. If Southwark procures another 400 units in 2018/19 then this would be the benchmark figure. The council would be required to ensure that 50% of this figure – 200 units – is procured through Capital Letters during 2019/20 to fulfil the entry requirements for A Membership.
59. This would constitute a relatively small proportion – approximately seven percent – of the council's total temporary accommodation stock.
60. The full procurement implications would be clarified in the Gateway 1 Procurement Strategy report.

Staffing

61. Participating boroughs would have to transfer sufficient resources to Capital Letters to fulfil 50% of their leased/PRS procurement. These resources could be provided by seconding staff, providing funding for new staff or transferring existing contracts with suppliers.
62. The council has a dedicated procurement team in the Housing Solutions service. The team consists of eight posts
 - 3 Procurement Officers (permanent)
 - 3 Procurement Officers (fixed term)
 - 1 Procurement Assistant
 - 1 Procurement Apprentice (fixed term)
63. If the council chose secondment then it would have to transfer an appropriate number of the Procurement Officers to procure approximately 200 placements, assuming this is the benchmark figure for 2018-19. It is thought this would be the equivalent of a maximum of two members of staff but the exact number would be based on a number of variables and cannot be confirmed at this time. The decision to undertake a secondment is voluntary.
64. Alternatively, the council could consider transferring funding to Capital Letters for the company to directly recruit the appropriate number of officers to procure 200 placements. In this scenario, the current team would be unaffected.
65. The council would also be liable for an additional 20% contribution to office overheads, which would cover additional staffing related costs such as travel, IT and training etc. It is not yet confirmed where the new company will be located.

66. The council will consult with any affected staff and trade unions in line with its re-organisation procedures.
67. It should be noted that the Housing Solutions service is currently going through a staffing restructure.
68. London Councils are procuring HR consultancy support for Capital Letters and member boroughs will work together as part of the proposed HR sub-group to ensure consistency of approach on staffing, whether via transfer of staff or funding.

Policy implications

69. The decision to join Capital Letters would support several of the council's existing policies and strategic objectives.
70. The Council Plan for 2018 – 2022 sets out the council's vision of a *"fairer future for all"*, and the difficulty of achieving this within the context of having made £227 million of savings since 2010. It says the council will have to *"spend money as if it is from our own pocket"* and *"work with neighbouring boroughs, London Councils and the Mayor of London to achieve our aims and to deliver for residents"*.
71. In September 2018 cabinet agreed a new Homelessness Strategy for 2018 – 2022. The strategy sets out the problems associated with the increased use of temporary accommodation. It pledges to *"explore and develop initiatives for London-wide procurement"*, *"increase the number of leased accommodation [units]"*, which offers *"greater stability for households"* and *"expand how we access the landlord market"*. It also restates the council's long-term commitment to *"eliminate bed and breakfast and hostel accommodation"*.
72. The Localism Act 2011 enabled councils to discharge their statutory duty to homeless households through the private rented sector. The council has not implemented this policy to date. If the council were to consider private sector discharge at a future date then the accommodation procured by Capital Letters could be used in this capacity.
73. The major risks are summarised in the table below.

Risk	Mitigation
a. There are not a sufficient number of officers in the Procurement Team who wish to undertake a secondment to Capital Letters.	The council would have to consider alternative options, including transferring resources to the company in lieu of officers, or even withdrawing from the company as an A Member and reconsidering B Membership or non-participation.

Risk	Mitigation
b. The company does not deliver the required number of properties	<p>The council is proposing to transfer a relatively small portion of procurement to the company; approximately 7% of all temporary accommodation stock as of October 2018.</p> <p>The council could serve six months notice to withdraw from the company.</p>
c. The company encounters financial difficulties	The company will be established as a company limited by guarantee and the council would be a limited liability member.
d. The company has a negative effect on the existing procurement team	The council would consult affected staff and support them throughout the process. The decision to accept a secondment would be voluntary. Managers would be instructed to maintain regular contact with seconded staff. Seconded staff would remain on their Southwark terms and conditions and have the right of return.
e. The council withdraws from the company but loses access to properties and landlords procured through the scheme	This would be discussed with the company's Board of Directors to confirm rights of access. The small percentage of procurement transferred to the company should limit the level of risk.

Community impact statement

74. The council has a statutory duty to consider the potential positive or negative effects on communities and in particular, groups with protected characteristics.
75. An equality and health impact analysis was prepared for the Homelessness Strategy – which recommended the exploration of London-wide procurement – and was presented to cabinet in September 2018.
76. The analysis identified that certain groups with protected characteristics are more likely to approach the council for support. As a consequence, these groups are disproportionately represented in temporary accommodation. Specifically:
- Black African, Black Caribbean, Asian and Other ethnic groups
 - The 25-44 age group (this group is also more likely to have children)
 - Women
 - Households with children/pregnant women
 - Children
 - Lone parents
 - Low income households.
77. The council has a statutory duty to ensure all temporary accommodation placements are suitable for the applicant and all members of their household. One key aspect of suitability is the location of placements. For example, ensuring placements consider a household's pre-existing links to employment, education and/or support networks.

78. Southwark would not have automatic priority to properties procured by Capital Letters in the borough. Instead, Capital Letters would attempt to place Southwark households “as locally as possible”. The council does not envision that this change will result in any more households being placed outside of the borough and any change is considered reasonable in recognition of three mitigating factors:
- Limited effect – The majority of placements will continue to be made by Southwark’s internal procurement team. As such, the effect will be limited.
 - Suitability rights – Local authorities must ensure any placement is suitable and there is statutory guidance on assessing suitability. The council has a written policy based on this statutory guidance. This policy will continue to apply to all placements, including those made through Capital Letters. Households have the right to a multiple-stage review if they think a placement is not suitable. It is considered unlikely that the council and Capital Letters would be in conflict over the suitability of a placement.
 - Financial constraints – Rising rents combined with static Housing Benefit rates mean it is becoming increasingly difficult to procure temporary accommodation in Southwark and the council will increasingly have to consider out of borough options regardless of whether a placement is made in-house or through Capital Letters. For the same reason it is considered unlikely that Capital Letters would procure in Southwark at any significant scale.

Consultation

79. The proposals have been developed in conjunction with and supported by MHCLG, GLA, London Councils, the 33 London Boroughs, including the London Councils’ Housing Directors Group and London Councils’ Leaders Group.
80. Consultation with affected staff would begin at the earliest opportunity if cabinet approves the council’s participation in Capital Letters. Consultation would be conducted in line with the council’s policies and in discussion with trade unions.
81. Consultation with service users is not planned at this current time. Capital Letters would only procure within London, in areas where the existing Procurement team are already active, meaning there should be minimal effect on service users.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Human Resources

82. If membership of Capital Letters is agreed, Southwark would be represented on the London-wide HR sub-group for the scheme. Set up and resourcing of the proposed company will require further and more detailed operational work at a London and local level which will inform whether we transfer staff or funding. The sub-group will also look at the wider establishment of the new limited company including recruitment to roles outside of those seconded from member authorities.
83. Within Southwark, there are interdependencies to be addressed around the resourcing and service delivery implications for the existing housing solutions service within housing & modernisation where a reorganisation is under way.

Consultation and discussion would be required with staff and trade unions and would be conducted in line with our established reorganisation procedures.

Director of Law and Democracy

84. Section 1 Localism Act 2011 provides the council with a 'general power of competence'. This power can be relied upon to establish and participate in Capital Letters.
85. The Council has a duty under Part VII of the Housing Act 1996 ("HA 1996") as amended by the Homelessness Reduction Act 2017, to secure that accommodation is available for eligible applicants who are homeless, in priority need and not intentionally homeless.
86. The duty under section 188 HA 1996 is to provide interim temporary accommodation if the applicant meets the appropriate criteria. Pending a decision that a housing duty is owed, the authority will secure accommodation for their occupation.
87. When a housing duty is accepted under Section 193 of the Housing Act 1996, the housing authority is obliged to provide housing assistance.
88. Section 206 of HA 1996 provides that a housing authority may discharge its housing function under Part VII by, amongst other things, securing that the applicant obtains accommodation from some other person. The accommodation must be suitable accommodation. It is envisaged that joining Capital Letters will secure the availability of more private rented and leased properties, reducing the need to place homeless families in B & B and hotel annexes.
89. Paragraph 31 of this report states that Capital Letters will be a company limited by guarantee and the participating boroughs would be limited liability members.
90. Paragraph 32 states that the company will be Teckal compliant. This means that as a company wholly owned by the participating local authorities it will be exempt from the Public Contracts Regulations 2015 and as such the council can award contracts to Capital Letters without the requirement for a competitive tender process involving external parties. However, the council must ensure compliance with its internal Contract Standing Orders.
91. The draft Articles of Association and Members Agreement will need to be reviewed and agreed by the participating local authorities.
92. Paragraphs 61 to 68 refer to staffing considerations. As the Human Resources concurrent at paragraph 82 sets out, the set up and resourcing of the proposed company will require further and more detailed operational work. Any proposals informed by that work which may affect council staff must be managed under the council's relevant human resources procedures to ensure that the council acts in accordance with employment legislation.

Strategic Director of Finance and Governance

93. The strategic director of finance and governance notes the risks outlined in para. 73 and notes that membership of the company is limited by guarantee (para. 31)

94. The number of households presenting as homeless is increasing year on year. The cost of temporary accommodation (TA) is forecast to increase by a further £1.5m p.a. over and above the £3.1m cost pressure recorded for the current financial year.
95. Strategic director of finance and governance cannot comment on the efficacy of this initiative compared to the existing sourcing arrangement. Acknowledging it is difficult to forecast the numbers of properties that would be used to prevent households becoming homeless or to place households presently in T.A., any activity that reduces costs, however marginal, should be considered. Para 41 notes that every household in TA placed in a property through this initiative will save £53 per week (£2,500 for a 12 month period) through a combination of government grant and additional housing benefit. Of the £53 per week saving, £23 is sustained as increased housing benefit and £30 p.w. an initial application of government grant. The sustained saving per household would be £1,200 p.a in additional housing benefit. Presently of the forecast 200 additional households pa. Requiring TA, 50% would be placed in the private rented sector. If these additional 100 properties were sourced through this initiative, the annual saving to the council is £120k p.a in additional housing benefit plus any one off saving from government grant.
96. The strategic director of finance and governance notes that the saving will be offset by the contribution to company overheads (para 65). There will be a break-even point for the number of properties that are required in order for a saving to be made from this initiative. This should be considered when finalising the total procurement being transferred to the company to inform whether membership is cost effective.
97. Whilst not all properties might be used for existing households in TA, every household that is prevented from requiring TA will avoid up to £7,500 for a 12 month period.
98. The strategic director of finance and governance notes that the tax implications for the company have been considered within the business plan and governance arrangements. Under section 33 of the Value Added Tax Act 1994, Local Authorities are able to recover VAT on their costs. When finalising staffing, financial and governance arrangements, care must be taken so as not to be exposing company Members to unexpected VAT liabilities.

REASONS FOR URGENCY

99. Boroughs are required to confirm whether they intend to participate in Capital Letters by the end of December 2018.

REASONS FOR LATENESS

100. It has not been possible to circulate this paper five clear days in advance of the meeting because requests for amendments and additional information were received close to the original submission deadline.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
None		

APPENDICES

No.	Title
Appendix 1	Articles of Association
Appendix 2	Members Agreement

AUDIT TRAIL

Cabinet Member	Councillor Stephanie Cryan, Housing Management and Modernisation		
Lead Officer	Michael Scorer, Strategic Director of Housing and Modernisation		
Report Author	Sean Backhurst, Service Development Manager		
Version	Final		
Dated	6 December 2018		
Key Decision?	Yes		
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER			
Officer Title		Comments Sought	Comments Included
Director of Law and Democracy		Yes	Yes
Strategic Director of Finance and Governance		Yes	Yes
Head of Human Resources		Yes	Yes
Cabinet Member		Yes	Yes
Date final report sent to Constitutional Team			6 December 2018