

<b>Item No.</b> 29.	<b>Classification:</b> Open	<b>Date:</b> 24 March 2020	<b>Meeting Name:</b> Cabinet
<b>Report title:</b>		New key worker housing powers (Churchyard Row)	
<b>Ward(s) or groups affected:</b>		All	
<b>Cabinet Member:</b>		Councillor Kieron Williams, Housing Management and Modernisation	

## **FOREWORD – COUNCILLOR KIERON WILLIAMS, CABINET MEMBER FOR HOUSING MANAGEMENT AND MODERNISATION**

Southwark council is on the pioneering front line in tackling the housing crisis. We have the most ambitious council home building programme of 11,000 new council homes by 2043. We have developed an award-winning approach to homelessness and temporary accommodation. We are expanding and enriching our estates through our innovative Great Estates programme. This administration does not shy away from exploring new and exciting ways to support our residents because we are on their side in the housing crisis.

This report provides the groundwork to lead the way in support of another vital group of residents – our keyworkers. Nurses, social workers, teachers, police officers and firefighters in Southwark provide a crucial service to our communities and yet very often cannot afford to enter the private rented sector as low and middle income earners. This cannot be right and so Southwark is dedicated to fixing this broken system to look after the public sector workers who look after us.

Southwark will be one of the first boroughs to utilise new government regulation, coming in to force in April, which will allow us to set aside council properties for keyworkers. At Churchyard Row, we will pilot this approach starting with 36 studio flats, suitable for single people or couples who will have excellent access to central London, proximity to their work in the Borough and a stepping stone to save for a larger home of their own in future.

These homes will be genuinely affordable, with rents set at 50% of the local market rate. This will save the average tenant over £8,300 per year compared to the private market. We will offer flexible tenancies of three years, offering tenants security while ensuring that the council can retain these properties for keyworkers in the long-term.

I hope this pilot is a great success and that we once again lead London in solving the problem posed by our broken housing market. Southwark is delivering for residents because we are on your side in the housing crisis.

## **RECOMMENDATIONS**

1. To agree to make use of new powers to rent homes to keyworkers at intermediate rents through the council's housing revenue account.
2. To agree that the 36 studio units at Churchyard Row should be used as a pilot for this new approach of letting homes to keyworkers.
3. Given the nature of these units, to agree to let these 36 units on flexible fixed-term tenancies to ensure these are retained for keyworkers.

4. To delegate authority to the Strategic Director of Housing and Modernisation to agree a local lettings plan following consultation and to finalise the details of the scheme including the conditions of tenancy.

## **BACKGROUND INFORMATION**

### **The need for intermediate rent homes, particularly for keyworkers**

5. The council has a strong commitment to help meet the needs of those who are unlikely to access social housing but who are unable to afford private rents and house prices. The council is particularly concerned about this issue for keyworkers who are essential for delivering high quality public services. Affordability issues present a real challenge in recruiting and retaining keyworkers, resulting in too much being spent on recruitment, an over reliance on agency staff, and the loss of experienced staff. In some areas vacancies are having a big impact on public services.
6. The Council Plan 2018-22 includes a commitment to secure the delivery of more discounted market rent homes. The New Southwark Plan will include a new policy that, on purpose built, private rental developments of over 100 units, the affordable housing requirement can be met through discount market rent at the London Living Rent (LLR) level and at council rent level. The Mayor of London is trying to increase the supply of LLR properties. LLR was introduced by the Mayor of London as an intermediate housing product directed at those on an average income. Rents are set in accordance with the average borough income with variations based on the ward market rent level. LLR properties are provided on an assured short hold tenancy, with a minimum 3 year length. Tenants are expected to save towards another form of housing such as shared ownership.
7. Southwark Council has agreed in principle to introduce a new intermediate rent housing list. This will assist with the allocation of intermediate rent housing products and help ensure any properties developed at these lower rents go to households in most need of these properties. This will be introduced once the New London Plan is published.
8. However, it is not clear how many new LLR homes will be developed. Most housing associations have so far preferred to deliver the intermediate homes as shared ownership rather than LLR. Additionally most private developers are still in the early stages of considering the options around purpose built private rent. Therefore the council has recognised a need to help plug this gap, so is looking at how to maximise new opportunities in changes to rent guidance to let homes to keyworkers directly through the council's housing revenue account (HRA).

### **New power for renting homes to keyworkers through the HRA**

9. The council has previously been prevented from charging intermediate rents within the council's housing revenue account due to rent restrictions. There are rules regarding both the allocation of council housing and the rent levels charged. However the rules in relation to rents are about to change which presents a new opportunity for the council to get ahead of the curve and let units to keyworkers on intermediate rents.
10. The Regulator for Social Housing (RSH) issued a new standard and guidance on 24 September 2019. This new standard will apply from April 2020.  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/781746/Policy\\_Statement.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/781746/Policy_Statement.pdf)

11. The guidance (in section 5.1) included excepted categories of accommodation, of which one was intermediate rent accommodation. Section 5.4 states “‘intermediate rent accommodation’ means low cost rental accommodation which satisfies either (a), (b) or (c) below”. Option c is that the accommodation is keyworker housing. There are still restrictions in the Rent Standard which limit what the council can do with existing social rent stock. In particular at point 2.33 which states that “social rent properties may not be converted to intermediate rent.”
12. Broadly councils must not allocate housing except in accordance with their social housing lettings scheme. However, the council may depart from this scheme where it puts in place a local lettings policy which prioritises particular groups of applicants for particular properties. So a local lettings scheme would be required for any units which would be restricted for keyworkers, and the council would need to consult on this.

### **Churchyard Row Acquisition**

13. The council acquired a leasehold interest from Peabody of 115 units of housing at Churchyard Row. This block includes 79 units to be let at social (target) rents and 36 intermediate rented units which were defined as “affordable housing units to be leased or rented at not more than 80% of the rental value of Local Market Rent”.
14. The design layout and size of the 36 studio intermediate rent units limit their use. These units would suit a single person or couple needing a sub-market rent and who are willing to accept the smaller space in return for the attractive views and the proximity to central London. These units would provide an excellent opportunity for keyworkers to enable them to both live and work in Southwark, paying a lower rent to enable them to save to move to an alternative property in the future.

### **ISSUES FOR CONSIDERATION**

#### **To let properties through the HRA to keyworkers at intermediate rents**

15. The RSH rent standard and guidance limits letting of intermediate rent properties within the HRA to key workers, so it is proposed that these 36 studio units will be prioritised to this group. The council recognises there is a need to help other people considered to be in the “squeezed middle” who are unlikely to get social housing but cannot realistically afford market housing. The broader intermediate rent housing list will prioritise keyworkers but other households will be eligible to join the list. Therefore non-key worker households will be eligible for private and housing association intermediate rent units. There may also be opportunities to deliver intermediate rent homes to a wider group through the Southwark Housing Company (SHC) in the longer term.
16. Council officers have explored different options for renting out the 36 intermediate rent units. Options considered were:
  - a. Letting the units directly as general needs units at social rents
  - b. Letting the units as temporary accommodation
  - c. Subletting the units to a registered provider or other public / charitable sector provider
  - d. Letting the units directly to keyworkers on secure or flexible fixed term tenancies at intermediate rents within the council's housing revenue account (HRA)

- e. Subletting the units to the councils arms length housing company (SHC) in order that it may let them to keyworkers on assured shorthold tenancies at intermediate rents.
- 17. The council has had specific negative issues with each approach. These problems have ranged from the homes simply not being suitable for the identified solution, to a lack of demand from our partners to the potential approach. Therefore options D and E were considered the best options.
- 18. Following the recent change to the Rent Standard by the Regulator of Social Housing in late 2019, this has opened up the option to let the units to keyworkers at intermediate rents through the HRA. This also presents an opportunity for future council new build schemes. This does still require consultation and agreement on a local lettings scheme.

**Use of flexible fixed term tenancies of three years, limited to these 36 intermediate rent units at Churchyard Row**

- 19. Cabinet is asked to agree that, given the nature of these 36 studio units, these units should be let on flexible fixed-term tenancies to ensure these are retained for keyworkers.
- 20. Most units under LLR arrangements are let on assured shorthold tenancies. A lower rent is charged to help the household save up a deposit to move to an alternative property. As with the LLR, officers believe that these units are more suitable for use as a stepping stone for keyworkers to move to other housing solutions such as shared ownership, rather than for long-term occupation.
- 21. Single people and couples that would be nominated to these flats are unlikely to have a significant housing need, and would ordinarily be unlikely to have been prioritised for a permanent home through the council's social housing allocations scheme.
- 22. The recommendation (for these units only) is that the tenancy will be a flexible fixed term tenancy. There will be an expectation that residents will try to save towards buying an alternative property such as through shared ownership, but this will not be monitored. Towards the end of each tenancy period, the households will be approached by the council to discuss their housing options, including advice regarding options to buy different properties on a shared ownership basis. If the household still contains a keyworker who meets the Southwark definition, who wants to stay, and is not overcrowded, the tenancy would be renewed. Otherwise the council may look to take back the property so that another keyworker can benefit from the stepping stone property. These cases would be handled carefully and the resident will be supported to understand their alternative options, such as buying an alternative shared ownership property. These decisions will be assessed on a case by case basis depending on the individual circumstances and officers will receive training to help provide advice.

**Keyworker definition**

- 23. The Rent Standard that permits intermediate rents for keyworkers within the HRA does not provide a definition of a keyworker. Therefore this is left to be determined locally. This is sensible as recruitment and retention issues will be different across the country and may change over time.

24. The council has consulted on a definition of keyworkers as part of the consultation on introducing an intermediate rent housing list. There was broad support for the proposal. The council is still working on finalising this definition so that we can clearly evidence the recruitment and retention issues to justify prioritising these people over other groups. The final definition will be included with the final design of the intermediate rent housing list in an Individual Member Decision Making (IDM) report later this year. The current proposed definition is:
- Nurses and other clinical staff employed in the NHS who work in London Borough of Southwark ("LBS") (at hospitals, health centres or in the community).
  - Social workers, educational psychologists and occupational therapists employed by LBS or the NHS who work in LBS.
  - Fire-fighters who work in LBS.
  - Police officers and Police Community Support Officers (PCSO) who work in LBS.
  - Teachers and teaching assistants who work in State schools, Faith schools, Free schools and Academies (i.e. non-fee charging schools) located within London Borough of Southwark.
25. For the first let of these units at Churchyard Row, the proposal is to restrict these units to teachers and social workers where recruitment and retention issues have already been clearly evidenced and which can be targeted quickly to ensure quicker letting of these units.
26. There is clear evidence of recruitment and retention issues in the education sector which has largely been attributed to the cost of living. A workforce planning recruitment and retention strategy group met on 22 May 2017 to summarise the key issues and develop a year long support plan to tackle recruitment and co-ordinate resources. This discussed the growing issue with teacher recruitment and retention. Comments included that "schools report considerable difficulty in filling vacancies especially with high quality experienced staff... Teachers with more than 3 years experience are leaving the borough, many due to affordable housing which will have an effect on school standards and promotion to leadership."
27. Between September 2017 and June 2018 there were 70 job listings at various primary and secondary schools across the borough. Of these 23 had nobody click to proceed to the application stage. These included posts across the range of levels from head teacher to teaching assistants and after school play workers. In 42 cases there was less than three applications. Only 4.1% of those who clicked for more information actually went on to click the application page.
28. Talks have been held with the Education team and initially there appears to be scope to offer the properties for rent to newly qualified teachers (NQTs). An NQT's take home net pay (after tax, NI, pension and student loan) is approximately £1,800 per month. If the units were rented out at 50% of market rent then that rent would equate to 39% of net take home pay for an NQT.
29. There is also clear evidence of recruitment and retention issues with social workers. Discussions with the council's human resources team has highlighted that retention of social workers is the key issue in that sector and having a big impact on services. A newly qualified social worker in their assessed and supported year in employment (ASYE) has a salary of £33,759 which makes affording private sector accommodation very challenging.

30. There will be a further report to the Strategic Director of Housing and Modernisation to finalise the precise details of the scheme. This will include how the availability of these properties will be communicated to the relevant staff. This report will also include a more precise definition of social workers and teachers, setting out exactly which posts will be included. For example some qualified social workers may be working in more senior managerial roles which could be excluded; however some of the more senior roles may already be excluded by the overall £60k household income limit. There may be some cases where people working in social work or teaching roles do not have an official qualification so the final design may need to retain some discretion for these applications, which would then be assessed by the Strategic Director of Housing and Modernisation. This report will also set out how competing applications will be prioritised, such as on factors like length of service in the sector.
31. Any relets of these Churchyard Row properties as they become vacant would be through the agreed broader keyworker definition adopted for the intermediate Rent Housing List, once this becomes operational.

### Rent levels

32. The rent levels will need to be set to ensure these are affordable to keyworkers on low to mid incomes. The intermediate rent levels are shown in the table below and are compared with LLR, market rent and social rent. The rent levels could be set at LLR levels but even this would be fairly high for keyworkers, and is only set for 1 beds rather than studios. Therefore the recommended rent level will be 50% of the market rent. This would still mean that 39% of income for a newly qualified teacher was being spent on housing costs, but this would still be much more affordable than renting in the private rented sector. This would save the keyworker approximately £8,364 a year compared to renting in the private rented sector. It is also likely their income would increase as they progress through their careers. This option would also have the additional benefit of a longer-term tenancy than is standard in the private rental market.

	Average market rent	80% of market rent	60% of market rent	50% of market rent	Social housing rent	1 bed London Living Rent Ward avg. 2019/20	London Affordable Rent
Monthly rent per unit	£1,395	£1,116	£837	£698	£428	£917	£672
Percentage of average market rent	100%	80%	60%	50%	31%	66%	48%
Monthly saving	0	279	558	697	967	478	723
Annual saving	0	3,348	6,696	8,364	11,604	5,736	8,676

33. There is a potential option that if the household was no longer a keyworker and on a higher income the rent could be increased to up to a maximum of 80% of the market rent. However, this would effectively be a form of pay to stay, which the council is opposed to. The council's priority is ensuring these properties are retained for keyworkers in perpetuity, and officers believe this can be best achieved through the fixed term tenancy review process.

### **Flexible fixed term tenancies**

34. Intermediate rent units are usually let on assured shorthold tenancies. However any tenancy granted by the council to a residential occupier will be secure, subject to certain exceptions which are not relevant in this case. This means that the tenancy will generally continue in existence unless the tenant breaches the terms of the tenancy. However, the council has the option of granting a time-limited secure tenancy. We are proposing that tenancies of three years be granted, so that the properties can be retained in perpetuity for keyworkers.

### **Policy implications**

35. This letting of the 36 intermediate rent units will help pilot the priority for keyworkers as part of the intermediate rent housing list. While this will be initially restricted for certain keyworker groups, this will only apply for the first letting. For relets the intermediate rent housing list definition of keyworkers will be used.
36. The council has no intention of deviating from the policy of issuing life-time tenancies in social housing.

### **Community impact statement**

37. This report relates only to the letting of 36 studio units on one development, and potential council intermediate new build schemes going forward. So the community impacts are limited. Restricting the letting to keyworkers who meet the Southwark definition means that all local residents should benefit from an improvement in local services through the recruitment and retention of these keyworkers.
38. The council has already consulted on the introduction of an intermediate rent housing list. There was broad support for introducing a list and for prioritising keyworkers among other selected groups.
39. There is very little data available at this stage to help assess any potential impacts of the prioritising of keyworkers. There is a potential risk that this may disadvantage women and those with disabilities who may find it more difficult to be in work. However, given the evidenced issues with recruitment and retention of teachers and social workers, the council believes this approach is justified.

## **RESOURCE IMPLICATIONS**

### **Financial and Budget Issues**

40. Setting intermediate rents within the HRA for the 36 top floor Churchyard Row properties will financially benefit the landlord account. It is proposed that the 36 units are rented out at 50% of market rent which would equate to approximately £700 per month per unit. The annual benefit to the HRA would be around £300,000 per year if all the units are fully let out.
41. There also service charge implications. Current tenants in the other 79 units at Churchyard Row are paying £15.31 per week for services such as concierge/CCTV, estate lighting, cleaning, grounds maintenance and door entry. If this charge was applied to the 36 units then this would equate to an additional cost to each key

worker of £15.31 per week, but would generate additional income to the HRA of £28k over a full year, to help recoup a share of the council's costs.

42. Additional costs for managing and maintaining the units would be marginal. The housing management team already manage the other 79 units within the block so the increase in staffing resources/time would be minimal. Likewise with maintenance as the council already holds the lease to the units so the units have to be maintained whether they are occupied or vacant.
43. The updated Rent Standard is only applicable from April 2020 but letting out properties for key workers at intermediate rent levels could be a key financial benefit to the HRA going forward. Obviously there has to be consideration of the need for social rented properties but when considering council new build or purchase, it may be that some properties could be let out at intermediate rents to key workers to help subsidise the social rented new build programme (dependant on planning obligations).
44. There would be a different financial approach if the units were let through the council's housing company (SHC). The company is accounted for within the general fund of the council and therefore any surpluses generated could be a financial benefit to the general fund. If the company was to be used then the most efficient tax arrangement for the company would be sought. One other benefit in using the company is that services would be bought in, such as management and maintenance from the HRA. There would also be services that the general fund could provide to the company, for example, property, legal and finance which would be a financial benefit to the general fund. If the company were to use general fund resources (borrowing) for any of its activities then there could be a significant financial gain for the general fund through on-lending.
45. If the council wished to house non-key workers who are not eligible for social housing but have similar economic challenges to key workers, at intermediate rents, then this could not be achieved through the HRA nor the general fund but instead would have to be progressed through the housing company.
46. The table below summarises the annual financial benefits of providing the units at intermediate rent within the HRA:

<b>Renting through HRA</b>	<b>£</b>
HRA Rental Income	(301,400)
Void & Bad Debts (3%)	9,042
Marginal Management Cost	3,600
<b>HRA Net Rental Income</b>	<b>(288,758)</b>

47. If the company route was chosen then the projected annual financial impact on the council is as shown within the table below:



<b>Renting through the Housing Company Benefit to the Council</b>	<b>£</b>
HRA - Sub-lease income	(200,000)
HRA - Net Management income	(18,540)
HRA - Net Maintenance income	(540)
GF - Provision of services to the Company	(15,000)
GF - Dividend from Surplus	(20,000)
	<b>(254,080)</b>

### **Staffing issues**

48. The staffing implications will be minimal. The 36 units will be managed by the Area North Resident Services team.

### **Legal implications**

49. Officers have considered the broad legal implications of all the options for letting these 36 studio units at Churchyard Row. Detailed implications are included below in the supplementary advice from the Director of Law and Democracy.

## **SUPPLEMENTARY ADVICE FROM OTHER OFFICERS**

### **Director of Law and Democracy**

#### ***Form of tenancy***

50. Any tenancy granted by the council to a residential occupier will be secure (ss 79-81 Housing Act 1985)<sup>1</sup>. This means that it will continue in existence unless the tenant breaches the tenancy or one of the other grounds set out in Schedule 2 HA1985 is satisfied. Such tenancies are intended to provide long-term, stable accommodation.
51. The council has the option of granting a time-limited secure tenancy under s107A HA1985. This must be at least 2 years in length and in most cases is required to be 5 years in length. This can be terminated at the end of the term without the need to satisfy one of the grounds in Schedule 2 HA 1985, but again an order for possession would be required. The landlord must follow a detailed termination procedure involving notice of termination and a review process: if this is not followed, or the landlord fails to grant a new flexible tenancy or seek possession at the end of the term, the tenancy will become a long-term secure tenancy: s107D HA1985.

#### ***Allocation***

52. Under Part 6 of the Housing Act 1996, an authority must have a scheme for determining priorities and procedures in the allocation of its housing (e.g. selection of secure tenants) and must not allocate housing except in accordance with that scheme (ss159 and 166A HA 1996). The council's Part 6 scheme gives effect to

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<sup>1</sup> Unless one of the exemptions in Schedule 1 to that Act applies: this allows the council to grant non-secure licences to homeless households, but none of the other exemptions apply to the options under consideration.

the legal requirement to give preference to certain groups of applicants, together with additional groups as a result of council priorities.

53. However the council may depart from this scheme where it instead puts in place a local lettings policy which prioritises particular groups of applicants for particular properties (s.166A(6) HA 1996). If the council wishes to ensure that it only lets particular council-owned properties to keyworkers, rather than in accordance with its 'Part 6' allocation scheme, it would need to devise, consult on and implement a local lettings policy to that effect.

### ***Rent setting***

54. As from 1 April 2020, the policy statement on rents for social housing (published in February 2019) will apply, via the regulator's rent standard. This sets conditions on rent setting in two categories: social rent (set by a formula, subject to a cap); and affordable rent (up to 80% of market rent subject to agreement with the Secretary of State, Homes England or the GLA).
55. There are a number of exceptions, which include intermediate rent housing offered to keyworkers under para 5.4(c) of the 2019 policy statement. Therefore the council could charge a higher rent to keyworkers from 1 April 2020.

### ***The requirements of the lease***

56. The lease acquired by the council has about 185 years left to run. It covers all the 115 dwellings acquired by the council (79 now in use at social rent and 36 studios). It states that the dwellings may not be disposed of except under assured shorthold tenancies or the equivalent in use in the market (Schedule 8 para 25).

### ***Planning requirements***

57. In the s106 planning agreement the 36 studio units are defined as 'Intermediate Market Rented Units'. These are described as '36 volumetric studio Residential Units being Affordable Housing Units to be leased or rented at not more than 80% of the rental value of Local Market Rents.' There is no lower threshold for the rents in the definition. This requirement would be satisfied if the council or a third party let the units at intermediate rents of 50% of market rents to keyworkers (assuming that target rents are around 35% of market rents).

### ***Consultation***

58. The decision to prioritise keyworkers for intermediate rent homes has already been consulted upon in the context of the Intermediate Rent Housing List. Again, as a result of the small number of units being considered in this report, it is not considered that a duty to consult arises again in this case, as a consequence of the general public law principles of fairness.
59. To put in place a local lettings policy so that the council can let the properties to keyworkers, outside of the Councils Part 6 allocation scheme, will require an appropriate consultation before the policy is finalised and implemented.

### ***Equalities issues***

60. In making these decisions the council must at all times consider the impact on groups of people with 'protected characteristics' under the Equality Act 2010. The

Act requires the council to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between different people.

61. The decision to prioritise working people will potentially disadvantage and therefore discriminate against groups with protected characteristics who are therefore less likely to be in work, such as disabled people, the elderly or women. Officers explain that they have considered this issue and believe that such potential discrimination is justified by the need to provide affordable accommodation for frontline keyworkers.
62. Further the layout of these particular units may render them unsuitable for elderly or disabled people to use in any event, though the council would be required to make 'reasonable adjustments' if the particular circumstances required it.

#### **Strategic Director of Finance and Governance (H&M19/150)**

63. Implementation of the new Rent Standard from 1 April 2020 provides the council with new powers to assist keyworkers through the provision of affordable housing at intermediate rent levels. One bedroom studio properties have been acquired at Churchyard Row that are ideally suited to pilot a scheme in line with the council's commitment to provide housing that is affordable to its keyworkers who are finding it increasingly harder to live in the borough because of rising rent levels in the private rented sector. It is anticipated that the pilot scheme will also benefit the council in alleviating some of the recruitment and retention challenges it faces particularly for its newly qualified teachers and social workers. The flexible fixed term tenancy of three years will help to maintain a regular supply of affordable housing over the longer term, whilst allowing sufficient time for tenants to save for their next home. As outlined in the financial implications section of the report, the proposed rent levels at 50% of market rent for the 36 units would provide an income to the HRA of approximately £300k a year, and net income after marginal management costs of £289k.

#### **BACKGROUND DOCUMENTS**

<b>Background Papers</b>	<b>Held At</b>	<b>Contact</b>
Intermediate rent housing list - feedback on the consultation and agreeing the next steps	Southwark Council Housing Strategy	Robert Weallans <a href="mailto:Robert.weallans@southwark.gov.uk">Robert.weallans@southwark.gov.uk</a> <a href="http://moderngov.southwark.gov.uk/ieDecisionDetails.aspx?ID=6878">http://moderngov.southwark.gov.uk/ieDecisionDetails.aspx?ID=6878</a>
London Borough of Southwark Tenancy Strategy	Southwark Council Housing Strategy	Robert Weallans <a href="mailto:Robert.weallans@southwark.gov.uk">Robert.weallans@southwark.gov.uk</a> <a href="http://moderngov.southwark.gov.uk/documents/s34611/Appendix%201.pdf">http://moderngov.southwark.gov.uk/documents/s34611/Appendix%201.pdf</a>

#### **APPENDIX**

<b>No.</b>	<b>Title</b>
N/A	

## AUDIT TRAIL

Cabinet Member	Councillor Kieron Williams, Cabinet Member for Housing Management and Modernisation		
Lead Officer	Michael Scorer, Strategic Director of Housing and Modernisation		
Report Author	Robert Weallans, Housing Strategy Manager		
Version	Final		
Dated	12 March 2020		
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
Cabinet Member		Yes	Yes
Date final report sent to Constitutional Team			12 March 2020