



CABINET

11 July 2012

Subject Heading:

Localisation of Council Tax Support

Cabinet Member:

Cllr Ramsey

CMT Lead:

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Group Director, Finance & Commerce

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Policy context:

Financial summary:

The proposed options in this paper seek to address the £1.9 million reduction in government grant as a result of the change to a local scheme

Is this a Key Decision?

No

Is this a Strategic Decision?

Yes

When should this matter be reviewed?

September 2012

Reviewing OSC:

Value

The subject matter of this report deals with the following Council Objectives

Ensuring a clean, safe and green borough	<input type="checkbox"/>
Championing education and learning for all	<input type="checkbox"/>
Providing economic, social and cultural activity in thriving towns and villages	<input type="checkbox"/>
Valuing and enhancing the lives of our residents	<input checked="" type="checkbox"/>
Delivering high customer satisfaction and a stable council tax	<input checked="" type="checkbox"/>

SUMMARY

The Welfare Reform Act 2012 will abolish the national Council tax Benefit scheme from April 2013 and the Local Government Finance Bill currently making its way through Parliament will enable Local Authorities to design their own local council tax support schemes.

This report brings to Cabinet's attention, eight options from which a local Council Tax Support Scheme can be developed.

A key issue for the Council will be developing and delivering a local scheme where the Government grant allocation has been reduced by 10% (£1.9 million).

Cabinet are asked to consider and be aware of the implications and risks associated with all eight options and also the risks generally associated with a local scheme as defined in the Risk Appendix D attached.

RECOMMENDATIONS

1. That Cabinet note the financial pressure of a £1.9m reduction in government grant for council tax support in 2013/4.
2. That Cabinet authorise consultation with the Greater London Authority on the Options with our preferred option being Option 8.

REPORT DETAIL

1. Background

- 1.1 At the 2010 Spending Review, the Government announced that it would localise support for council tax (CTS) from 2013 and that expenditure allocated to CTS would be reduced by 10% compared to council tax benefit expenditure.
- 1.2 As part of the Welfare Reform Act 2012, the national council tax benefit scheme (CTB) will be abolished from April 2013. The Department for Communities and Local Government (DCLG) under the Local Government Finance Bill have proposed local schemes to support residents with their council tax to be administered by local authorities.
- 1.3 Funding and financial implications have also been considered in light of papers provided by the DCLG and documented in the Financial Implications and Risks areas of this report.
- 1.4 The DCLG have published papers which set out the principles of the scheme and policy intentions and these are summarised in this report.

2. Principles of the Local Council Tax Support Scheme

- 2.1 The principles and policy intent of the scheme can be summarised as follows:
 - Local authorities will be expected to manage the 10% reduction in subsidised expenditure.
 - Regulations will be set to protect claimants of state pension credit age.
 - Local authorities must consult on their schemes with precepting authorities and the public.
 - Local authorities may collaborate to develop joint schemes.
 - The Council must adopt the final scheme before 31 January 2013 or the default scheme will apply.
 - Local authorities should aim to protect vulnerable groups.
 - In developing schemes, local authorities should consider incentivising claimants into work.

3. Breakdown of Current Council Tax Benefit Customer Profile

3.1 The table below provides a profile of the residents who currently claim council tax benefit at May 2012.

Type of customer	Number	Yearly (£) Expenditure	% of Total Expenditure
Pensioners	8,860	£9,033,500.76	47%
Working Age	10,313	£10,144,382.32	53%
Total CTB caseload	19,173	£19,177,883.08	100%

Working Age Breakdown

Not in work claimants (IS /JSA/ESA)	6,954	£7,284,396	38%
In work Claimants	3,359	£2,859,986	15%
Working Age Totals	10,313	£10,144,382	53%

Working Age Claimant Groups

Lone Parents with children under 5	1,685	£1,589,920	8%
Single claimants	8,275	£7,722,355	40%
Disabled claimants	1,790	£1,736,581	9%

Working Age Benefit Claim

Type			
Council Tax Benefit only claims	1,577	£1,780,344	9%
Council Tenants (HB&CTB)	4,097	£3,760,794	20%
Private Tenant (HB &CTB)	4,639	£4,603,244	24%
Working Age Claim Type Total	10,313	£10,144,382	53%

3.2 Please note that the 'Groups' data is not mutually exclusive. For example, 'single claimants' are also included in the totals for 'Disabled' & 'Lone Parents' categories.

3.3 This particular analysis was devised in order to identify particular groups that the Council may wish to protect as 'vulnerable' e.g. lone parents with children under five or claims that have disabled markers on the benefit system. Thus a claimant could well be single but also be in the disabled group. Consequently, because of this overlap, the 'Group' totals are not meant to balance back to the overall working age total of 10,313.

4. The Current Council Tax Benefit Scheme

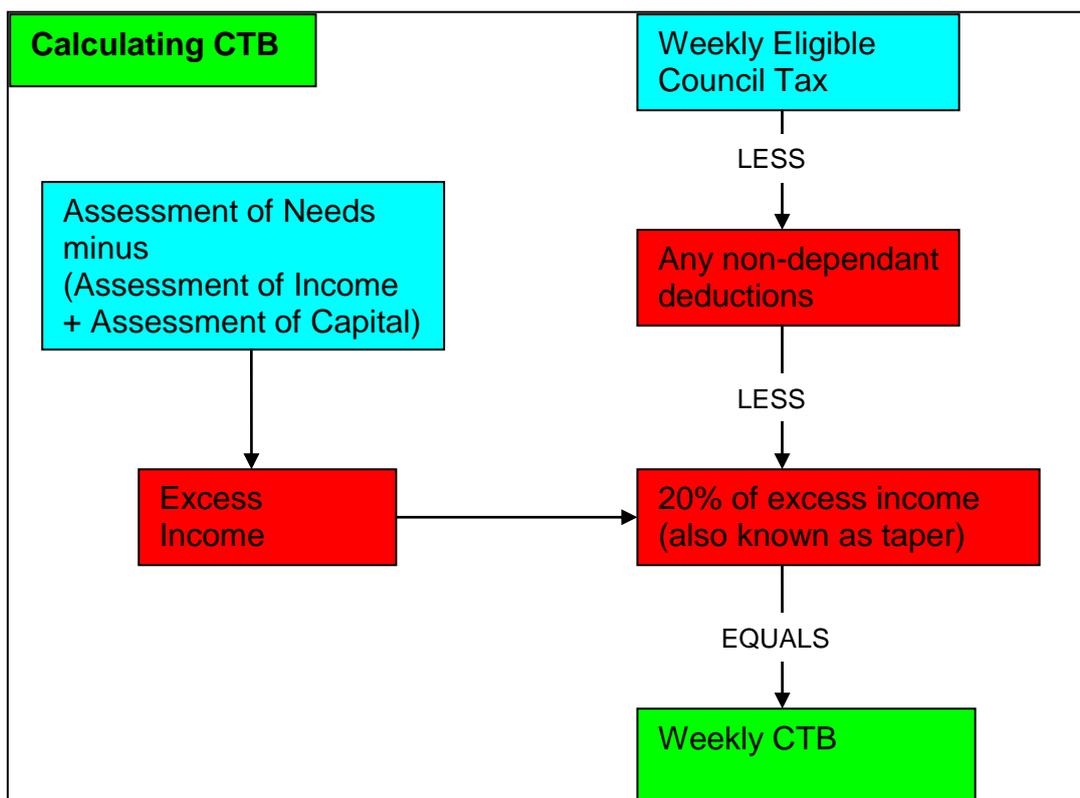
4.1 A brief high level account of how council tax benefit is calculated is set out below. This will assist in providing an understanding of the options which will inform the Local Council Tax Support Scheme that are set out later in this report. In addition, a Glossary is attached at Appendix C to explain benefit technical terms.

4.2 The council tax benefit scheme is a national scheme which has been in place since the introduction of Council Tax in 1993. The scheme is governed by legislation, case law and statute.

4.3 To work out a claimant's entitlement to benefit, the following calculation is used.

4.4 The Council Tax Benefit Calculation

- 4.5 The starting point for all calculations of Council Tax Benefit is the claimant's 'maximum benefit'. This is the claimant's weekly eligible Council Tax less any non-dependant deductions that apply.
- 4.6 Income and capital are compared to the claimant's applicable amount. Any income over the applicable amount is known as the Excess Income.
- 4.7 The claimant qualifies for maximum benefit less 20% of any excess income figure. The 20% reduction to the maximum benefit is known as a taper.
- 4.8 Claimants in receipt of Job Seeker's Allowance and Income Support have already been assessed by the DWP as having income lower than their applicable amount and so will receive maximum benefit less any non-dependant deductions.



5. Options for the New Local Council Tax Support Scheme

- 5.1 The proposed framework of any scheme adopted should have due regard to the DCLG's policy intentions and must unequivocally protect pensioners. Accordingly, a 10% reduction in expenditure shared amongst working age claimants only, increases the reduction to 18%.
- 5.2 A number of options have been worked up that create the base scheme designs and it is felt the following eight options provide a good range from which short listing and consultation could take place.
- 5.3 The eight options listed below do not all meet the target 10% reduction in expenditure. However, some can be separated into component parts and combined with other options to develop the optimal scheme for Havering.
- 5.4 A surplus or contingency has been built into some of the options below to allow for a hardship fund to assist vulnerable households or to mitigate unexpected increases in demand for council tax support from low income residents.

- 5.5 The figures we have used for initial modelling are based on expenditure for active benefit claims in 2011/12. The financial figures included in the initial modelling should be treated as indicative only as they are formulated on assumptions based on current and historical activity levels.
- 5.6 It is important to note that in any final scheme, expenditure may be higher than the figures provided here. Therefore more detailed analysis and verification of the data used will be required to accurately determine the reduction.
- 5.7 Two different tools for profiling the Havering caseload have been used in this paper to provide the range of choices available from which Cabinet Members can make informed decisions. However, a consequence of using two different tools is that there will be minor differences in the data that has been presented depending on which tool has been used.
- 5.8 The CLG calculator that has been provided to local authorities uses caseload extract data which is reported to the Department of Work & Pensions. This calculator currently holds data for 2011/12 and the lower expenditure gives a projected saving required of £1.8 million.
- 5.9 A more recent tool bases the calculations on 2012/13 expenditure and consequently the projected saving required is £1.9 million.
- 5.10 Both tools are complimentary in that they provide the scope to test a variety of schemes at this stage in the process. Once a scheme has been selected in principle, further analysis can be conducted to consider the full implication on the current benefit caseload with more accuracy.
- 5.11 A further modelling toolkit which extracts data directly from the core council tax and benefit databases to allow full and more accurate modelling will become available shortly.
- 5.12 Please see Appendix A for details of the eight options from which a shortlist is requested for consultation. A number of case studies are provided and attached at Appendix B to draw Member's attention to how individual claimants will be affected by the Options,

6. Options Summary

- Option 1. This option does not change the current Council Tax Benefit scheme and requires the savings of £1.9 million to be funded through reserves. Claimants and council tax payers would not be affected by the 10% reduction.
- Option 2. By restricting liability across each band to 80% of the council tax liability, a projected saving of £1.9 million could be made. This would impact all working age claimants below the age of 60 years of age.
- Option 3. This option reduces each working age claimant's benefit award by 18% and makes projected savings of £1.8 million. Working age claimants only would be impacted by this option.

Officers recommend Option 3. is shortlisted for consultation with the GLA because it evenly distributes the reduction in benefit between all 10,313 working age claimants and does not disproportionately impact any single vulnerable group.

Option 4. In this option, working age claimants who are in work would be affected by the proposed calculation along with any claimant who has an adult living in their household. Additionally, claimants' benefit would be restricted to a maximum of £20.57 per week. This would make a projected saving of £1.8 million.

Option 5. Savings projected at £1.8 million could also be gained from this option that affects working age claimants only. This option is similar to option 4 as it changes the way in which benefit is calculated but has a less harsh effect on those in work.

Option 6. The Council Tax Technical Reforms are currently making their way through the Houses of Parliament via the Local Government Finance Bill. This option forecasts savings of £1.8 million based on those reforms becoming statute and will affect people who have second homes.

Option 7. £1.85 million projected savings can also be made by increasing the council tax charge. This would affect all taxpayers who are not in receipt of maximum council tax benefit.

Officers also recommend Option 7 is shortlisted for consultation with the GLA as it evenly distributes a £22 per year rise in Council Tax to all chargeable properties in the borough.

Option 8. This option combines a restriction in benefit to a weekly Band D charge, increases non dependant deductions and reduces certain exemptions to zero per cent. A projected saving of £1.8 million is proposed under this option.

6.1 Officers recommend Option 8 is also shortlisted for consultation with the GLA as it combines elements which propose minimal impacts on working age claimants and taxpayers with only one home. It is also reasonable to expect working adults residing with the claimant to make a contribution to the council tax through an increased non dependant deduction.

6.2 In order to present the GLA with the principles behind a true range of variable options, it is recommended that Options 3, 7 and 8 are taken forward to the formal consultation process.

6.3 The table below summarises the eight options above. Appendix A provides a more detailed breakdown of the options and associated risks.

Option	Projected Saving £	Impacts
1. Absorb 10% reduction into council financial reserves.	1.9 mil	No impact on Council Tax Benefit claimants or wider Council Tax
2. Restrict Council Tax liability to 80% for benefit purposes.	1.9 mil	All working age Council Tax Benefit claimants
3. Reduce Council Tax Benefit by 18%	1.8 mil	All working age Council Tax Benefit claimants
4. Restrict benefit to average band D award, increase taper & non dependant deductions	1.8 mil	All working age Council Tax Benefit claimants, particularly those with non dependants in household.
5. Restrict benefit to average band D award, increase taper & non dependant deductions, reduce premiums	1.8 mil	All working age Council Tax Benefit claimants
6. Increase Council Tax in line with technical reforms.	1.8 mil	Direct impact on the wider Council Tax collection for residents with certain discounts and exemptions
7. Increase Council Tax for all tax payers by £22 per year.	1.85 mil	All residents in borough not claiming maximum CTS (approx 87,000)
8. Restrict benefit to band D, increase non dependant deductions, increase council tax for second homes in line with technical reforms.	1.8mil	Working age claimants who have non dependants or who reside in properties banded E to H. Also affects people who have second homes or homes that are not inhabited

7. Working in Partnership to Deliver local Council Tax Support Schemes

7.1 The Council is working in partnership with the London Boroughs of Barking, Redbridge, Waltham Forest and Newham Council Tax & Benefit Services to deliver their local council tax support schemes on time.

7.2 The partnership is working together to share and maximise resources and knowledge and have jointly recruited a Benefits Expert Co-ordinator who will manage the project implementation. The Coordinator will assist in a number of activities such as drafting plans, communications strategy including consultation and publicity.

7.3 Consultation and publicity as much as possible will be consistent and aligned with our colleagues in the North East London Partnership.

8. Consultation

8.1 With regard to consultation, the Government, in Schedule 4 of the Local Government Finance Bill require consultation with major precepting authorities, which in Havering's case is the GLA. Billing Authorities are also required to consult the public once a draft scheme has been determined.

8.2 The Council will formally consult with the Greater London Authority ahead of the consultation with residents and others who will be affected as detailed in the Consultation Plan attached at Appendix F.

- 8.3 The period of consultation in the *Government's code of practice on consultation* is twelve weeks. However, billing authorities may reduce this period where timescales are restricted and this is the case with regard to developing a Local Council Tax Support Scheme. The project plan has allowed only six weeks for consultation because of limited time overall to introduce the scheme which will be subject to Cabinet approval.
- 8.4 Consultation on the design of the local scheme design will commence in October 2012.

9. Set Up, Development and Administration Costs

- 9.1 To efficiently administer the proposed Council Tax Support Scheme in addition to the Council Tax Benefit Scheme for people of pensionable age and the Housing Benefit Scheme will have major implications on Council resources.
- 9.2 Customer Services will consider the implications on the administration of the new scheme and incorporate the outcomes for reporting to September Cabinet.
- 9.3 Government have indicated in their paper *New burdens doctrine – Guidance for government departments*, that “all new burdens on local authorities must be properly assessed and fully funded by the relevant department”.
- 9.4 The DCLG have already made available costs in the sum £84,000 to set up the local council tax support scheme.
- 9.5 The Government is committed to keeping council tax down and to ensuring that reasonable net additional costs of all new burdens is assessed and fully funded. These will include any one-off implementation costs, set up and transition costs as well as recurring costs for the first three years.

10. Local Authorities to Grow Their Local Economy

- 10.1 The Government has proposed that:

Including funding for council tax support within the business rates retention scheme provides a strong incentive for local authorities to grow their local economy and opportunity to increase their income from increases in business rates. This will increase the funding available for local services or help reduce council tax for some or all tax payers. By strengthening the incentive to grow the local economy it will help create jobs which will reduce poverty and demand for support with council tax.

- 10.2 Opportunities to increase the business base in the borough are being considered through the development of a Business Growth Strategy. The delivery of this strategy will be important in retaining and potentially growing income from Business Rates.
- 10.3 In addition, the Cabinet may wish to consider whether the development of employment support initiatives should be considered to support people back into work to potentially reduce the overall call on Council Tax relief. In particular programmes which support people recently made redundant back into work before they become long term unemployed would compliment the range of schemes offered through Jobcentre Plus and the work programme, which are targeted at long term unemployed people.

11. Timetable for Implementation

11.1 The timetable for implementation of the scheme is very challenging. A scheme must be approved by Members before 31 January 2013.

11.2 A detailed project plan has been developed to identify the activities necessary to expedite the development and implementation of a new local Council Tax Support Scheme.

11.3 The table below identifies key milestones by which Activities must be completed.

Identify initial options	Completed
Review financial implications of scheme using council tax support module.	1 July 2012– 1 August 2012
Cabinet Agree principal options.	11 July 2012
Brief Senior Management and Officers regarding agreed options.	12 July 2012
Arrange briefings for staff including back office, frontline customer services and other depts.	12 July 2012 – 31 March 2013
Consult with GLA on options and scheme design.	16 July 2012 - 6 August 2012
Set framework and document policy for New Scheme administration.	16 July 2012 – 1 October 2012
Prepare Guidance Manual	16 July 2012 – 17 December 2012
Prepare consultation which will enable residents to comment on the proposed final scheme	16 July 2012 - 24 September 2012
Draw up staff training plan, liaising with in house customer service trainers	3 September 2012 - 30 September 2012
Prepare initial Publicity, initially focusing on advising Havering residents & Council Tax payers of the new localised scheme	3 September 2012 - 16 September 2012
Cabinet approve draft final scheme.	26 September 2012
Publish Draft Final scheme	1 October 2012

Prepare final scheme publicity including detailed article and press statements.	1 October 2012 – 31 January 2013
Consultation period on Draft Final scheme with residents, including meeting with external providers/partners	4 October 2012 - 14 November 2012
Convert software and data, engaging with software supplier, Capita and in house ICT department.	29 October 2012 – 6 January 2013
Prepare Appeals procedure	5 November 2012 - 6 January 2013
Prepare Overpayment procedure	5 November 2012 - 6 January 2013
Prepare Fraud procedure	5 November 2012 - 6 January 2013
Consultation analysis of responses received. Outcomes to be published separately to wider public.	14 November 2012 - 1 December 2012
Identify and contact Customers affected, draft and issue information letter to affected households	9 December 2012 – 6 January 2013
Undertake Staff Training	17 December 2012 – 3 March 2013
Cabinet Approve the Final Scheme	23 January 2013
Publish Final Scheme	1 February 2013
New Localised Council Tax Support Scheme comes into force.	1 April 2013

REASONS AND OPTIONS

Reasons for the decision:

This report arises as a result of the Local Government Finance Bill 2012 which requires the Council to design a Local Council Tax Support Scheme to support people who are liable to pay Council Tax and are in financial need.

Other options considered:

The options available are summarised in the detail of the report above and a more detailed explanation is provided in Appendix A .

IMPLICATIONS AND RISKS

Financial implications and risks:

The DCLG in their paper, Localising Support for Council – Funding arrangements consultation was issued in May 2012. This document sets out how the Government intends to distribute funding to support local schemes and that expenditure is reduced by 10% from 2013-14.

The funding for council tax support will be set at 90 per cent of the forecast subsidised council tax benefit expenditure for 2013-14. The Greater London Authority (GLA) element of the grant will be allocated directly to them by DCLG. An illustrative figure of £13,564k has been used which does not include the funding attributable to local precepting authorities, the GLA. DCLG advise final allocations will likely differ both in amount and also in the relative distribution between authorities.

The GLA have assumed that their allocation will be £3.48mil and have based this figure on the actual benefit subsidy expenditure for 2010-11. These figures are also illustrative to assist the Council forecast demand for the council tax support in 2013-14. The assumed funding for council tax support inclusive of the 10% Government reduction is therefore £13,564k plus £3.48 mil which equals £17.04 million.

The DCLG will make funding available to billing and precepting authorities based on 90% of the forecast council tax benefit expenditure for 2013-14. Currently, subsidised benefit expenditure is forecast at £19.1m therefore the 10% would equal £1.9m.

The Government is providing funding via the retained business rates system to strengthen the incentives for authorities to grow their local economy and help residents back into employment.

The GLA council tax portion is 20.42% and they share the 10% reduction with local authorities and will be funded directly from the DCLG.

The GLA also now share the risk in uncollected council tax and unexpected increases in caseload. An increase in the GLA precept is not anticipated in the first year of CTS.

There are a significant number of risks to the successful implementation and operation of a localised Council Tax Support Scheme. These can be separated into scheme options which are individually reflected in the eight options at Appendix A and those relating to policy and project management which are attached to Appendix D.

Whichever options are selected for further scrutiny, there is a core risk that these changes could result in an increase in council tax arrears thus affecting the council's collection fund. Any adverse impact of these changes would result in a deficit position on the fund which would be required by statute to be funded between the London Borough of Havering and the Greater London Authority during the budget setting process 2014/15 onwards. This is a risk that will be added to the Risk Analysis for mitigation.

There is a significant financial risk that the options under consideration do not deliver the level of savings required. The actual savings achieved will depend upon the extent to which outcomes match our assumptions (which are based upon historic data). Financial outcomes may depend upon a complex range of inter-related factors including customer resistance and benefit eligibility.

In view of the financial risks involved it would be sensible to build in a level of contingency. This may require some changes to the preferred options to deliver increased savings or an increase in the central contingency (or a combination of both). Changes to the central contingency will of course have wider implications for the development of the MTFS and Council Tax setting.

It is also recognised that a new local scheme may be manipulated to avoid or reduce council tax thereby increasing the risk of potential for Fraud. This is highlighted in the Risk Analysis and a review of the robustness of monitoring arrangements and controls will be required.

Due to the nature of the local council tax support scheme and funding allocation passing to local authorities, there is a risk of increases in either numbers of claims or value of claims (or both). That being the

case, the financial risk associated with the local scheme now falls on the local authority.

Due account will need to be taken of this as part of the Council's budget strategy and reflected in the budget setting cycle for 2013/14.

The number of people reaching pensionable age and the pensionable population in Havering is high. The protected pensioner caseload is very likely to increase as a result of this and add further financial risk to the Council. This risk will be recorded in the Risk Register.

A Risk Appendix D is attached which outlines the policy, project and scheme implementation risks along with comments on mitigation.

Legal implications and risks:

The Local Government Finance Bill introduces a requirement for Billing Authorities to create a new local scheme for Council Tax Support by 31 January 2013 and be effective from 1 April 2013. Whilst this has not been through all relevant stages in Parliament, given the short timescales involved it is advisable that the Council act as if it is to be passed in its current form. However, there is a risk that the final version differs in a material respect and if that does occur then a further report may be necessary. Officers will keep the passage of the Bill under close review.

The local Council Tax Support Scheme will replace the national Council Tax Benefit Scheme which will be abolished by the Welfare Reform Act 2012 from April 2013.

The Bill will require Billing Authorities to consult on any proposed scheme as part of the scheme's development as follows:

Schedule 4 paragraph 3 (1) " Before making a scheme, the authority must (in the following order)—

- (a) consult any major precepting authority which has power to issue a precept to it,
- (b) publish a draft scheme in such manner as it thinks fit, and
- (c) consult such other persons as it considers are likely to have an interest in the operation of the scheme.

There are therefore two stages to the consultation requirements. Firstly with the major precepting authority, then once the final draft scheme has been determined with the public. A consultation must be meaningful in that it must be undertaken at a stage when consultees can influence the final decision and enough time and information must be given to enable them to respond properly.

The Bill further determines for Council Tax Support expenditure to be reduced by 10% although Pensioners are fully protected. The Council

also has an obligation to consider other vulnerable groups in any scheme it puts forward.

Policy statements and detailed guidance must also be developed along with an amendment to the Constitution that reflects this new local scheme policy.

Human Resources implications and risks:

The introduction of a new local scheme will require a detailed training plan and strategy to develop staff awareness and support them through the transition from Council Tax Benefit to Council Tax Support. Staff will also require briefings throughout implementation as the options develop into a local scheme. This is contained within the Project Plan.

Customer Services will consider the implications on the administration and commit in their Business Plan to develop a strategy in partnership with staff and Human Resources.

There is a short to medium term risk of significant queries arising from council tax support claimants at the start of April 2013. This is highlighted in the Risks Analysis and mitigation should be considered.

There are no human resource implications arising directly from this report.

Equalities implications and risks:

The chosen Local Council Tax Support Scheme will be a new policy that requires an equalities assessment.

The local scheme should also take note of the DCLG guidance note: Localising Support for Council Tax - Vulnerable people – key local authority duties which was published on 21 May 2012. This is intended to address the requirement to take into account the following duties.

The Public Sector Equality Duty (and *The Equality Act 2010*) requires local authorities to have clearly defined responsibilities in relation to, and awareness of, those in the most vulnerable situations. This means that a local authority must pay due regard and consider how a scheme might affect people who share a relevant protected characteristic and people who do not share it. Each of the eight options to be considered are the subject of detailed Equality Analysis.

The duty to mitigate effects of child poverty (*The Child Poverty Act 2010*): understanding the characteristics of low income and disadvantaged families. The omission of child benefit income in the calculation of local Council Tax support goes some way to protecting children and again additional money from a discretionary fund could also help with this.

The duty to prevent homelessness (The Housing Act 1996) Those households who find themselves homeless through no fault of their own and who are eligible and in priority need are owed the main homelessness duty.

Armed Forces covenant: The DCLG also highlights the need to comply with the Armed Forces covenant. The current provision to fully disregard income received from the War Pension Scheme (£35,165 based on 2011/12 Subsidy expenditure) and Armed Forces Compensation scheme will remain in place in all of our proposed schemes.

The guidance note does not tell local authorities what they must do in their schemes to be compliant with their duties. It is important to note the need to demonstrate that the local Council Tax support scheme is compliant with the above acts and to document all work undertaken in this area.

In developing a local Council Tax Support Scheme Equality analysis is considered an integral part of the process. Each of the eight options have been the subject of an Equality analysis report which is attached in Appendix E.

The Equality analysis will be reviewed on a regular basis as the policy for the local scheme develops to ensure negative impacts are identified and minimised if not eliminated.

BACKGROUND PAPERS

Reference Documents

Localising Support for Council Tax – Funding arrangements consultation
Localising Support for Council Tax – A statement of intent
Localising Support for Council Tax in England - Government's response to consultation
Localising Support for Council Tax in England – Consultation
New Burdens Doctrine – Guidance for government departments

Appendices

Options Appendix A
Case Studies Appendix B
Glossary Appendix C
Risks Appendix D
Equalities Analysis Appendix E
Consultation Plan Appendix F