



# Havering

L O N D O N   B O R O U G H

## PLACES OVERVIEW & SCRUTINY SUB COMMITTEE AGENDA

**7.00 pm**

**Tuesday  
4 October 2022**

**Council Chamber -  
Town Hall**

Members 12: Quorum 5

### **COUNCILLORS:**

#### **Conservative Group (5)**

Robert Benham (Chairman)  
Osman Dervish  
TBC  
TBC  
TBC

#### **Havering Residents' Group (4)**

David Godwin  
Gerry O'Sullivan  
Natasha Summers  
Bryan Vincent

#### **Labour Group (2)**

Katharine Tumilty (Vice-Chair)  
Matthew Stanton

#### **East Havering Residents Group (1)**

Brian Eagling

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**For information about the meeting please contact:**

**Taiwo Adeoye - 01708 433079  
taiwo.adeoye@onesource.co.uk**

***Under the Committee Procedure Rules within the Council's Constitution the Chairman of the meeting may exercise the powers conferred upon the Mayor in relation to the conduct of full Council meetings. As such, should any member of the public interrupt proceedings, the Chairman will warn the person concerned. If they continue to interrupt, the Chairman will order their removal from the meeting room and may adjourn the meeting while this takes place.***

***Excessive noise and talking should also be kept to a minimum whilst the meeting is in progress in order that the scheduled business may proceed as planned.***

### **Protocol for members of the public wishing to report on meetings of the London Borough of Havering**

Members of the public are entitled to report on meetings of Council, Committees and Cabinet, except in circumstances where the public have been excluded as permitted by law.

Reporting means:-

- filming, photographing or making an audio recording of the proceedings of the meeting;
- using any other means for enabling persons not present to see or hear proceedings at a meeting as it takes place or later; or
- reporting or providing commentary on proceedings at a meeting, orally or in writing, so that the report or commentary is available as the meeting takes place or later if the person is not present.

Anyone present at a meeting as it takes place is not permitted to carry out an oral commentary or report. This is to prevent the business of the meeting being disrupted.

Anyone attending a meeting is asked to advise Democratic Services staff on 01708 433076 that they wish to report on the meeting and how they wish to do so. This is to enable employees to guide anyone choosing to report on proceedings to an appropriate place from which to be able to report effectively.

Members of the public are asked to remain seated throughout the meeting as standing up and walking around could distract from the business in hand.

## **What is Overview & Scrutiny?**

Each local authority is required by law to establish an overview and scrutiny function to support and scrutinise the Council's executive arrangements. Each overview and scrutiny sub-committee has its own remit as set out in the terms of reference but they each meet to consider issues of local importance.

The sub-committees have a number of key roles:

1. Providing a critical friend challenge to policy and decision makers.
2. Driving improvement in public services.
3. Holding key local partners to account.
4. Enabling the voice and concerns to the public.

The sub-committees consider issues by receiving information from, and questioning, Cabinet Members, officers and external partners to develop an understanding of proposals, policy and practices. They can then develop recommendations that they believe will improve performance, or as a response to public consultations. These are considered by the Overview and Scrutiny Board and if approved, submitted for a response to Council, Cabinet and other relevant bodies.

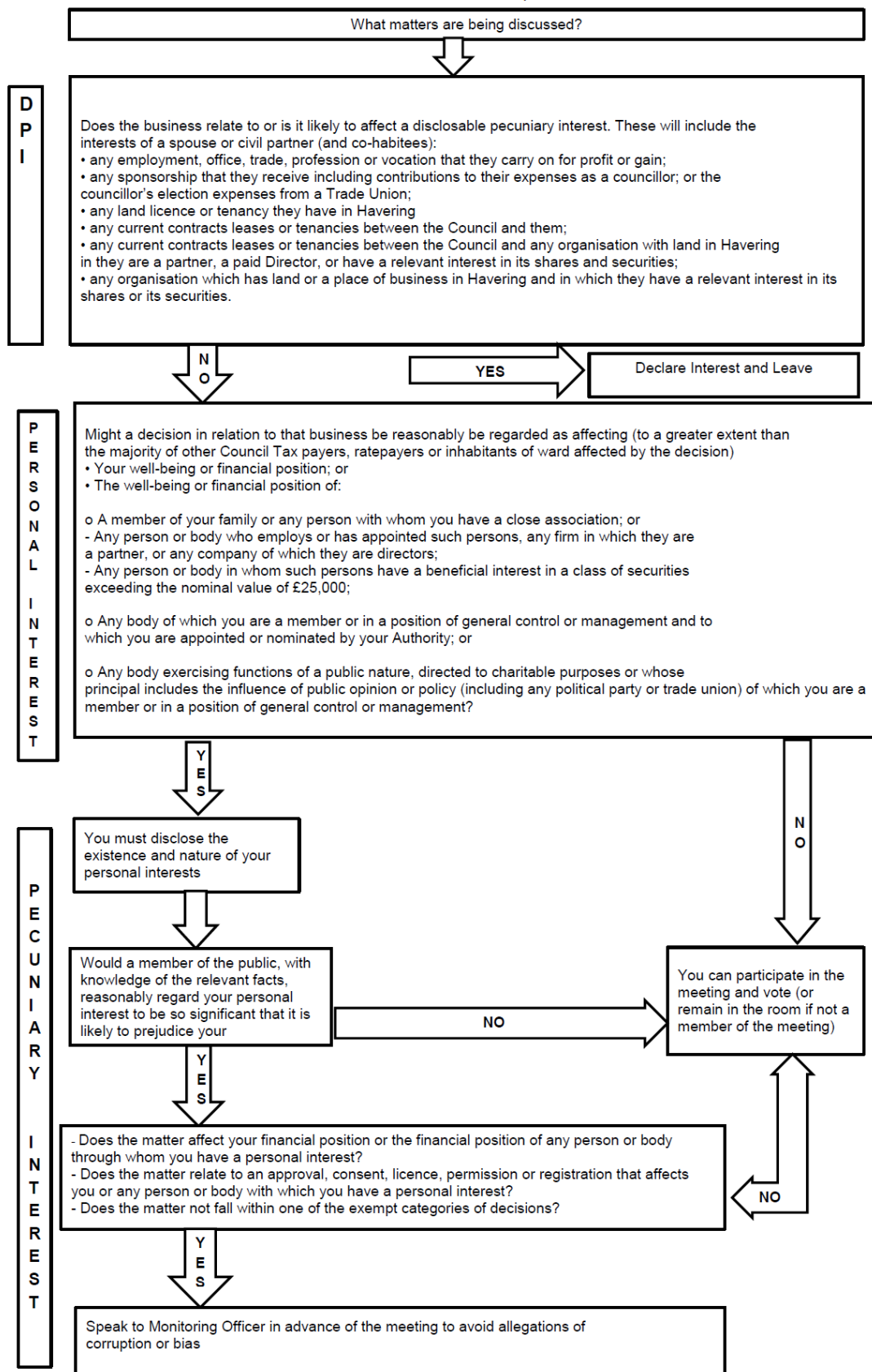
Sub-Committees will often establish Topic Groups to examine specific areas in much greater detail. These groups consist of a number of Members and the review period can last for anything from a few weeks to a year or more to allow the Members to comprehensively examine an issue through interviewing expert witnesses, conducting research or undertaking site visits. Once the topic group has finished its work it will send a report to the Sub-Committee that created it and will often suggest recommendations for the Overview and Scrutiny Board to pass to the Council's Executive.

## **Terms of Reference**

- Housing & Accommodation Services
- Land & Property Services
- Planning
- Building control
- Business Services
- Inward Investment
- Asset Management
- Property Services

- Facilities Management
- Sports
- Leisure
- Arts
- Music
- Libraries
- Heritage
- Parks & Open Space
- Highways
- Parking & Traffic
- Waste & recycling
- Climate Change
- Transport & Infrastructure

**DECLARING INTERESTS FLOWCHART – QUESTIONS TO ASK YOURSELF**



## **AGENDA ITEMS**

### **1 CHAIRMAN'S ANNOUNCEMENTS**

The Chairman will give details of the arrangements in case of fire or other event that may require the meeting room or building's evacuation.

### **2 APOLOGIES FOR ABSENCE**

To receive apologies for absence (if any).

### **3 DISCLOSURE OF INTERESTS**

Members are invited to disclose any interest in any of the items on the agenda at this point of the meeting.

*Members may still disclose any interest in an item at any time prior to the consideration of the matter.*

### **4 EMERGENCY PLANNING & LAUNDERS LANE (Pages 1 - 6)**

Report attached.

### **5 HOUSING TARGETS AND LARGER HOMES**

Report to follow if available.

### **6 HOUSING REPAIRS PERFORMANCE UPDATE (Pages 7 - 12)**

Report attached

### **7 HOUSING RESIDENT SAFETY AND COMPLIANCE PERFORMANCE (Pages 13 - 26)**

Report attached.

### **8 UPDATE REPORT - COST OF LIVING CRISIS THE AFTERMATH OF COVID 19 AND THE IMPACT ON HOUSING DEMAND (Pages 27 - 34)**

Report attached

**Zena Smith  
Democratic and Election  
Services Manager**

## PLACES OVERVIEW AND SCRUTINY COMMITTEE

<b>Subject Heading:</b>	Launders Lane (Arnolds Field)
<b>SLT Lead:</b>	Sandy Hamberger
<b>Report Author and contact details:</b>	Lilly Spillman - 01708 431942 lilly.spillman@haveirng.gov.uk
<b>Policy context:</b>	This relates to Borough's Places Theme and the council vision.

### SUMMARY

This high level report capturing the Corporate Emergency Planning involvement with the long standing Launders Lane site issues, was requested to enable Place Scrutiny Members to decide if they wished to undertake more in depth scrutiny of the issues and seek other partners' perspectives and responsibilities.

This summary will help members understanding, and seek assurance that the council has undertaken its responsibilities, through the avenues available to it, namely enforcement and legal ones, to help resolve the impact on residents.

The following gives a brief history of the impacts from 2000-todate, from a Corporate Emergency Planning lens, highlighting known incidents, together with an overview of the upcoming work underway, related to reducing the disruption that Launders Lane creates for the residents of Rainham and South Hornchurch announced by the Leader in response to the historic issues. This summary provides;

- A background on the site named Arnolds Field (commonly known as Launders Lanes) however, this history is patchy, with dormant periods.
- The Emergency Response to the large fire in July 2019 including the cost implications
- The London Fire Brigades position on responding to fires at Launders Lane
- The Forthcoming Launders Lane Actions from the August and early September meetings held to listen to residents' concerns and identify appropriate actions
- Advice to Members that options may be limited and potentially expensive given the complicated history issues, ownership and enforcement limitations associated with this site.

## **RECOMMENDATIONS**

Members are asked to discuss the summary below, with a view to deciding if they wish to undertake further scrutiny work.

Members would need to be clear of the scope of any further work and the outcomes they wish to achieve, and the information they require to progress this and the sources that could provide that.

## **REPORT DETAIL**

### **Background of Launderers Lane:**

The site of Arnolds Field, otherwise known as Launderers Lane, was originally a mineral extraction site. From planning records, in 2000, planning permission was granted by the Council to the site's previous owner to restore the land by importation of material and use as a community woodland.

In 2004 planning enforcement notices and a Stop Notice were served by the Council as excessive amounts of material had been brought onto the site at Arnolds Field. This enforcement notice was served to North London Developments Limited (48 Langham Street, London). It was believed that in certain places the material was in excess of 5m above the approved levels. The applicant appealed against that decision to the Planning Inspectorate and the appeal was dismissed in 2005.

The company which owned the site at that time, went into liquidation circa 2005-2006, consequently, there was nobody for the Council to prosecute against for non-compliance with the Enforcement Notice.

Between 2009 and 2011 there was some earth movement but no significant dumping of waste.

In 2012 the new owner of the land (at that time) was imprisoned for cultivating drugs on the site and being in possession of firearms, which was reported in the local press.

Between 2012-2016, significant quantities of waste was brought onto the site and either buried under, or deposited on top of the site. The Environment Agency led a criminal investigation at the time because their powers were the considered the most effective to achieve a prosecution.

The Environment Agency successfully prosecuted those responsible in 2017-2018. The defendants pleaded guilty and received custodial sentences, with one set suspended. The defendants were further subject to orders from the Proceeds of

Crime Act (POCA) and two were given additional custodial sentences as they could not meet the monetary orders against them.

The land is now currently owned by a different person/company to those who were prosecuted in 2017-2018.

**Corporate Emergency Planning Response July 2019:**

In July 2019, Havering Council were made aware of an incident at Launderers Lane that required a Local Authority Liaison Officer to attend. The fire at Launderers Lane required the support of some additional heavy plant to tackle the ongoing fire. At the time of the incident, London Fire Brigade (LFB) estimated that the fire could last in excess of 4 weeks if not tackled with an alternative approach. Whilst the details of the land owner were shared with LFB, they were unable to make contact with the owner.

A specialist contractor was used to provide bespoke support to LFB over the course of 4 days. The cost implication of the incident totalled £13,740.00 (inclusive of VAT). This cost was split 50/50 for the first 3 days between the London Borough of Havering and the Environment Agency. The fourth day was charged to just the Environment Agency.

The Pandemic brought a dormant period.

**Launderers Lane Meetings August 2022 – “To proactively explore options for resolving this historic and on-going Issue”:**

It is acknowledged that this has been a known complex issue that has blighted the lives of local residents for many years. At the July Council Meeting this was passionately raised, and the new Leader committed to undertaking meetings with residents and other parties to explore and identify any additional options that may be undertaken to mitigate the impact on residents. Subsequently meetings have been held with responsible partners and residents in August and the latest one on 6<sup>th</sup> September.

Launderers Lane is private land, and over the years, although the Council and the Environment Agency have taken action which against the previous owner, partly due to the change in landowners it has been difficult to achieve a satisfactory outcome.

Agencies are currently working together with the London Fire Brigade, the Environment Agency, Jon Cruddas MP and local councillors to explore options to resolve and improve the situation. Enforcement action is undertaken when offences have been committed, but does not offer a full resolution.

The Council's public health team have commissioned an independent company to monitor air quality arising from the site. Imperial College London have been appointed to undertake this work and this work, will take place imminently. This will monitor current and future air quality levels, and provide an analysis of historic

impacts. This approach is anticipated to provide evidence of any impact of the site from air quality that poses a risk to public health.

The Council are looking at repositioning of a fire hydrant, so it is easier for the LFB to manage the fires, although, currently, they are not causing physical danger to local people.

The Environment Agency have confirmed they do not have any legal powers to enforce against the current landowners.

The council believes it has, and is doing all it can to help residents with this issue, because it is private land, it is complicated and it is not easy to resolve. Havering's legal team are in the process of reviewing the legal powers open to the Council again.

Given the complexity of the issues, a number of agencies are working together and are committed to resolving this problem. This will not be a quick fix, evidence of impact must be gathered, along with costed options, and legal powers required alongside these have to be identified and considered. Residents will be kept informed as this work progresses.

## **IMPLICATIONS AND RISKS**

**Financial implications and risks:** There are no current financial risks known to the Local Authority. However, there is the risk that London Fire Brigade alongside multi-agency partners such as the Environment Agency may request a financial contribution to the response phase of a similar incident to the July 2019 fire. The cost of this previous incident for Havering was £4,725.00 + VAT. More recent fires have been dealt with by LFB within their existing resources and therefore we have not had any incidents since July 2019 that have financially impacted Havering council.

The long term financial implications from this site could include possible remuneration costs and options that would need to be considered by the organisation to aid in the possible reduction of impacts. This is not confirmed but it is a suggested options for consideration.

**Legal implications and risks:** The Local Authority could be subject to legal challenge from the residents of the immediate area and the site owners.

**Human Resources implications and risks:** There are no known HR implications or risks, except the ongoing support required from the Emergency Planning team and subsequent Local Authority Liaison Officers.

**Equalities implications and risks:** The Public Sector Equality Duty (PSED) under section 149 of the Equality Act 2010 requires the Council, when exercising its functions, to have 'due regard' to:

- (i) The need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- (ii) The need to advance equality of opportunity between persons who share protected characteristics and those who do not, and;
- (iii) Foster good relations between those who have protected characteristics and those who do not.

Note: 'Protected characteristics' are age, disability, gender reassignment, marriage and civil partnerships, pregnancy and maternity, race, religion or belief, sex/gender, and sexual orientation.

The Council is committed to all of the above in the provision, procurement and commissioning of its services, and the employment of its workforce. In addition, the Council is also committed to improving the quality of life and wellbeing for all Havering residents in respect of socio-economics and health determinants.

Health determinants are particularly relevant to Launderers Lane, this will be informed by the air quality impact commissioned and its findings.

#### **ENVIRONMENTAL AND CLIMATE CHANGE IMPLICATIONS AND RISKS**

The ongoing fires at Launderers Lane has implications on the air quality in the area of Rainham and South Hornchurch. As the landfill site includes a variety of waste, the risks associated with regular burning material is essential to be considered.

With increasingly hot summers and the likelihood and impacts of "grass fires" increasing, Launderers Lane is at greater risk of further and more regular fires.

#### **BACKGROUND PAPERS**

There are no background papers regarding this report at this time.

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## PLACES OVERVIEW AND SCRUTINY SUB-COMMITTEE

<b>Subject Heading:</b>	Housing Resident Safety and Compliance Performance
<b>SLT Lead:</b>	Patrick Odling-Smee
<b>Report Author and contact details:</b>	Garry Knights Assistant Director of Housing Property Services garry.knights@havering.gov.uk
<b>Policy context:</b>	For information only The report provide details of the new Repairs and Voids contract for Housing with Mears

### SUMMARY

1. The report is for information only, no decision is required.
- 1.1. The report provides an update to Places OSSC on the new Repair and Voids contract with Mears.

### RECOMMENDATIONS

2. Members note the report

### REPORT DETAIL

#### Background

3. The Council owns and manages circa 9,200 homes and circa 2,500 leasehold properties including 10 tower blocks and 1,000 medium and low rise blocks.

- 3.1. The Council undertakes circa 30,000 responsive repairs annually (excluding heating repairs which are under a separate contract) and works to circa 1,000 void properties (stock and PSL properties)
- 3.2. The Council's previous contract for delivering the responsive repairs works ended in March 2022 and following an extensive procurement Mears were appointed to a new 10 year contract to deliver the new service.
- 3.3. The procurement exercise gave us the opportunity to re-assess the requirements from the service, including improved use of technology, better end to end journey for our customers, better system interfaces, more stringent KPIs and an improved Social value offer.

### Mobilisation and TUPE

- 3.4. In order for the full end to end process to work effectively it was necessary to integrate the Council's Housing Management system, Open Housing, with Mears MCM system. This allows jobs to be raised by our call centre in Open and seamlessly pushed to MCM for planning and completion.
- 3.5. Significant work was undertaken by both parties to ensure this full integration and we now have complete visibility of the MCM system which allows us to interrogate all jobs, including looking at before, during and after photos, agree variations, approve jobs in much quicker and auditable way than previously.
- 3.6. A number of staff (front and back office) transferred across from the previous contract but not in sufficient numbers to provide the full service. Mears supplemented this resource with their Task Team, a specialist group of operatives who support mobilisation of contracts, whilst they recruited to the new service.
- 3.7. This has proved to be extremely challenging in the current economic circumstances, Mears have seen some turnover in the original transferred staff plus some new team members who have not fitted into the culture of the new service and have moved on. Mears have continued the recruitment drive but given the difficulties they are supporting the service with the Task Team to ensure the works in progress (WIP) remains in control and we move towards meeting our KPIs.
- 3.8. One of the reasons that the previous contract was not as effective as required was a lack of collaboration and we have worked hard to develop a joint delivery culture with the new service co-located at the CEME centre in Rainham. This has completely transformed the culture of the service and allows for quicker resolution of problems, more open dialogue around performance and a much greater understanding of each other's challenges.
- 3.9. Also co-located at CEME are members of the Council's call centre who are specialist repairs handlers. They sit alongside Mears planners and supervisors allowing them to appoint jobs at first point of contact and improving our ability to triage jobs, improving the journey for customers.

- 3.10. Mears have a full fleet of vehicles in place, with Havering preferred livery and a full material supply chain using local merchants.
- 3.11. Where Mears have found challenges have been around sub-contractors and securing those which provide the quality of performance and capacity to undertake works. Given the current high demand in the sector coupled with a low supply of labour, and the challenges of rising prices across all areas this has been one of the most difficult aspects, but is now improving.

### Current Performance

- 3.12. The Council have a clear plan for the repairs service and have set some very challenging goals which have the full commitment of Mears
- To meet all of our KPIS by 1 - 2
  - To be the best repairs service in London in year 2 - 3
  - To be the best repairs service in England by year 3 - 4



- 3.13. The first 6 months of any new contract are very much a bedding in process, development of approaches, clarifying any areas of ambiguity especially around voids, staff and sub-contract recruitment and therefore formal performance figures tend not to show significant improvement during this period. Accordingly our main measures for the Mears contract to date have not hit target.

Measure	Performance	Target
<b>Emergency jobs completed on time (attended 2 hours and made safe 4 hours)</b>	91.61%	100%
<b>Urgent jobs completed on time (3 days)</b>	61.04%	97%
<b>Routine jobs completed on time (28 days)</b>	89.33%	95%
<b>Average void days with repairs</b>	39 days	8 and 16 days
<b>Customer Satisfaction</b>		95%
<b>Havering Data</b>	80%	
<b>Mears data</b>	79%	

- 3.14. Emergency and Routine repairs are moving towards their targets, but remain challenging due to the recruitment difficulties across the sector, and as such Mears will continue to support the service with their Task Team.
- 3.15. In order to provide the best service to our customers we aim to hold circa 1,000 jobs in WIP which represents around 2 weeks of work. Our WIP is currently 1916 but with all mobilisations there is always a period of crossover between contractors in which jobs move between systems and contracts and Mears have had to deal with this alongside new demand.
- 3.16. Due to the storms in February we had a large number of fencing jobs which were handed over to Mears and this backlog has made bringing the WIP down to our target more difficult. Mears have now brought in additional specialist resource to deal with new fencing jobs which remain a high volume area of work.
- 3.17. The urgent jobs performance (such as partial loss of electric, containable/controllable leak) reflects the disproportionality large number of jobs which are incorrectly raised as urgent and we are working with the call centre and Mears to improve the triage and messaging to customers, through better call scripts, video call triaging and communication with residents.
- 3.18. The voids performance is reflective both of the sheer number of voids Mears have had to complete and the difficulty they have had recruiting high quality sub-contractors in the current market conditions.
- 3.19. There is a detailed plan in place to bring the open number of voids down and Mears have already reduced the number to the lowest level the Council have had in several years. As at the end of August we had 79 voids in WIP, needing to bring this down to circa 60 voids in order to meet the turnaround times of 8 days for small voids and 16 for those which involve decent homes work.
- 3.20. A robust customer satisfaction approach has been introduced with Mears giving residents options on how they would like to provide feedback (on the doorstep, paper survey via post, email, text) and this is also followed

up by the Council undertaking a separate telephone survey, average performance to date is shown in the table above and largely correlates.

- 3.21. We are still dealing with some legacy issues from the previous contract but customer satisfaction is improving toward the target.
- 3.22. The Council is working with Mears to develop the social value offering, we included a significant suite of requirements which will be delivered over the term. We will work with Councillors to identify suitable projects and consider those which join up other social value offers to ensure we maximise local opportunities.
- 3.23. During this initial mobilisation Mears are recruiting three apprentices from within the borough, they attending the Housing fun days, they provided a cooker for an elderly vulnerable resident who had no cooking facilities and they are about to work with the Harold Hill Wombles on some estate work in the Harold Hill area.

#### Future Development

- 3.24. In order to reduce the demand on the repairs service, which is the most disruptive and costly approach to maintenance, we need to move to a more proactive service, which gets ahead of likely problems
- 3.25. The Council is currently re-introducing cyclical decorating programme and gutter and drain clearance programmes but will also be looking to introduce a property MOT approach with Mears.
- 3.26. This is a proactive approach in which operatives visit a property and undertake checks and minor repairs across the whole property, largely in low cost high use items such as window and door handles, kitchen door and drawer adjustments, taps and traps checks with the aim of eliminating the need for future responsive repairs. We will initially look at high and low users of the repairs service and this approach will also allow us to capture some stock condition data to inform future planned programmes of work.
- 3.27. The Council are also working with Mears on developing some other areas of planned preventative works, especially around fencing and hardstanding's which cause significant concerns to residents when left on a reactive basis.
- 3.28. The Council is also continuing to further improve the IT integrations, including direct access to our asset management system (Keystone) and our finance systems to streamline efficiencies of service

<b>BACKGROUND PAPERS</b>
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None

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## PLACES OVERVIEW AND SCRUTINY SUB-COMMITTEE

<b>Subject Heading:</b>	Housing Resident Safety and Compliance Performance
<b>SLT Lead:</b>	Patrick Odling-Smee Director of Housing
<b>Report Author and contact details:</b>	Garry Knights Assistant Director of Housing Property Services garry.knights@havering.gov.uk
<b>Policy context:</b>	For information only The report provide details of our performance against our statutory duty as a landlord in regards to resident safety

### SUMMARY

The report is for information only, no decision is required.

The report provides an update to Places OSSC of the position of LBH Housing services resident safety and compliance programmes against its statutory and regulatory duties.

As agreed by Cabinet on the 16<sup>th</sup> February 2022 Places OSSC will be provided with a quarterly report on the Housing compliance performance as part of the internal governance approach, performance is also scrutinised monthly by both the Compliance board and the Asset Management Sub Steering Group.

### RECOMMENDATIONS

Members note the report

### REPORT DETAIL

LBH owns and manages circa 9,200 homes and circa 2,500 leasehold properties including circa 10 tower blocks and 1,000 medium and low rise blocks.

LBH has a duty to ensure each of these properties are safe and meet all relevant statutory duties around testing and servicing equipment and meets the relevant consumer standards of the Regulator for Social Housing and the requirements of the Building Safety Act monitored by the new Building Safety Regulator

We consider Resident Safety around the six big compliance areas:

- Gas Safety – all gas appliances should be inspected annually and a Landlord Gas Safety Record (LGSR) provided
- Electrical Safety – all social rented properties must have an electrical inspection (EICR) every 10 years, although recent regulation changes require private landlords to have 5 year inspections and this is considered best practice in social rented properties and the approach we have adopted
- Lift Safety – Monthly inspections and planned maintenance regimes and an annual certificate provided by our insurer
- Water Safety – all relevant water systems must be checked for legionella risk, this is based on a risk based approach which can be on a cyclical programme between 1 and 3 years. All actions flowing from the legionella inspection must be completed within prescribed timescales.
- Fire Safety – All relevant properties must have a valid Fire risk assessment (FRA) undertaken on a risk based approach which can be on a cyclical programme between 1 and 3 years. All actions flowing from the FRA must be completed within prescribed timescales.
- Asbestos – under the asbestos regulations all communal areas must have a valid management level asbestos survey which must be held on a relevant asbestos register. In addition we are completing a survey programme of all domestic properties to ensure we manage all risk appropriately, this is not however a statutory requirement under the asbestos regulations.

Alongside the main six areas we also have a duty to ensure compliance across a number of other associated areas such as PAT testing, lightning protection testing, Dry Riser testing and Fire alarm testing and as we bring new properties on stream we will also need to ensure areas such as sprinkler and communal extract systems are included in compliance programmes

Given the seriousness of resident safety all KPIs are set at 100% as shown in Appendix 1.

After a significant programme of work we have been able to complete most programmes and to ensure we have the relevant evidence to support this position.

We have a small number of EICRs to complete, these are our hard to reach properties and are working through approached to resolve these. In addition we continue to work on fully populating our asbestos register for domestic properties.

The introduction of the Building Safety Act has brought a number of additional requirements for landlords, principle around fire and structural safety and only in relevant builds (those above 6 stories or 18m) and we are working to ensure we comply with the new regimes. All action are captures on the Action plan in appendix 2.

We are in the process of determining the appropriate future procurement strategy across all areas of compliance, to ensure we have contracts that deliver a high level of performance whilst meeting the upcoming changes in technology and we will be bringing this strategy to cabinet ahead of procurement exercises commencing later this year.

## **BACKGROUND PAPERS**

Appendix 1 - Performance Report

Appendix 2 – Action Plan

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# LONDON BOROUGH OF HAVERING - HOUSING COMPLIANCE

DATE: 01 September 2022

	NUMBER	June	July	August	TREND	TARGET	COMMENTS
<b>FIRE SAFETY COMPLIANCE</b>							
New NODs received		0	0	0	➡	0	
Outstanding NOD's		0	0	0	➡	0	
PROPERTIES WITH FRA OR RE-ASSESSED FRA		97.32%	98.66%	100.00%	⬆	100%	
Cumulative total	894	870	882	894	⬆		
Overdue actions -					➡		
A – to be completed within 14 days		0	0	0	➡	0	
B – to be completed within 6 months		5	2	16	⬆	0	11 x Fire Stopping works, 1 x Loft compartmentation, 3 x Door works
C – to be completed within 24 months		1	6	4	⬇	0	1 x Loft Compartmentation required significant design work, 2 x intake doors on order , 1 x Loft Compartmentation requiring significant design work
D – to be completed within 5 years		0	0	0	➡	0	
Dry Riser Testing		100.00%	100.00%	100.00%	➡	100%	
	12	12	12	12			
Fire Alarm Testing		92.00%	92.00%	100.00%	⬆	100%	
	25	23	23	25			
<b>GAS COMPLIANCE</b>							
Domestic Gas - General Needs		99.94%	99.91%	100.00%	⬆	100%	
	8574	8569	8566	8574			
Domestic Gas - PSL		100.00%	100.00%	100.00%	➡	100%	

	658	658	658	658			
Gas Carcassing		100.00%	100.00%	100.00%	➔	100%	
	87	87	87	87			
Communal Gas servicing		100.00%	100.00%	100.00%	➔	100%	
	67	67	67	67			
<b>ELECTRICAL COMPLIANCE</b>							
EICRs domestic		96.31%	96.90%	97.26%	⬆	100%	
	9077	8748	8796	8828			5 year programme
EICRs domestic – PSL		82.14%	83.05%	83.05%	➔	100%	
	655	538	544	544			
EICRs Communal		100.00%	100.00%	100.00%	➔	100%	
	870	870	870	870			
Emergency Lighting testing - monthly		100.00%	100.00%	100.00%	➔	100%	
	863	863	863	863			
Lightning Protection testing		100.00%	100.00%	100.00%	➔	100%	
	43	43	43	43			
PAT Testing		100.00%	100.00%	100.00%		100%	
	48	49	48	48			
<b>LIFT COMPLIANCE</b>							
Monthly maintenance		100.00%	100.00%	100.00%	➔	100%	
	36	38	36	36			
Annual servicing		100.00%	100.00%	100.00%	➔	100%	
	36	38	36	36			
Bi-Annual insurance certificate		100.00%	100.00%	100.00%	➔	100%	
	36	38	36	36			
<b>LEGIONELLA COMPLIANCE</b>							
L8 Legionella Monitoring - High Risk		100.00%	100.00%	100.00%	➔	100%	

	34	34	34	34			
High Risk Properties on monthly testing programme	21	24	24	24			
High Risk Properties on six monthly testing programme	13	13	13	13			
L8 Legionella Reports - 2 Year Review Programme		100.00%	100.00%	100.00%	➔	100%	
	830	830	830	830			
Overdue actions from L8 reports							
High - to be completed within 3 months	0	0	0	0	➔	0	
Medium – to be completed within 6 months	0	0	0	0	➔	0	
Low – to be completed within 12 months	25	0	0	0	➔	0	
<b>ASBESTOS COMPLIANCE</b>							
Asbestos Surveys - Domestic		61.88%	62.73%	64.72%	⬆	100%	
	9184	5683	5761	5944			
Asbestos Surveys - Communal		100.00%	100.00%	100.00%	➔	100%	
	1138	1138	1138	1138			
Asbestos Surveys - Garages		100.00%	100.00%	100.00%	➔	100%	
	143	143	143	143			



## Housing Compliance Action Plan

(Completion of all actions will take us to a BAU state)

Ref	Action Source	Code	Action	Lead	Due Date
CAP4	Risk - IT	C2	<b>CADI project implementing keystone modules fully operational</b>	Garry Knights	Mar 2021
			<i>Comments</i>		
			Successfully move from the current use of individual spreadsheets to a fully integrated system		
			Delays to project (Data matching, Procurement and IT processes)		
			<i>Milestones</i>		<i>Progress</i>
			Full keystone system review undertaken	John Mitchell	Sep 2020
			To-be processed mapped and ready	John Sanders	Oct 2020
			System design work and data update	John Mitchell	Sept 2021
			Go live for Gas and Electric workstream	John Mitchell	Dec 2021
			Design work for all other workstreams	John Mitchell	September 2022
CAP8	Risk – Staff/team	C3	<b>Training programme to be developed for growing our own compliance officers</b>	Garry Knights	Mar 2021
			<i>Comments</i>		
			Training identified in policies and will work with Occupational Development and apprenticeship team		
			<i>Milestones</i>		<i>Progress</i>
			All staff trained following reorganisation		September 2022
CAP9	Risk – Staff/team	C3	<b>Develop additional team capacity, take through relevant governance and recruit</b>	Complete	
			<i>Comments</i>		
			Will begin recruitment in October.		
			<i>Milestones</i>		

			New reorganisation underway to include all of Property Services		
			Permanent recruitment to be completed		
CAP12	Risk – Fire Safety	C5	Long terms works programmes to deliver FRA works to be developed and procured	Garry Knights	Nov 2021
	Risk – Compliance Management	C6	Comments		
			14 individual packages identified		
			Delays to procurement due to the removal of consultant. New consultant being sought via Bloom		
			Looking to extend contracts for a further year		
			Milestones		Progress
			Appoint consultant to support	Garry Knights	Aug 2020
			Scope and strategy to be agreed	Garry Knights	Nov 2020
			All packages procured, all contracts to be in place to replace existing arrangement mobilised by April 2022	Garry Knights	April 2023
CAP101	Building Safety Bill		<b>Building Safety Manager</b>		
			Develop new role and undertake pay evaluation	June 2022	
			Recruit 3 based on 13 buildings	June 2022	
			Establish resident engagement strategy for BSM (Building Safety Manager)	Post recruitment	
			Establish strategy for managing each property	Post recruitment	
			Establish approval processes for works etc	Post recruitment	
			Establish reporting protocols	Post recruitment	
			Establish right of entry protocols and publish	Post recruitment	
			<b>NO LONGER A REQUIREMENT OF THE BILL</b>		
CAP102	Building Safety Bill		<b>Resident Safety and Compliance Policies</b>		
			Review policies to ensure compliance with new bill	Resident Safety Manager	Sep 2022
			Undertake Independent review of policies	Savills	Nov 2022
CAP103	Building Safety Bill		<b>Products</b>		

		Establish a Havering product standard (involve long term partnering contractors)	<i>All PS managers</i>	<i>Oct 2022</i>
		Develop a review panel and process		<i>Oct 2022</i>
<b>CAP104</b>	<b>Building Safety Bill</b>	<b>IT</b>		
		Determine if current systems are fit for purpose to deliver the full golden thread required (keystone, Open Housing – given the level of asset data which will be required and updating required at granular level)	<i>GK/JS/JM/DC</i>	<i>Oct 2022</i>
		Identify and procure alternative solutions where required	<i>DC</i>	<i>TBA</i>
<b>CAP105</b>	<b>Building Safety Bill</b>	<b>Regulator</b>		
		Establish links with regulator	<i>GK</i>	<i>As per the Act</i>
		Register all relevant existing buildings as per the act and apply for relevant certificate	<i>TBA</i>	<i>TBA</i>
		Ensure Mandatory Occurrence Reporting system is in place	<i>TBA</i>	<i>TBA</i>
		Establish process for Accountable person to demonstrate compliance with duties	<i>TBA</i>	<i>TBA</i>
		Agree reporting processes for building failures (what is considered a failure)	<i>TBA</i>	<i>TBA</i>
<b>CAP106</b>	<b>Building Safety Bill</b>	<b>Regeneration (this is only the actions required as a the freeholder/landlord/accountable person not as developer)</b>		
		Develop a clear client role with the regeneration team in regards to building safety	<i>GK/ Resident Safety Manager</i>	<i>Sep 2022</i>
		Agree full handover processes including all relevant documentation in format which support golden thread/building safety case file	<i>JS</i>	<i>Oct 2022</i>
		Registration of new building with BSR (Building Safety Regulator)	<i>GK/Resident Safety Manager</i>	<i>Oct 2022 for NNP (Napier and New Plymouth)</i>
		Obtain building Assessment Certificate	<i>GK/Resident Safety Manager</i>	<i>Nov/Dec 2022 for NNP</i>
<b>CAP107</b>	<b>Building Safety Bill</b>	<b>Building Safety Case File</b>		

			Determine appropriate content (liaise with regulator, best practice groups)	GK/JM/JS/CS/BSMs	Highfield towers pilot
			Establish how and where published	GK/BSM	TBA
			Establish updating process	GK/BSM	TBA
			Establish ownership and control process (BSM)	GK/BSM	TBA
			Establish information publication approaches (twinnedit and website)	GK/BSM	TBA
			Establish Asset tagging/identification approach	GK/BSM	TBA
<b>CAP108</b>	<b>Building Safety Bill</b>		<b>Costs</b>		
			Determine service charge approach for new regimes	GK/EH	Mar 2023
<b>CAP109</b>	<b>RFFO</b>		<b>Door Checking Regime</b>		
			Establish new door checking regime, who, how often etc	JS	October 2022
<b>CAP110</b>	<b>Building Safety Bill and RFFO</b>		<b>Leaseholder Issues</b>		
			Access Protocols	EH/Legal	Dec 2022
			Enforcement	EH/Legal	Dec 2022
			Lease changes??	EH/Legal	Dec 2022
<b>CAP111</b>	<b>Building Safety Bill and RFFO</b>		<b>Education for all Staff</b>		
			Training session for all housing staff on responsibilities	Resident Safety Manager	Oct 2022
			Clear protocols on how to report issues	GK/EH	Oct 2022
<b>CAP112</b>	<b>Building Safety Bill</b>		<b>Enforcement</b>		
			Issuing Contravention notices from Accountable Person (how and when)	Resident Safety Manager/GK	Dec 2022
<b>CAP113</b>	<b>Mazars</b>	<b>5.1.1</b>	Ensure operational procedures for all compliance areas are written down and understood by team	Resident safety and Compliance Manager	Oct 2022

			Gas		
			Electrical		
			Lifts		
			Legionella		
			Asbestos		
			Fire safety		
<b>CAP113</b>	<b>Mazars</b>	<b>5.1.2</b>	Ensure overdue remedial actions are included in performance reporting	<i>completed</i>	
<b>CAP114</b>	<b>Mazars</b>	<b>5.3</b>	Data integrity		
		<b>5.3.1</b>	Accuracy of programme data	<i>Completed</i>	
			Open housing and keystone interface fully operational so all properties reconciled		
			Data tested and checked regularly, EICR and gas data on keystone with automatic updates		
<b>CAP115</b>	<b>Mazars</b>	<b>5.4.1</b>	Adding properties to the gas register	<i>Complete</i>	
		<b>5.4.2</b>	Disposing of properties and removing from the list	<i>Complete</i>	
			Open housing and keystone interface fully operational so all properties reconciled		
			We now provide weekly property lists for servicing to K&T so properties will no longer be missed (previously K&T worked off an annual lists with ad hoc amendments)		
<b>CAP116</b>	<b>Mazars</b>	<b>5.4.3</b>	Post inspection	<i>Complete</i>	
		<b>5.4.4</b>	Monitoring of post inspections		

			New surveyor is in the repairs teams who will be undertaking post inspections and review PCM work		
<b>CAP117</b>	<b>Mazars</b>	<b>5.5.1</b>	Overdue FRAs	<i>Complete</i>	
			All FRAs are complete and no in the reassessment cycle		
<b>CAP118</b>	<b>Mazars</b>	<b>5.5.2</b>	Missing FRA remedial actions from tracker	<i>Complete</i>	
		<b>5.5.3</b>	Completion of FRA actions	<i>Complete</i>	
			Full FRA team in place and all actions being entered onto system and monitored, where they cannot be completed before due date this is noted on compliance performance reports		
<b>CAP119</b>	<b>Mazars</b>	<b>5.5.4</b>	Contract Management – regular progress meeting with contractors	<i>Complete</i>	
			Regular meeting in place with all compliance contractors		
<b>CAP120</b>	<b>Mazars</b>	<b>5.6.1</b>	Updating the asbestos register	<i>Complete</i>	
			Asbestos team manage all asbestos surveys and ensure they are on the system, they are working across teams to ensure all source are covered		

## OVERVIEW AND SCRUTINY SUB-COMMITTEE

<b>Subject Heading:</b>	<b>Cost of living crisis the aftermath of COVID 19 and the impact on housing demand</b>
<b>SLT Lead:</b>	Patrick Odling-Smee, Director of Housing
<b>Report Author and contact details:</b>	<i>Darren Alexander, Assistant Director, Housing Demand</i> <a href="mailto:Darren.alexander@haverling.gov.uk">Darren.alexander@haverling.gov.uk</a> 01708433751
<b>Policy context:</b>	<i>Cost of living crisis, the aftermath of COVID 19 and the impact on Housing Demand</i>

### SUMMARY

#### **Cost of living crisis the aftermath of COVID 19 and the impact on housing demand**

In previous briefings we identified the impact COVID 19 had on homelessness demand. We highlighted that average homelessness approaches moved from less than 150 a month in 2020 to 290 per month for the next two years.

We illustrated that this had inflated expenditure in our Find-Your-Own (FYO) rent deposit scheme, where our highest spend at that time reached £118,000 in a single month with an average of 40 households securing accommodation in the private rented sector.

We secured membership to Capital Letters in 2020, who in their first year with us exceeded their targets by securing approx. 80 properties in the first year when the target was 50. We advised that we envisaged a continuation of this high level of homelessness approaches for the foreseeable future and that this could lead to additional cost pressures in temporary accommodation and risk to the current rate of homelessness prevention.

We also reiterated the risk of using bed and breakfast hotels for people previously sleeping on the streets and where, during COVID 19 pandemic, there was acute focus to support those single people under the government's "Everyone In" initiative. Additionally we foresaw that the lifting of court evictions would lead to increased strain on the supply of temporary accommodation meaning there was increasing risk to the use of hotels for families and their children.

It was outlined then that it was imperative we continue to develop the service and provide as many pathways to appropriate and suitable accommodation as possible.

1. We planned to do this through increasing our Private Sector Lease supply to stem the outflow of properties handed back to the landlord. This meant improving our lease and property maintenance terms, reviewing the rents and providing better quality accommodation for our residents.
2. We also sought Cabinet sign off to purchase 125 properties through Mercury Land Holdings (MLH) as well as bolster the number of properties we sourced in the private rented market.
3. We also introduced 35 units of high complex needs accommodation for people who were sleeping on the streets, released from prison or hospital and had mental health, drug and alcohol as well as other combined complex needs preventing high cost interventions from acute services such as A&E.

#### War in Ukraine and the impact deepens

What we didn't anticipate however, was Russia's invasion of Ukraine and the devastating impact it has had on Ukrainian families who had fled their homes seeking refuge in the United Kingdom.

We did not see the impact the macro-economic forces would cause with record inflation and rising interest rates since the 1980s hitting London badly meaning:

- Tenants rents are unaffordable
- Landlords are exiting the market
- The private rented sector market is drying up

#### **Afghan Relocation Assistance Programme (ARAP) and Homes 4 Ukraine Scheme (H4UK)**

With the backdrop of the Home Office exhausting hotel use across London to accommodate Afghan refugees and other asylum seekers they sort to meet the needs of Ukrainian Refugees with alternative accommodation vehicles.

To date Havering Council have pledged to support 8 Afghan families accommodating five. We have yet to declare any further support until it is clear what the proposal for the fair share distribution plans look like across London for Afghan refugees currently held in hotels and dispersal accommodation.

Homes4Ukraine Havering however, have facilitated the support for 319 fleeing guests through the sponsorship and family visa programme and have since collaborated with other local authorities sharing valuable insights and service infrastructure. However, the pressure is continuing to mount with sponsorships coming to the end of its 6 month plan and relationship breakdowns increasingly prevalent in the family visa scheme.

As a result of the scheme the people of Havering have responded admirably to the humanitarian effort and alleviated some of the pressure to secure housing for

refugees in the interim, however, our inability to move households on into longer term housing will have lasting consequences for children settling into the area. It is anticipated that many host will ask their HfU guests to leave at the end of the initial six months of their commitment which will put additional pressure on homelessness services as we will have a statutory duty to accommodate.

### **Impact on our MLH Scheme and private rented market**

Rising inflation and interest rates have damaged the viability of our MLH scheme and we can no longer deliver the 125 units we proposed.

### **Find your Own**

The private rented sector has also taken a dramatic turn with the Council no longer able to deliver the 40 units of accommodation it was securing each month. This number has fallen drastically with landlords asking for premium rents, deposits, rent advances and additional incentive payments.

We have not been able to secure private rented accommodation at the previous rates of 40 properties a month through the Find Your Own scheme with this has fallen by almost 60% with expenditure fallen from an all-time high of £118k per month to as low as £26k. This illustrates the challenges in the market to secure available private rented properties.

## **RECOMMENDATIONS**

- To inform the overview and scrutiny committee of the significant pressures on Housing and its accommodation resources
- To inform of the wider implications of housing and the impact on children's and families.

## **REPORT DETAIL**

### **Main causes of homelessness**

The service is fighting to effectively address homelessness by supporting households to remain in their accommodation as long as possible right up until bailiff warrants are issued. We understand this causes particular distress to families; the alternatives, however, do not make good reading.

Family and friend exclusions remains the main cause of homelessness in Havering, and in this climate it is vital we get the message out that support is required from our extended families to preserve and keep their loved ones at home as much as is possible as the impact of children living in emergency hotel accommodation where we do not see immediate move on arising in the near future.

As the private rented market is drying up landlords no longer want to support benefit dependent households unless offered exorbitant fees. Other costs pressures on landlords i.e. inflation, interest rates and tax implications mean they are expected to sell their properties.

The table below illustrates the number of homeless approaches pre-pandemic to now. Havering Council has seen a 40% increase over the last two years in the number of households who require emergency accommodation. We have also seen significant increase on domestic abuse approaches to the service which illustrates the pressure to place into emergency accommodation.

Dates	Homeless Approaches	Dates	Homeless Approaches	Dates	Homeless Approaches	Dates	Homeless Approaches
Apr-19	155	Apr-20	114	Apr-21	235	Apr-22	261
May-19	186	May-20	141	May-21	268	May-22	294
Jun-19	160	Jun-20	165	Jun-21	315	Jun-22	237
Jul-19	195	Jul-20	166	Jul-21	246	Jul-22	280
Aug-19	177	Aug-20	228	Aug-21	275	Aug-22	319
Sep-19	165	Sep-20	269	Sep-21	302	Sep-22	
Oct-19	187	Oct-20	236	Oct-21	262	Oct-22	
Nov-19	174	Nov-20	256	Nov-21	280	Nov-22	
Dec-19	111	Dec-20	175	Dec-21	169	Dec-22	
Jan-20	233	Jan-21	239	Jan-22	258	Jan-23	
Feb-20	160	Feb-21	258	Feb-22	250	Feb-23	
Mar-20	129	Mar-21	292	Mar-22	282	Mar-23	
	2032		2539		3142		1391

### Domestic Abuse in Havering

The number of domestic abuse cases in Havering continues to increase where households fleeing violence and abuse are likely to be placed in emergency hotels.

	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Total
<b>2019/20</b>	7	5	7	7	5	7	12	9	2	7	4	5	<b>77</b>
<b>2020/21</b>	8	12	9	12	29	19	24	29	15	22	18	29	<b>226</b>
<b>2021/22</b>	22	24	26	19	31	28	18	25	12	18	13	18	<b>254</b>
<b>2022/23</b>	25	30	20	13	36								<b>124*</b>

Number of households placed in Bed & Breakfast hotels Apr 22 to Aug 22

	Numbers	Ukraine (Both)	Council Tenant/PSL/ Children's (Both)	Totals

<b>Family</b>	49	9	4	<b>62</b>
<b>Single</b>	29	0	1	<b>30</b>
<b>Total</b>	78	9	5	<b>92</b>
<b>Total spend for hotels for families and singles to date</b>				<b>£276k</b>

### **Properties secured in the private rented market through Find Your Own**

	<b>Apr 22</b>	<b>May 22</b>	<b>Jun 22</b>	<b>July 22</b>	<b>Projections for year end</b>	<b>Previous Year</b>
<b>Find your Own</b>	<b>19 ↑</b>	<b>10 ↓</b>	<b>12 ↑</b>	<b>16 ↑</b>	<b>135</b>	<b>222</b>
<b>Find your own expenditure</b>	<b>£54,121 ↓</b>	<b>£26,024 ↑</b>	<b>£30,001 ↓</b>	<b>£47,384 ↓</b>	<b>£365,976</b>	<b>£538,140</b>
<b>Capital Letters</b>	<b>5</b>	<b>4</b>	<b>0</b>	<b>2</b>	<b>28.5</b>	<b>83</b>

### **Children's Services and Housing Protocol**

The Joint Housing and Children's Services Protocol has been in place since June 2021 and has significantly reduced the number of families approaching services on the day of eviction. By working jointly we have been able to assess and accommodate families where required under housing and/or children services.

However, September 2022 has seen a significant increase in families approaching Havering in urgent need of accommodation for various reasons which has meant that the pre-notification allowing a 25-56 day joint assessment has not been possible. Due to the increasing demand the services now are putting in place an emergency approach.

Many of the challenges have been in relation Havering and other boroughs being in dispute about fulfilling their respective statutory obligations. More recently we have had neighbouring boroughs evicting households for significant rent arrears and/or advising s193 tenants to withdraw their applications to approach Havering.

Families have attended the Town Hall where there are no available housing services asking for assistance. With Children's Services present at the Town Hall the immediate assumption is they will be responsible for rehousing the family when this is not the case. The need for communication between Housing and Children's over where the responsibility lies is heightened with very little time to fully ascertain the circumstances of the presentation. This should be helped when both services are available through the appointment centre from October 2022.

This places additional pressure on the out of hour's service and education services who want to ensure the child's welfare is safeguarded for school the next day.

The core challenge is insufficient supply of appropriate housing in the borough.

Number of Children's services referrals from Housing in the last 3 months.

Date	04-Jul	11-Jul	18-Jul	25-Jul	01-Aug	08-Aug	15-Aug	22-Aug	29-Aug	05-Sep	12-Sep	19-Sep
Number of referrals to Children's Services	0	0	0	3	2	0	1	2	3	2	24	5

## IMPLICATIONS AND RISKS

### Financial implications and risks:

Risks to the general fund budget have already been forecasted however, deepening cost of living crisis and growing need to provide emergency accommodation for families with children does present great risk with the incoming winter pressure and energy crisis. Local Authorities are lobbying for change to current Local Housing Allowance Rates and existing benefit caps which are impeding our ability to secure properties in the open private rented market.

Homeless Prevention Grant (HPG) formerly the Flexible Homeless Support Grant (FHSG) is likely to be reduced by between 8% and 26% for Havering.

### Legal implications and risks:

Families facing eviction and requiring emergency accommodation are likely to be placed in hotels for longer than the statutory 6 week time frame. This presents a risk both legally and financially.

Challenges from local solicitors judicially reviewing the local authority's ability to meet need and to provide temporary accommodation is also likely to rise.

When housing demand are discharging their duties towards families who are found intentionally homeless we will see a rise in children services interventions.

### Human Resources implications and risks:

The recommendations made in this report do not give rise to any identifiable HR risks or implications that would affect either the Council or its workforce. It should be noted however that the strain on staff in both Housing and Children's Services

in dealing with homeless families in emergency situations is intense and will have an impact in the long term.

### **Equalities implications and risks:**

The Public Sector Equality Duty (PSED) under section 149 of the Equality Act 2010 requires the Council, when exercising its functions, to have 'due regard' to:

- (i) The need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- (ii) The need to advance equality of opportunity between persons who share protected characteristics<sup>1</sup> and those who do not, and;
- (iii) Foster good relations between those who have protected characteristics and those who do not.

The Council is committed to all of the above in the provision, procurement and commissioning of its services, and the employment of its workforce.

In addition, the Council is also committed to improving the quality of life and wellbeing for all Havering residents in respect of socio-economics and health determinants

### **Equalities Health and Wellbeing implications and Risks**

It is anticipated that the cost of living crisis will impact general health and wellbeing benefits for directly affected residents. The impact of homelessness on both adults and children is significant.

#### **ENVIRONMENTAL AND CLIMATE CHANGE IMPLICATIONS AND RISKS**

The recommendations made in this report do not give rise to any identifiable Climate Change risks or implications that would affect either the Council or residents.

#### **BACKGROUND PAPERS**

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<sup>1</sup> 'Protected characteristics' are age, disability, gender reassignment, marriage and civil partnerships, pregnancy and maternity, race, religion or belief, sex/gender, and sexual orientation.

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