

HOUSING AND REGENERATION SCRUTINY COMMITTEE – 17TH SEPTEMBER 2020

SUBJECT: WHQS & POST 2020 ASSET MANAGEMENT PROGRAMME UPDATE

REPORT BY: CORPORATE DIRECTOR OF SOCIAL SERVICES AND HOUSING

1. PURPOSE OF REPORT

1.1 This report provides members with a progress update on performance of the Welsh Housing Quality Standard (WHQS) Team to date and the impact of the Covid 19 pandemic on completion of the programme by our internal deadline of June 2020.

2. SUMMARY

- 2.1 The details contained within this report provide information on the performance of the internal and external main WHQS Programme prior to the Government lockdown on 23rd March 2020 which demonstrate that full compliance was achievable prior to the statutory deadline of December 2020.
- 2.2 To date Welsh Government (WG) have not issued any updated guidance on completing the WHQS programme since the pandemic prevented us from continuing with the programme as planned, however officers are in regular discussions with WG and await an update on the revised completion date. Early indications are that it is expected to be December 2021. Caerphilly CBC are one of the four remaining Local Authorities that were due to complete by December 2020, although we were in a more advanced position to complete the programme early compared to other Local Authorities.
- 2.3 Details of the current performance and financial outturn to date are also included. The many achievements that have been made as part of the wider commitments and benefits delivered by the WHQS programme have been reported in previous update reports
- 2.4 The report also provides members with an overview of the Post 2020 Asset Management Strategy (PAMS) proposals and impacts from the Covid 19 pandemic, which was due to commence following the successful completion of the WHQS programme.
- 2.5 It is important to note that if the Covid-19 pandemic had not occurred, Caerphilly Homes would have been on track to complete the WHQS programme by June 2020, ahead of the WG deadline of December 2020.

3. **RECOMMENDATIONS**

3.1 That the report is noted.

4. REASONS FOR THE RECOMMENDATIONS

4.1 The report is for information only

5. THE REPORT

Progress of the internal works programme 2019/20 – Completion of works

- 5.1 The total number of properties achieving internal compliance at the end of 2019/20 was 10,344 which is 96.97% of our total stock (10667). 1,248 properties were completed internally during 2019/20. The target set at the start of the year was 24 properties per week to achieve compliance by June 2020. This weekly target was achieved consistently as at March 2020 and demonstrates that we were on target to meet the completion of the WHQS programme by June 2020.
- 5.2 The planned programme for 2019/20 confirms that 323 properties were remaining in its final stage which represents approximately 3% of the total stock. The remaining 3% of work left to complete is predominantly in-house contractor work.
- 5.3 The above performance has been achieved despite the enforcement of the pandemic lockdown in the week commencing 23rd March 2020, and a loss of contractors during the latter stages of the programme. Contingency arrangements to cover the loss of contractors were originally set up i.e. the DPS (Dynamic Purchasing System), inhouse mop up teams with other options also being considered. About 57% of the total WHQS internal works programme is being completed by our own in-house workforce, the remaining work has been carried out by external contractors. Support is also being received from the Housing Repairs Operations (HRO) Team which has assisted in completing mop up properties where tenants had previously refused works but later changed their mind, along with void properties, achieving additional WHQS compliance to 101 properties in 2019/20 financial year.
- 5.4 Members will be aware that three sheltered schemes (Ty Isaf, Britannia Court & Highfield Court) had been transferred to the Planned Asset Maintenance Strategy (PAMS) programme for Health & Safety issues and this was agreed pre 2019/20.
- 5.5 The transfer to the PAMS programme was as a result of secondary surveys carried out at the schemes in preparation for the works to commence, which identified issues with electrical works involving the supply from Western Power, in addition to the detection of Asbestos Containing Material (ACM's).
- 5.6 For this reason, tenants will need to be decanted via a staged approach for all three schemes, which would not have been achievable within the timescale of the original WHQS timescale and were therefore included within the first year of the Post 2020 Asset Management Programme.
- 5.7 However, as the WHQS timescale is likely to be extended by WG there is a possibility that these schemes may now be incorporated into the revised WHQS programme and officers are currently investigating re-profiling options.

Progress of the internal works programme – Quarter 1 2020/21

- 5.8 As at Quarter 1, 9 properties have been made compliant in 2020/21 financial year in relation to their internal elements with a total internal compliance of 97.06%. Due to the Covid restrictions, we have been unable to enter most tenants' homes since the end of March.
- 5.9 314 properties remain outstanding as at Quarter 1. Surveys previously undertaken indicate the remaining work is in the region of:
 - 202 Kitchens
 - 174 Bathrooms
 - 268 Electrical rewires
 - 48 Central heating upgrades
 - 27 Electrical tests
- 5.10 During lockdown 31 properties where internal works had commenced were left incomplete. Essential works continued to 14 of these properties to ensure tenants were not left without basic amenities. No other internal WHQS works have commenced since lockdown, although HRO continued to carry out emergency repairs where necessary.
- 5.11 Due to the inability to continue with work inside tenants' homes, operatives were transferred to void properties in order to provide housing for essential allocations, and empty buy-back stock which was originally intended to be completed post WHQS. Fourteen buy back properties allocated to the in-house team are currently receiving full refurbishments including all WHQS elements, and 33 void properties have been worked on with 13 completed as at Quarter 1.
- 5.12 DLO contractors that have un-furloughed their staff have been re-engaged to undertake roofing, heating and electrics in Ty Isaf (a vacated sheltered scheme). Some of the internal workforce were redeployed to support the critical delivery of free school meals and the buddy service during the pandemic, and this is still ongoing.
- 5.13 Supply issues have eased with deliveries now going to properties rather than one central point. When internal works re-commence, officers will ensure that supply is in line with the required target dates.
- 5.14 Pace is expected to gradually increase when we re-commence the internal works, however, work will undoubtedly take longer under Covid-19 restrictions, following the development of detailed Risk Assessments on safe working practices, and we need to establish the impact of this as we work through the remainder of the programme. Some tenants will undoubtedly refuse works if they are continuing to shield or have any medical issues or fears, and we will record these as acceptable fails tenant refusal (Covid) for internal purposes and review as appropriate.
- 5.15 At present, we are unable to confirm how long the remaining properties will take to complete under these conditions. The programme initially had approximately 14 weeks of work left to complete prior to lockdown and was on target to be met by June 2020. A reasonable assumption at this stage would be three times this timescale to allow for the impact of restarting contracts, risk assessments, social distancing of operatives and contractors, any suppliers issues, and tenants concerns, etc. which would currently estimate internal completion at around August 2021. This is pending

no further delays from a potential 2nd or 3rd wave or local lockdowns. A 50% increase of costs is initially anticipated for internal works and a full year cost for the delivery team which was only anticipated to be supporting the programme for 3 months.

5.16 The restrictions mentioned above will also increase the time to complete a typical property and whilst we would still like to achieve the programme by December 2020, it is acknowledged that December 2020 is no longer realistic. It is therefore likely that the completion of the internal works programme will fall into the 2021 year. Although this is disappointing for everyone concerned, the circumstances were beyond our control and could not have been foreseen.

Progress of the External Works Programme 2019/20 – Completion of Works

- 5.17 The total number of properties achieving external compliance at the end of the 2019/20 financial year was 10,061 which is 94.32% of the total stock (10,667). 2,473 properties were completed externally during 2019/20. The target set at the start of the year was 48 properties per week to achieve compliance by June 2020 and although the target was not quite achieved by March 2020, there was some contingency to ensure the June 2020 compliance.
- 5.18 The planned programme for 2019/20 confirms that 606 properties (excluding leaseholders) were remaining in its final stages which represent 5% of the total stock. The majority of this work is predominantly external contractor awards.
- 5.19 Within reason, contractors have been able to obtain the required materials. There have been some delays due to collections being made on an appointment basis. The first few weeks of lockdown, contractors had to go "off contract" to source materials elsewhere due to our single source supplier being closed. There have been some shortages i.e. roofing tiles due to manufacturing issues, but some supplies were obtained and held by our supply partner prior to lockdown. The window and door manufacturer and supplier closed for a few weeks, however again orders and deliveries for a number of contracts were made prior to lockdown and stored on site
- 5.20 In addition to the above, we are also completing external works to 408 leasehold properties; however, this has detrimentally affected progress due to the legislative process that needs to be followed by way of consultation. As at the end of 2019/20 302 leaseholder properties were compliant, representing 74% of the total leasehold stock. The weekly completion rate of 2.5 properties per week is just under the target of 3.8 per week. Prior to Covid restrictions the completion date for leaseholders was still expected to fall in line with the Welsh Government deadline of December 2020.

Progress of the External Works Programme Quarter 1 2020/21

- 5.21 As at Quarter 1, 147 properties have been made compliant in 2020/21 financial year in relation to their external elements with a total external compliance of 95.55%. Although there have been Covid restrictions to enter tenants' homes, we have been able to carry out some work to the exterior of most properties.
- 5.22 During lockdown two contractors remained working and some restarted mid-May with others following in June. Due to the nature of the work being outside, the risk for tenants, staff and contractors is lower.

- 5.23 Appropriate detailed risk assessments were issued by the contractors (in addition to the standard external work risk assessments) to ensure adequate health and safety measures were taken whilst working externally at properties. Essential work was carried out internally where gas boilers needed to be turned off whilst carrying out external works near or around the gas flue. Contractors also carried out works to windows and doors on their return subject to household circumstances. Prior to commencing with any works, tenants are contacted to ensure they are happy for us to proceed, that they are not showing symptoms of Covid 19 and there are no shielding/vulnerability issues. No concerns have been received from tenants during this time, however, some work may need to be delayed where issues are encountered.
- 5.24 It is accepted that the June 2020 target for completion has not been met due to the impacts of Covid-19, which were out of our control, but having reviewed the outstanding contracts it is anticipated that all external works should be completed by October 2020, with the exception of Graig Y Rhacca contract 2 and leasehold contracts, which will be completed by December 2020 and February 2021 respectively. Works remaining include roofing, doors, groundworks and a small number of storage sheds.
- 5.25 93% of the whole WHQS external works programme (including leaseholders) is being completed by external contractors and 7% by our in-house workforce. Following previous agreement by Cabinet, the in-house workforce is undertaking all works (internal and external) to sheltered housing schemes, and more recently to our buy back properties.
- 5.26 All ongoing leaseholder contracts were closed during lockdown but most of them recommenced in June. Supplies have returned to near normal although there were some initial complaints from contractors that materials were not readily available. Contractors have indicated that there are a number of contracts expected to be completed in August, September and November 2020, but a small number of contracts are not anticipated to be completed until the end of February 2021 (pending weather conditions and further Covid-19 restrictions).
- 5.27 All remaining external works within the programme are now in progress. A 10% increase of costs is anticipated for external works to allow for supply issues and some restrictions when entering tenants' homes.

Environmental Programme

- 5.28 Part of the commitment to deliver the WHQS across all 10,667 homes (31st March 2020 count) also includes a requirement to comply with Part 6 which aims to ensure that 'all dwellings should be located in an environment to which residents can relate and in which they can be proud to live'.
- 5.29 An indicative budget of £10.6m has been set aside in the business plan and agreed with WG specifically for this purpose.
- 5.30 Three Environmental Officers were recruited to work with the Area Housing teams, communities and local members in order to initially identify environmental maintenance/repair issues.
- 5.31 The majority of the work identified as a result of the Environmental Programme has been undertaken in house via colleagues in Parks & Countryside, and Infrastructure.

All schemes identified in the consultation exercise with stakeholders were originally anticipated to be undertaken by March 2021. Unfortunately, due to the flooding in the early part of 2020, and the Covid-19 pandemic, it has not been possible for departments to complete all the works scheduled. In the Infrastructure section particularly, efforts have been deployed elsewhere to manage the impact of flooding on villages and town centres. It is now unlikely that the 52 outstanding schemes will commence delivery until October 2020, with a further 12 months for all schemes to be delivered.

The Capital Expenditure Programme for WHQS Works

- 5.32 Total expenditure on the HRA Capital Programme for 2019/20 was £49.5m. This expenditure was funded from the £7.35m Major Repairs Allowance (MRA) received from the WG, revenue contributions from the HRA of £16.3m, HRA balances & in year surpluses of £8m with the remaining funding of £17.9m from borrowing. Total borrowing to date for the WHQS programme is £40.9m.
- 5.33 The total expenditure on the WHQS capital programme this financial year (as at period 3) is some £1.3m which is a significant decrease compared to the same period last year of £7m. This is as a consequence of not being able to progress with works in the normal way during the Covid-19 pandemic (with the exception of essential work), but the programme still has to be delivered. Therefore, any savings made this year, will be required to fund the programme if it is extended beyond the financial year as expected.
- 5.34 Total spend up to the end of 2019/20 financial year for the HRA capital programme is £254m of which £238m relates directly to the WHQS Programme. This resulted in 10,344 (96.97%) properties achieving compliance for internal works, 10,061 (94.32%) properties achieving compliance for external works, and 10,047 (93.51%) properties achieving full compliance by 31/3/20.
- 5.35 The budget for the 2020/21 financial year includes an element to complete the WHQS programme including adaptations & voids (£13m), the start of the new PAMS programme (£8.7m), and £7.3m for indicative new build proposals.
- 5.36 Due to the delays on the WHQS programme as a direct result from Covid-19, this budget will need to be re-profiled to ensure the focus remains on completing the WHQS programme as a priority
- 5.37 The PAMS programme will also need to be re-profiled to allow for the WHQS programme to be completed. On a positive note, some of the works that were earmarked for the PAMS programme could be completed as part of the WHQS programme, such as the buy-backs that were too late to be entered into the WHQS programme for the June 2020 deadline, and the three sheltered schemes as stated previously.

Post Asset Management Strategy

5.38 As previously reported, this strategy sets out proposals following achievement of WHQS by 2020/21, to ensure the standard is maintained thereafter and the Council's housing portfolio continues to provide affordable, quality homes that meet our customers' needs. The Strategy was considered by CHTG on the 4th September 2018, Policy & Resources Committee on the 6th September 2018, and Cabinet on the 12th September 2018.

- 5.39 The asset management programme will initially focus mainly on external works and will ensure continuity of work for the in-house workforce following the completion of the WHQS programme. The in-house workforce will be the main contractor, supported by specialist contractors undertaking work such as roofing and energy efficiency related schemes.
- 5.40 The programme will also include five sheltered schemes identified for remodelling or demolition, and potentially the three sheltered housing schemes being suspended from the programme on Health and Safety grounds (see 5.4) (reported previously in the Re-profiling of WHQS Programme 14th February 2019). These schemes are currently accounted for as an Acceptable Fail due to Timing of Remedy within the WHQS programme, in line with the WHQS guidance document issued by WG. However, on the basis that the WHQS programme is likely to be extended to December 2021, these works could now form part of the WHQS programme and be completed accordingly. Officers are currently considering the logistics on achieving this.
- 5.41 The strategy assumes the successful achievement of WHQS accepting however, that there will be a number of properties that have not met the standard fully and will be classed as "acceptable fails". The majority of these are down to tenant refusals and will continue to be picked up when properties become void at the end of a tenancy. Again, some of these Acceptable Fails could be reviewed within the new timescale of the WHQS Programme.
- 5.42 Further information on the Post Asset Management Strategy programme of work including special projects and improvements will be confirmed following the completion of all the external works surveys and will be detailed in future reports. This will now include re-profiling of surveys and works to account for the impact from Covid 19.

Tenants Communications

- 5.43 As part of the Councils commitment to engage with residents throughout the lockdown period, there have been regular updates on social media, signposting those that need it to support services for housing related advice. Housing services also set up a financial crisis helpline to assist those facing difficulties with rent payments or needing benefits advice, and assurance was given that no eviction action would be taken as a result of financial hardship caused by the Coronavirus pandemic. Tenants were also advised that servicing of gas, stair lifts and hoists would continue to be carried out, along with urgent repairs.
- 5.44 Tenants were informed that contractors were following the current guidelines set by WG and are practising safe distancing measures with appropriate PPE. Alternative measures for paying rent were promoted to tenants and those who were unable to pay via their usual methods, were offered support with changes if required. Signposts to WG links for advice and support during the pandemic were also included.
- 5.45 The majority of council tenants were called to offer reassurance as part of our support offered during lockdown. The objective of the call was to check on the tenants' circumstances/welfare and signpost any tenants who needed support during lockdown (e.g. buddy scheme, essential repairs, food parcels). Support on financial matters was also offered from our Tenancy Support Officers.

- 5.46 When we recommence the internal works we will be contacting every tenant remaining on the internal programme to establish if they are choosing to shield or have any particular vulnerabilities that we need to consider, and if they are happy to allow us into their homes to undertake the work. This is a changing situation and contact needs to be made close to the start of any work on each property to establish the circumstances of the household.
- 5.47 External work has re-commenced in some of our sheltered schemes where risk assessments have been completed and tenants have been consulted. Some schemes are near completion where works to paths and painting are progressing. Further external surveys are intended to be carried out for the post 2020 sheltered schemes with no impact on tenants.
- 5.48 All necessary measures in line with the most up to date WG advice on entering and working inside people's homes have been introduced and appropriate training given. We have been entering properties throughout lockdown to carry out emergency works, including homes where tenants have been either shielding or symptomatic, which required significant measures to be put in place to protect employees and tenants during the peak of the virus. We are therefore in a good position to move towards the non-essential works in tenanted homes, due to our workforce understanding the requirements which need to be adopted, i.e. use of PPE/RPE, planning around and maintaining social distancing, hand hygiene, and appropriate communication with tenants.

6.0 **ASSUMPTIONS**

- 6.1 The main WHQS programme has been set out in communities which are then broken down into streets and account for the full council housing stock.
- 6.2 In order to be able to complete the remaining programme and ensure compliance with WHQS by the deadline set by WG, a number of assumptions have been made:
 - Adequate resources will be maintained.
 - No significant unforeseen work will be encountered which could delay the programme and increase costs.
 - Performance is maintained at current levels or improved.
 - No contractual disputes or challenges are encountered which could result in delays and/or increased costs.
 - No legislative challenges are made which could delay the awarding of contracts.
 - Reasonable weather conditions have been assumed for the remainder of the programme as significant adverse weather could impact on external works in particular.
 - Revenue and expenditure assumed within the latest Business Plan does not alter significantly to impact on the completion of the programme
 - Future waves of the Coronavirus do not materialise
 - No local lockdowns are enforced

7. LINKS TO RELEVANT COUNCIL POLICIES

Corporate Plan 2018-2023

7.1 **The Caerphilly We Want (CCBC, 2018-2023) - Well-Being Plan Objective** Enabling Employment – Use investment in the housing stock to increase the Number of qualified workers and tackle worklessness by providing apprenticeship, training and work placements with our in-house workforce and building contractors.

- 7.2 **The Caerphilly We Want (CCBC, 2018-2023): Well-being Objective 3**: "Address the availability, condition and sustainability of homes throughout the county borough and provide advice, assistance or support to help improve people's wellbeing."
- 7.3 **Caerphilly Homes Service Plan (2018-2023): Priority 1A:** All Council housing is Improved to meet the Welsh Housing Quality Standard by 2020.

Welsh Government Policies

- 7.4 The Welsh Housing Quality Standard: Revised Guidance for Social Landlords on Interpretation and Achievement of the Welsh Housing Quality Standard (Welsh Government, 2008)
- 7.5 **A Healthier Wales:** Our Plan for Health and Social Care (Welsh Government, 2018)

8. WELL-BEING OF FUTURE GENERATIONS

- 8.1 The underlying principles of the WHQS programme, which includes the provision of good quality affordable housing, energy efficient homes and carbon reduction, sustainable communities, health and wellbeing, targeted recruitment and training, clearly links to 5 of the 7 well-being goals in *The Well Being of Future Generations (Wales) Act 2015.* It is consistent with the five ways of working as defined within the sustainable development principle in the Act:-
- 8.2 **Long-term** Since the Housing Ballot (2012) we continue to make substantial investments and improvements to both the internal and external environments of the Council's housing stock, including specialised adaptations in accordance with the needs of some of our tenants.
- 8.3 These fundamental changes and improvements are being achieved through; the implementation of the Welsh Housing Quality Standards; housing adaptations in accordance with tenants and homeowners needs; enhancing the quality of product installations and repairs; improving environments around homes; all aiding the well-being of our communities, its infrastructure and citizens alike, providing homes and communities for now and the future.
- 8.4 **Prevention** The works undertaken through Housing Services helps to improve lives and communities, by securing local employment either in-house or through supplier, contractor and partnership arrangements.
- 8.5 Works undertaken by our services make significant visual improvements to housing stocks and their surroundings environments (improved the look and feel) helping to prevent anti-social behaviour and enviro-crime.
- 8.6 By raising standards and conditions with improved quality materials and appropriate service response, should aide and ease future maintenance schedules and requirements, better controlling costs, levels of deterioration/depreciation, improve safety and accessibility, while also reducing disruption to our tenants in the future,

and aiding quality of life, through intervention and support actions that are fit-forpurpose.

- 8.7 **Involvement** Through established governance and performance frameworks, tenants and local residents are consulted on proposed property and environment improvements works along with various initiatives, and they are periodically informed of progress as part of for example, the WHQS delivery programme.
- 8.8 Numerous working groups are established and well embedded with periodic reporting and feedback opportunities exploited. Welsh Government, Environment Standards, Regulatory Controls and Checks, Tenant Engagement are all part of our daily business.
- 8.9 **Collaboration** The programme delivery focused on internal collaboration, wider partnership arrangements with suppliers and contractors, joint working with the community and various other interested parties/groups. The delivery of community benefits and tenant engagement by all involved with the WHQS programme is a key focus for the success and delivery of this objective.
- 8.10 **Integration** The programme looks to integrate property and environmental improvements that will benefit and transform lives and communities throughout the county borough. It further brings together a variety of stakeholders to deliver long term sustainable benefits for lives and communities including Social Services & Health.

9. EQUALITIES IMPLICATIONS

- 9.1 An Equalities Impact Assessment is not needed because the issues covered are for information purposes only, therefore the Council's full EIA process does not need to be applied.
- 9.2 However, it should be noted that, through the 'adaptations work and improvement programmes' we are assisting citizens with well-being opportunities and helping them stay within their home communities (inclusion). All WHQS improvements and wider environment programmes are delivering equitable standards of facilities where practical and reasonably appropriate and there are no equalities implications to this report that have not been considered or would adversely affect any individual or group who fall under one of the protected characteristics or wider issues as shown in the Council's Strategic Equality Plan.

10. FINANCIAL IMPLICATIONS

- 10.1 Finance arrangements are explained in 5.32-5.35 of this report and are incorporated into the 30 year business plan required by WG as part of the annual MRA application.
- 10.2 The latest business plan was submitted in March 2020 just before the lockdown occurred. At the time it remained affordable to sustain the level of work required to complete the programme within the timescale required, and the current post 2020 commitments.
- 10.3 The business plan includes a level of assumptions such as interest rates, rent increases, pay awards and inflation that are subject to variation. Any significant

changes are reviewed and re-run into the business plan to ensure affordability remains. However, as with all other Local Housing Authorities, the business plan could not have accounted for a pandemic that would disrupt the programme to the extent it has.

- 10.4 The impact of an increase in rent arrears as a consequence of Covid 19 means less rental income being received, which reduces the funding levels for our required expenditure.
- 10.5 Other costs as a consequence include additional void costs, extension of fixed term contracts that were due to end during lockdown, extra deep cleaning of properties during handover and clearance charges, overtime for clearing the backlog of repairs, costs to ensure social distancing measures are in the workplace, and also the continuation of the capital programme under the new safety measures that will be required going forward.
- 10.6 WG have confirmed they will not support any HRA claims for financial assistance from the Covid 19 hardship fund on the basis that not all local authorities have retained their housing stock and the sector would therefore not be treated equally because transferred and traditional RSL's are not offered the same assistance.
- 10.7 Officers are in regular contact with WG officials to agree an extension to finalise the programme. Once this has been confirmed, and properties start to re-open, we should be able to re-cost the work to allow for the social distancing measures that need to be in place to allow safe working for tenants, workforce and contractors. It is anticipated that a revised business plan will need to be submitted to account for this impact, which could have an implication on future new build proposals and borrowing levels.

11. PERSONNEL IMPLICATIONS

- 11.1 Personnel resources are continually reviewed to ensure the momentum of this major investment programme remains on track. Agency workers are also utilised to support the programme due to the temporary nature of some positions and also due to the lack of suitable candidates in the market-place.
- 11.2 Furthermore, as this is the final stage of the programme, we need to review our resources to maintain the Post 2020 strategy programme, with the aim of ensuring the in-house workforce remains sustainable and that there is effective integration across the housing service
- 11.3 As part of the Post 2020 programme, continued close management and monitoring of performance of the programme is essential to ensure that its delivery is not compromised in any way. There will be an increase in workload for the in-house team who are predominantly managing the programme along with remodelling of sheltered schemes. Additional resources may be required to ensure performance in achieving the objective is maintained and the right skill set is available and will be considered further as the Post 2020 work is developed in detail.

12. CONSULTATIONS

12.1 All consultee responses have been incorporated within the report.

13. STATUTORY POWER

- 13.1 Housing Acts 1985, 1996, 2004. This is a Cabinet function.
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