

Agenda

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City Executive Board

Date: **Tuesday 22 January 2019**

Time: **6.00 pm**

Place: **The Old Library - Oxford Town Hall**

For any further information please contact:

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Details of how City Councillors and members of the public may engage with this meeting may be found on page 8 of this agenda.

As a matter of courtesy, if you intend to record the meeting please let the Committee Services Officer know how you wish to do this before the start of the meeting.

City Executive Board

Membership

Chair/ Leader Councillor Susan Brown

Leader of the Council, Board
Member for Economic
Development and Partnership

Vice Chair

Councillor Linda Smith

Deputy Leader (Statutory), Board
Member for Leisure and Housing

Councillor Ed Turner

Deputy Leader, Board Member
for Finance and Asset
Management

Councillor Nigel Chapman

Board Member for Customer
Focused Services

Councillor Mary Clarkson

Board Member for Culture and
City Centre

Councillor Tom Hayes

Board Member for Safer,
Greener, Environment

Councillor Alex Hollingsworth

Board Member for Planning and
Transport

Councillor Mike Rowley

Board Member for Housing

Councillor Christine Simm

Board Member for Supporting
Local Communities

Councillor Louise Upton

Board Member for Healthy Oxford

The quorum for this meeting is three, substitutes are not allowed.

Future items to be discussed by the City Executive Board can be found on the Forward Plan which is available on the Council's [website](#)

Copies of this agenda

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AGENDA

PART ONE PUBLIC BUSINESS

Pages

- 1 APOLOGIES FOR ABSENCE
- 2 DECLARATIONS OF INTEREST
- 3 ADDRESSES AND QUESTIONS BY MEMBERS OF THE PUBLIC
- 4 COUNCILLOR ADDRESSES ON ANY ITEM FOR DECISION ON THE BOARD'S AGENDA
- 5 COUNCILLOR ADDRESSES ON NEIGHBOURHOOD ISSUES
- 6 ITEMS RAISED BY BOARD MEMBERS
- 7 SCRUTINY COMMITTEE REPORTS

The Scrutiny Committee will meet on 21 January 2019 to consider the JSSP Regulation 18 Consultation document (item 8 of this agenda). Any recommendations flowing from the Committee will be published as a supplement to this agenda.

8 JSSP REGULATION 18 CONSULTATION DOCUMENT

Lead Member: Planning and Transport (Councillor Alex Hollingsworth)

The Acting Head of Planning Services will submit a report to seek approvals to progress the production of the Oxfordshire Plan 2050 through adopting the Statement of Community Involvement, approving an amendment to the Local Development Scheme and approving the Regulation 18 (Part 1) document for consultation.

The report will be published as a supplement to this agenda.

9 COUNCIL TAX REDUCTION SCHEME 2019.20

9 - 36

Lead Member: Supporting Local Communities (Councillor Christine Simm)

The Head of Financial Services has submitted a report to consider feedback from the recent consultation on proposed changes to the Council Tax Support Scheme and to agree the principles of the new

scheme to be drawn up for approval by Council on 28 January 2019.

Recommendations: That the City Executive Board resolves to:

1. **Note** the outcome of the consultation on the proposed Council Tax Reduction Scheme;
2. **Delegate** authority to the Head of Financial Services to draft the details of the new Council Tax Reduction Scheme for 2019/20 so that it can be submitted to Council for approval at its meeting on the 28 January 2019; and
3. **Recommend** Council to resolve to adopt the new Local Council Tax Reduction Scheme for 2019/20.

10 REVIEW OF TRAILBLAZER PROGRAMME (HOMELESSNESS PREVENTION)

37 - 76

Lead Member: Deputy Leader (Statutory) - Leisure and Housing (Councillor Linda Smith)

The Head of Housing Services has submitted a report to update the Board on progress of the Oxfordshire Homelessness Prevention Trailblazer programme.

Recommendations: That the City Executive Board resolves to:

Note the outcome of the review and the priorities for the year ahead.

11 TREASURY MANAGEMENT MID-YEAR REPORT

77 - 94

Lead Member: Deputy Leader - Finance and Asset Management (Councillor Ed Turner)

The Head of Financial Services has submitted a report on the performance of the Treasury Management function for the 6 months to 30 September 2018.

Recommendation: That the City Executive Board resolves to:

Note the performance of the Treasury Management function for the six months to 30th September 2018.

12 PROPOSAL TO MOVE CAR PARKING DECKING FROM OXPENS CAR PARK TO REDBRIDGE PARK AND RIDE

Lead Member: Planning and Transport (Councillor Alex Hollingsworth)

The Executive Director Sustainable City will submit a report to seek project approval, subject to budget approval by Council, to relocate and extend the car parking decking currently at Oxpens car park at Redbridge Park & Ride.

The report will be published as a supplement to this agenda.

13 MINUTES

95 - 102

Recommendation: The City Executive Board resolves to APPROVE the minutes of the meeting held on 18 December as a true and accurate record.

14 DATES OF FUTURE MEETINGS

Meetings are scheduled for the following dates:

12 February 2019

13 March 2019

10 April 2019

All of which will start at 6pm.

15 MATTERS EXEMPT FROM PUBLICATION

If the Board wishes to exclude the press and the public from the meeting during consideration of any of the items on the exempt from publication part of the agenda, it will be necessary for the Board to pass a resolution in accordance with the provisions of Paragraph 4(2)(b) of the Local Authorities (Executive Arrangements) (Access to Information) (England) Regulations 2012 on the grounds that their presence could involve the likely disclosure of exempt information as described in specific paragraphs of Schedule 12A of the Local Government Act 1972.

The Board may maintain the exemption if and so long as, in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

PART TWO
MATTERS EXEMPT FROM PUBLICATION

DECLARING INTERESTS

General duty

You must declare any disclosable pecuniary interests when the meeting reaches the item on the agenda headed "Declarations of Interest" or as soon as it becomes apparent to you.

What is a disclosable pecuniary interest?

Disclosable pecuniary interests relate to your* employment; sponsorship (ie payment for expenses incurred by you in carrying out your duties as a councillor or towards your election expenses); contracts; land in the Council's area; licences for land in the Council's area; corporate tenancies; and securities. These declarations must be recorded in each councillor's Register of Interests which is publicly available on the Council's website.

Declaring an interest

Where any matter disclosed in your Register of Interests is being considered at a meeting, you must declare that you have an interest. You should also disclose the nature as well as the existence of the interest.

If you have a disclosable pecuniary interest, after having declared it at the meeting you must not participate in discussion or voting on the item and must withdraw from the meeting whilst the matter is discussed.

Member's Code of Conduct and public perception

Even if you do not have a disclosable pecuniary interest in a matter, the Members' Code of Conduct says that a member "must serve only the public interest and must never improperly confer an advantage or disadvantage on any person including yourself" and that "you must not place yourself in situations where your honesty and integrity may be questioned". What this means is that the matter of interests must be viewed within the context of the Code as a whole and regard should continue to be paid to the perception of the public.

*Disclosable pecuniary interests that must be declared are not only those of the member her or himself but also those of the member's spouse, civil partner or person they are living with as husband or wife or as if they were civil partners.

HOW OXFORD CITY COUNCILLORS AND MEMBERS OF THE PUBLIC CAN ENGAGE AT THE CITY EXECUTIVE BOARD

Addresses and questions by members of the public, (15 minutes in total)

Members of the public can submit questions in writing about any item for decision at the meeting. Questions, stating the relevant agenda item, must be received by the Head of Law and Governance by 9.30am two clear working day before the meeting (eg for a Tuesday meeting, the deadline would be 9.30am on the Friday before). Questions can be submitted either by letter or by email (executiveboard@oxford.gov.uk).

Answers to the questions will be provided in writing at the meeting; supplementary questions will not be allowed. If it is not possible to provide an answer at the meeting it will be included in the minutes that are published on the Council's website within 2 working days of the meeting.

The Chair has discretion in exceptional circumstances to agree that a submitted question or related statement (dealing with matters that appear on the agenda) can be asked verbally at the meeting. In these cases, the question and/or address is limited to 3 minutes, and will be answered verbally by the Chair or another Board member or an officer of the Council. The text of any proposed address must be submitted within the same timescale as questions.

For this agenda item the Chair's decision is final.

Councillors speaking at meetings

Oxford City councillors may, when the chair agrees, address the Board on an item for decision on the agenda (other than on the minutes). The member seeking to make an address must notify the Head of Law and Governance by 9.30am at least one clear working day before the meeting, stating the relevant agenda items. An address may last for no more than three minutes. If an address is made, the Board member who has political responsibility for the item for decision may respond or the Board will have regard to the points raised in reaching its decision.

Councillors speaking on Neighbourhood issues (10 minutes in total)

Any City Councillor can raise local issues on behalf of communities directly with the Board. The member seeking to make an address must notify the Head of Law and Governance by 9.30am at least one clear working day before the meeting, giving outline details of the issue. Priority will be given to those members who have not already addressed the Board within the year and in the order received. Issues can only be raised once unless otherwise agreed by the Board. The Board's responsibility will be to hear the issue and respond at the meeting, if possible, or arrange a written response within 10 working days.

Items raised by Board members

Such items must be submitted within the same timescale as questions and will be for discussion only and not for a Board decision. Any item which requires a decision of the Board will be the subject of a report to a future meeting of the Board

To: City Executive Board
Date: 22 January 2019
Report of: Head of Financial Services
Title of Report: Council Tax Reduction Scheme 2019/20

Summary and recommendations	
Purpose of report:	To consider the feedback from the recent consultation on the proposed changes to the Council Tax Support Scheme and to agree the principles of the new scheme to be drawn up for approval by Council on 28th January 2019
Key decision:	Yes
Executive Board Member:	Councillor Christine Simm, Supporting Local Communities
Corporate Priority:	Meeting housing need; Efficient, effective council.
Policy Framework:	Financial Inclusion Strategy.
Recommendations: That the City Executive Board resolves to:	
<ol style="list-style-type: none"> 1. Note the outcome of the consultation on the proposed Council Tax Reduction Scheme; 2. Delegate authority to the Head of Financial Services to draft the details of the new Council Tax Reduction Scheme for 2019/20 so that it can be submitted to Council for approval at its meeting on the 28th January 2019; and 3. Recommend Council to resolve to adopt the new Local Council Tax Reduction Scheme for 2019/20. 	
Appendices	
Appendix 1	Response to consultation
Appendix 2	Risk Register
Appendix 3	Equalities Impact Assessment

Introduction and background

1. The previous Council tax benefit where people on benefits had some or all of their Council tax paid was stopped by the Government in April 2013. It was replaced with the council tax reduction scheme that was mainly funded by a Government grant.

Councils are required to review their Council Tax Reduction Scheme (“CTR”) for working age recipients on an annual basis and determine whether to revise it or not. The scheme that exists for pension age recipients is a national scheme prescribed by regulations and cannot be varied locally.

2. In order to change its CTR the council is required by law to:
 - Consult with the major precepting authorities
 - Consult with other persons it considers are likely to have an interest in the operation of the scheme

The Council Tax Reduction Scheme itself must be adopted by Council, it cannot be delegated to an officer or committee.

3. Local Schemes must take account of and support:
 - Work incentives and in particular avoid disincentives for those moving into work
 - The Council's duties to protect vulnerable people (under the Equality Act 2010, The Care Act 2014, Child Poverty Act 2010, The Housing Act 1996)
 - The Armed Forces Covenant

Proposed changes to scheme

4. At its meeting on the 18 September 2018, the City Executive Board (“CEB”) agreed to consult on a new CTR Scheme for 2019/20. Public consultation was undertaken from 28 September 2018 to 18 November 2018. The views of the major preceptors, Oxfordshire County Council and The Thames Valley Police Commissioner have also been sought.
5. Prior to recommending consultation to the CEB, officers considered a range of options for changing the CTR scheme for 2019/20 onwards. This included options to reduce the cost of the scheme by introducing a minimum charge for all residents, capping the amount of support that is provided at the level of a Band D council tax charge, or reducing the amount of capital that can be held by a recipient whilst still qualifying for support. These options were rejected as they risked putting further pressure on households struggling with reductions in benefits, low wages and increasing household costs. These options will need to be revisited in future years due to the increasing cost of the CTR scheme to the Council.
6. Only two proposals for change were submitted for consultation. Both proposals relate to a review of two measures which were introduced this financial year; the income band scheme for residents on Universal Credit, and the minimum income floor for self-employed people. The consultation proposed uprating the income bands and sought views on the minimum income floor which had received some criticism for treating self-employed people differently from those who are employed.
7. The existing income bandings used to determine the amount of Council Tax support provided are shown in Table 1 below.

Table 1.

Band	Weekly Income	Discount received	No. of cases per band
1	£0 - £125.99	100%	682
2	£126 - £187.99	75%	163
3	£188 - £290.99	50%	88
4	£291 - £384.99	25%	15
5	£385	0%	

The rationale for the figures is:

- £126 is 16 hours on the National Minimum Wage (“NMW”) rounded upwards, (and is at a level which ensures households who previously received 100% reduction continue to do so)
- £188 is 24 hours on the NMW rounded upwards
- £291 is 30 hours on the Oxford living wage (“OLW”), rounded upwards
- £385 is the benefit cap

8. It is proposed that the income bands should be updated annually in line with changes to the National Minimum Wage (NMW) and the Oxford Living Wage (OLW), and that the benefit cap, be updated in line with inflation (based on the Retail Price Index figure for September 2018). These changes would have no significant impact on the amount of support provided by the Council, and will ensure that no-one has to pay more council tax as a result of receiving a small pay rise. The proposed income bandings based on the methodology above are shown in Table 2 below. The figures have been calculated using the 2019 figures for the NMW and the OLW which are £8.21 and £10.02 per hour respectively. The band 5 value has been updated by 3.3% which is the RPI figure for September 2018.

Table 2

Band	Weekly Income	Discount received
1	£0 - £131.99	100%
2	£132 - £197.99	75%
3	£198 - £300.99	50%
4	£301 - £397.99	25%
5	£398	0%

9. In respect of the minimum income floor for self employed claimants, based on the consultation responses and inequalities in this aspect of the scheme (identified by officers and councillors through feedback and administration of the scheme), it is proposed that this measure be removed from the 2019/20 CTR scheme. Alternative options which were considered included reducing the level of the floor, exempting some types of self-employment from the floor and extending the exemption for new businesses. Whilst there was some support for these options in the consultation, all these options would still leave self-employed people being treated differently from

people earning a salary. Removing the minimum income floor means that support for self-employed people will be based on their actual earnings.

Summary of consultation

10. Appendix 1 provides details of the responses to the consultation on the proposed changes to the CTR scheme. Although only 25 responses were received, many answers were very detailed and showed a good understanding of the issues. The responses also contained some feedback that the consultation document itself was confusing. In view of the detailed responses received that show a good understanding of the issues it is considered that the consultation has been effective and the Council has complied with the legislative requirements for consultation. However, officers will take this feedback on board when drafting consultation on this issue in the future.
11. In relation to the income band aspect of the scheme, a majority of respondents both agreed with the principle of the income banding, and with the proposed uprating.
12. On the proposals for amending the minimum income floor, there was some support for changing the level of the floor, but overwhelmingly respondents said that there should be no minimum income floor in the CTR for self employed claimants. Eighteen respondents either disagreed or strongly disagreed with continuing to maintain this aspect of the CTR. There was a small majority against exempting some types of self-employment from the minimum income floor, and a large majority in favour of increasing the exemption period for new businesses from one to three years.
13. A number of comments were received in respect of the way the national council tax scheme operates. This included the structure of the Council tax bands, the absence of any revaluation of properties since council tax was introduced in 1993 and the liability of tenants for the charge. Oxford City Council has no power to amend these features of the council tax

Implementation

14. There will be some administrative work required to implement the amendments to the CTR and to inform the public about the changes. This includes revising the CTR, amending the functionality of the software used for administering CTR, amending local processes, training staff and producing communications for the Council's customers.

Financial Implications

15. Oxford City Council is one of a small number of Councils whose CTR scheme has maintained the same level of financial support as existed within the old Council Tax Benefit scheme. Most councils have reduced the cost of their CTR schemes by providing a lower level of support. Oxford City Council's scheme will cost £1.4m for the current financial year, and from 2019 will cost a minimum of £1.6m. An increase in the number of CTR claims will increase this cost further.

16. The table below sets out the cost and caseload for the Council's CTR scheme since its introduction. The cost of the scheme is shared by Oxford City Council (15.9%), Oxfordshire County Council (74.6%) and Thames Valley Police and Crime Commissioner (9.5%) in accordance with the proportion of Council Tax levied by each. The table shows that the gap between the net and gross cost to the Council is narrowing as government grant reduces. The gross cost to the Council has remained broadly unchanged for the last four years. This is because despite Council Tax levels increasing significantly in this period, the number of recipients of support has reduced.

Table 3

	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19
Cost of Pension Age	£3,567,670	£3,557,466	£3,326,142	£3,274,619	£3,172,713	£3,284,610
Pension Age caseload	3,572	3,424	3,261	3,122	3,056	2,990
Cost of Working Age	£6,593,636	£6,485,387	£6,234,439	£6,357,253	£6,318,785	£6,541,638
Working age caseload	6,434	6,121	5,963	5,841	5,666	5,558
Total Cost	£10,161,306	£10,042,852	£9,560,581	£9,631,872	£9,491,498	£9,826,248
Total Caseload	10,006	9,545	9,224	8,963	8,722	8,548
Gross Council Cost	£1,712,631	£1,626,667	£1,575,329	£1,572,711	£1,546,165	£1,561,391
Net Cost to Council	-£11,785	£193,396	£523,977	£875,604	£1,230,572	£1,425,212

17. The current cost of the CTR scheme has been factored into the Council's Medium Term Financial Plan with no reductions over the next 4 year period assumed. The actual cost of the scheme to the Council will depend on claimant numbers and the amount of discount given which reduced the Council's tax base and hence the amount of council tax income raised. The proposed changes to the scheme will lead to a small increase in the scheme's cost. The bandings in the income band scheme are being uprated in line with expected increases in wages, and so this change should ensure current recipients of support stay in the same band despite their pay rises. As such this will have a neutral impact on cost. The introduction of the minimum income floor was forecast to save £25,000 in any financial year. As such, reversing the measure will restore this cost to the scheme.

18. Only approximately 17% of the total cost of the scheme will fall on the Council, the balance falling on Thames Valley Police Crime Commissioner and Oxfordshire County Council. Consequently, in order for the Council to save £1 the cost of the scheme must reduce by £6. Reducing the amount of support provided to claimants will also lead to some administrative costs being incurred in the collection of any additional Council Tax charged.

Legal issues

19. In considering changes to the CTR scheme, the Council must take into account the provisions of The Council Tax Reduction Schemes (Prescribed Requirements) (England) 2012 and subsequent amendments.

20. The Council is required to consult on any proposed changes to CTR in accordance with Section 13A and Schedule 1A of the Local Government Finance Act 1992

which require the preparation of a scheme. Before making a scheme, the Council 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. Consideration must be given to the finding of the consultation and equality impact assessment in reaching a decision. Paragraphs 4-9 of this report set out the proposed changes to the scheme and the consultation that was carried out is explained in paragraphs 10-13.

Level of risk

21. A risk register is attached at Appendix two.

Equalities impact

22. The changes proposed in this report do not have any new equality impacts attached to them and in fact removes an inequality that existed by treating self employed earners differently to employed earners. A revised equality impact assessment to reflect the proposals is attached as appendix 3.

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Background Papers: None

Consultation on changes to the Council Tax Reduction Scheme

This document collates the responses to the Council Tax Reduction (CTR) scheme consultation carried out between 28 September 2018 and 18 November 2018. Twenty five complete responses were received to the consultation. The comments received indicate that responses have been received from both people who claim CTR, and people who don't.

All the responses were from individuals rather than organisations. The responses to the two proposals for change are shown below. There was strong support for uprating the bandings used in the income band scheme. In respect of the minimum income floor, there was a high level of disapproval, and strong support for not having a floor.

Comments are collated at the end of the document, together with the Council's responses where required.

Income band scheme for households in receipt of Universal Credit

To what extent do you agree or disagree with the use of income bands to decide how much support people get to pay their Council Tax?

- Strongly Agree 4
- Agree 10
- Unsure 6
- Disagree 3
- Strongly Disagree 1

To what extent do you agree or disagree with the proposal to uprate the income bands from 2019/20?

- Strongly Agree 2
- Agree 9
- Unsure 7
- Disagree 4
- Strongly Disagree 3

Minimum income floor for self-employed people

To what extent do you agree or disagree with the principle that the council should assume a minimum income level for CTR claimants who are self-employed?

- Strongly Agree 3
- Agree 3
- Unsure 4
- Disagree 14
- Strongly Disagree 4

The minimum income floor for CTR claimants who are self-employed is 35 hours at the National Minimum Wage. What level do you think the minimum income floor should be set at?

- 35 hours at the national minimum wage 3
- 30-35 hours at the national minimum wage 2
- 24-30 hours at the national minimum wage 1
- 16-24 hours at the national minimum wage 2
- Below 16 hours at the national minimum wage 1
- There should be no minimum income level 16

Appendix 1

It is difficult for people to increase their earnings in some types of self-employment (such as child-minders). To what extent do you agree or disagree that the Council should exempt some types of self-employment from the minimum income floor?

- Strongly Agree 7
- Agree 2
- Unsure 7
- Disagree 4
- Strongly Disagree 7

New businesses are exempt from the minimum income floor for their first year of operation. To what extent do you agree or disagree that the Council should increase this exemption from one to three years?

- Strongly Agree 8
- Agree 6
- Unsure 8
- Disagree 2
- Strongly Disagree 1

As some of the proposals in the consultation reduce the support people receive, the Council was required to consult on alternatives to making these changes. This included increasing the level of Council Tax, finding savings by cutting other Council services and increasing fees and charges. The responses to these proposals were as follows.

Increase the level of Council Tax

- Strongly Agree 2
- Agree 3
- Neither agree nor disagree 11
- Disagree 5
- Strongly Disagree 4

Find savings from cutting other Council services

- Strongly Agree 0
- Agree 5
- Neither agree nor disagree 8
- Disagree 4
- Strongly Disagree 8

Increase fees and charges

- Strongly Agree 1
- Agree 6
- Neither agree nor disagree 11
- Disagree 3
- Strongly Disagree 5

Appendix One – Comments and Council responses

Income band scheme for Universal Credit customers

1. this is confusing . Most help should go to those with least and/those who have special needs from disability or dependants. Is this what will be achieved?
Response: The scheme provides more support to people on lower incomes. Income received from benefit payments in relation to disability are not counted when assessing the level of support. Universal Credit payments in respect of dependants, disability and caring responsibilities are also not counted.
2. It makes sense to assess income when working out the affordability of Council Tax for low earners, however, the use of flat percentages in the discount does not seem to take into account the different rates of council tax paid because of the property bands so, someone who lives in a higher rated property will pay more than someone in a lower rated property even if they are on the same income. I don't know how to mitigate for this, but since it is difficult to choose where you live, especially if you rent your property, people effectively don't have a choice about what council tax band the property they live in is.
Response: Support is calculated as a percentage of the Council Tax charge, so if you receive a 50% discount this will be more in a Band D property than in a Band C property. However the amount you have to pay will also be higher. This is a feature of the Council Tax scheme that is set by the government, and Oxford City Council has no control over it.
3. I disagree to the extent that you do not take into consideration self-employed people, people with disabilities or single parents. You need to include these categories and take into account their different circumstances which do not necessarily align with people on low incomes.
Response: The scheme does not completely account for individual circumstances, but see the response to the first comment above for the way that parents and people with disabilities are treated.
4. Why not, but I believe landlord should pay the council tax. If the landlord would not pay council tax and maybe other taxed due to the fact of having a low-income person, he may be more inclined to have them as a tenant? This could be a sort of subsidized social housing..
Response: In most circumstances the resident is liable for the Council Tax charge. This is a feature of the Council Tax scheme that is set by the government, and Oxford City Council has no control over it.
5. Why do we pay council tax on the value of the property on 1 April 1991?
Response: This is a feature of the Council Tax scheme that is set by the government, and Oxford City Council has no control over it.
6. This is very financially worded and difficult to understand. It needs to be explained in plain English. If someone is just 1p above a band they lose 25% discount, the bands are too wide, there should be at least 7 bands. How much deduction is made for non-dependants?
Response: A feature of any income band scheme is that there are sharp increases or decreases at the margins of each band. The benefit for those at the lower part of a band is that they can significantly increase their earnings without having to pay more Council Tax.

Appendix 1

Section 58 of the published scheme outlines the rules for non-dependant deductions: https://www.oxford.gov.uk/downloads/file/4505/council_tax_reduction_for_working_age_people_from_april_2018

Your comments in relation to the wording of the scheme are noted and will be taken into account when consulting on this matter in the future.

7. I think the bands should be updated, but because of the high rents in Oxford will they not leave anyone on the so called higher bands in an impossible situation?

I must say I think this whole document very hard to understand.

Response: The Council are aware of the high cost of renting property in Oxford. This is one of the reasons why Councillors have not tried to make any savings in the amount of Council Tax support provided to people on low incomes.

Your comments in relation to the wording of the scheme are noted and will be taken into account when consulting on this matter in the future.

8. Bands 3 and 4 should be merged on the basis that too few employers in Oxford are actually paying the OLW (unfortunately) and therefore the 30 hours calculation should be based on NMW and all those at that level of income should have 50% discount.

Response: When the income band scheme was introduced last year, it led to a small increase in the overall amount of support provided. Any increase in support is a direct cost to the City Council, County Council and Thames Valley Police Commissioner.

Oxford City Council provides one of the most generous schemes of support in the country, but a balance must be struck between ensuring people receive support and the additional cost burden that would be faced by Council Tax payers when increasing that support.

9. The income of poor people fluctuates sporadically. It is no good making assessments on the basis of their last year's income, if the current year's income has dropped catastrophically. Where is your provision for discovering their present income? Also the notes do not state the 'Oxford living wage' - it is an expensive city to live in - nor the meaning of 'over-25s'. The proposal can't be assessed without more specification

Response: The income band scheme is based on an individual's Universal Credit award which is reassessed monthly. As such if someone has had a reduction in their income, their Council Tax Reduction will be reassessed. The Oxford Living Wage is referenced in the scheme, and over 25's refers to a person's age. The national minimum wage has a number of different rates, and the highest rate is for people over the age of 25.

10. Everyone should be treated equally and not classed as any different from anyone else purely based on the area of which they live and if they are in employment.

Response: Noted

11. If you are reliant on benefits then depending on your payments and how much you may have in savings then council tax benefit should be calculated by this.

Response: The Council introduced the income band scheme to simplify the system for providing support for Council Tax. This change has led to a small increase in the amount of support provided to people, however in some cases people might lose out. Where this happens, people can apply for a discretionary reduction. Details of this process are here:

https://www.oxford.gov.uk/info/20036/discounts_and_exemptions/936/council_tax_discretionary_discount

12. This is too complicated - I don't understand
Response: We are sorry for the complicated wording. We will take this into account when consulting on this matter in the future.
13. It fails to take into account individual circumstances
Response: The scheme does account for individual circumstances as the amount of support provided depends on an individual's basic Universal Credit award and the amount of their earnings.
14. I would need more information here to make an informed judgment on how this actually effects people and how it compares to their current situation.
Response: Noted
15. You say "Uprating the bands in this way will ensure that no-one has to make more Council Tax as a result of getting a pay rise." I assume you mean "make more Council Tax *payments*" *Response: That is correct. Apologies for this mistake.*

MINIMUM INCOME FLOOR FOR CTR CLAIMANTS WHO ARE SELF-EMPLOYED

What kinds of self-employment should be exempted from the minimum income floor?

As it is proposed to discontinue the minimum income floor, the specific suggestions in the responses below will not be taken forward.

16. Different people have different difficulties increasing their earnings eg disability , repeated ill health , looking after family . In spite of the administrative problems it should be case by case to be fair.
Response: Noted, by discontinuing the minimum income floor for self-employed people, support will be based on the actual earnings of individuals.
17. I think a minimum income floor completely defeats the purpose of a welfare support system that should be there to help people get through tough financial times. I believe that the minimum income floor along with the benefits cap and bedroom tax are flawed attempts at reducing benefit fraud that disproportionately punish those struggling on low incomes and fail in their objectives by creating an atmosphere of fear and anxiety for low wage earners. For the purposes of this consultation I would suggest the minimum income floor should not be applied to any self-employment whose income opportunities are capped by regulation; any self-employment that is seasonal or otherwise dependent on cycles of activity; and any self-employment that provides a service to the community. I would further suggest that any scheme should be able to fully recognise the individual's actual circumstances and make assessments based on that rather than some arbitrary figure.
Response: Noted, by discontinuing the minimum income floor for self-employed people, support will be based on the actual earnings of individuals.
18. Again, it is circumstances such as single-parenthood which make working a 35 hour week impossible therefore there should be a further exemption for this category.
Response: Noted, by discontinuing the minimum income floor for self-employed people, support will be based on the actual earnings of individuals.
19. Single/loan parent families; disabled; voluntary work
Response: Noted.

Appendix 1

20. Regardless of the kind of self-employment: Like people who are employed, who are full or part time, receive council tax reduction if they are on a 'low income', the same should apply to the self employed. Exemptions should be made for the disabled or single parents who are self employed.
Response: Noted, by discontinuing the minimum income floor for self-employed people, support will be based on the actual earnings of individuals.
21. All self-employments
Response: Noted
22. I think it is very inequitable to assume a level of earning for all self-employed people and to single this group out . I can only assume this is for administrative convenience Self-employed people are likely to be subject to unexpected gaps and fluctuations in earnings , and many choose this option because of poor health or family commitments .
Response: Noted, by discontinuing the minimum income floor for self-employed people, support will be based on the actual earnings of individuals.
23. Qu 8 is misleading. I am against any minimum income floor in all cases.
Response: Noted
24. All those involved in the "caring" professions
Response: Noted
25. The harder question is to identify self-employment which is secure. But the range which is insecure is huge: not only child-minding, but other social work e.g. care for children with special needs which is subject to shortage of funding and unpredictable swings of funding, including swings from local government cut backs. Moreover, the choice of self-employment is due in 30% of cases to long-term health conditions, as pointed out by the Special Committee for Work and Pensions report on MIF for the self-employed.
Response: Noted, by discontinuing the minimum income floor for self-employed people, support will be based on the actual earnings of individuals.
26. Why are we being asked to differentiate between different self-employed people?
Response: Noted
27. I feel that all working people on low incomes should have equality of access to CTR, regardless of whether they are employed or self-employed. Many disabled people work in a self-employed capacity because their disability means that employment is not accessible to them and self-employment offers them meaningful work and an important contribution to the economy and society. This is a strong reason to support their continued self-employment, rather than risk causing unemployment. Self-employed people who are single parents or who have other caring responsibilities need to work around their caring responsibilities. This group should also be allowed to continue in meaningful self-employment.
Response: Noted
28. Child-minders.
Response: Noted.

Please provide any comments you have on the minimum income floor.

29. It is clearly inequitable to single out a particular group. Especially as the self-employed are likely to comprise those with fluctuating hours and pay, having to work around health problems or family care . How can you calculate and assume a minimum income level?

Response: The level was set at the same rate as that which is used within Universal Credit. After reviewing it, the Council is proposing to discontinue it, partly for the reasons you have outlined.

30. Self-employed people should be able to take holidays the same as employed people and therefore applying the minimum income floor 52 weeks a year seems unfair. The effect of this is that anyone hoping to take 4 weeks annual leave will have to earn £296.89 per week. The minimum income floor means that anyone trying to support themselves will not get support when they actually need it. The imposition of a minimum income floor puts the burden of tackling the low wage economy on the individual and fails to recognise that they have no power to change things. It adds a further burden to those already struggling on subsistence levels of income and takes the dignity out of low paid labour.

Response: After reviewing the minimum income floor, the Council is proposing to discontinue it, partly for the reasons you have outlined.

31. Single parents and carers should have further exemptions unless they are high earners.

Response: The circumstances you have outlined are taken into account within the CTR scheme as a whole, although not specifically in the way the minimum income floor operates.

32. Q 10 is too loaded. What if you think exemptions should be considered indefinitely? If you are a lone/disabled parent, you are possibly always going to be one!

Response: Noted

33. In principle I agree, if it is to encourage local businesses. But this again depends on the income of the business in question. Exemption should be based on the low income of businesses (whether run by self-employed or not).

Response: Noted

34. It is impossible to judge the majority of self-employment on set minimum income levels, set minimum hours. It should be on more in line with employees but making allowances for self-employed costs and expenses.

Response: After reviewing the minimum income floor, the Council is proposing to discontinue it, partly for the reasons you have outlined.

35. It is wrong have a minimum income floor, it cripples start up businesses, discourages entrepreneurs from opening businesses, if they know they have to get to a certain level of income to make it worthwhile. The MIF makes it less likely that people will learn the business skills which will inevitably be useful after Brexit, and indeed whatever happens in individual cases some businesses simply won't get off the ground. It is intensely annoying that disabled business-people and those with childcare responsibilities will be less likely to start a business. These are businesses that Oxford and the country needs, and this will simply stifle the economy at this level. There are nearly 6 million businesses in the UK with under 10 employees, this is key to the UK economy, so why would you want to hinder economic growth? It is extremely short term thinking, highly counter-productive and needs a complete review.

Appendix 1

Response: After reviewing the minimum income floor, the Council is proposing to discontinue it, partly for the reasons you have outlined.

36. It takes longer to establish a business than 1 year so should be increased to 3 years.

Response: Noted

37. It is totally unjust, and is untrue, to assume that every self-employed individual is earning at least £274.05 per week. Because of unpredictabilities mentioned above, their weekly income may drop to zero for periods. You must have a system of finding out what current income is and provide the opportunity for individuals to make their position clear to you. See also alternatives below

Response: After reviewing the minimum income floor, the Council is proposing to discontinue it, partly for the reasons you have outlined.

38. New businesses need time to establish a base for how much custom they will get and the reflection in the income of the business.

Response: Noted

39. Surely there should be different options / rules for disabled people?

Response: The circumstances of disabled people are taken into account within the CTR scheme as a whole, although not specifically in the way the minimum income floor operates.

40. I would continue with the current schema.

Response: Noted

41. I think the MIF is an absolutely terrible idea, and I am not surprised that it's received strong criticism (for example: "MPs and campaigners to call for a rethink" – <https://www.theguardian.com/society/2018/mar/25/universal-credit-self-employed-benefit-slash>).

Response: Noted

42. The assumption that self-employed people earn nearly £10,000 a year is laughable: it's an exceedingly high figure which demonstrates just how disconnected policymakers are from the poorest citizens.

Response: Noted

43. The idea that this assumed income level will "encourage self-employed people to increase their hours of work", suggesting that all poor people need is a little motivation is cruelly insulting. As if the poverty itself isn't motivation enough; as if being self-employed isn't already a daily struggle to make ends meet.

Response: This was not the intention of this statement, but the point is understood

44. For many people, the choice is not between 'regular employment' and self-employment, the choice is self-employment or unemployment. Being self-employed is the one way that those who cannot meet the necessities of regular employment (due to e.g. childcare, illness or disability, lack of opportunity, etc.) can still work hard, not lean more heavily on the welfare state, and not fall through the cracks. The MIF attacks, insults and threatens these people – that feels deeply unjust.

Response: After reviewing the minimum income floor, the Council is proposing to discontinue it, partly for the reasons you have outlined.

45. It is highly unfair, and discriminatory against people who are trying to lift themselves out of poverty through self-employment. For example, I am a disabled person, and have slowly and organically brought myself back into work via self-employment.

While I do work more than 30 hours a week, I only get paid for about 16 hours at the minimum wage level. This is because my disability makes it take far longer to complete work tasks than an able bodied person. A MIF fails to take that into account. As a result, because I am hit with a hefty Council Tax bill, I am now FAR below the breadline, but the MIF will refuse to take that into account. I am now far worse off than if I was simply unemployed. Most people would give up work at this point.

Response: After reviewing the minimum income floor, the Council is proposing to discontinue it, partly for the reasons you have outlined.

46. Question 10 does not offer the respondent the opportunity to disagree with the principle of creating a finite exemption period. I do not agree that there should be a finite exemption period for self-employed people, particularly those who are disabled and those who are single parents.

The Special Committee for Work and Pensions' report on MIF for the self-employed points out that, "45% of self-employed claimants with children need to work around childcare or other caring responsibilities, and 30% have a long-term physical or mental health condition" and "Several self-employed people, and organisations supporting them, told us that the consequence of the MIF for them would not be increasing their income or taking an employee job (which they felt was unviable), but unemployment or a major shortfall in income."

The creation of MIF, the minimum income floor, is damaging the lives of thousands of self-employed families across the country. MIF is an assumed amount of income used in calculating in work benefits for the self-employed. This means, unlike other working people, the self-employed are not assessed on actual financial earnings or hours of work. Where as employees on comparable low incomes continue to be assessed on their actual earnings, the self-employed are assumed to work 52 weeks a year for 35 hours a week, with no holidays, public holidays or sick pay, a situation which would be illegal for any employer to impose on an employee. There is no account taken in these calculations of the overheads for small businesses including material expenses, equipment, marketing outlay, travel, premises, light, heat etc etc. There were 0.55 million self-employed people living in households below average income in the UK in 2017 (Joseph Rowntree Foundation, www.jrf.org.uk). This policy disproportionately targets the disabled and lone parents who are contributing valuable skills to their communities and have found work that is accessible to them and can accommodate their physical impairments and their childcare responsibilities. In fact 16%, 750,000, of the self-employed in 2017 were registered disabled (<https://www.resolutionfoundation.org/media/blog/is-self-employment-taylor-made-for-people-with-disabilities/>).

I appreciate that abolishing Council tax reduction for the self-employed may save the council thousands of pounds, which no doubt are desperately needed, but it is also causing enormous financial hardship and will inevitably lead to many small businesses folding under the strain. This has the potential to be counterproductive in the short and long term, as disabled and able bodied self-employed people join the ranks of the unemployed.

Disabled people, single parents and self-employed people have suffered a great deal under the austerity policies of this government and many have been forced into debt and into despair. It would seem discriminatory to offer all other working people in Oxford access to the Council Tax Reduction Scheme, whether they are part or full time employed, but not self-employed people.

Response: Thank you for taking the time to provide such a considered and detailed response. After reviewing the minimum income floor, the Council is proposing to discontinue it, partly for the reasons you have outlined.

47. People starting as self-employed should have a concessionary window of more time as they build their business. i.e People that start a business through some aspect of crafting will need to allow time to grow their clientele and profits before being charged at a certain rate.

Response: Noted

Alternative funding options

48. The council tax banding is unfair because it doesn't differentiate wealthy owners of expensive properties from those much poorer.

Response: This is a feature of the Council Tax scheme that is set by the government, and Oxford City Council has no control over it.

49. Add further Council Tax Bands for properties worth over 500,000 and 1,000,000 and charge a premium for those properties.

Response: Oxford City Council is unable to change the Council Tax bands or create new bands., only the government can make this change.

50. Why not tax people for stalling with their engines on in their cars? Or tax every empty seat in cars? Or fly-tipping? Littering? Public urination? Vandalism? Why not have a two-tiered system for business rates for big and small businesses so that small businesses aren't punished and eventually pushed out?

Response: There is a national scheme of relief from business rates for small businesses. Your other suggestions will be passed on to the Head of Financial Services

51. Introduce a (joint with the county) congestion charge + work-place parking levy and share the income. Stop selling-off Council land to the highest bidder/for commercial-retail developments and use it to provide affordable housing that raises income (working with community-led housing groups).

Response: The council assesses all Council owned sites for their affordable housing development potential, and there have been no recent sales of sites for commercial/retail developments where there was a potential to use them for housing. Your other suggestions have been been passed on to the Councils Head of Financial Services for consideration.

52. To the above questions 12-13-14 are unclear: to whom would you increase the Council Tax? Which services would you cut/reduce? What fees/charges would you introduce? Oxford Colleges and new developments such as the west gate for example should provide ample funds to Oxford Council. Heavily taxing cars and traffic in the city centre. Heavily taxing those on the highest incomes.

Response: The Council is not permitted to levy an income tax. Your suggestion on taxing traffic will be passed to the Head of Financial Services.

53. Why can't council tax bands be distributed more fairly? As it is large and in Oxford extremely expensive properties pay no more than moderate ones .

Response: Oxford City Council is unable to change the Council Tax bands or create new bands. Only the government can make this change.

54. Adjust the banding by investing in a new valuation exercise. Then increase the rate on the top bands and lower it on the bottom.

Response: Oxford City Council is unable to make this change only the government can arrange a revaluation.

55. Vote Labour & we can all have the level of services we once had! NO more Austerity!!!
Response: Noted.
56. Besides increasing Council tax for the better off, the house banding should be far more flexible, with owners of houses worth millions of pounds paying a very much higher rate. In addition, I recognise that Central Government has imposed on Councils the need to supplement their own inadequate social provision. I would contribute myself to a voluntary extra donation for a limited period, if every member of Council did so according to their means and the Oxford Council raised a voluntary fund from the Oxford public. A few thousand contributions could provide more than you would get from the unjust imposition of an imaginary MIF on some of the worst off in the community.
Response: Your suggestion of voluntary contributions will be passed to the Head of Financial Services
57. How about being clearer about what these last questions actually mean?
Response: We are sorry that this was unclear. We will bear your comment in mind when conducting future consultation on this issue.
58. Instead of increasing bills for those with the lowest incomes (who could be pushed into dire circumstances), why not for those with the highest incomes?
Response: The Council is unable to increase Council Tax bills for people on high incomes. Only the government can make this change.
59. Take into account individual circumstances. By not doing so, you make an assumption that because someone is self employed and works a number of hours, that their income matches that of an able-bodied person. This is not true. There are so many circumstances that need to be looked at and a single, immutable calculation is discriminatory - especially against the disabled. I have even considered court action against this system because it is blatant discrimination when the scheme refuses to incorporate disability into earning potential or productivity output.
Response: It is proposed to discontinue the minimum income floor for self-employed people.
60. Questions 12,13 and 14 do NOT offer the 'unsure' response or 'I don't know'. I am not clear on what the statement options mean. 'Increase the level of council tax' for whom? Cutting which council services? And what does fees and charges mean? The questions are unclear. I don't understand what options are being offered because they are so general. I would also have liked to have seen more specific alternative options to funding the CTR scheme. For instance Oxford city is home to some of the wealthiest people in the country and to many second homes. Could the council not look to its wealthiest residents to pay a little more council tax, rather than put the onus on its poorest and most vulnerable?
Response: We are sorry that these questions were not specific enough. We will bear your comment in mind when conducting future consultation on this issue. The Council cannot levy any additional charge, but a suggestion has been made above to consider a voluntary charge. This will be passed to the Head of Financial Services for consideration.

Other comments on the CTR scheme

61. I am very happy that our Council recognises the problems that would be caused if there was no help for people who struggle to pay their Council Tax. Withdrawing all support is likely to lead to many struggling people facing increased costs, criminal

prosecution and imprisonment for being poor, so thank you. Also, following the administration methods of Universal Credit and assessing people's income every month for ever in order to calculate their entitlement is costly and counterproductive if the aim is to reduce costs. Assessing income annually and using an average is much more effective in terms of administrative costs to the council and also much easier for self-employed people to administer. And it gives a fairer benefit outcome since it allows the high earning periods to contribute to the low earning periods in a way that monthly assessment does not.

Response: For self-employed people who are not on Universal Credit, it is the annual earnings which are used to assess the amount of support. It is proposed to discontinue the minimum income floor which will mean that from next year, calculations will be based on actual earnings.

62. If Oxford City Council truly wants to build a "world class city for everyone" it should put its money where its mouth is. Everyone is not just big business and high-earners, it's everyone. I have lived in Oxford on and off for several years and have seen how commercial interests have been put before any environmental or heritage considerations. Given that the council is in the hands of the Greens and Labour, I hope that this will inaugurate positive change.

Response: Noted

63. Using MIF the minimum income floor to assess income means that it will discriminate against self-employed people who will not receive council tax reduction in Oxford. This is unlike people who are employed, who whether they are in full or part time, receive council tax reduction if they are on a 'low income'. There is no sliding scale and no exemptions for the disabled or single parents. Oxford City Council (majority Labour) have chosen to pursue this policy voluntarily to save money, going against Labour principles of inclusion, social democracy, and improving the lives of the most vulnerable.

Response: After reviewing the minimum income floor, the Council is proposing to discontinue it, partly for the reasons you have outlined.

64. CT is an extremely heavy financial burden on too many residents. CTR is vital but in its current form it is still exacerbating inequality.

Response: Oxford City Council provides one of the most generous CTR schemes in the country. The proposal to discontinue the minimum income floor will remove an element of inequality within the scheme.

65. Please vote Labour & you will get funding from the government.

Response: Noted.

66. It is a very helpful scheme to help people get out of poverty - provided the scheme is applied using common sense rather than a single-solution cookie-cutter approach. We are human beings with different skills and abilities. Just because someone works 35 hours a week, it does NOT mean they are at the same level of productivity or earning potential. Additionally, self-employed people have far wider expenses than employees, and this is not taken into account either. I am currently surviving on an income of less than £100 per week. Without the help from the scheme I would never be able to find myself in a position where I can increase this. The added stress and exacerbation of symptoms caused by this MIF assumption has been devastating. In a modern society, we should be going out of our way to make the journey from poverty as motivating as possible. But us self-employed and disabled people are just crushed by a system that apparently refuses to acknowledge our existence or contribution.

Response: After reviewing the minimum income floor, the Council is proposing to discontinue it, partly for the reasons you have outlined.

67. As a member of the Labour party I am more than disappointed that the majority Labour, local city council seems to be out of kilter with the national Labour party's mandate, 'not for the few but for the many'. It's a great shame to choose to hit hardest the poorest and most vulnerable in our city in order to balance the books.
Response: Oxford City Council provides one of the most generous CTR schemes in the country. However after reviewing the minimum income floor, the Council is proposing to discontinue it, partly for the reasons you have outlined.

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Appendix 2

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Title	Risk description	Opp/ threat	Cause	Consequence	Date Raised	Owner	Gross		Current		Residual		Comments	Controls				
							I	P	I	P	I	P		Control description	Due date	Status	Progress %	Action Owner
CTR schme becomes inefficient to adminster	The migration to Universal Credit results in a CTR scheme which is relatively expensive to adminster	Opp	CTR is currently aligned to the Housing Benefit regulations. As customers migrate to Universal Credit, maintaining such a complex scheme is unnecessary	The Council fails to achieve potential efficiency savings from a better scheme design	Sept 18	James Pickering	2	4	1	2	1	2		Introducing the banded scheme removes the complicated means testing of UC	31/3/19		100	James Pickering
Increased customer contact	Customers are concerned at potential changes to the support they get and contact the Council about them.	Threat	Poor explanation of changes, and no mitigation planned.	Customers are not clear about the impact of the changes.	Sept 18	James Pickering	2	2	1	1	1	1		The banding based approach to CTRS makes the scheme easier to explain. The further changes proposed for 19/20 should simplify the scheme and make communication of it more straightforward	15/3/19		50	Laura Bessell
Council reputation	Proposals for changes not clearly thought through, and impact not properly understood, resulting in damage to Council reputation	Opp	Insufficient modelling undertaken, and/or impact of changes not properly understood. Scheme poorly drafted.	Informed customers spot impacts of changes that the Council has not properly identified, undermining the proposals for the revised scheme.	June 17	James Pickering	3	3	3	2	3	2		Expert team from different service areas assembled to work on the proposals, time taken to model changes and understand customer impact. Expert in CTR legislation commissioned to drfat the scheme.	28/2/19		100	James Pickering
Implementation of Scheme	There may not be time to implement and test the necessary software changes prior to the annual Council Tax billing process.	Threat	Lack of resource allocated of testing process and additional resource required for testing of other Academy functionality	Unable to implement the income band schme	May 18	James Pickering	3	3	2	2	1	1		Learning from 18/19 as to the amount of testing required resulted in CTR functionality testing incorporated into the end of year plan for the Academy software system.	01/3/18		25	Laura Bessell

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Initial Equalities Impact Assessment screening form

Prior to making the decision, the Council's decision makers considered the following: guide to decision making under the Equality Act 2010:

*The Council is a public authority. All public authorities when exercising public functions are caught by the Equality Act 2010 which became law in December 2011. In making any decisions and proposals, the Council - specifically members and officers - are required to have **due regard** to the **9** protected characteristics defined under the Act. These protected characteristics are: **age, disability, race, gender reassignment, pregnancy and maternity, religion or belief, sex, sexual orientation and marriage & civil partnership***

The decision maker(s) must specifically consider those protected by the above characteristics:

- (a) To seek to ensure equality of treatment towards service users and employees;*
- (b) To identify the potential impact of the proposal or decision upon them.*

The Council will also ask that officers specifically consider whether:

- (A) The policy, strategy or spending decisions could have an impact on safeguarding and / or the welfare of children and vulnerable adults*
- (B) The proposed policy / service is likely to have any significant impact on mental wellbeing / community resilience (staff or residents)*

If the Council fails to give 'due regard', the Council is likely to face a Court challenge. This will either be through a judicial review of its decision making, the decision may be quashed and/or returned for it to have to be made again, which can be costly and time-consuming diversion for the Council. When considering 'due regard', decision makers must consider the following principles:

- 1. **The decision maker is responsible for identifying whether there is an issue and discharging it.** The threshold for one of the duties to be triggered is low and will be triggered where there is any issue which needs at least to be addressed.*
- 2. **The duties arise before the decision or proposal is made, and not after and are ongoing.** They require **advance** consideration by the policy decision maker with conscientiousness, rigour and an open mind. The duty is similar to an open consultation process.*
- 3. The decision maker must be **aware of the needs of the duty**.*
- 4. The **impact of the proposal or decision must be properly understood first**. The amount of regard due will depend on the individual circumstances of each case. The greater the potential impact, the greater the regard.*
- 5. **Get your facts straight first!** There will be no due regard at all if the decision maker or those advising it make a fundamental error of fact (e.g. because of failing to properly inform yourself about the impact of a particular decision).*

Appendix 3

6. What does 'due regard' entail?
 - a. **Collection and consideration of data and information;**
 - b. **Ensuring data is sufficient to assess the decision/any potential discrimination/ensure equality of opportunity;**
 - c. **Proper appreciation of the extent, nature and duration of the proposal or decision.**
 7. **Responsibility** for discharging can't be delegated or sub-contracted (although an equality impact assessment ("EIA") can be undertaken by officers, decision makers must be sufficiently aware of the outcome).
 8. **Document the process** of having due regard! Keep records and make it transparent! If in any doubt carry out an equality impact assessment ("EIA"), to test whether a policy will impact differentially or not. Evidentially an EIA will be the best way of defending a legal challenge. See hyperlink for the questions you should consider <http://occweb/files/seealsodocs/93561/Equalities%20-%20Initial%20Equality%20Impact%20Assessment%20screening%20template.doc>
1. Within the aims and objectives of the policy or strategy which group (s) of people has been identified as being potentially disadvantaged by your proposals? What are the equality impacts?

Council Tax Reduction is claimed by low income households in the city. The proposals for 2019/20 should not disadvantage any groups as they are designed to make the scheme more generous. Increasing the income bands ensures CTR claimants who receive an hourly pay increase in line with the national and Oxford living wage are not disproportionately affected by moving into a band with less CTR available. The removal of the minimum income floor for self-employed earners will remove an existing inequality by treating self-employed and employed customers in the same way by calculating any CTR entitlement using their actual earned income.

The proposals will affect groups with protected characteristics in the following ways:

Race

It is not intended that this policy will disproportionately affect any particular ethnicity. However BAME groups are over represented in the existing CTR caseload, compared to Oxford as a whole.

Disability

No adverse impact

Gender or Gender Identity/Gender Assignment

There are a greater proportion of female claimants than male within the current CTR caseload. This will therefore affect more women than men of working age.

Sexual Orientation

No adverse impact

Age

Appendix 3

The impact of this policy will be felt by people of working age, as national legislation prevents changes being made to the pension age CTR scheme.

Religion, Faith and Belief

No adverse impact

2. In brief, what changes are you planning to make to your current or proposed new or changed policy, strategy, procedure, project or service to minimise or eliminate the adverse equality impacts?

Please provide further details of the proposed actions, timetable for making the changes and the person(s) responsible for making the changes on the resultant action plan

Increasing the income bands ensures CTR claimants who receive an hourly pay increase in line with the national and Oxford living wage are not disproportionately affected by moving into a band with less CTR available. The removal of the minimum income floor for self-employed earners will remove an existing inequality by treating self-employed and employed customers in the same way by calculating any CTR entitlement using their actual earned income.

The parameters for adjusting the income bands will be made and customers affected will be notified as part of the Council Tax annual billing process.

Self-employed claimants will be identified and cases will be adjusted manually to ensure accuracy in the calculation of earnings and will be notified as part of the Council Tax annual billing process.

If customers feel they are experiencing hardship, there is provision for discretionary payments to be made to people within the existing Council Tax regulations.

3. Please provide details of whom you will consult on the proposed changes and if you do not plan to consult, please provide the rationale behind that decision.

Please note that you are required to involve disabled people in decisions that impact on them

Appendix 3

Consultation has been conducted and details of the responses are provided at Appendix 2 of this report.

4. Can the adverse impacts you identified during the initial screening be justified without making any adjustments to the existing or new policy, strategy, procedure, project or service?

Please set out the basis on which you justify making no adjustments

There are no adverse impacts anticipated.

5. You are legally required to monitor and review the proposed changes after implementation to check they work as planned and to screen for unexpected equality impacts.

Please provide details of how you will monitor/evaluate or review your proposals and when the review will take place

Self-employed claimants have their claims reviewed regularly to ensure the earned income used in the calculation is accurate.

The impact will also be monitored via applications for discretionary support and this should highlight any areas of concern.

Lead officer responsible for signing off the EqIA: James Pickering

Role: Welfare Reform Manager

Date: 3 December 2018

Note, please consider & include the following areas:

Appendix 3

- Summary of the impacts of any individual policies
- Specific impact tests (e.g. statutory equality duties, social, regeneration and sustainability)
- Consultation
- Post implementation review plan (consider the basis for the review, objectives and how these will be measured, impacts and outcomes including the “unknown”)
- Potential data sources (attach hyperlinks including Government impact assessments or Oxfordshire data observatory information where relevant)

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To: City Executive Board
Date: 22 January 2019
Report of: Head of Housing Services
Title of Report: Review of Year One of the Homelessness Prevention Trailblazer

Summary and recommendations	
Purpose of report:	To update the Board on progress of the Trailblazer
Key decision:	Yes
Executive Board Member:	Councillor Linda Smith, Leisure and Housing
Corporate Priority:	Meeting housing need.
Policy Framework:	Housing and Homelessness Strategy
Recommendations: That the City Executive Board resolves to:	
1. Note the outcome of the review and the priorities for the year ahead	

Appendices	
Appendix 1	Year One Trailblazer review
Appendix 2	Case Studies
Appendix 3	Risk register

Introduction

1. The Oxfordshire Homelessness Prevention Trailblazer is a multi-agency programme aiming to tackle systemic issues in the public sector which can increase the risk of homelessness to individuals throughout the county. The two year programme has been running from September 2017 to August 2019. It received £790,000 from the Ministry of Housing, Communities and Local Government, and a further £100,000 from the Oxfordshire local housing authorities, providing a total of £890,000. Commencement of the programme was reported to CEB on 20 December 2017. The county-wide Trailblazer programme is managed by a small team based at Oxford City Council.

2. The broad objectives of the programme are to explore options for intervening as early as possible to prevent people at risk of homelessness ultimately reaching a crisis point. The review of the programme's first year can be found in full at Appendix One. The first six months was spent researching homelessness in Oxfordshire and planning the programme. This included analysis of homelessness data, a qualitative stakeholder consultation exercise and piloting system interventions.

Trailblazer Delivery

3. Key findings from the above data analysis informed the design of the Trailblazer services to be provided. This included the finding that the presence of a housing issue could lead to a significant delay in discharge from hospital once a patient is medically fit. Additionally, within the Oxfordshire prison system, 88% of people entering prison with no fixed address ends up leaving prison with the same status.
4. The stakeholder consultation included workshops involving front-line housing staff, people with lived experience of homelessness and a range of professionals from health, criminal justice and children's social care. People with lived experience expressed a sense of hopelessness about their situation and difficulties in accessing services, but reflected positive experiences of being supported by other people with lived experience. Professionals within the systems felt there was a significant need to improve connections and relationships across statutory and non-statutory services. Awareness of the housing options available to individuals and the local housing authorities' role in this process was low. As a result, early indicators of homelessness were not being acted upon.
5. Following the research three strands of work were developed. These were the embedding of specialist workers within the health, criminal justice and children's social services settings, a community navigator service to connect people at risk of homelessness to the services they needed, and a homelessness champions network to raise the profile of housing in stakeholder organisations.
6. Before commissioning Trailblazer services, some proof of concept activity was undertaken. The research that had been undertaken suggested that there may be some benefit from embedding housing experts in other statutory systems. One of the Trailblazer team piloted this approach in the John Radcliffe hospital, basing themselves with the discharge and social work teams. This trial proved successful by helping to speed the discharge of a number of patients. The Trailblazer team then developed an embedded housing worker(EHW) model with Connection Support, to provide two embedded housing workers in the health, criminal justice and children's social services setting. The embedded workers have been trying to identify people at risk of homelessness in each setting in order to carry out prevention work.

7. From April 2018 to September 2018 the embedded workers dealt with 338 referrals from the three systems they are working in. This breaks down as follows:
 - Health – 145
 - Criminal Justice – 126
 - Children’s Social services – 67

8. There have been fewer cases dealt with in children’s social services, as the second embedded worker only commenced working towards the end of August 2018. The outcomes for the embedded workers model are still emerging but in the first two quarters the team have reported 234 closed cases. 107 (46%) of these cases have resulted in a known prevention of homelessness, 24 (10%) have resulted in an unsuccessful prevention and the remaining 103 (44%) have been categorised as an unknown outcome. The nature of the EHW model (short, sharp interactions) means there will always be instances when the team is unsure of the impact of the intervention or advice provided. However in the second year of the programme we will be working to maximise the number of known outcomes from the work of Trailblazer.

9. The programme wanted to build resilience throughout the county and enable households and individuals to cope better with life and prevent housing-related crises. This built on the feedback from people with lived experience who had reflected a sense of hopelessness about their situation, and had struggled to access the services they required. A Community Navigator service was commissioned to act as a navigator of services to people at risk of homelessness. Aspire Oxford are delivering this part of the programme providing support, brokerage and advocacy to their clients, to empower them to engage with statutory services.

10. Within the first 2 quarters of the programme the Community Navigator team have reached out to both statutory and non-statutory services across Oxfordshire in order to receive referrals at the earliest possible opportunity. The team have also co-located the service in housing associations, GP surgeries and support agencies (e.g. drug and alcohol advice and job centre plus) to create a visible frontline for homelessness prevention.

11. In the first two quarters the community navigators have received 153 referrals. There have been 23 self-referrals and the rest have originated from the local housing authorities and 21 separate agencies. The breakdown of cases in terms of the perceived threat to homelessness is as follows:
 - Client may become homeless in more than 56 days: 92 cases (60%)
 - Client may become homeless within 56 days: 57 cases (37%)
 - Already homeless: 4 cases (3%)

12. To date 53 cases have been closed. Of these closed cases 35 have resulted in a successful prevention of homelessness. Of these, 30 households were able to stay in their existing home and 5 were able secure new accommodation. Four cases have resulted in an unsuccessful attempt to prevent homelessness and the remaining 14 cases are circumstances where the individual lost contact with the service or was unwilling to co-operate.

13. The third element of the Trailblazer is the homelessness champions network. The aim of this strand of the programme is to create a network of housing expertise across other statutory services. The network is facilitated by the Trailblazer programme team who have delivered training and network events on a bi-monthly basis. The network has been used to help design a single countywide process for the new “duty to refer” obligation brought in by the Homelessness Reduction Act (2017). This duty obliges a range of statutory agencies to refer people who appear at risk of homelessness to a local housing authority. All agencies with this obligation are represented in the champions network.
14. The Trailblazer programme has learning at its heart. It is breaking new ground in the connections it is enhancing between sector-wide partners in order to reduce the risk of local homelessness. The programme’s learning is externally facilitated by an organisation called Ratio. Practitioners within the services are brought together on a monthly basis to talk about their work, both what has worked, and what hasn’t. The focus is on the practice of the embedded housing workers and community navigators, and the system barriers that they encounter.
15. Now the services are firmly established, the second and final year of the programme will focus on developing the learning that has been achieved so far. This in order to leave a lasting legacy for the programme, through changing systems in order to continue the progress made in reducing the risk of homelessness, or in exploring options for new services based on the experience of the Trailblazer programme.

Financial implications

16. The funding outlined in paragraph one has all been received. Expenditure is reported on a quarterly basis to the Trailblazer steering group. There is currently a saving of £12,670 as well as projected ongoing quarterly savings of nearly £6,000 per quarter for project costs. This item acts as a contingency and gives the programme flexibility to utilise additional resources, which given its iterative nature is a likely requirement.

Legal issues

17. The Trailblazer programme operates with regard to the Homelessness Reduction Act (2017). The programme aims to engage with individuals prior to the timescale which triggers the Act’s duties. The Act requires local housing authorities to work to prevent homelessness if an individual appears to be at risk of homelessness within 56 days. When the programme engages with individuals who are owed a duty by any local housing authority under this act, the relevant authority is contacted and made aware of the individual’s circumstances.

Level of risk

18. A risk register is attached at Appendix 3.

Equalities impact

19. The Trailblazer programme only works with residents at risk of homelessness and so an impact assessment is not required.

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Oxfordshire Trailblazer: Homelessness Prevention

Year 1 Review

September 2017 – September 2018



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1. EXECUTIVE SUMMARY

The Oxfordshire Homelessness Prevention Trailblazer represents a multi-agency approach to tackling systemic issues in the public sector which can increase the risk of homelessness to individuals. The two year programme runs from September 2017 to August 2019. It received £790,000 from the Ministry of Housing, Communities and Local Government and Communities (MHCLG), and a further £100,000 from the Oxfordshire local housing authorities.

This report outlines the work of the first year of this two year programme. The first six months were spent researching the issue. This included analysis of homelessness data, qualitative stakeholder consultation and piloting of system interventions. Following the research a number of services were commissioned and the second six months has seen those services working holistically with a range of actors within public service sectors including those at risk of homelessness, and the professionals engaging with them.

Chapter two sets out the background to the Trailblazer bid and the broad objectives of the programme. These can be summarised as intervening as early as possible to prevent people at risk of homelessness reaching crisis point. It also provides an overview of the chronology of the project so far, showing how three key themes were developed; targeted upstream prevention, person centred resilience and strategic and integrated system change.

The data analysis which was carried out at the start of the programme is outlined in chapter three. Initially the statutory homelessness returns from the Oxfordshire local housing authorities was evaluated. This showed that the number of single people accepted as statutory homeless was disproportionately low compared to the volume of single people that approach housing teams for help. Data relating to housing issues for the health and criminal justice settings was also analysed. This showed that the presence of a housing issue could lead to a significant delay in discharge from hospital once a patient is medically fit. Within the Oxfordshire prison system, 88% of people entering prison with no fixed address, leave prison with the same status. These findings informed the design of Trailblazer services.

The appreciative enquiry conducted as part of the research phase is the subject of chapter four. Workshops were run with front-line housing staff, people with lived experience of homelessness and a range of professionals from health, criminal justice and children's social care. People with lived experience expressed a sense of hopelessness about their situation and difficulties in accessing services, but reflected positive experiences of being supported by other people with lived experience. Professionals within the systems felt there was a significant need to improve connections and relationships across statutory and non-statutory services. Awareness of the housing options available to individuals and the local housing authorities' role in this process was low. As a result, early indicators of homelessness were not being acted upon.

Chapter five outlines the development of the first of three strands of activity within Trailblazer. The research that had been undertaken suggested that there may be some benefit from embedding housing experts in other statutory systems. One of the Trailblazer team piloted this approach in the John Radcliffe hospital, basing themselves with the discharge and social work teams. This trial proved successful by helping to speed up the discharge of a number of patients. The Trailblazer team then developed an embedded housing worker model with Connection Support, to provide two embedded housing workers in the health, criminal justice and children's social services setting. The embedded workers have been trying to identify people at risk of homelessness in each setting in order to carry out prevention work.

The second Trailblazer service, Community Navigators, is covered in chapter six. The programme wanted to build resilience throughout the county and enable households and individuals to cope better with life and prevent housing related crises. This built on the feedback from people with lived experience who had reflected a sense of hopelessness about their situation, and had struggled to access the services they required. A Community Navigator service was commissioned to act as a navigator of services to people at risk of homelessness. Aspire Oxford are delivering this part of the programme, providing support, brokerage and advocacy to their clients, to empower them to engage with statutory services.

Chapter seven describes the Champions' Network which is the third element of the Trailblazer. The aim of this strand of the programme is to create a network of housing expertise across other statutory services. The network is facilitated by the Trailblazer programme team who have delivered training and network events on a bi-monthly basis. The network has been used to help design a single countywide process for the new "duty to refer" obligation brought in by the Homelessness Reduction Act (2017).

Chapter eight explains Trailblazer's approach to managing the learning that is developed within the programme. This is facilitated by the programme's learning partner, Ratio, who have applied an approach called Era 3 learning. Practitioners within the services are brought together on a monthly basis to talk about their work, both what has functioned well, and what hasn't. The focus is on the practice of the embedded housing workers and community navigators, and the system barriers that they encounter.

Finally chapter nine closes the report by looking ahead to the second and final year of the programme. This will focus on achieving some legacy for the programme, through changing systems in order to reduce the risk of homelessness, or in exploring options for new services based on the experience of the Trailblazer programme.

2. INTRODUCTION

The Homelessness Prevention Trailblazers are a national programme funded by the Ministry of Housing Communities and Local Government (MHCLG) which commenced in spring 2017. The programme's objective was to fund innovative new approaches to preventing homelessness, and develop approaches that could be applied across England by Local Authorities to meet their duties under the Homelessness Reduction Act (2017).

From the outset, the aim of the Oxfordshire Trailblazer was to reduce both the number of people becoming homeless, and those becoming at risk of homelessness. The Trailblazer set out to reduce the number of presentations at Local Housing Authorities, by intervening earlier with people, before they reach crisis.

The Oxfordshire Trailblazer has developed innovative approaches to intervene with people to prevent homelessness much earlier than often happens. This approach is called "working upstream", and has been applied in health, criminal justice, and children's social care settings. This has required a strategic and integrated approach across the county.

The bid was submitted on behalf of the Oxfordshire District Councils, with support from the Oxfordshire Clinical Commissioning Group; County Council; and other partners (Probation, Children's Trust Board and a wider provider network of voluntary and community agencies). Partners agreed to make far less of a distinction between households that would be statutory homeless as opposed to non-statutory homeless, as the overall aim was to reduce homelessness, not to just reduce pressure on statutory services. The bid was seen as an opportunity to:

- Develop improved homelessness prevention
- Address some identified unmet needs and improve multi-agency co-operation
- Inform the approach to the new prevention duty in the Homelessness Reduction Act (2017)

Partners agreed that the bid should attempt to achieve:

- Improved options and advice to vulnerable clients (before crisis where possible)
- Reductions in homeless presentations (to Councils and others – especially non-statutory/ non-priority clients)
- A holistic approach to homelessness from all relevant services dealing with vulnerable customers
- An understanding of people's journeys and triggers to fully inform upstream prevention, what prevention services are needed, and which approaches work best

The key partners and stakeholders in the Trailblazer Programme are:

- Local Authority Housing Needs/ Homeless Teams
- Health (Mental Health Partnership inc. acute services & pathway; A&E; Hospital Trusts; OCCG; GPs;)
- Social Care (Adult Care; Early Intervention and Think Families; Safeguarding)
- Criminal Justice (Community Rehabilitation Company; Probation; Prisons; ASB/ Community Safety teams; Domestic Abuse work)
- Day centres, employment, training and education organisations, substance misuse services, housing associations and less conventional services where people may first seek help (community groups etc.)

The Council submitted the funding bid in November 2016, and received notification that this had been successful in securing £790k of funding for two years (17/18 & 18/19) in December 2016. The programme has been enhanced by a further £100k provided by the Oxfordshire district councils and became fully operational in September 2017 following the initial recruitment phase.

Research phase

The first six months of the project were spent researching homelessness data, engaging with stakeholders and designing services. The research was used to set benchmarks in order to measure the impact of Trailblazer. Key findings in this phase included:

- 43% of prisoners released from Bullingdon Prison into Oxfordshire are discharged with “no fixed abode” or their expected housing outcome is “not known”
- 88% of Oxfordshire prisoners that enter Bullingdon prison with “no fixed abode” leave with “no fixed abode”
- The average Delayed Transfer of Care* in Oxfordshire is 19.8 days, but when only considering cases where housing is the reason for delay, it is 31.8 days

*this is the period where a patient is medically fit, but cannot leave hospital for a variety of reasons, include those related to their housing situation

The Trailblazer development was also informed by an appreciative enquiry. This was a qualitative piece of stakeholder engagement which asked questions about the best way to conduct homelessness prevention, rather than focussing on correcting problems in the current system. The enquiry engaged with front line staff, people with lived experience and professionals working across the systems. Key insight from people who participated was that they would like:

- Better access to housing and homelessness advice earlier, ideally on their own front lines
- Improved relationships across systems, with named contacts
- Not to be judged by the services meant to be supporting them
- Help to deal with the lack of self-esteem which prevents them from approaching the right support service

The research led to the development of three models based on early prevention, improving quality and timeliness of advice and support. These initiatives are summarised below.

Targeted Upstream Prevention (Embedded Housing Workers)

This is a commissioned service to identify households who may be at risk of homelessness, and intervene before any crisis point, when households may need to seek help from local authorities or other statutory agencies. This service is provided by Connection Support, who employ 5 full time equivalent (FTE) Embedded Housing Workers (EHWs) based in children’s social services, criminal justice and hospital settings around the county.

The client of the EHW’s is the system itself, rather than the individuals needing support. Their role is to support professionals in the setting to deal with their client’s housing issues, thereby passing on skills and developing relationships across systems.

In respect of health the officers are embedded in all of the general hospitals across Oxfordshire and in mental health wards. The work started with Delayed Transfer of Care

cases, and progressively moved upstream by attending ward rounds with social workers, enabling hospital staff to spot indicators of homelessness.

In the criminal justice system, EHWs are based in Community Rehabilitation Centre and National Probation Service offices in the community, as well as at Bullingdon and Spring Hill prisons to support resettlement staff to prevent individuals leaving prison with no fixed abode.

The officers embedded in Children's Social Services sit with LCSS and Early Help, to provide robust housing assistance at the earliest possible opportunity.

Person centred Resilience Service (Community Navigators)

In the first 3 months, the Trailblazer team developed a resilience map highlighting the wealth of services available across Oxfordshire. A broad spectrum of services was identified but people lacked the confidence to approach them, or were unaware of how to access the services. As a result Trailblazer co-developed an innovation that would embed a number of community navigators across the county in specific settings. The navigators both support and broker services with a focus on empowering individuals to engage effectively and confidently with what they need to prevent homelessness.

The service is provided by Aspire who offer a range of different services to support longer term solutions to preventing homelessness, working with households to build their skills and improve resilience to changes that may otherwise result in them becoming homeless or threatened with homelessness. They employ 5 FTE in a range of settings around the County and use a personal asset based approach to tackle issues of employability, financial resilience and resilience to homelessness. They link in with existing social prescribing initiatives as well as with housing associations and local authority options teams to help prevent evictions and stabilise tenancies. Many of the navigators have lived experience of homelessness which helps with advocacy and peer support.

Strategic and Integrated “systems change” - Homelessness Champions Network

This network has been established to enhance statutory and other agencies' knowledge of homelessness and effective homelessness prevention activities. It provides a forum for co-operation across key services. (e.g. health and criminal justice), and supporting staff in these settings. This work focuses on delivering more joined-up communication, case management and planning. Ultimately it is envisaged that this will bring about system change by leaving a network of skilled housing champions which can be supported by local authorities.

The delivery of these strands is covered in detail in Sections 5 to 7.

Approach to learning

The final element of Trailblazer is a proactive approach to learning that sits across the entire programme. Ratio has been commissioned to deliver this aspect of the programme. The principles underlying the learning process within Trailblazer reflect the ethos of the programme as a whole which is:

- to learn,
- to listen,
- to collaborate
- to build mutually respectful relationships

Ratio's approach is to hold honest and reflective conversations between actors in the system in order to improve practice. Learning and reflection drive improvement and accountability. This focus on learning and knowledge is a deliberate investment in the quality of relationships and underpins a "positive error culture" – one in which talking about mistakes, and the uncertainties that people feel about their practice, is viewed positively. Ratio have shared this approach within the programme, are applying it to the work of the Trailblazer team. Their learning so far is shown in section 8.

Trailblazer's approach to learning helps to define the ethos of the programme. The contracts with commissioned services are viewed as partnerships with learning at the core of all of them. This is clearly articulated within the service specification of each contract. The purpose of structuring the programme in this way is to develop a culture which encourages and enables challenge and honesty between actors. Learning from the data collected in Trailblazer is intended to lead quickly to revision and adaption and iteration.

3. DATA ANALYSIS

At the outset of the project the central Trailblazer team wanted to understand the extent of housing and homelessness issues across Oxfordshire. The Trailblazer team was particularly interested in understanding the main reason for presenting as homeless to a local housing authority (LHA), and whether there were any tangible differences between the five Oxfordshire LHAs. This analysis was completed by looking at historic P1E (statutory homeless applications) returns to central government. However, it should be noted that since April 2018 a new reporting methodology known as Homelessness Case Level Information Classification (HCLIC) has been implemented. This should produce a richer set of data that should allow for more in depth interrogation of homeless approaches, particularly those cases that do not result in a statutory duty to house the applicants. Under P1E, statistics connected to these individuals or households were not recorded.

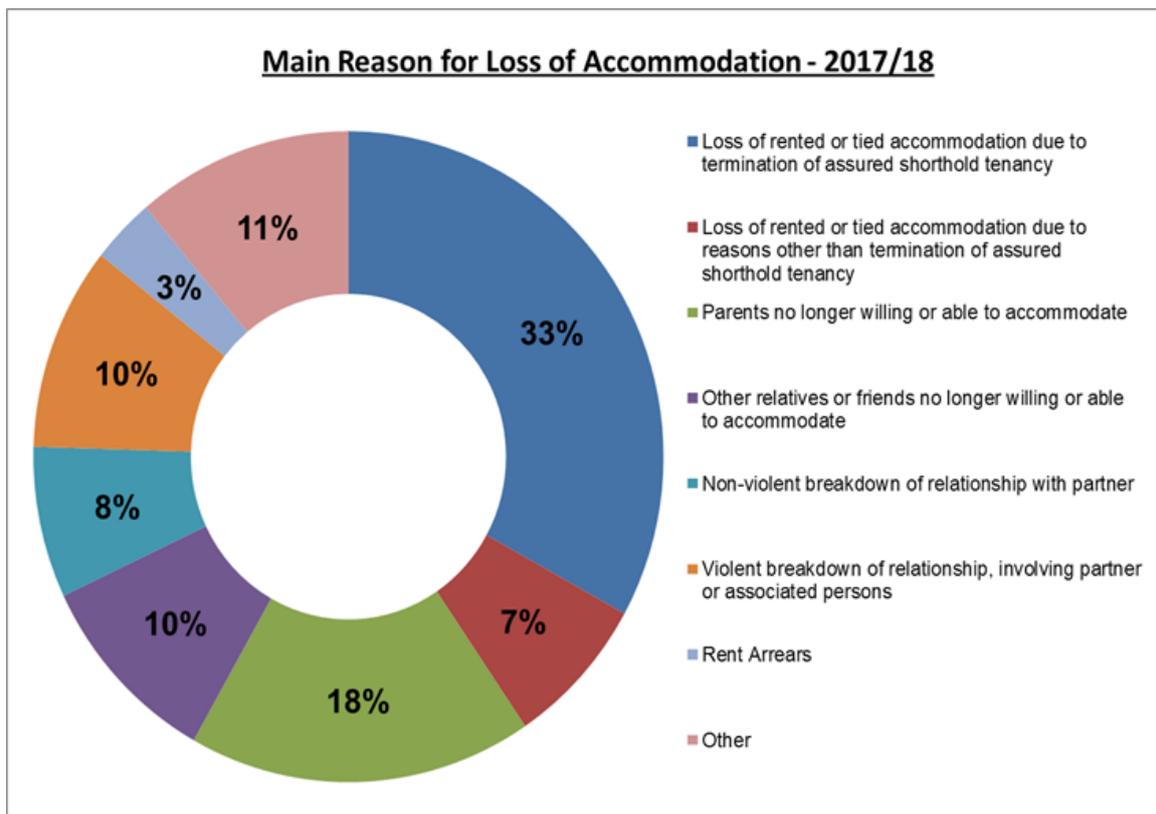
In 2017/18 there was an increase in the number of homeless applications made in Oxfordshire when compared to the previous year; an increase from 616 to 690. 306 (44%) of the applicant households were accepted as being eligible for housing assistance (e.g. a British national, EEA and EU nationals with a right to reside and other qualifying persons based on immigration status), unintentionally homeless and in priority need (certain households that are deemed to be most vulnerable based on known characteristics) and were therefore owed a full duty by the LHA. This number is virtually identical to the previous year's total of 302 (49%) but actually represents a drop in the percentage of homeless applications accepted.

Approximately 36% of homeless applications made in Oxfordshire result in either a decision that the applicant has made themselves intentionally homeless, or they are not considered to be in priority need. This therefore means that these households were not owed any duties under the previous legislative framework. The overall total of these decisions in 2017/18 was 246. This was a significant increase on the previous year (172) and is largely attributable to the decisions taken by West Oxfordshire who have seen their numbers of intentional or non-priority decisions increase from 25 to 88. However as a result of the introduction of the Homelessness Reduction Act (HRA) in April 2018, these types of household are now owed duties to prevent and/or relieve their homelessness and are likely to receive greater support from the LHA as a result.

Diagram 3.1 represents the main reason for loss of accommodation in 2017/18 when a statutory homeless duty was accepted by an Oxfordshire LHA. 40.5% of cases relate to an approach as a result of losing private rented or tied accommodation that is linked to employment. This figure is broadly the same for all of the Oxfordshire districts but the one major divergence relates to Oxford City where 50.5% of all acceptances result from a household losing private rented or tied accommodation.

36.0% of accepted cases were as a result of a non-violent relationship breakdown with a partner, parent, other family member or friend. This represents a decrease in the overall proportion from the previous year (41.6%) and is largely offset by the increase in violent relationship breakdowns, which increased from 6% (18 examples) to 10% (31 examples).

Diagram 3.1



Our analysis of the P1E data demonstrates that the Oxfordshire districts are disproportionately servicing a young population in respect of homeless applications. 81% of all individuals/ households accepted as eligible, unintentionally homeless and in priority need were aged between 16 and 44 (this age range is forced upon us by the configuration of the P1E report). In 2016/17 the proportion was higher at 86%.

Likewise, families with dependent children appear to be over represented. 75% of all acceptances relate to this group but the Trailblazer team has approximated that only 40% of approaches relate to families with dependent children. Conversely the number of single people accepted as statutory homeless is disproportionately low compared to the volume of single people that approach the housing options services. For example, prior to the introduction of HRA in April 2018 the Trailblazer team estimated that only 2.5% of single men that approached the housing options service in Oxford received a full statutory duty. The remainder received general advice on how to resolve their issue but with very little, if any, follow up support.

The introduction of the Prevention and Relief duties, in the HRA, will help to reverse this trend but the analysis did help to shape the Trailblazer programme and the focus of the commissioned services. In particular the programme was interested in how we could support non-statutory single people to prevent homelessness much earlier on in their journey.

Health

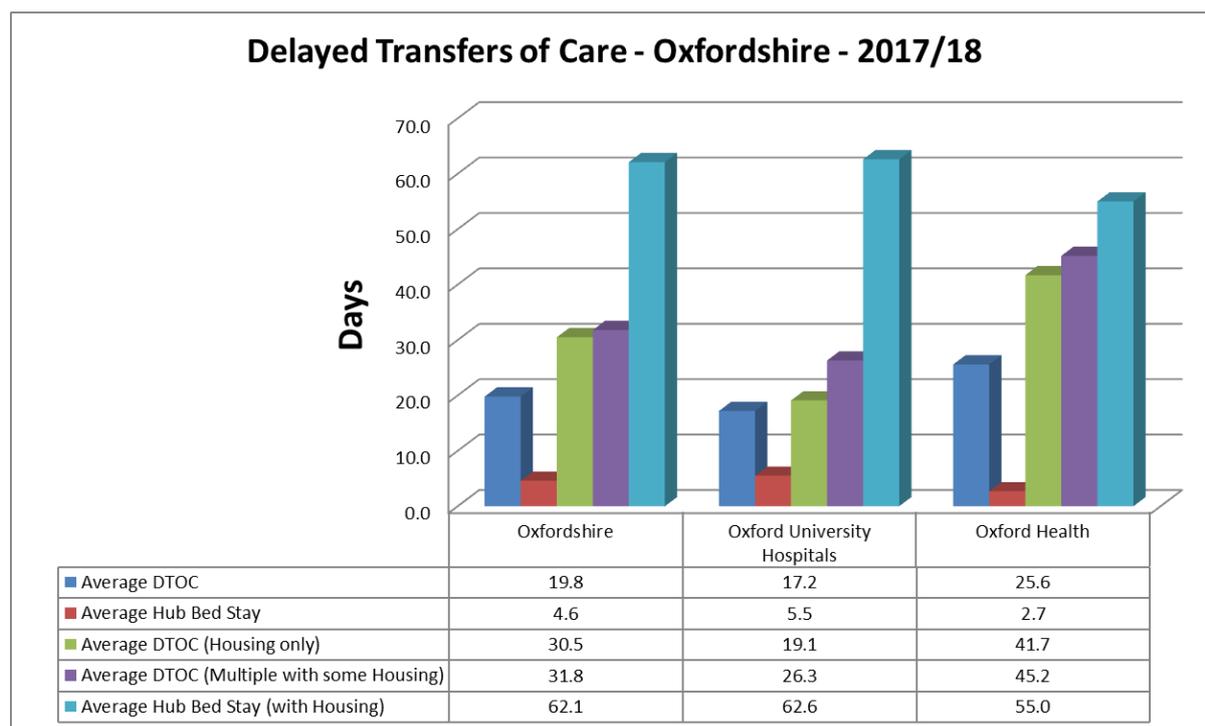
The following information is based on data that has been provided by the Oxfordshire Clinical Commissioning Group. It relates to all delayed transfers of care (DTOC) for the period of April 2017 to February 2018. This is when someone is medically fit for discharge but is unable to go home. This data is collected across 'Oxford Health NHS Trust' (OH) and 'Oxford University Hospitals NHS Trust' (OUH).

Within this timeframe there were 59 delayed transfers of care (DTOC) cases which have specified housing as one of the reasons for the delayed discharge. This resulted in 2,744 days of delayed transfer across Oxfordshire's hospitals and hub beds (additional beds in the community that free up hospital beds and support recovery) when someone was medically fit for discharge. If using the New Economy Manchester model of cost analysis the total cost of these beds to the NHS in Oxfordshire could be in excess of £1.2m (£451 per bed per day). In addition to this there is the unknown social cost of other individuals being unable to receive the treatment they need due to a lack of capacity.

Diagram 3.2 indicates the extent to which housing has an impact on an individual's DTOC across the county. It also indicates the split between OUH, 42 cases, and OH, 17 cases, over 2017/18.

Across the Oxfordshire hospitals the average DTOC case extends to 19.8 days, this figure encompasses all reasons for a delayed discharge. However when you isolate the cases that have indicated housing as the only reason for the delay, the average delay increases to 30.5 days. Equally, if all cases that have given housing as one of multiple reasons for the delay are considered, the average wait jumps to 31.8 days.

Diagram 3.2



The data indicates that there is a significant issue surrounding the use of hub beds for people with housing and homelessness issues. As indicated in the table above, the average use of a hub bed across Oxfordshire is just 4.6 days. However when isolating housing cases this rises to approximately nine weeks. There was one example where an individual was moved to a hub bed which resulted in an additional delay of 146 days.

The data also indicates that there appears to be a more pronounced issue across the OH portfolio in terms of all DTOC. In instances of DTOC involving housing related problems, the average delay can be twice as long as people that have been provided care by OUH (see

the green column in Diagram 3.2 above). It must be noted however that OH have experienced significantly fewer cases than OUH.

Criminal Justice

The following figures are based on information provided by the CRC Resettlement Team at Bullingdon Prison. It relates to information they have been collecting since June 2017 and relates to individuals with an Oxfordshire connection.

In this period 43% of prisoners released from Bullingdon Prison with an Oxfordshire connection are either discharged with 'No fixed address' (NFA) or their expected housing outcome is 'Not known'. This accounted for 112 individuals. As a comparison, only 29% of prisoners enter prison with this as their housing status.

There is a stark contrast between the outcomes for those managed by NPS and the CRC. 48% of CRC managed prisoners are either discharged with 'No fixed address' (NFA) or their expected housing outcome is 'Not known', but this falls to 35% for NPS managed individuals. The lower proportion is expected to be related to the use of approved premises for this higher risk category of prisoner. Work is still being collated to understand the extent of the NFA problem for individuals that move on from approved premises and have a Oxfordshire local connection.

Only 12% of Oxfordshire prisoners that enter the prison system with NFA as their housing status manage to secure some form of accommodation prior to their release. For CRC managed prisoners it is as low as 9.5%. Effectively this means that if you enter prison without a home, it is highly likely that you will leave prison without anywhere to go. In the 10 months monitored only 13 prisoners that had entered prison NFA managed to source new accommodation prior to release. This indicates that much more needs to be done at an early stage if an individual presents as NFA.

Conversely 88% of prisoners that enter prison with a known address, leave prison with somewhere secure to stay. In the 10 months monitored only 19 individuals went from having somewhere to live, to leaving prison NFA.

The data indicates that length of stay does impact on the proportion of prisoners released NFA, particularly for people on very short sentences. For those individuals with a sentence of less than 4 weeks; 56% are released NFA. For people on a sentence of 4-13 weeks; 29% are released NFA. For prisoners on a sentence of between 3 months and a year the figure is 33%. For those individuals serving a sentence in excess of 1 year, 35% are released NFA.

Children's Social Services

Given the nature of how Children's Social Services have operated in the past there was no clear benchmarking data that related to housing and homelessness issues. However some of the impact from working in this system is outlined in the Embedded Housing Worker section of this report (see Chapter 5.)

4. THE APPRECIATIVE ENQUIRY

The Trailblazer Programme is based on the principles of an appreciative enquiry. This is a strengths-based approach, giving value to front-line expertise, people with lived experience and building on the good practice that already exists within the system. The central team felt that it was imperative to take time to study the system, listen to the experts and form an opinion on how to improve homelessness prevention and avoid crisis situations.

Over the initial months of the Trailblazer programme a range of workshops were run with housing front-line staff, people with lived experience and a range of professionals across health, hospitals, mental health hospitals, midwives, Bullingdon and Spring Hill Prisons, Job Centre Plus, Think Families and care leavers' teams. The team has taken time to think, build relationships, build trust, establish a coalition of the willing, as well as evaluate the qualitative and quantitative information being gathered related to systems.

The team have taken advice and spoken to national experts such as the Lankelly Chase Foundation and Dr Michael Little from Ratio (formerly from Dartington Social Research Unit) to refine and think through the direction of travel for the programme and are keen to embrace the principles of a "study – experiment – re-design" approach to the programme and to the commissioning.

Lived Experience Analysis

With the support of Aspire Oxford, Bullingdon and Spring Hill prisons and Crisis, the Trailblazer team undertook a number of one-on-one interviews and focus groups with people that have a lived experienced of homelessness. We wanted to understand their encounters with the system, how it made them feel and what potentially they could have done differently to avoid homelessness. The hope was that the team could then take this learning and build it in to the development of the commissioned services.

The qualitative analysis of this data engendered a number of repeating themes, namely:

- People experiencing a sense of hopelessness about their situation;
- Low self-esteem which wasn't addressed and perpetuated the existing issue;
- A lack of awareness about how to access appropriate services
- Individuals lacking the skills or knowledge about how to maintain a tenancy
- A feeling that they were being judged, rather than supported, by statutory agencies;
- Individuals found that assistance from people with lived experience really helped
- A lack of continuity with direct support
- Unstable childhoods with an absence of guidance in formative years

The following quotes have been taken from some of the interviews and group sessions. They add context to the themes listed above and helped the Trailblazer team to think about how to develop a resilience service:

"I would have liked someone to help me ask questions and give me encouragement. I needed someone to see the potential in me."

"I was encouraged to approach the council but was offered no help and was turned away."

"Throughout my life having an advocate would have helped. It would need to be someone with lived experience or who actually cares."

“My support worker at Aspire is an ex-addict and understands how people feel. There is no judgement”.

The Frontline and Professional View

Having spent time studying the system, talking to professionals working in the system and those who are recipients of the system’s services, it was clear that frontline staff wanted better access to housing and homelessness advice. Ideally this would be on their own frontlines and easily accessible.

Moreover almost all professionals expressed a view that there was a significant need to improve connections and relationships across statutory and non-statutory services. It was acknowledged that there was a wealth of expertise and support available in Oxfordshire but that it was often difficult to know who these organisations were, and what specific services they delivered. This in turn made it difficult to signpost households to those organisations.

Furthermore our initial discussions with staff and service users of the three systems signalled that our preconceived assumptions about the levels of housing and homelessness knowledge were excessive. The team were constantly told that housing was considered as a ‘can of worms’ or ‘not my responsibility’, often meaning that cases were missed at the first opportunity. More particularly there appeared to be a number of recurring systemic barriers and concerns that prolonged or impaired a housing and homelessness issue. In general these could be broken down in to the followings categories:

- Early indicators of homelessness were not being acted upon
- There is a lack of understanding about housing rights and the applicable legislation
- Little knowledge on the suite of housing options available to households threatened with homelessness, when to use them and the role of the Local Housing Authority in this process
- Staff appeared to be unaware of the responsibilities placed upon a household in respect of maintaining their tenancy, or their property
- A lack of knowledge in respect of related legislation e.g. Universal Credit and Housing Benefit
- Poor communication between organisations and a lack of clarity about who is taking the lead

Based on our analysis of housing and homelessness data, combined with the findings of the qualitative research, the Trailblazer team were able to formulate an idea of how to move forward with the commissioning process. The following sections of the report demonstrate how the two main services; the Embedded Housing Workers and the Community Navigators, have this built in to them.

5. EMBEDDED HOUSING WORKERS

Following the data analysis and appreciative enquiry, the next stage was to deliver a response – an experiment. The concept of having on-hand housing expertise had been repeatedly requested by professionals and people with lived experience as something that they would like to see happening.

This prompted the team to consider the viability of embedding housing experts in other statutory systems so that housing issues could be flagged up at the earliest possible time. Additionally it should help to build awareness of housing issues in those settings by sharing knowledge with professionals about the options available to households threatened with homelessness.

The team utilised the knowledge and experience of the Champions' Network Co-ordinator, Mel Armstrong, who had previously worked as a front-line housing options officer. This enabled the programme to accelerate the roll out of this proof of concept by placing Mel at the John Radcliffe hospital, and subsequently both mental health hospitals, to test the model. This was with the following purpose:

- To establish housing expertise within the discharge and social work teams at the hospitals
- To “add value” to cases by providing advice on the suite of housing and prevention options available
- Share expertise with these teams in respect of housing and homelessness and at the same time build relationships across systems
- Test whether this approach works, and has value going forward
- Collect observations and data in respect of how hospital systems work and interact with housing services, enabling the programme to focus on system change in those settings
- Help the Trailblazer team think about what might be a sensible cascading system to enable the earliest possible indications of homelessness to be spotted

The response to the trial was overwhelmingly positive, particularly as a result of Trailblazer being able to produce ‘quick wins’ for both the health and housing systems. In the most part this meant that individuals were able to return home, or move to new accommodation, more swiftly than previously experienced because of a direct intervention by the embedded worker. This in turn meant that the bed became available quicker and that housing options teams did not encounter a crisis presentation at a later point.

Frontline staff were very appreciative of having a named person to talk to on site, particularly in cases of a legislative or local connection nature. Moreover, it was clear that there was a limited understanding of the housing options available to households and that by having an expert to talk to, more holistic techniques could be employed to prevent homelessness.

Based on the success of the trial, the Trailblazer team worked closely with Connection Support to develop a full service encompassing six embedded housing workers across the Health, Criminal Justice and Children’s Social Services systems in Oxfordshire (two in each system). The innovation has been commissioned for 17 months and will run from 1st April 2018 through to 31st August 2019.

The contract established the objective of the embedded workers as enabling professionals working in those systems to navigate the suite of homelessness prevention options in the county, and understand the differences and commonality between the five districts. In addition it was expected that they would build trust and relationships with professionals

working in their system and be seen as a go-to person for help whilst also inspiring others to do things for themselves.

They have also been tasked with thinking about the end-to-end journey of people's engagement with the housing system in order for the team to start unpicking the wider systemic issues that are threatening people with homelessness.

Health

Further to the initial work at the John Radcliffe, the Trailblazer programme is now embedded at all of the county's general hospitals and mental health hospitals. The two embedded workers each have designated sites and working patterns which enable staff in those locations to know when it is best to approach them. They also respond to requests for support via phone and email when not on site. They work in a systematic way to find relevant housing cases and support the healthcare systems existing discharge procedures and protocols.

What the trial uncovered was that the health system was accustomed to individuals getting stuck in hospital as a result of a delayed transfer of care (DTC). This is when someone is medically fit for discharge but is unable to go home. Each case is coded based on the reason for delay and as indicated in chapter three, cases exhibiting a housing issue cause much longer delays than average DTC cases in Oxfordshire. DTC cases are important to hospitals because they want to release those beds to patients needing care and make more efficient use of the resource. In effect DTC cases create an unnecessary financial cost for the NHS and a social cost for those people unable to receive timely treatment. Whilst it is difficult to pinpoint the exact financial cost of an NHS bed per day (it is reliant on the type of hospital and the specific ward it is situated on), the New Economy Manchester model estimates an indexed figure of £451 per day. A two week delay would therefore result in a potential overspend in excess of £6,000.

The team therefore deemed it appropriate to start the process by working with DTC cases where housing had been highlighted as a reason as to why that person could not go home. The team wanted to resolve the threat to housing as quickly as possible but also to start unpicking these cases to understand how they could have been flagged up earlier, in order to totally prevent cases from becoming DTC. Ultimately the programme is looking to reduce the number of people becoming DTC as a result of a housing issue, but also to reduce the average length of a delayed discharge for these types of case.

In the trial phase it appeared that the perceived complexity of housing and homelessness meant that these types of cases were often only picked up at the point that an individual was ready to be discharged home. This clearly has implications for the hospital and the individual simply because it can take a significant amount of time to adapt a home or re-house someone, particularly when someone has had a life-changing material change of circumstances. As a result the team has been constantly thinking about how to move upstream to prevent DTC cases from happening in the first instance, and to provide more time to resolve significant housing problems.

The embedded workers still regularly attend DTC meetings, but with the assistance of the Oxfordshire Clinical Commissioning Group and the various discharge teams the programme is now supporting the 'stranded' and 'super-stranded' initiatives within these settings. These procedures have been set up to ensure that everyone admitted to a hospital for more than 7 days has a confirmed discharge plan in place. If an individual has been in the hospital for 7 days but does not have a known destination for discharge they are categorised as 'stranded'. This information is picked up on the ward rounds by doctors, nurses and social workers and is subsequently flagged to the embedded workers if a housing issue is raised. If

a patient gets to 21 days without a confirmed discharge plan they become a 'super-stranded' case. This is considered a serious threat to that person being able to leave the hospital once medically fit for discharge and is therefore escalated to a more senior level to find a resolution. Trailblazer staff are attending all 'super-stranded' meetings and are contributing to any cases where a potential housing issues has been raised. This is with a view of preventing as many cases as possible from reaching a DTOC status.

One of the key learning points developed thus far is how to ensure that the programme remains sufficiently upstream in a hospital setting. The pathway of stranded, super-stranded and DTOC has provided us with a systematic procedure to prevent homelessness but the monitoring suggests that the embedded workers are regularly asked to support rough sleepers. More often than not this is a chaotic cohort of people with significant complex needs that require specialist support from other commissioned services. The embedded workers will signpost to the relevant services but given the complexity of these cases it is not expected that they would necessarily spend a significant amount helping to resolve them.

In the Mental Health setting there has also been considerable learning about the limited options available to this cohort of people, largely due to the level of support needed to maintain tenancies. It has been noted that a number of people with mental health concerns have experienced eviction in spite of the fact that they are often positioned in specialist accommodation most suitable for their needs. Ultimately this then creates a cycle of homelessness that regularly results in the local housing authority placing the individual in temporary accommodation. This form of housing is likely to be unsuitable based on the vulnerability of the person and is often a precursor to being placed back in supported housing.

As a result of this the Trailblazer programme has engaged with both Oxfordshire Mind and Response to revise the pre-eviction protocol within the mental health pathway. This now places much more emphasis on early prevention and is a countywide protocol that has been signed off by all of the districts. The procedure is currently being put into practice with Trailblazer supporting effective delivery and mediation.

Health Case Study

A woman - vulnerable because of a learning disability - was admitted to hospital in a state of distress following the death of her partner. The patient was a social tenant and had been advised by her landlord that she should not return to the property because they had concerns over her ability to manage the tenancy on her own. The hospital staff believed that the patient did not have the right to return to her home so she remained in hospital.

The patient was referred to the embedded worker who advised hospital staff about the tenant's legal rights and confirmed that she was able to return home. The embedded worker identified sources of support, including tenancy sustainment services and money management, and worked with hospital staff to make the appropriate referrals.

As a result of the trailblazer, the patient was discharged to her home with ongoing support in place to help her maintain her tenancy. This reduced the delay in her discharge and the hospital bed was made available at a time of peak demand. Taking into account the costs that would have been incurred if the embedded housing worker had not intervened to prevent homelessness; this case was estimated to have resulted in savings to the public purse of £7,612. This estimate is based on figures contained within the New Economy Manchester model Unit Cost Database.

Criminal Justice

The nature of the criminal justice system means that is very difficult for an individual to resolve their own housing situation, mainly because they do not have access to the necessary support services. Hence it is the role of probation officers and the resettlement teams to work with prisoners to ensure that some form of housing advice and support is delivered to them. However, given the data analysis of people leaving prison with no fixed address (NFA) it was clear that more needed to be done to support staff to find suitable housing for this cohort where possible.

The Trailblazer programme has embedded two housing workers in the criminal justice setting to support Oxfordshire residents that are threatened with exiting the system NFA. One is located with the National Probation Service (NPS) and the other works alongside staff from the Thames Valley Community Rehabilitation Company (CRC). Both are located in Bullingdon and Spring Hill prisons, as well as in community settings. The NPS worker is also embedded at the two approved premises located in Oxford City.

The Trailblazer team have tried to approach the identification of cases in a systematic way by using the techniques already employed within the criminal justice setting. Effectively there are two main points at which housing information is collected from people contained within the system. On entry an initial interview is conducted to establish their circumstances, including their housing status. Likewise at 12 weeks prior to release a similar consultation is held to establish whether there is an accommodation need for that person. The embedded housing workers have been tasked with supporting those individuals that report that they are either leaving NFA, or suggest that they do not know where they are going at that pre-release interview. Where possible they will also use the entry information to start supporting those individuals that present as NFA from the outset.

By targeting this cohort the programme hopes to reduce the number of crisis presentations to local housing authorities (LHAs) immediately after release. Likewise the expectation is that by finding accommodation for these individuals the chance of re-offending is greatly reduced, which in turn produces a significant saving to the public purse.

However, it should be stated that the housing options for people being released from prison NFA are greatly reduced when compared to the average person. They are unlikely to receive any significant support from LHAs as they are less likely to be considered a priority need, and are likely to be considered as intentionally homeless. Likewise on release they can struggle to find accommodation with a private landlord because of a lack of deposit or simply because of their circumstances. Issues around claiming Universal Credit on release also impact an individual's ability to secure suitable accommodation. With this in mind the Trailblazer team have put together a check list of all possible options for this cohort and work with the staff in the system to explore them prior to release.

Children's Social Services

The Trailblazer programme is looking to place resilience further upstream to prevent families who may have children in need, or on child protection plans becoming homelessness. Anecdotally, professionals in the setting report that the root cause of 10% of all children who are currently in care is housing and their view is that it is significantly under reported across other areas of social services.

Our early work with Children's Social Services suggested that housing was a blind spot for the system as it was considered to be too complex to navigate. For instance, at no point in a Multi-Agency Safeguarding Hub (MASH) referral are any questions specifically asked about housing. This sometimes means that the excellent work being undertaken to keep families

together is being undone by housing issues that could have been resolved if a flag had been put up earlier.

With support from the Think Families team at Oxfordshire County Council, the team has considered the processes that already exist within the system and have tried to align the embedded workers with those processes. It took some time to ascertain exactly where to embed the housing workers but both are now located with the three Locality and Community Support Service (LCSS) teams in the north and south of the county, and in the city of Oxford. The two embedded workers each have designated patches and working patterns which enable staff in those locations to know when it is best to approach them. They have also started working closely with the MASH to support professionals in that part of the system should a housing issue be disclosed at the very start of the referral process.

The LCSS provides advice and guidance to professional partner agencies including schools, health and voluntary and community groups, across Oxfordshire when emerging concerns are raised for children that do not require an immediate safeguarding response. They are also the first point of contact where non-immediate safeguarding concerns are identified. Because of the work they do in connection to Early Help Assessments and the Team Around the Family (TAF) processes, Trailblazer saw this as an excellent opportunity for housing to become part of the thinking process at a much earlier stage.

Children's Social Services Case Study

This case study involves a grandmother caring for three of her grandchildren after they were removed from the care of their parents due to neglect. The grandmother had permanent custody of the eldest child, but the other two children were placed on a temporary arrangement, awaiting the court to award permanent custody. They were living in a one bedroom social tenancy flat.

The placement was at risk of breaking down due to inadequate accommodation and overcrowding; potentially leading to the children being taken into the care of social services. This was a difficult situation as the court would not award permanent custody of the remaining two children until they were adequately accommodated; and the local housing authority did not recognise the overcrowding as the two children were not in the permanent custody of the grandmother.

The embedded worker supported an application to the exceptional circumstances panel at the local housing authority so that they could be moved up the social housing waiting list. The panel awarded a two bedroom need and the family were allocated a home quickly as a temporary arrangement. They were subsequently awarded a three bedroom need but are waiting for appropriate housing to become available.

The placement has therefore been made permanent and the three siblings have been kept together without the need for placing any of the children in care. Using the New Economy Manchester model Unit Cost Database it is estimated the total saving to the public purse exceeded £50,000 (mostly to the benefit of children's social services) when considering that two of the children may have needed to be placed in care. Based on our estimates of net spend and net saving, the cost benefit ratio of this case suggests that for every £1 spent, somewhere in the region of £13 - £14 was saved. An added benefit is that this case improved the partnership working between the LHA and children's social services based on the positive and swift outcome.

Monitoring to date

Since April 2018 the embedded workers have received 338 referrals from across the various systems. The breakdown across the three systems is as follows; Health – 145; Criminal Justice – 126; and Children’s Social Services – 67. These numbers are representative of where the Trailblazer team was able to establish the embedded worker model during the initial piloting phase and the levels of staffing since the inception of the project. The numbers for children’s social services appear low because until mid-August there was only one embedded worker operating in this system.

Diagram 5.1

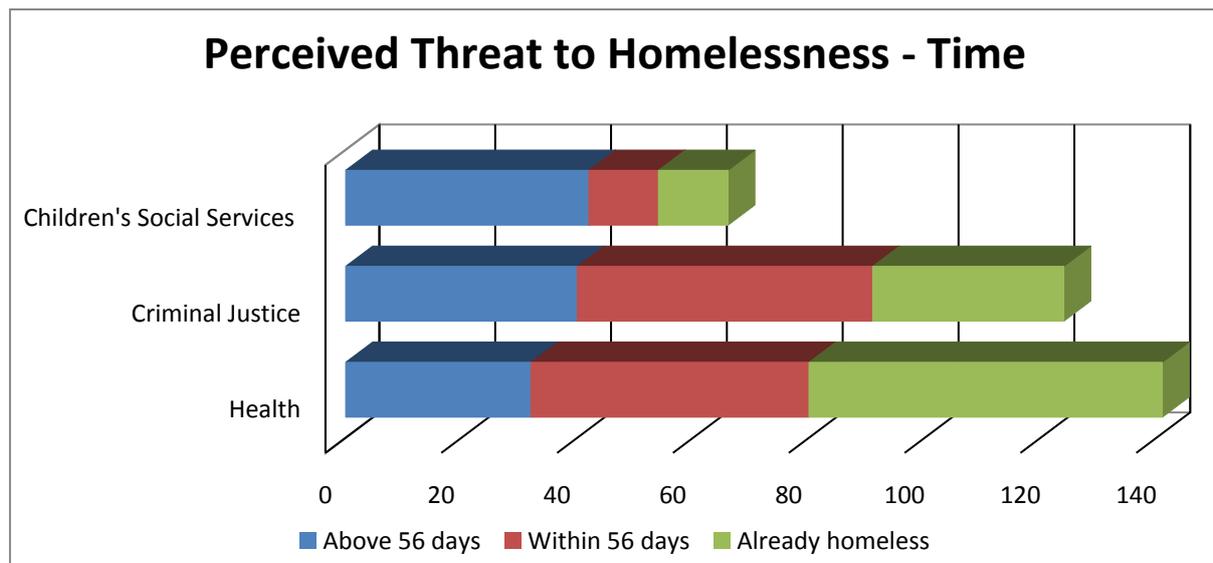


Diagram 5.1 indicates the assessment of the perceived threat to homelessness in terms of time (where recorded) for all cases across the three systems in quarters one and two. The timeframes mirror the Homelessness Reduction Act and therefore any case where the threat to housing is perceived to be above 56 days is regarded as being ‘upstream’.

What the table demonstrates is that the social care system has been supported by the embedded worker to highlight housing issues at a consistently early stage. It also illustrates that across the Health system, particularly in the John Radcliffe hospital, the EHWs have been supporting individuals that are already homeless. As mentioned above, the Trailblazer team have been working closely with Connection Support and our partners in Health to support the EHWs to move upstream. This is being facilitated by attending all DTOC, Stranded and Super-stranded meetings across the county, as well as making better links between the hospitals and homeless/rough-sleeping outreach services so that better signposting can take place.

It should be noted that between quarters one and two all of the systems were able to move progressively more upstream in terms of the clients they are supporting. The Trailblazer programme will continue to monitor this and consider ways that it can revise and iterate its approach to picking up cases at the earliest opportunity.

The outcomes for the embedded workers model are still emerging but in the first two quarters the team have reported 234 closed cases. Of these cases, 107 have resulted in a known prevention of homelessness, 24 have resulted in an unsuccessful prevention and the remainder (103) have been categorised as an unknown outcome. The nature of the EHW model (short, sharp interactions) means it is likely that there will always be instances when

the team is unsure of the impact of the intervention or advice provided. This is evidenced above and we have addressed this issue with the EHWs and are seeking support from the respective systems to reduce the proportion of cases being reported in this way.

6. COMMUNITY NAVIGATORS

One of the core strands of the Oxfordshire Trailblazer bid was to build resilience throughout the county and enable households and individuals to cope better with life and prevent a housing related crisis. This could potentially include help with matters such as financial inclusion and access to work opportunities, as well as tackling issues such as social isolation and drug and alcohol misuse.

Whilst the embedded worker model is focused on the system, this arm of the Trailblazer programme is a person centred approach focusing on those households threatened with homelessness. We were told by people with a lived experience of homelessness that any such approach to preventing homelessness should focus on the following areas:

- Alleviating an individual's sense of hopelessness and low self-esteem
- Improve awareness about how to access appropriate services
- Provide continuity in respect of direct support (a single point of contact)
- Deliver a service where people with lived experience are involved

In the initial appreciative enquiry phase the central Trailblazer team also undertook a mapping exercise which sought to identify any gaps in resilience services within the county, or gaps in specific geographical locations. This in turn would enable the team to determine what kind of commissioning, if any, was needed to better assist the population. Of the regional hubs across Oxfordshire, only Oxford seemed to have a strong network of organisations that understand the crossover and inter-related necessity of a diverse set of support services.

The team therefore decided to explore whether it is possible to replicate this level of interconnectedness in the other parts of the county by commissioning an organisation to function as a navigator of services. This was with a view of working with households to build their skills and improve resilience to changes that may otherwise result in homelessness or the threat of it.

Commissioning

Aspire Oxford have been commissioned to implement the Community Navigators Project, for a 17 month period from April 2018 to August 2019. The team incorporates three full-time community navigators and three part-time grow workers, some of which have a lived experience of homelessness. The team are divided in to three locations; the north & west of Oxfordshire, the south and the city; with one of each worker located in each area.

The purpose of the project is to provide a support, brokerage and advocacy function that will empower and enable beneficiaries to engage effectively and confidently with statutory and support agencies, centred on their housing and homeless prevention needs. This will include working in collaboration with multiple services across Oxfordshire, including from co-located venues and in an outreach capacity. As well as being in the major towns and cities in the county, the Aspire team have focused their attention on known areas of deprivation (e.g. Berinsfield). This is so that they can reach out and target households that may otherwise slip through the net and only appear at crisis point, By engaging with people at risk of homelessness before crisis point is reached, the team realises that there is far more potential to work with individuals and use their energy, ideas and resilience to create a better outcome together.

At the heart of the approach is partnership working with statutory services, housing authorities, housing associations, health partners (including GP practices), charities and

community organisations to reach those most in need. These organisations are often the first place where a housing issue will be raised by an individual and household. If this concern or issue is not raised or acted upon, it can often escalate quickly and lead to a much less manageable situation. The Trailblazer team are then asking our partner organisations to make referrals at the very first signs of a threat to housing (with the households consent). The community navigators will then speak with the household, triage the case, and determine the best course of action to prevent homelessness.

Key programme activities

- Aspire's new team of Community Navigators and support workers will work across five District Housing Authorities and Housing Associations, in co-located venues with a key focus on outreach delivery
- Aspire's Trailblazer team will proactively seek out those at risk of homelessness. This will include ex-offenders who are vulnerably housed and care leavers
- Their role will be to provide both a support and a brokerage function, designed to empower individuals to have confidence in engaging with statutory and support agencies, centred on their housing and homeless prevention needs
- The Community Navigators will work with individuals to sustain their housing options and maintain their tenancies
- The Trailblazer project team will work to enable each individual to help them maintain their accommodation through career & employability development advice. This will be linked to identifying local education, training and employment development and opportunities
- Individuals at risk of homelessness will also be given access to Aspire's wider employment programme

Work to date

Within the first two quarters of the programme the Community Navigator team have reached out to both statutory and non-statutory services across Oxfordshire in order to receive referrals at the earliest possible opportunity. The team have also co-located the service in housing associations, GP surgeries and support agencies (e.g. drug and alcohol advice and Jobcentre Plus) to create a visible frontline for homelessness prevention.

In the first two quarters the community navigators have received 153 referrals. There have been 23 self-referrals and the rest have originated from the local housing authorities and 21 separate agencies. These were: *Aspire; Building Better Opportunities, Turning Point, OxFed, Response, Crisis, Agnes Smith, Citizens Advice, Salvation Army, Unlocking Potential, Job Centre Plus, A2Dominion, Edge Housing, Rose Hill Community Centre, Berinsfield Volunteer Centre, Ministry of Defence, National Probation Service, Connection Support, GP Surgeries, Hospital Inpatient Wards, Oxfordshire Domestic Abuse Service.*

The breakdown of cases in terms of the perceived threat to homelessness is as follows:

- *Above 56 days: 92 cases (60%)*
- *Within 56 days: 57 cases (37%)*
- *Already homeless: 4 cases (3%)*

These figures indicate that the navigators have been able to pick up cases sufficiently upstream. This has been achieved by enabling referral agencies to truly understand the purpose of the service and when to refer in to it. Likewise the community navigators have been able to triage referrals and signpost households to support services (including local housing authorities) that are better able to deal with situations that are closer to crisis point.

The outcomes for the community navigator service are still emerging but to date they have been able to close 53 cases. Of these closed cases 35 have resulted in a successful prevention of homelessness. 30 households were able to stay in their existing home and 5 were able secure new accommodation. Four cases have resulted in an unsuccessful attempt to prevent homelessness and the remaining 14 cases are circumstances where the individual lost contact with the service or was unwilling to co-operate.

Key Learning

There were several key learning points in the project's first two quarters.

One has been to develop an understanding of the new service's aims and purpose within existing agencies and services, particularly where some of the Community Navigators' activities were not sufficiently differentiated from existing services (e.g. Floating Support). This has subsequently been resolved through discussion about the positioning of the service upstream and away from crisis point.

Work has also been required to position the Community Navigators properly in respect of advice and guidance services (e.g. Citizens Advice, and independent estate based organisations) as well as Tenancy Sustainment services in a number of housing associations. This has been achieved by continuing to deliver the message that the community navigator role works in a brokerage and navigation function alongside the experts and will not be looked at as a replacement for any already established services. The Aspire team found that spending time with each service face to face was the best way to move forward. This included senior management and support workers and avoided unnecessary emails.

The team has taken care not to fill, or be encouraged to fill, apparent gaps resulting from system failures across other areas of homeless prevention. This has often manifested itself in inappropriate referrals to Community Navigators (both up and downstream). It is interesting to note that in quarter two over 40% of the referrals were in respect of someone with a social tenancy, often relating to problems with rent arrears. Whilst these are not necessarily inappropriate referrals, it has allowed the central team to start thinking about how Trailblazer can work with these organisations to understand how intervention could have been undertaken at an earlier stage.

As the project has progressed the community navigators, along with the embedded workers, have started to consider the tension between fixing a household's housing issue and connecting them to the appropriate services in order to build resilience. For the community navigators there has been a particular concern in respect of financial issues and whether it is appropriate to fix the problem (pay off arrears or debt) in the first instance and then build resilience from that point onwards.

One of the next steps for the community navigators is to start seeking feedback from people that have used the service to understand how it supported them and whether any resilience has been developed. Likewise it is important for the programme to understand how referral agencies and support services feel about the service and whether it was useful for them. Of particular interest will be to determine whether this way of working is having an impact on the way that external services operate and interact with both clients and supplementary support agencies.

7. HOMELESSNESS CHAMPIONS' NETWORK

Why was the network created?

The third work strand of the Oxfordshire Trailblazer is the Homelessness Champions Network. This was established to become the eyes and ears of the programme. It aims to upskill individuals across all stakeholders in Trailblazer, and create a knowledge base that would enable network members to identify early risk factors of homelessness. These key people would be the housing 'Go to' person in their organisation and will either know what action to take, or who to ask for help when trying to prevent homelessness.

Trailblazer is all about system change, but change happens with individuals, not organisations, and as such it is people rather than systems which are prioritised. The Champions' Network is intended to break down the barriers between systems by developing relationships between individuals in the different systems as outlined above. These relationships will start to fill the gaps that exist between systems.

The network is also a support mechanism. Members get to know each other through learning events held by the Trailblazer team, and establish strong relationships, appreciating colleagues working in other systems, and becoming a resource for each other.

Finally the Champions Network was also intended as a precursor to the Duty to Refer which came in to effect from 1 October 2018. This is part of the Homelessness Reduction Act (HRA) 2017, and requires a range of public sector organisations to refer people they identify as being homeless or at risk of homelessness to a local housing authority.

Operation of network

The network consists of roughly 60 people from 25 separate organisations. This includes all bodies subject to the Duty to Refer as well as other interested parties. Workshops have been held on a bi-monthly basis to train the network on the following:

- Options available to people at risk of homelessness in Oxfordshire
- Early indicators of homelessness
- The HRA
- Universal Credit
- Developing the Oxfordshire Duty to Refer procedure

The network has been established for 10 months, and is managed by the Trailblazer programme team at Oxford City Council. The ambition for the network is that it will become self-sustaining and continue after the life of the programme has ended. It is also expected that the District Council Housing teams will provide ongoing support to the network at the end of the programme. It has been established in a similar way to the Safeguarding Champions Network or the Domestic Abuse Network.

Three tiered approach

To maximise the impact of the Champions Network, a tiered approach has been planned in order to upskill and provide relevant resources to as wide a group of people as possible.

Tier 1 Specialist level:

This comprises the 60 individuals who will participate in a series of specialised higher level training sessions which are outlined above. Networking opportunities will be provided and

they have direct access to the Network Coordinator in the Trailblazer Programme team for specialist advice. Tier 1 Champions will have an input into the design of training and workshops to ensure training meets specific needs. Tier 1 champions have been identified through the predictive data available to Trailblazer, our enquiries to date and experiences of initial embedded working and include front line staff across multiple disciplines and organisations including the voluntary sector.

Tier 2 Generalist level:

This is a wider group of people from the same organisations as the Tier 1 champions. They will receive training from the Network Coordinator aimed at achieving a more in-depth recognition of the early indicators of homelessness, how and who to sign post to, and any other emerging issues identified as Trailblazer progresses. It is anticipated that this will involve issues linked to prevention advice training.

Tier 3 Awareness level:

This will provide awareness level training for staff and volunteers working within organisations that might come in to contact with people at risk of homelessness. This level of training will be provided electronically via the Oxfordshire Safeguarding Children's Board (OSCB) website. The outcome of training will be the ability to recognise the indicators of homelessness, and how and who to signpost to.

Duty to Refer

The Champions' Network played a practical role in establishing a single countywide process for the Duty to Refer in Oxfordshire. The network were consulted on what they wanted the process to look like, rather than Housing teams across the County determining what this should be. Feedback from the network was that they wanted a uniform approach across Oxfordshire, a named contact in each Housing team, a prompt response to referrals and a process which was compliant with new data protection regulations.

A task and finish group was established to take this work forward, and worked in partnership with Crisis to develop a procedure. This work was completed in September, and a single county wide procedure and two page summary document was produced. The ALERT portal developed by Housing Jigsaw is the preferred solution for making referrals. Although local partners all indicated their willingness to use this tool, two government departments have issued instructions to their staff to email referrals to local housing authorities instead of using locally agreed processes.

The Champions' Network has embedded the understanding that service users' housing and homeless issues are more effectively resolved by agencies working together achieving better outcomes for all services involved. Over the second year of the programme these relationships will be deepened and strengthened.

8. THE LEARNING APPROACH

This section of the report summarises the learning approach, the principle findings to date and anticipated developments in 2019. This chapter has been written by Dr Michael Little of Ratio.

Ratio is an independent research organisation specialising in understanding how relationships influence human development. Ratio is the learning partner for the Oxford Trailblazer. It brings to bear a new approach to learning, referred to as Era 3, the primary features of which are described below.

Era 3 Learning

Don Berwick wrote a paper in 2016 that described three eras of health policy and science. The first era, he argued, was dominated by the professions. But by the 1960s health inequalities led to a drive for more accountability. A second era took hold. In the UK we call this 'new public management', with a focus on finding efficiencies that lie between inputs, outputs and outcomes. Health was to some extent transformed by this rearrangement, but it tended to favour those with the resources, knowledge and outlook to play what became a game (that could be gamed). Berwick has predicted the beginning of a new era, the moral era, with a focus on improvement and civility.

There are two innovations being tested in the Trailblazers work, embedded workers seeking to change the relationship between housing systems and health, social care and justice systems; and community navigators that work with residents long before their housing problems become a crisis. The learning approach employed:

- Brings the practitioners together once a month
- Creates a context for them to talk about their work, successes and failures
- Asks the workers to collect data on reach, quality and impact of their work, and
- to work with managers and other experts to develop and test adaptations to their practice.

The approach is producing new knowledge about:

- Improving embedded workers and community navigators' practice
- System barriers to effective policy and practice, and ways of overcoming those barriers
- National government barriers to effective policy and practice.

High-Level Learning

The embedded workers operate in three systems, where each produces different challenges and opportunities:

- Social care uses the advice of embedded workers to prevent family breakdown by addressing housing issues that contribute towards household stress. There are strong system incentives for social care to engage with Trailblazers, reductions in numbers of children requiring statutory support for example
- Hospitals find it more difficult to see housing issues before they become challenging. There are however strong system incentives, for example reducing DTOC cases
- There are government targets to reduce the number of inmates leaving prison to no fixed address, but the severe stress on the prison and probation systems appears to negate the potential benefits of Trailblazer work

There is more commonality in the stories of people who stand to benefit from the work of embedded workers and community navigators. The emotional reaction to the risk in their lives is strong. They feel culpable. They frequently exhibit a sense of shame. Their agency is lost. This contributes to a disconnection from sources of help just at the point when help is urgently needed.

The housing system is under severe stress. Need greatly exceeds supply, and the concept of the 'deserving poor' plus strong system dynamics -producing for example perverse incentives- lead the system to operate inefficiently, creating pressure for all its parts -people with housing problems, housing stock, public and private, processes that link need and supply, and the people who operate those processes.

In this context, an optimal result of reform of the systems is to keep as many people in the accommodation they currently use, and to find the next best alternative for those who must move on (and minimise the number whose change in accommodation reflects system inefficiencies).

The work has identified several factors that influence achieving optimal results including:

- Geography; there is variation in outcomes from one part of Oxfordshire to another
- Practitioner knowledge; there is variation in understanding and interest in learning more about how to get the best from the housing system
- Ethics; the dynamics of the systems can lead good practitioners who entered public service with noble intentions to behave in ways that are counter-productive to the needs of service users
- The need for provider agencies to protect contracts and jobs for their workers.

The practice of embedded workers and community navigators

As expected, the work has found variation in the practice of community navigators and embedded workers, which reflects their different tasks and possibly their parent organisations. There is also variation in *between* embedded workers, which may be explained by differences in the agencies they support. There is less connection between community navigators and embedded workers than some practitioners had envisioned at the outset.

Progress has been strong with the possible exception of the justice system where the level of need, the fragility of the prison and probation systems and the fact that prisoners are too often viewed by the housing system as less deserving than other citizens has hampered progress.

The market forces and dynamics that operate across systems exert a force on Connections and Aspire, the two organisations that employ the community navigators and embedded workers.

Practical Learning

The work is producing learning that may have relevance across the housing, social care, health and justice systems contributing to the Trailblazer programme.

The embedded workers and community navigators are encouraged to achieve their goals by connecting people (systems people in the case of embedded workers, citizens in the case of community navigators). This objective is both a challenge and an opportunity, throwing up examples of failure and success. Analysis shows that there are contexts and conditions that

favour connection, and contexts/conditions that favour fixing. A short paper exploring these options written to inform practice is in preparation.

Many of the community navigators have personal experience of negotiating the system, and they are highly attuned to the needs of the service users they support. They stress the need to maintain the 'humanity' of the system. At the same time, there are absolute limits on the systems' capacity to help. Current arrangements often fail to balance humanity and resource constraints, producing within system tensions. Further analysis of this tension and its resolutions continues.

The work has begun to map the system, with a view to an output that can help practitioners from all agencies better understand and navigate its pathways. Likewise a review of the literature on social prescribing has been completed with a view to informing the practice of community navigators and embedded workers.

Getting more precision

As the work moves into the next phase, it is proposed to introduce more precision into the process:

- Exploring whether learning about the practice of individual practitioners can become a routine part of practice supervision
- Whether that supervision can identify system barriers to effective practice
- Whether the monthly learning meeting can focus on finding effective remedies to system barriers, and
- Whether these remedies can be tested in between learning meetings

There is a general objective to adapt the Era 3 learning approach so that it can be applied across systems beyond the term of the Trailblazers project and without Ratio's direct involvement.

Overlapping learning

The leaning approach and lessons taken from the work has come to the notice of other innovators across the country. In particular, Toby Lowe from Collaborate and Newcastle University has provided useful illustrations from his work on complexity in public systems, and has suggested connection with teams he is supporting across the U.K.

9. PRIORITIES FOR YEAR TWO

There is already evidence to show that the interventions of the Trailblazer are having positive impacts on both people at risk of homelessness, and people working in the systems described earlier in the report.

Some of these outcomes have also saved significant sums of money as a result of avoiding delays in discharging people from hospital, or in avoiding the costs of taking children into care. How can Trailblazer ensure that these outcomes continue to be delivered after the programme ends next year? Can the observed system barriers be overcome, are new services required, and are the relationships that have developed between systems sustainable? These are the questions that the programme will seek to answer in its second year.

The monthly learning sessions, facilitated by Ratio, provide an opportunity for the Trailblazer programme to identify new approaches which may help to overcome system barriers or to create better connections within systems. The meetings in the next year will be used to identify different ways of working, and these will be trialled, and then reviewed at subsequent meetings. The innovation can then either be adapted, or a new barrier can be tackled using the same approach. Work has already commenced in the learning sessions to map the systems Trailblazer is working in. This map will inform the ongoing work of the programme.

Trailblazer's second year will involve work to overcome system barriers to effect permanent change which will reduce the risk of homelessness. However the systems that the programme is working in are under great pressure, both in terms of resources and demand for services. Trailblazer represents a £890,000 investment in preventing homelessness, so the end of the programme will represent a consequent reduction in support for preventing homelessness if there is nothing to replace it. As such the programme will be researching options for the funding of ongoing services. There are a small number of case studies from the first six months of operation which individually show some significant savings. The robustness of these figures need to be tested, as does the likely scale of potential savings in the different systems Trailblazer is working in. This will help make a case for further funding of services to continue the work of Trailblazer.

In the health system there is already a model for homeless healthcare teams. The organisation Pathway has supported 11 hospitals to create such teams which help over 3,500 patients each year. This model could be adapted to provide a more upstream service, ensuring people's discharge from hospital is not delayed.

The Champions' Network will continue to foster relationships between people in different sectors, and up-skill members knowledge of housing and related issues. The network provides a good opportunity to leave a lasting legacy from Trailblazer, both in terms of the connections formed between people in systems, and a knowledge base and toolkit. This is still in development, and will require some resource to be dedicated to maintain it after the programme has ended. Options for this will be explored during the second year.

Finally, the work of the Trailblazer programme will continue to be monitored and evaluated in the second year, to demonstrate its impact. This will include on-going data monitoring to see how the Trailblazer interventions impact on the system. Ethnographic research will also be conducted to understand how Trailblazer has impacted on people both working in, and engaging with the systems that the programme is working in. A further phase of appreciative enquiry will be undertaken to understand what, if anything has changed as a result of Trailblazer, and what work is still required.

Appendix 2 – Case Studies

Two case studies are provided below, the first is from the Community Navigator service, and the second is from one of the embedded housing worker's based in health.

Case Study 1

Summary

- Working couple with joint income of circa £60,000, living in private rented sector (PRS) accommodation with 2 dependent children (one with ASD)
- The father had an undiagnosed chronic condition that affected his mobility.
- The family had previously applied to the general register (GR) for an adapted home but were declined based on income
- The father was hospitalised following a decline in the chronic condition and was subsequently advised that it was unlikely that he would be able to work, resulting in a large loss of income (father on SSP)
- The father was subsequently discharged from the JR and inappropriately placed in a respite dementia home without a care package in place
- A complaint was made about the placement. Social services accepted the error and the father was permitted to return home. This resulted in him being in a bed in the living room with no access to washing facilities and no on-going care
- In addition there was no confirmed diagnosis of the conditions and the hospital had stated that this must come either from ward staff or the patient's GP

Actions taken / Timeline

- The community navigator (CN) worked with the family to re-apply to go on the GR and request an OT assessment of existing home
- The LHA requested that diagnosis & change in income be confirmed and other relevant information be provided
- CN supported the family to obtain full discharge summary and a documented diagnosis of condition by connecting them with Adult Social Care at the JR
- Advised the family to demand a social care assessment so that a care package could be put in place at existing residence
- CN supported the mother to approach Citizens Advice in respect of financial/benefits situation
- The CN advocated on behalf of the family with the assessment officer at the LHA. This involved exploring the possibility of securing PRS accommodation (with modifications) that was proactively identified by the mother

Key Outcomes

- The couple have been accepted on to the LHAs GR, albeit there is a lack of appropriate stock so a long wait may be incurred
- The mother contacted adult social services and an OT community assessment was completed on their existing property. This was forwarded to the LHA with recommended adaptations
- The couple have attended Citizens Advice sessions and approached JCP to open a Universal Credit Claim. This was approved but there have been significant issues with the payments since
- The family identified 2 PRS properties (in absence of anything suitable on the GR) and with the support of the CN approached the LHA to utilise their bond scheme. One was deemed inappropriate but the second has been secured with a bond
- The CN worked with the LHA to ensure that a swift OT assessment of the new property was completed

- Minor works are required on the property and the OT is liaising directly with the LHA to streamline the process. The OT has ordered all of the required aids and equipment
- The LHA is currently considering the family's eligibility for a disabled facilities grant to fund the works. This should be approved
- The family remain on the GR and will be offered suitable accommodation when it becomes available

Learning & Reflections

- Lots of people involved but not everyone connected, CN often the focal point for all parties at the beginning
- Better connections have now been built between OTs and housing team at LHA
- Why was the individual discharged a) to a dementia home, b) without a home assessment completed?
- Significant delays between hospital discharge and OT assessment. Only through active self-advocacy/CN/Floating Support/MP involvement was this facilitated
- UC errors have had detrimental impact on the ability of the couple to pay their rent. This has resulted in the couple feeling defeated by the system
- Often little feedback provided to the family about on-going processes. They expressed a feeling of being lost in the system
- The case highlighted the lack of understanding about the support available to people requiring adaptations or money for a deposit (Bond)

Case Study 2

Case Summary

- A patient with learning disabilities living in accommodation that he jointly owned with his brother. Recently admitted to hospital but that was medically fit for discharge
- The patient's brother and his sister in law refused to allow the patient to return home
- The patient remained in hospital as a delayed discharge with no provisional discharge date

Actions taken

- Embedded worker advised hospital staff of the relevant legislation regarding homelessness, in that the housing authority would be unable to accept a housing duty as the patient was not homeless in law
- Embedded worker advised the patient had a legal right to occupy the property he co-owned
- Embedded worker advised the patient should be discharged with support and advice to ensure the patient's fair treatment by his family

Key Outcomes

- The patient was discharged to his home successfully reducing delayed discharge
- The hospital bed was made available at a time of peak demand
- The patient will be receiving support to ensure his rights are protected
- An ineffective homeless application/presentation was avoided

Additional Achievements

- Training needs/ information resources identified for discharge staff
- The brother and sister in law's own support needs were identified

Appendix 3

Title	Risk description	Opp/ threat	Cause	Consequence	Date Raised	Owner	Gross		Current		Residual		Comments	Controls				
							I	P	I	P	I	P		Control description	Due date	Status	Progress %	Action Owner
Focus of Trailblazer(TB)	TB focuses too exclusively on needs of Oxfordshire housing authorities	Opp	Operational teams and strategic leadership sourced from district councils	Needs of Health, Criminal Justice and Social Care not adequately accounted for resulting in failure of joint initiatives	01/04/18	Paul Wilding	3	3	3	1	3	1		Steering group comprises members of all sectors. Champions Network established with members of teams from all sectors.	31/8/19		50	Paul Wilding
Upstream prevention	TB deals with people in crisis instead of working upstream to prevent crisis	Opp	Lack of understanding and engagement in ethos of programme.	TB fails to learn about systemic causes of homeless and/or to trial solutions to these problems	01/04/18	Paul Wilding	3	4	3	3	3	1		Monthly learning meetings to reflect on practice. Regular engagement between TB team and commissioned services	31/8/19		50	Paul Wilding
Legacy	TB is successful during operation but produces no sustainable benefit.	Opp	Focus on operational delivery, and not on system change	End of the TB programme leaves gaps in services.	01/04/18	Paul Wilding	3	3	3	3	3	2		Ensure steering group maintains a focus on establishing a legacy for the programme.	31/8/19		25	Paul Wilding

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To: City Executive Board
Date: 22 January 2019
Report of: Head of Financial Services
Title of Report: Treasury Management Mid-Year Review for April – September 2018

Summary and recommendations	
Purpose of report:	To report on the performance of the Treasury Management function for the 6 months to 30 th September 2018
Key decision:	No
Executive Board Member:	Councillor Ed Turner, (Deputy Leader) Finance, Asset Management and Public Health
Corporate Priority:	None
Policy Framework:	Efficient and effective Council
Recommendation: That the City Executive Board resolves to:	
1. Note the performance of the Treasury Management function for the six months to 30 th September 2018.	

Appendices	
Appendix 1	List of investments as at 30 th September 2018
Appendix 2	Risk Register

Introduction and Background

- This report has been written in accordance with the requirements of the Chartered Institute of Public Finance and Accountancy's (CIPFA) Code of Practice on Treasury and has been prepared in compliance with CIPFA's Code of Practice on Treasury Management, covering the following:
 - An economic overview for the first part of the 2018/19 financial year
 - A review of the Council's investment portfolio for 2018/19
 - A review of the Council's borrowing strategy for 2018/19
 - A statement of compliance with Treasury and Prudential Limits for 2018/19

2. The Council operates a balanced budget, which broadly means cash raised during the year will meet its cash expenditure. Part of the treasury management operations ensure this cash flow is adequately planned, with surplus monies being invested in low risk counterparties, providing adequate liquidity initially before considering optimising investment return.
3. The second main function of the treasury management service is the funding of the Council's capital plans. These capital plans provide a guide to the borrowing need of the Council, essentially the longer term cash flow planning to ensure the Council can meet its capital spending operations. This management of longer term cash may involve arranging long or short term loans, or using longer term cash flow surpluses, and on occasion any debt previously drawn may be restructured to meet Council risk or cost objectives.

Economic Overview

4. The first half of 2018/19 has seen a modest growth in the UK economy, but sufficiently robust enough for the Monetary Policy Committee, (MPC) to unanimously (9-0) vote to increase Bank Rate on 2nd August from 0.5% to 0.75%. Although growth looks as if it will only be modest at around 1.5% in 2018, the Bank of England's August Quarterly Inflation Report forecast that growth will pick up to 1.8% in 2019, but much of this is dependent on an orderly withdrawal from the European Union in March 2019.
5. Some MPC members have expressed concerns about a build-up of inflationary pressures, particularly with the pound falling in value again against both the US dollar and the Euro. The Consumer Price Index (CPI) measure of inflation rose unexpectedly from 2.4% in June to 2.7% in August due to increases in volatile components, but is expected to fall back to the 2% inflation target over the next two years given a scenario of minimal increases in Bank Rate. The MPC has indicated Bank Rate would need to be in the region of 1.5% by March 2021 for inflation to stay on track. Financial markets are currently pricing in the next increase in Bank Rate for the second half of 2019.
6. Unemployment has continued at a rate of 4% on the Independent Labour Organisation measure. A combination of job vacancies hitting an all-time high in July, together with negligible growth in total employment numbers, indicates that employers are now having major difficulties filling job vacancies with suitable staff. It was therefore unsurprising that wage inflation picked up to 2.9%, (3 month average regular pay, excluding bonuses) and to a one month figure in July of 3.1%. This meant that in real terms, earnings grew by about 0.4% (i.e. wage rate rises are higher than CPI inflation), near to the highest of 0.5% since 2009. (The previous high point was in July 2015.)

Interest and Interest Rate Forecasts

7. The performance target rate for investment returns is 0.6% above base rate, equating to 1.1% from April until the beginning of August when the MPC voted unanimously to increase base rate by 0.25%, thereby proportionately increasing the Council's target rate to 1.35%. The cumulative average rate of return on investments to 30th September 2017 was 1.13%, which is 0.22% below the performance target of 1.35%.

8. The base rate rises in November 2017 and August 2018 have resulted in the Council not always exceeding its target rate of return which is 0.6% above base; this is due to the fact that the majority of the Council's investments are held in fixed deposits and therefore, any investments arranged prior to November 2017 and those arranged between November 2017 and August 2018 did not benefit from the subsequent rises. This is a risk of which the Council is aware and seeks to manage by establishing an evenly distributed maturity profile where possible. However, given the volatile nature of cashflow, cash balances fluctuate throughout the year and it is important to maintain a liquid position so that financial obligations are met as and when they fall due. There have been and continue to be some uncertainty in the timing of some significant financial transactions (such as the sale of the Council's land at Oxpens and the purchase of properties at Barton). To that end, the Council also holds a proportion of cash in instant access deposit facilities such as call accounts and money market funds. The inclusion of instant access cash instruments within the investment portfolio provides some advantage in as much as there is an instant benefit from any rate rises and availability of cash to meet expenditure of uncertain timing, however the downside to short deposits is that the interest rate will always produce a lower yield than longer term investments.
9. The MPC intimated once again that future bank rate increases will be gradual and would rise more steadily than before the 2008 crash, indicating that base rate will not reach 2.5% for another ten years, although they did not produce a medium term forecast.
10. The Council's Treasury advisers, Link Asset Services, do not think that the MPC will further increase base rate until August 2019, although much is dependent on the final Brexit deal for the UK's departure from the European Union in March 2019.
11. Currently, Link Asset Services interest rate forecast is as follows:

Link Asset Services Interest Rate View											
	Sep-18	Dec-18	Mar-19	Jun-19	Sep-19	Dec-19	Mar-20	Jun-20	Sep-20	Dec-20	Mar-21
Bank Rate View	0.75%	0.75%	0.75%	0.75%	1.00%	1.00%	1.00%	1.25%	1.25%	1.50%	1.50%
3 Month LIBID	0.75%	0.80%	0.80%	0.90%	1.10%	1.10%	1.20%	1.40%	1.50%	1.60%	1.60%
6 Month LIBID	0.85%	0.90%	0.90%	1.00%	1.20%	1.20%	1.30%	1.50%	1.60%	1.70%	1.70%
12 Month LIBID	1.00%	1.00%	1.00%	1.10%	1.30%	1.30%	1.40%	1.60%	1.70%	1.80%	1.80%
5yr PWLB Rate	2.00%	2.00%	2.10%	2.20%	2.20%	2.30%	2.30%	2.40%	2.50%	2.50%	2.60%
10yr PWLB Rate	2.40%	2.50%	2.50%	2.60%	2.70%	2.70%	2.80%	2.90%	2.90%	3.00%	3.10%
25yr PWLB Rate	2.80%	2.90%	3.00%	3.10%	3.10%	3.20%	3.30%	3.30%	3.40%	3.50%	3.50%
50yr PWLB Rate	2.60%	2.70%	2.80%	2.90%	2.90%	3.00%	3.10%	3.10%	3.20%	3.30%	3.30%

Investment Portfolio and Performance

12. The budgeted investment income for 2017/18 is £1.839 million. As at the 30th September 2018, forecast investment income for 2018/19 is £1.814m. There are a number of reasons for the variation but the primary impact is reduced net interest from the Council's companies due to expected slippage in their capital expenditure plans.

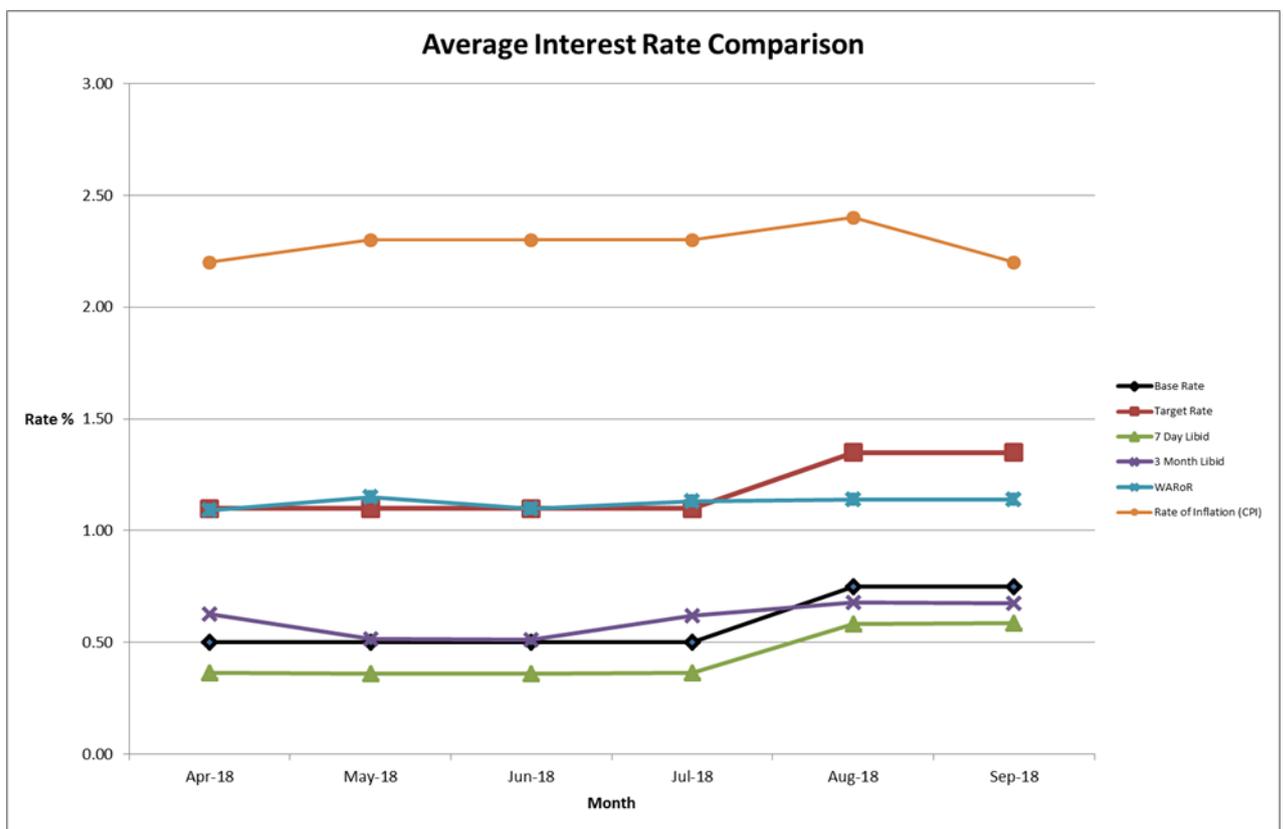
13. The Treasury Management Strategy for 2018/19 was approved by this Council in February 2018; to date the Strategy has been fully adhered to and there are no proposed changes at this stage.
14. As part of its Strategy, the Council aims to maintain a diversified investment portfolio whilst ensuring there are no policy and procedure breaches. Security of investments is always the primary concern when arranging investments with liquidity and yield being secondary, but key considerations.
15. The Council operates an approved counterparty listing which details all institutions with whom the Council may invest, the maximum amount which may be invested with any single counterparty group at any given point and the maximum duration period. The counterparty list is set in association with recommendations from Link Asset Services although ultimate authorisation of approved counterparties rests with the Section 151 Officer. The list is actively managed and reviewed on a weekly basis or more regularly if required.
16. The strategy also adopts an ethical approach to investments, stating that:

“The Council will not knowingly invest directly in businesses whose activities and practices pose a risk of serious harm to individuals or groups, or whose activities are inconsistent with the Council’s mission and values. This would include, inter alia, avoiding direct investment in institutions with material links to:

 - *Human rights abuse (e.g. child labour, political oppression)*
 - *Environmentally harmful activities (e.g. pollutants, destruction of habitat, fossil fuels)*
 - *Socially harmful activities (e.g. tobacco, gambling)”*
17. Over the past quarter, there appears to be more awareness of ethical investments in the market with more counterparties introducing their own ethical policy and in some cases, establishing “green deposit” products into which customers may invest.
18. The Council has been able to take advantage of some green deposit notice accounts offered by Barclays Bank who are working in association with Sustainalytics, a leading global provider of environmental, social and corporate governance research and ratings, to achieve a positive environmental impact. Their green framework covers the following environmental areas:
 - Energy efficiency projects and renewable energy
 - Sustainable food agriculture and forestry
 - Waste management
 - Greenhouse gas emission reduction
 - Sustainable water
19. Initial deposits into the green deposits were placed in October 2018 and therefore, more detailed information regarding their performance will be included in the Treasury outturn report.
20. Concerns have been raised over Barclays’ funding of three pipelines to link Canada’s Alberta province with the country’s Pacific coast and the US which are

connected with “tar sands” operations. The Council has written to Barclays to express its concerns over this and is awaiting a response.

21. In May 2018, Council agreed to extend its existing loan facility to Low Carbon Hub. In 2013, the Council set up a loan facility for the value of £1.623m. Of this capital sum, £1.3m remained payable as at 30th September 2018, but interest is charged at an annual rate of 5% and collected on a monthly basis. The Financial Accounting team is in regular contact with Low Carbon Hub and they have repaid the loan in November 2018.
22. The chart below illustrates the Council’s performance against its benchmarks and also tracks inflation rates, thereby showing the Council’s return in “real terms”. It is also important to note that the Council’s return – the Weighted Average Rate of Return (WARoR) – is significantly boosted by the Council’s investments in property funds and that without these the Council would not achieve its target rate.



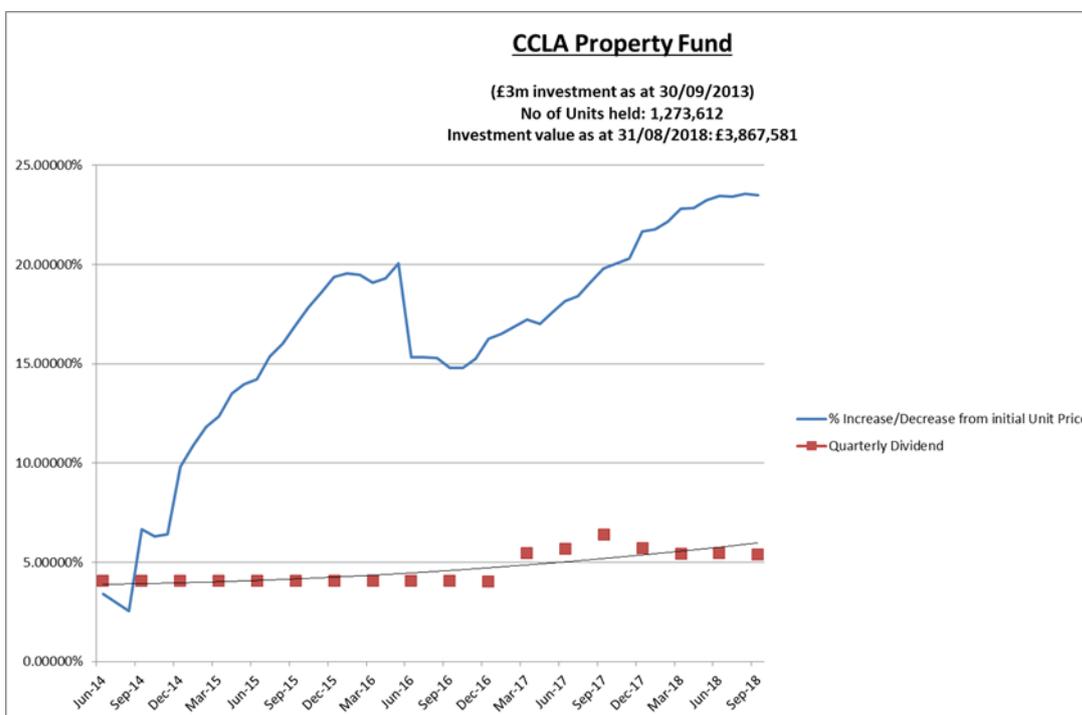
Property Funds

23. At present, the Council has placed investments with two property funds; CCLA Investment Management, which is a property fund that limits its investors to Charities, Churches and Local Authorities and Lothbury Investment Management, a specialist UK property fund manager with a range of funds providing high quality exposure to different property sectors.

CCLA Investment Management Limited

24. The Council has held a £3m investment in the CCLA fund since September 2013. The investment has produced quarterly returns ranging between 5% and 6% and it is expected that the Fund will continue to achieve rates in this region.

25. Additionally, the value of the Council's investment with CCLA has appreciated from £3m to £3.86m as at 30th September 2018, equating to growth of 28.92% to date. However, the values of the individual unit prices have fluctuated over time and the effect of capital appreciation (and depreciation) is illustrated in the graph below.



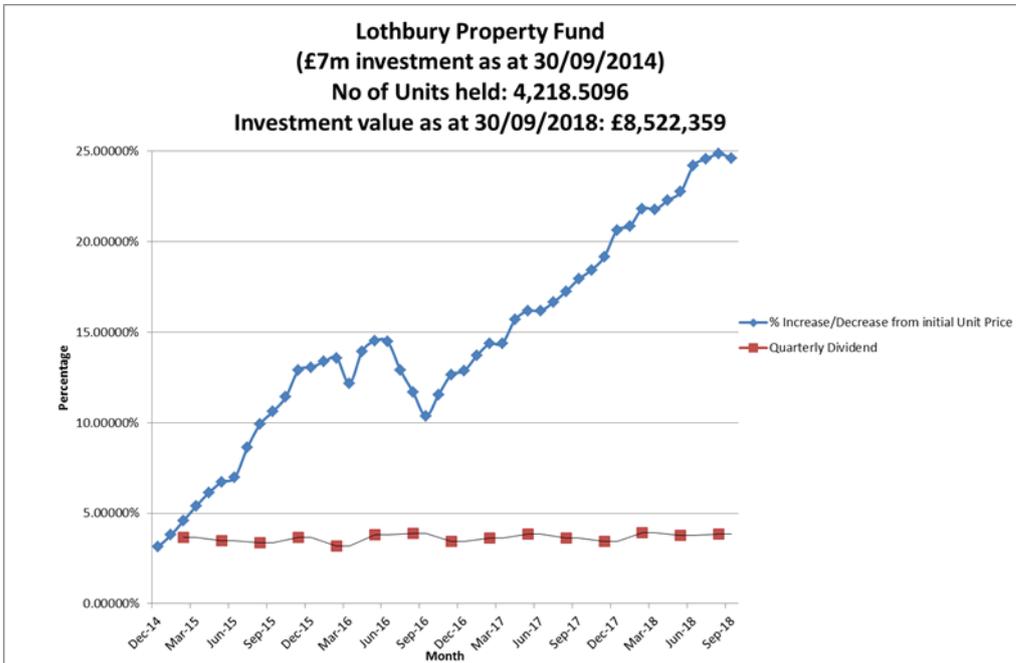
26. Changes to the accounting rules on property funds means that the principal gain or loss will now be charged to the Surplus or Deficit on the Provision of Services, rather than being held on the balance sheet. However, following consultation by MHCLG the government has introduced a mandatory statutory override for local authorities to reverse out the effect for five years from 1st April 2018. Even without the statutory override, the Council would have created a reserve to hold the funds until the return was realised due to the potential for fluctuations in the property markets.
27. The table below shows the gains and losses made on the fund each quarter this year (plus the figures at 31st March 2018 in order to show the opening position). It also details the quarterly dividends received. The Council holds 1,273,612 units in the Fund and the unit price is re-valued on a monthly basis, reflecting the current value of the investment (but not the interest).

Financial Year	Date	Fund Value £	Quarterly Dividend rec'd £	Quarterly Dividend as % of initial Investment
2017/18	Mar-18	3,846,438.62	43,009.88	5.73%
2018/19	Jun-18	3,866,816.43	40,681.71	5.42%
2018/19	Sep-18	3,867,580.60	40,882.95	5.45%

Lothbury Investment Management

28. During 2014/15, the Council invested £7m in the Lothbury Property fund and the Fund has produced quarterly returns in the range of 3-4%. Furthermore, the Fund has seen a capital appreciation over the period with the value currently standing at just over £8.5m, compared with £7m at inception, equating to overall growth of

21.75% to date. However, as with CCLA, the values of the individual unit prices have fluctuated over time and the effect of capital appreciation (and depreciation) is illustrated in the graph below. The changes to accounting rules will also affect the Lothbury Property Fund as explained in paragraph 26 above.



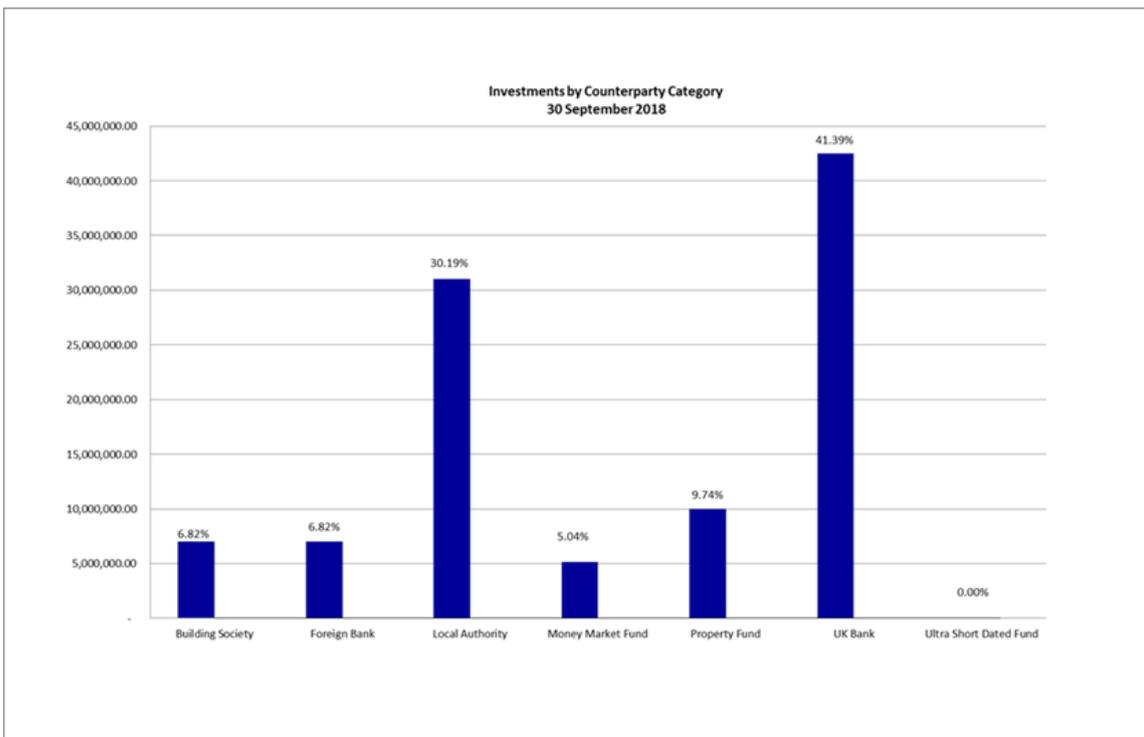
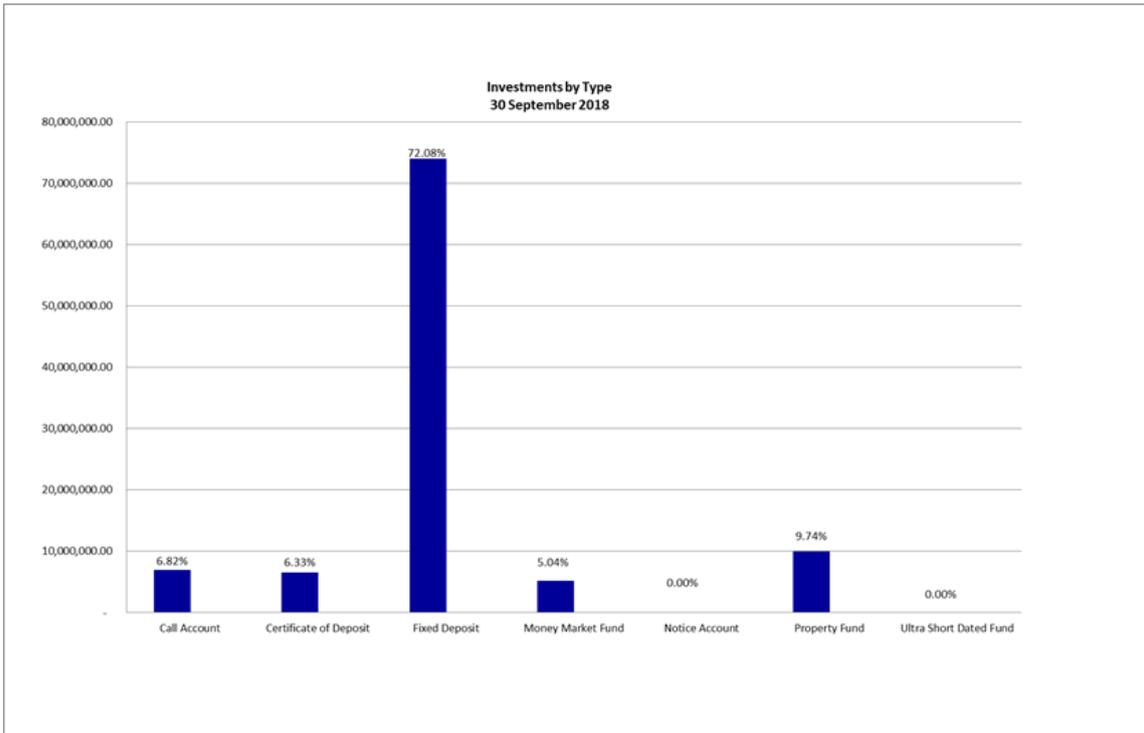
29. The table below shows the gains and losses made on the Fund each quarter this year (plus the figures at 31st March 2018 in order to show the opening position) as well as the quarterly dividends received. The Council holds 4,219 units in the fund and the unit price is re-valued on a monthly basis, reflecting the current value of the investment (but not the interest).

Financial Year	Date	Fund Value £	Quarterly Dividend rec'd £	Quarterly Dividend as % of initial Investment
2017/18	Mar-18	8,333,388.56	66,345.83	3.79%
2018/19	Jun-18	8,495,472.13	67,131.25	3.84%
2018/19	Sep-18	8,522,358.81	62,582.70	3.58%

Investment Portfolio

30. As at 30th September, the Council's total investment portfolio amounted to £102.6m, with £10m of this being held in property funds and £12.1m being held in instant access cash facilities.

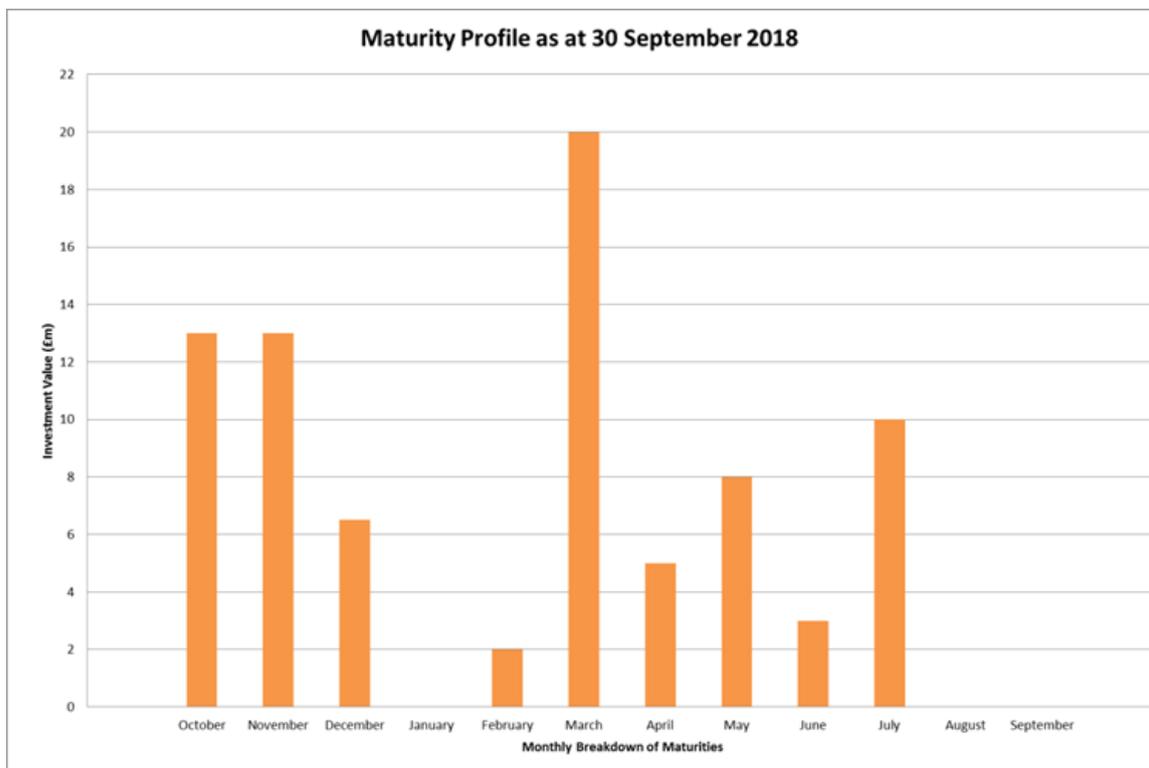
31. The graphs below illustrate how Council's investment portfolio is distributed, both in terms of the type of investment and counterparty category:



32. Fixed deposits and certificates of deposits both have an agreed start and end date which are arranged where possible, to suit the cashflow requirements. However, as mentioned previously, it is also important to keep a proportion in instant access funds.
33. The Council's Treasury Management Strategy limits non-specified investments to 25% of the previous year's average investment portfolio. This limit is reviewed each year when setting the Strategy in order to ensure a balanced and diversified portfolio of investments. Property funds and investments in excess of 364 days are classified as non-specified due to the associated risk; property funds by nature are

high risk due to the volatility of the market. There are several factors that deem longer term investments to be more risky in nature including the risk of interest rate rises and the commitment of cash for longer periods.

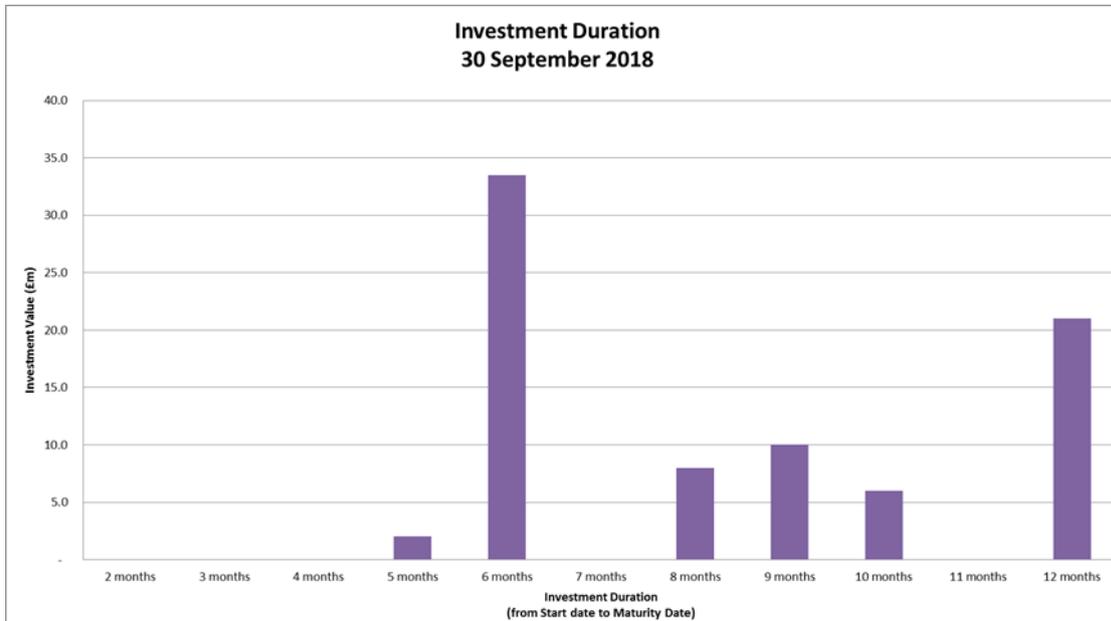
34. £10 million is committed in the CCLA and Lothbury property funds and we are currently looking at utilising residual headroom to invest further in some non-specified investments. It should be noted that the £5 million invested in the National Homelessness Property Fund (Real Lettings) is, following discussions with our external auditors, classified as a service investment undertaken using service delivery powers rather than treasury powers under Section 12 of the Local Government Act 2003.
35. The Strategy defines a specified investment as one that is in sterling, no more than one year in duration or, if in excess of one year can be repaid earlier on request and with counterparties that meet the Council's credit rating criteria. Additionally, once the duration of a non-specified investment falls below 366 days, it also falls into the Specified category. The maturity profile for the Council's specified investments (equating to £80.5m when excluding the instant access cash) is illustrated below.



36. Traditionally, the Council does not have as high an inflow of cash in February and March as it does earlier in the financial year, hence the reason for so many maturities being arranged to mature in March. It is also worth noting that the Council is limited to a duration period of six months for the majority of its approved counterparties and therefore, investments arranged in February and March would most likely mature in August and September. However, as the majority of cash income that is received towards the latter end of the financial year is accounted for within the cash flow forecasts, there is not the capacity to arrange additional investments which is why there are currently no maturities forecast for August and September 2019. Should there be a cash requirement, the Council may arrange for some short-term investments to mature in August and September but as longer

investments pay a higher yield, the Council will seek to invest for longer periods where possible.

37. The graph below illustrates the same investments by duration period in order to demonstrate duration periods. It is not surprising that the majority of investments have a duration period of six months as this is the limit for most of the banks and building societies with whom the Council may invest. When the opportunity arises, longer investments are arranged to allow for a greater yield.



38. The 2018/19 budget has allowed for £1.84m interest from investments; as at 30th September 2018, total interest earned amounted to £0.901m and a revised forecast interest suggests that the Council will earn a further £0.987m in the second half of the financial year, bringing the overall total interest to £1.88m; the variance is primarily due to the base rate rise that occurred in August.

Borrowing

39. The Council has not taken on any additional debt during the year to date and so the balance of its external borrowing remains at approximately £198.5 million; this figure relates to funds borrowed from the Public Works Loans Board (PWLB) to buy out the Housing Revenue Account (HRA) from the subsidy system and relates wholly to Housing with interest repayment being met by the HRA. The Council does not consider that debt restructuring and/or premature repayment would be practical at this time as due to the differential in interest rates, the Council would incur a large premium from the PWLB for doing so. The Council continues to monitor borrowing interest rates and forecasts on a regular basis and will continue to review its position on debt restructuring.
40. The Council anticipates borrowing in the future to meet its capital expenditure requirements, including loans to the Housing Company, but does not anticipate any external borrowing during 2018/19. The levels of external borrowing currently anticipated are as follows:
- 2019/20 £25.780 million
 - 2020/21 £16.338 million
 - 2021/22 £23.335 million

2022/23 £8.194 million

Treasury and Prudential Limits for 2018/19

41. The Council has operated all of its Treasury Management activity within the parameters set by the Treasury and Prudential indicators in the Treasury Management Strategy for 2018/19.

Other Key Updates

Capital Strategy

42. In December 2017, the Chartered Institute of Public Finance and Accountancy, (CIPFA), issued revised Prudential and Treasury Management Codes. As from 2019/20, all local authorities will be required to prepare a Capital Strategy which is intended to provide the following:
- a high-level overview of how capital expenditure, capital financing and related treasury management activity (primarily borrowing) contribute to the provision of services
 - an overview of how the associated risk is managed
 - the implications for future financial sustainability
43. A report setting out our Capital Strategy will be taken to CEB and then Council, before 31st March 2019.

UK Banks – ring-fencing

44. The largest UK banks, (those with more than £25bn of retail / Small and Medium-sized Enterprise (SME) deposits), are required, by UK law, to separate core retail banking services from their investment and international banking activities by 1st January 2019. This is known as “ring-fencing”. Whilst smaller banks with less than £25bn in deposits are exempt, they can choose to opt up. Several banks are very close to the threshold already and so may come into scope in the future regardless.
45. Ring-fencing is a regulatory initiative created in response to the global financial crisis. It mandates the separation of retail and SME deposits from investment banking. In general, simpler activities offered from within a ring-fenced bank, (RFB), will be focused on lower risk, day-to-day core transactions, whilst more complex and “riskier” activities are required to be housed in a separate entity, a non-ring-fenced bank, (NRFB). This is intended to ensure that an entity’s core activities are not adversely affected by the acts or omissions of other members of its group and that the risks inherent in investment banking are removed from the retail customers.
46. While the structure of the banks included within this process may have changed, the fundamentals of credit assessment have not. The Council will continue to assess the new-formed entities in the same way that it does others and those with sufficiently high ratings will be considered for investment purposes.

Markets in Financial Instruments Directive (MiFID) II

47. Under the MiFID directive, local authorities must be categorised as ‘retail’ clients, with the ability to opt-up to elective professional client status should it have a business requirement to do so. MiFID II was implemented in January 2018 and the Council did indeed opt up to professional status; had the Council continued to be classified as a retail client after this date, it would have extremely limited access to

the money markets as several of the approved counterparties, including the property funds, money market funds, brokers and indeed the Council's own treasury advisors, stipulated that their clients must be classified as "professional" under the new directive.

48. In order to 'opt up' from a retail client to an elective professional client, the Council had to fulfil several quantitative and qualitative criteria as prescribed by the Financial Conduct Authority in relation to its business as a local public authority or municipality ("Treasury Business").
49. As part of the process, the Treasury Manager had to provide evidence that all officers with Treasury responsibilities have the necessary expertise, experience and knowledge to conduct transactions envisaged in the respective markets; that the officers understand the nature of the risks involved with Treasury transactions and that
50. The Council also had to fulfil the following criteria:
 - That over 4 quarters prior to January 2018, it had conducted an average of 10 transactions per quarter, in significant size, on the relevant market; or
 - That the persons undertaking the transactions work or have worked in the financial sector for at least one year in a professional position, requiring knowledge of the provision of services envisaged; or
 - The authority is an 'administering authority' of the Local Government Pension Scheme
51. Oxford City Council fulfilled and continues to fulfil the first two requirements; it is exempt from the third criterion.
52. As part of the "opting up" process, the Section 151 Officer had to sign a declaration acknowledging that being categorised as a Professional Client means that the Council will not benefit from the protections and investor compensation rights; the loss of these protections and rights were carefully considered and advice was sought from Link Asset Services.

IFRS 9 Accounting Standard

53. This accounting standard came into effect from 1st April 2018. One of the changes means that the category of investments valued under the available for sale category will be removed and any potential fluctuations in market valuations will impact on the Surplus or Deficit on the Provision of Services, rather than being held on the balance sheet. This change is unlikely to materially affect the commonly used types of treasury management investments but more specialist types of investments (e.g. pooled funds, third party loans, commercial investments) are likely to be impacted. Following the consultation undertaken by MHCLG on IFRS9 the government has introduced a mandatory statutory override for local authorities to reverse out all unrealised fair value movements resulting from pooled investment funds. This will be effective from this financial year, 1 April 2018. The statutory override applies for five years from this date. Local Authorities are required to disclose the net impact of the unrealised fair value movements in a separate unusable reserve throughout the duration of the override in order for the Government to keep the override under review and to maintain a form of transparency.

54. The other major effect of this accounting standard is to require authorities to make a provision for the loss of its investments based on an assessed risk. Where provision is necessary, this cost will also be charged to the Surplus or Deficit on the Provision of Services, however the impact of this is also subject to the statutory override for 5 years following the MHCLG consultation.

Changes in Risk Appetite

55. The 2018 CIPFA Codes and guidance notes have placed enhanced importance on risk management. Where an authority changes its risk appetite e.g. for moving surplus cash into or out of certain types of investment funds or other types of investment instruments, this change in risk appetite and policy should be brought to members' attention in treasury management update reports. Oxford City Council has not made any significant changes to its investment approach at this time although there is the intention to further invest in property funds in the near future. The risk will continue to be managed by through understanding the individual investment vehicles and also by considering the appropriate percentage of non-specified investments that can be held in the overall portfolio.

Treasury Advisor

56. Treasury advice and market information is provided by Link Asset Services, formerly known as Capita Asset Services. The contract for Treasury Advisors was extended for two years in September 2016 and was due for retendering in September 2018. The tender process has completed and Link Asset Services have again be awarded the Treasury Advisor contract for 3 years with an option to extend for a further 2. Information provided by Link Asset Services is used to advise Council Officers when making investment decisions.

Financial Implications

57. Any financial implications are contained within the body of this report.

Legal Issues

58. There are no legal implications directly relevant to this report.

Level of Risk

59. There are no risks in connection with the report's recommendations. Risk assessment and management is a key part of Treasury Management activity especially in the selection of counterparties when considering investment opportunities. The Council uses external advisors and counterparty credit ratings issued by the rating agencies to assist in this process.

Equalities Impact

60. There are no equalities impacts arising directly from this report.

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Background Papers: None

OXFORD CITY COUNCIL LOANS LIST 2018/19									
OCC Investments as at:		30/09/2018	102,670,000.00						
Counterparty Group	Group Operational Lending Limit	Counterparty Name	Investment Amount	Interest Rate	Trade Date	Start Date	Maturity Date	Remaining Limit	Broker
SPECIFIED INVESTMENTS									
Barclays Bank (NRFB)	10,000,000.00								
Fixed Deposits									
Call Account		Barclays Bank BPA (call account)	-	0.20%	13/03/2018				
6 months maturity limit									
AT checked 25/06/2018									
								10,000,000.00	
Lloyds Banking Group (RFB)	15,000,000.00								
Lloyds Bank		175-day notice account	-	0.75%	27/07/2018				
Bank of Scotland		1261 Bank of Scotland	5,000,000.00	0.90%	15/05/2018	15/05/2018	19/03/2019		Direct
£15m operational limit agreed by JY 02/08/16		1264 Bank of Scotland	3,000,000.00	1.00%	05/06/2018	05/06/2018	05/06/2019		Direct
364-day maturity limit									
AT checked 25/06/2018									
								7,000,000.00	
Royal Bank of Scotland Group (RFB)	10,000,000.00								
RBS		1250 Royal Bank of Scotland Certificate of Deposit	1,000,000.00	0.78%	08/01/2018	09/01/2018	27/11/2018		King & Shaxson
NatWest		1271 National Westminster Bank plc	5,000,000.00	0.98%	05/07/2018	05/07/2018	04/07/2019		R P Martin
364-day maturity limit									
AT checked 18/07/18									
								4,000,000.00	
Close Brothers	7,000,000.00								
£7m operational limit agreed by NK 25/11/15		1272 Close Brothers	5,000,000.00	0.85%	05/09/2018	14/09/2018	14/03/2019		Tradition
6 month maturity limit		1273 Close Brothers	2,000,000.00	0.85%	05/09/2018	20/09/2018	20/02/2019		ICAP
AT checked 25/06/2018									
Goldman Sachs International	9,000,000.00								
£9m operational limit agreed by NK 16/06/2017		1255 Goldman Sachs International Bank	7,000,000.00	0.940%	09/04/2018	09/04/2018	09/10/2018		Tradition
6 month maturity limit		1265 Goldman Sachs International Bank	2,000,000.00	0.790%	05/06/2018	06/06/2018	06/12/2018		ICAP
AT checked 18/07/18									
HSBC Bank plc	10,000,000.00								
12 month maturity limit									
AT checked 18/07/18									
								10,000,000.00	
Santander UK plc	7,000,000.00								
£7m operational limit agreed by NK 25/11/15		Santander Instant Access Call Account	-	0.80%	31/05/2018				
6 month maturity limit		Corporate Notice Account Statement (31 days)	-						
AT checked 18/07/18		Corporate Notice Account Statement (95 days)	-						
		Corporate Notice Account Statement (180 days)	-	0.55%					
								7,000,000.00	
SMBC	7,000,000.00								
£7m operational limit agreed by NK 25/11/15		Sumitomo Mitsui Banking Corporation	2,500,000.00	0.73%	02/05/2018	02/05/2018	02/11/2018		Direct
6 month maturity limit		1263 Sumitomo Mitsui Banking Corporation	4,500,000.00	0.67%	31/05/2018	01/06/2018	30/11/2018		Direct
AT checked 18/07/18									
Standard Chartered	7,000,000.00								
£7m operational limit agreed by NK 25/11/15		1256 Standard Chartered Certificate of Deposit	3,000,000.00	0.93%	09/04/2018	13/04/2018	12/10/2018		King & Shaxson
6 month maturity limit		1268 Standard Chartered Certificate of Deposit	2,500,000.00	0.72%	14/06/2018	15/06/2018	17/12/2018		King & Shaxson
AT checked 18/07/18									
								1,500,000.00	
Svenska Handelsbanken	7,000,000.00								
£7m operational limit agreed by NK 09/06/17		Instant Access Call Account	7,000,000.00	0.65%	03/09/2018				
12 month maturity limit		35-day Notice Account							
AT checked 18/07/18									
Coventry Building Society	7,000,000.00								
£7m operational limit agreed by NK 25/11/15		1260 Coventry Building Society	5,000,000.00	0.72%	10/05/2018	14/05/2018	14/11/2018		Tradition
6 month maturity limit		1266 Coventry Building Society	2,000,000.00	0.67%	07/06/2018	07/06/2018	07/12/2018		Tradition
AT checked 18/07/18									
Leeds Building Society	7,000,000.00								
£7m operational limit agreed by NK 25/11/15									
100 days maturity limit									
AT checked 18/07/18									
								7,000,000.00	
Nationwide Building Society	10,000,000.00								
6 month maturity limit									
AT checked 18/07/18									
								10,000,000.00	
Skipton Building Society	3,000,000.00								
100 days maturity limit									
AT checked 18/07/18									
								3,000,000.00	
Yorkshire Building Society	7,000,000.00								
£7m operational limit agreed by NK 25/11/15									
100 days maturity limit									
AT checked 18/07/18									
								7,000,000.00	
Treasury Bills	7,000,000.00								
								7,000,000.00	
Local Authorities	18,977,000.00								
£18,977m limit per authority (20% of previous year's average balance)		1247 Blackburn with Darwen Council	3,000,000.00	0.60%	19/10/2017	31/01/2018	18/10/2018	15,977,000.00	Tradition
364 day maturity limit (specified only) as per 2015/16 Strategy		1269 Surrey County Council	5,000,000.00	0.80%	25/06/2018	09/07/2018	08/07/2019	13,977,000.00	Tradition
		1257 Lancashire County Council	3,000,000.00	1.00%	09/04/2018	01/05/2018	01/05/2019	15,977,000.00	Tradition
		1258 Police and Crime Commissioner for Lancash	5,000,000.00	1.04%	24/04/2018	27/04/2018	26/04/2019	13,977,000.00	ICAP
		1262 Lancashire County Council	5,000,000.00	0.70%	12/06/2018	02/07/2018	04/03/2019	10,977,000.00	ICAP
		1267 Derbyshire County Council	5,000,000.00	0.65%	31/05/2018	25/06/2018	15/03/2019	13,977,000.00	Tradition
		1270 Salford City Council	5,000,000.00	0.70%	02/07/2018	06/08/2018	07/05/2019	13,977,000.00	Tradition
Money Market Funds	25,000,000.00								
Overall limit increase approved by Council 29th Sept 2016		Legal and General Investment Management	-		19/09/2018				
£9m operational limit per MMF agreed by JY 02/08/16		Federated Investors	5,170,000.00		28/09/2018				
		Standard Life (Igris)	-		20/08/2018				
								19,830,000.00	
Cash Plus Funds	15,000,000.00								
£15m operational limit of Fund agreed by JY 02/08/16		Royal London Cash Plus	-		15/01/2018				
								15,000,000.00	
NON-SPECIFIED INVESTMENTS (Discuss with BL or AT (RS) before arranging non-specified investments)									
Property Funds	20,525,000.00								
		CCLA	3,000,000.00		30/04/2013	30/04/2013			
		Lothbury	3,500,000.00		06/08/2014	06/08/2014			
		Lothbury	3,500,000.00		04/09/2014	04/09/2014			
Unrated Building Societies (100 days maturity limit)									
Local Authorities (2 years maturity limit)									
								10,525,000.00	
Total Investments as at		05 December 2018	102,670,000.00						

FORWARD DEALS: (To be moved from this section to Investments List above once start date arrives)									
Counterparty Group	Group Operational Lending Limit	Counterparty Name	Investment Amount	Interest Rate	Trade Date	Start Date	Maturity Date	Remaining Limit	Broker
Local Authorities	18,977,000.00	Rotherham MBC	5,000,000.00	0.90%	25/09/2018	15/10/2018	15/04/2019	13,977,000.00	
								- 5,000,000.00	

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Treasury Management

Risk Register

Risk ID	Risk						Gross Risk		Current Risk		Residual Risk		Risk Mitigation
	Risk Title	Opportunity/Threat	Risk Description	Risk Cause	Consequence	Date raised	I	P	I	P	I	P	
1	Loss of capital investment due to a counterparty collapsing	T	The Council loses its principal investment or an investment becomes impaired.	Counterparty collapses or hits a financial crisis rendering it unable to repay investments.	The Council may lose money or repayment of funds could be significantly delayed which could have an adverse impact on operational funding levels	5-Aug-16	5	3	5	3	5	3	Reducing risk by limiting the use of high risk counterparties. Imposing a maximum investment value on approved counterparties in order to spread and reduce risk. Controls and procedures are in place to ensure investment and durations limits with approved counterparties are not exceeded. Counterparties are also monitored and reviewed on a weekly basis at least, or more regularly if considered necessary to do so.
2	Property fund investments lose value	T	The value of the Council's units held in property fund investments decreases.	Uncertainty in the commercial property market following Brexit and slowdown in general economic activity.	Capital depreciation will decrease the overall value of the investment.	5-Aug-16	4	3	3	3	3	3	The Council receives monthly valuations from the property fund managers detailing the indicative redemption value of the individual units. These are reported to the Head of Finance on a monthly basis. The Council has the option to sell its units if there is a concern that the fund value is likely to decrease for a prolonged period.
3	Decline in interest rates	T	Interest rates continue to fall with very little prospect of upward movement in the next 12 months.	Economic growth forecasts remain subdued leading to low interest rates. Consequently lower risk counterparties tend to offer low investment rates.	The Council may not achieve its target level of interest.	5-Aug-16	2	3	2	3	2	3	In the current economic climate where rates tend to be static, arranging investments over a longer period of time where possible will allow the Council to capitalise on a higher rate of return without there being an opportunity cost. The Council continually monitors base rate and rates being achieved against budget to ensure it has secured the best value possible in a difficult economic climate.
4	Fraudulent activity	T	Potential fraud by staff	Fraudulent activity	Loss of money for the Council Disciplinary action for the staff involved	5-Aug-16	3	3	2	1	2	1	Segregation of staff duties, reviewing and monitoring of internal controls to ensure the correct protocol is being followed. Ensuring all insurance policies and the fidelity guarantee are fully up to date.
5	Money laundering	T	Money laundering by external parties	External parties pay a transaction by cash and subsequently request a refund	Fine and/or imprisonment	5-Aug-16	4	2	4	1	4	1	Ensuring the money laundering policy is reviewed and up to date. Checking refunds back to source. Raising awareness of this issue amongst staff and reviewing the financial regulations.
6	Network failure/Barclays.net being inaccessible	T	The Council is unable to carry out its daily treasury functions due to a network failure	Barclays.net is unavailable or the Council's network has failed	Daily Treasury functions will not be carried out	5-Aug-16	2	3	1	2	1	2	Invoke the business continuity plan to minimise the effects of a network issue.
7	Revenue Budgets	T	Revenue budgets are unable to meet borrowing costs of capital schemes	Revenue budgets come under pressure from restricted government funding or non delivery of programmed savings	The Council may not be able to execute some desired projects.	5-Aug-16	3	3	2	2	2	2	Revenue budgets monitored on monthly basis and future year forecasts undertaken. Reserve some capital receipts to cover borrowing costs in the short term. Monthly financial reports and forecasts.
8	Lack of suitable counterparties	T	The Council does not have enough "space" with approved counterparties to place investments/deposit surplus cash balances.	Rising cash balances and a restricted counterparty list	Use of counterparties not paying best value rates.	5-Aug-16	3	4	3	3	3	3	The Council continually monitors its approved counterparty listing in conjunction with cash balances. Any potential new investment opportunities are discussed at Treasury Management performance meetings. The Council utilises money market and enhanced cash funds to deposit surplus cash balances in the event of no space with other counterparties and also to ensure there is always cash instantly available in order to meet payment obligations when they fall due. However, there are also limits on the amounts deposited to such funds. The Council has a facility to deposit cash with the Debt Management Office should all other investment options be exhausted.

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Minutes of a meeting of the CITY EXECUTIVE BOARD on Tuesday 18 December 2018

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Committee members:

Councillor Brown (Chair)	Councillor Turner
Councillor Chapman	Councillor Clarkson
Councillor Hayes	Councillor Hollingsworth
Councillor Simm	Councillor Upton

Officers:

Gordon Mitchell, Chief Executive
Tim Sadler, Executive Director Sustainable City
Caroline Green, Assistant Chief Executive
Nigel Kennedy, Head of Financial Services
Anita Bradley, Monitoring Officer
Amanda Ford, Principal Planner
John Mitchell, Committee and Member Services Officer

Also present:

Councillor Andrew Gant
Councillor Elizabeth Wade

Apologies:

Councillors Smith and Rowley sent apologies.

105. Declarations of Interest

None.

106. Addresses and Questions by Members of the Public

None.

107. Councillor Addresses on any item for decision on the Board's agenda

Councillor Wade spoke in relation to item 7 (Housing Panel recommendation re the Severe Weather Emergency Protocol).

Councillor Gant spoke in relation to item 9 (Annual Monitoring Report) and item 10 (Summertown and St Margaret's Neighbourhood Plan).

108. Councillor Addresses on Neighbourhood Issues

None.

109. Items raised by Board Members

None.

110. Scrutiny Committee Reports

Westgate Centre

At its meeting on 4 December 2018, the Scrutiny Committee had considered a report about the impact of the Westgate redevelopment on the City Centre, since it had opened a year previously. Cllr Gant, in his capacity as Chair of the Scrutiny Committee, was grateful for the Board's response to the recommendations. He drew particular attention to the Committee's focus on the Oxford Living Wage (OLW) while recognising the limited extent to which it could be insisted upon. He welcomed the agreement to promote the OLW and said the Committee would be pleased to be kept informed about progress. The engagement with local retailers to understand where public realm improvements were needed was also welcome and Committee would be pleased to hear about the timetable for that in due course. Finally, the Committee would also be pleased to hear about the outcome of the recent shop frontage survey of occupancy levels, referred to in the Board's response.

The Board Member for Culture and the City Centre said the Council was committed to principle of the OLW and took every opportunity to promote it while noting that it was not appropriate to target any one employer to introduce it over and above another.

The Chair said that she always raised the matter of the OLW in her conversations with employers. While appreciating elements of the Committee's reports she was disappointed with its apparent focus on the negative consequences of the Westgate Centre and insufficient recognition of its benefits. The retail sector throughout the UK was under immense pressure for a variety of reasons and it was unreasonable to ascribe the pressures in the City, disproportionately, to the Westgate Centre.

Councillor Gant said the Committee had heard that some retailers were asserting a 'cause and effect' as a result of the Westgate Centre but he would of course pass the Chair's views back to the Committee.

Severe Weather Emergency Protocol (SWEP)

At its meeting on 12 November 2018, the Scrutiny Committee's Housing Panel had considered a report concerning preparations being made for the Severe Weather Emergency Protocol (SWEP).

Cllr Gant, speaking on behalf of the Scrutiny Committee's Housing Panel, thanked the Board for its positive response to the Panel's recommendation.

The Chair, passing on a message from Cllr Smith, was pleased to report that the first exit survey of SWEP clients had been conducted the previous week.

Cllr Wade, speaking as a Councillor on an item for decision on the agenda, said that SWEP provision was important and the opportunity to exercise some discretion in its application was welcome. Nonetheless, the temperature threshold for its operation

should be raised and the window for its time of operation be widened. More provision should be made for those who were especially vulnerable and every effort made to secure government funding to assist with the provision.

The Chair reassured Cllr Wade that the Council took every opportunity to secure funding for this area of work and the ambition was to get to the point where there was no rough sleeping at all. It was, however, necessary to return to the fundamental point that rough sleeping was driven to the greatest extent by a succession of government policies, such as the introduction of Universal Credit and reduced funding levels in many parts of the public sector.

The Board Member for Finance and Asset Management noted that the government's ambition to reduce rough sleeping by half by 2022 was worthy if ambitious and would not be achieved by measures in "drips and drabs" but, rather, by fundamental changes to address the causes described by the Chair.

111. Annual Monitoring Report 2017-2018

The Acting Head of Planning Services had submitted a report asking the City Executive Board to approve the Annual Monitoring Report for publication.

The Board Member for Planning and Transport introduced the report.

Cllr Gant, speaking as a Councillor on an item for decision on the agenda, questioned the data in the Housing Trajectory section of the AMR suggesting that the cited "average annual completion target of 400 dwellings per year" when set against the accompanying table giving annual completion figures for the last 12 years represented a shortfall. He also suggested that the City's housing shortfall should be addressed by revisiting the protection afforded to employment sites.

In relation to housebuilding The Board Member for Planning and Transport said the critical matter was the cumulative total, rather than the annual figures which contributed to it, and that was on target. In relation the protection afforded to employment sites he said that a proper balance had to be struck between the need for jobs and the need for housing. He believed that the current balance was the right one. To remove the protection in the Local Plan for a category of employment space would have to apply to all of that category and not just some.

The City Executive Board resolved to:

1. **Approve** the Annual Monitoring Report 2017/18 for publication; and
2. **Authorise** the Acting Head of Planning Services to make any necessary additional minor corrections not materially affecting the document prior to publication.

112. Draft Consultation Budget 2019/20

The Head of Financial Services had submitted a report to propose a Medium Term Financial Strategy and the 2019/20 Budget for consultation.

The Board Member for Finance and Asset Management introduced the report briefly in anticipation of a fuller debate, in due course, in Council.

The proposals were being framed in challenging times. Government grant is reducing to zero in April 2019, interest rates remain low (and therefore affect the returns on council investments), and the Council is exposed to wider economic risks which might affect the local economy, investment income and commercial property.

However, once again a fully balanced four-year budget is proposed, which retains front-line services in full, continues to support the most vulnerable, including extra spending towards the Council's aim of ending homelessness and support for the Oxford Living Wage, and includes £192 million of capital investment over the four-year period.

The Council will review how best to use the government's welcome decision to lift the restriction on borrowing in the Housing Revenue Account, and how both this, and Oxford City Housing Ltd, can help address the city's housing shortage. There would be no increase in park and ride charges.

He drew attention to the early success of Oxford Direct Services as a wholly owned local authority trading company, its increasing efficiency and increasing return to the Council which vindicated the "insourcing" model which had been adopted.

The Board Member for Customer Focused Services congratulated all those involved for having assembled a set of thoughtful and balanced budget proposals, its inclusive approach was commendable.

The Head of Financial Services gave an update on the Provisional Finance Settlement announced by the Government on 13 December 2018 and the impact on the Authority's Consultation Budget in the following areas :

- **Council tax Referendum level** - confirmed as previously proposed at 3% for local authorities
- **New Homes Bonus** - the 2019/20 allocations show limited change from indicative figures previously announced. No changes to the deadweight threshold (at 0.4%) or the eligibility of properties to qualify for the funding
- **Business Rates Pilots** – the Council was unsuccessful in its bid to be a Business rates pilot in 2019-20. No change to MTFP as no increased income assumed.
- **Revenue Support Grant** – for this authority this will be zero from 01 April 2019 and the Government have withdrawn plans to apply negative support grant. This position had been assumed in the MTFP
- **Retained Business Rates** – Little change to that forecast for the baseline funding level or tariffs for 2019-20
- **Fair Funding Review and Business Rates Retention** – The Government has published consultation papers on these areas which the authority will be responding to within by the deadline of 21 February 2019.

The Chair concluded by drawing attention to the Council's continued commitment to supporting the most disadvantaged members of the community, reducing inequalities, as evidenced by the proposals for supporting people in poverty.

The City Executive Board resolved to:

1. **Approve** the 2019-20 General Fund and Housing Revenue Account budgets for consultation and the General Fund and Housing Revenue Account Medium Term Financial Plan as set out in Appendices 1-9, noting :

a) the Council's General Fund Budget Requirement of £24.175 million for 2019/20 and an increase in the Band D Council Tax of 2.99% or £8.94 per annum representing a Band D Council Tax of £307.80 per annum (subject to the assumption in paragraph 22)

b) the Housing Revenue Account budget for 2019/20 of £43.162 million and a reduction of 1% (£1.03/wk) in social dwelling rents from April 2019 giving a revised weekly average social rent of £102.26 as set out in Appendix 4

c) the General Fund and Housing Revenue Account Capital Programme as shown in Appendix 6.

2. **Agree** the fees and charges shown in Appendix 7

3. **Delegate** to the Section 151 Officer in consultation with the Board Member for Finance and Asset Management the decision to determine whether it is financially advantageous for the Council to enter into a Business Rates Distribution Agreement as referred to in paragraphs 29-30 below; and

4. **Ratify** their decision to implement the Premium Council Tax of 100% for properties that have been empty for more than 2 years and approve the escalated rate of premium council tax when permitted to do so, as referred to in paragraphs 13- 16 below.

5. **Authorise** the Section 151 Officer to make any necessary minor correction to the draft consultation budget 2019/20 proposals before formal consultation commences.

113. Summertown and St Margaret's Neighbourhood Plan

The Acting Head of Planning Services had submitted a report to consider the Examiner's Report, approve modifications to the Summertown and St. Margaret's Neighbourhood Plan and agree that the Summertown and St. Margaret's Neighbourhood Plan be submitted to a referendum.

Cllr Gant, speaking as a local Councillor on an item for decision on the agenda, paid tribute to the work of the three Chairs of the St Margaret's Neighbourhood Forum and those officers, notably Tom Morris and Amada Ford, who had got the plan to its present state. He was pleased to say that the Forum supported the latest iteration of the plan.

The Board Member for Planning and Transport introduced the report, adding his thanks to those involved. The next step would be a referendum as set out in the report before

coming back to Council for final approval. He noted that all neighbourhood plans had to be compatible with whichever Local Plans were in force at a particular time.

It was agreed that references to electoral wards which might not exist by the time the plan was effective should be removed to avoid possible subsequent confusion.

The City Executive Board resolved to:

1. **Approve** the Modifications to Policies in the Summertown and St. Margaret's Neighbourhood Plan as recommended by the Examiner's Report (September 2018);
2. **Approve** the factual modifications that have been made for the purpose of correcting errors and approve the factual modifications relating to textual changes in the introductory chapters or in terms of the justification for the policies in the Summertown and St. Margaret's Neighbourhood Plan; and
3. **Agree** that the Summertown and St. Margaret's Neighbourhood Plan (as modified in the form at Appendix 4) is submitted to a referendum.

114. Marsh Road Car Park

The Executive Director of Sustainable City had submitted a report to introduce a parking tariff at Marsh Road Recreation Ground.

The Board Member for Planning and Transport introduced the report which sought to fulfil a planning condition relating the improvement of the car park. Once agreed the County Council as Highways Authority would need to give its consent via a traffic order. All steps would be taken to encourage the County Council to expedite this stage of the process.

The City Executive Board resolved to:

1. **Introduce** a pay & display parking scheme at Marsh Road Car Park;
2. **Add** Marsh Road Car Park to the existing Off-Street Parking Order;
3. **Agree** that the level of penalty charges is kept in accordance with all other City Council operated car parks;
4. **Agree** the tariff level and hours of operation at the car park as set out in the report; and
5. **Delegate** to the Executive Director of Sustainable City the consideration of any consultation responses in consultation with the Portfolio holder for Planning and Transport and to take any steps necessary to confirm the parking order.

115. Street naming and numbering

The Head of Law and Governance had submitted a report to request a determination on the street name for the former Temple Cowley Pool site.

The Chair introduced the report and proposed that the street be named Sher Azal Close.

The City Executive Board resolved to:

Agree that the name of the new road on the site of the former Temple Cowley Pool should be Sher Afzal Close .

116.Minutes

The City Executive Board resolved to APPROVE the minutes of the meeting held on 29 November 2018 as a true and accurate record.

117.Dates of Future Meetings

Meetings are scheduled for the following dates:

- 22 January 2019
- 12 February 2019
- 13 March 2019
- 10 April 2019

All of which will start at 6pm.

118.Matters Exempt from Publication

The Board passed a resolution in accordance with the provisions of Paragraph 4(2)(b) of the Local Authorities (Executive Arrangements) (Access to Information) (England) Regulations 2012 on the grounds that their presence could involve the likely disclosure of exempt information as described in specific paragraphs of Schedule 12A of the Local Government Act 1972.

119.Update from Appointments Committee meeting

The Chair gave Board members an update on the meeting of the Appointments Committee earlier that day and on the proposed appointment to the post of Executive Director Development.

The meeting started at 6.00 pm and ended at 7.05 pm

Chair

Date: Tuesday 22 January 2019

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