

BARNSELY METROPOLITAN BOROUGH COUNCIL

REPORT OF: EXECUTIVE DIRECTOR – GROWTH AND SUSTAINABILITY

TITLE: Planned Regulation Changes for the Social Housing Sector Implications for the Local Authority and ALMO and review of the existing Clienting Assurance Framework

REPORT TO:	CABINET
Date of Meeting	12 July 2023
Cabinet Member Portfolio	Regeneration and Culture
Key Decision	Yes
Public or Private	Public

Purpose of report

This report provides Full Council with an update of the latest position regarding social housing reform and a gap analysis of the current Clienting Assurance Framework adopted between the Council and Berneslai Homes in May 2022. The Framework was developed further to an external Clienting Review undertaken by ARUM in 2021/22 and in response to planned significant regulatory reform of the social housing sector following the publication of the Government's Social Housing White Paper (published in November 2020) and the Social Housing Regulation (SHR) Bill (expected to receive Royal Assent during 2023). Planned changes, particularly in relation to Building and Fire Safety Accountability, Damp and Mould and the professional requirements of housing staff have been a moving feat as the SHR Bill has been passing through the House of Commons. This review of the current framework both sense checks existing arrangements, identifies areas of risk/issue and ensures that it remains fit for purpose one year on.

The paper has been produced following a review of the Clienting Action Plan by the Strategic Plan Management Group in April 2023 and an internal Risk Workshop on 3rd April 2023. Consultation has also been undertaken with Berneslai Homes Services Agreement Core Group and EMT.

Council Plan priority

Learning, Growing, Healthy and Sustainable

Recommendations

That Full Council -

1. Review the update provided in relation to social housing reform and the implications that these proposed changes have for the Council and the

assurance that it needs from the ALMO in terms of its management and maintenance of the Council's Housing Stock under the Services Agreement 2021-2031.

2. Endorse the proposed Governance Structure to comply with duties under the Fire Safety and Building Safety Bills, and the appointment of the Accountable Person within the Council. Delegates responsibility to the Fire and Asbestos Compliance Officer to register the Council's high-rise buildings and prepare and submit building safety cases, as required.
3. Supports opportunities to enhance the current Assurance Framework and the draft Action Plan which includes an independent review of current governance arrangements by Campbell Tickell.

1. INTRODUCTION

Background:

- 1.1 In February 2021, the Council presented a report to Cabinet which outlined the key details and implications for the Council and Berneslai Homes which are expected to arise from the implementation of recommendations within the Social Housing White Paper – "The Charter for Social Housing Residents" and the Fire and Building Safety Bills. At that time, Cabinet asked for a future report which updates on key activities completed in response to the regulatory changes alongside a comprehensive review of the required assurance framework and appointment of a suitable Accountable Person(s) as the designated duty holder(s) under Fire and Building Safety.
- 1.2 Further to this the Council commissioned ARUM, an independent consultant, to undertake a review of the Council's client and contract management arrangements in relation to the Services Agreement in Spring 2021. The review advised on areas for improvement in relation to client governance, identified areas where strategic intent/alignment with the Council's priorities could be strengthened and prompted the development of an assurance mapping exercise to ensure that the Council can meet its requirements under the regulatory changes being implemented by the Regulator of Social Housing (RSH) as part of 'The Charter for Social Housing'.
- 1.3 Following the review, a Clienting Action Plan was produced, progress against which has been monitored by the Council's Strategic Plan Management Group, which resulted in the adoption of the current Assurance Framework (including a new governance structure) in May 2022. The Council and Berneslai Homes sense checked the framework against the NFA (National Federation of ALMO's) and CWAG (Council's with ALMO's Group) self-assessment tool, Excellence in Management and Partnership.

Current Situation:

- 1.4 As a landlord of social housing the Council is ultimately responsible for meeting its regulatory requirements under the consumer standards set by the

Regulator of Social Housing. Regulation within the sector has been significantly strengthened following the Social Housing White Paper in 2020 and amendments to the Social Housing Regulation Bill 2022/23 which are due to receive Royal Assent in 2023. The amendments to the Bill provide the legal basis for many of the changes set out in the White Paper which seeks to deliver transformational change within the sector to empower residents, provide greater redress, better regulation, and improve the quality of social housing - giving greater powers to both the regulator and housing ombudsman and re-defining the role of landlord in terms of both accountability to the regulator and health and safety. As a landlord, the Council must have a robust Assurance Framework in place to ensure that our service provision (delivered by Berneslai Homes as part of the Services Agreement) meets all Consumer Standards, performs well and to the satisfaction of our tenants; ensuring the tenant voice is heard and at the heart of everything we do. The Council must also meet the Rents Standard.

1.5 Recent amendments to the Social Housing Bill include:

- An amendment introducing Awaab's Law which will require landlords to investigate and fix reported hazards in their homes within specified timeframes, or re-house tenants where a home cannot be made safe.
- An amendment to the powers of the Housing Ombudsman to help social landlords improve performance by instructing them to self-assess against guidance during a complaint's investigation.
- An amendment enabling the Social Housing Regulator to set a standard relating to information and transparency requiring social landlords to provide residents with information regarding how they can make a complaint against them.
- An amendment which will require all social housing managers to have a professional qualification. The aim of this change being to protect residents and raise standards in the sector.

1.6 The above amendments are as yet without detail and as such the Council and Berneslai Homes await further clarity regarding their implementation following the Social Housing Bill receiving Royal Assent. However, in preparation, the Council and Berneslai Homes has already reviewed the timeframes for dealing with damp and mould related works, committing to assessing all cases within a 7-day period as part of a revised and updated Damp and Mould Policy and operational processes. Current policy and practice within Berneslai Homes already meet the required standard. A further review of the wider repairs' completion timeframes (currently 24hr, 3, 7 and 25 days) will be undertaken as part of the contract review process linked to the mid-point of the current Property Repair Improvement Programme (PRIP) contract and with full compliance to Awaab's Law.

1.7 The Council and Berneslai Homes have also reviewed the Housing Ombudsman recording and reporting processes and have sought to streamline current arrangements and implement an escalation process for more complex cases to allow review, scrutiny, and responses to be jointly prepared between Berneslai Homes and the Council.

- 1.8 Berneslai Homes has done a lot of work to promote its complaints process and the reporting/recording of all complaints across various pathways. Berneslai Homes Tenant Voice Panel (TVP) Scrutiny Panel completed a review of Berneslai Homes' self-assessment on the Complaints Handling Code in February 2022 and the Council's internal audit completed a deep dive into the process and recording/monitoring mechanisms earlier this year. Actions from the audit review include further work to promote and improve the transparency of the complaints process; particularly in relation to reporting and record keeping.
- 1.9 Whilst the Social Housing Bill is welcomed across the sector, it should be noted that planned legislative changes, including plans to amend the decent homes standard, to implement inspection regimes, any further changes to regulations and requirements for professional qualifications (the details of which are all yet to be confirmed) will have significant implications for the sector from both a Housing Revenue Account (HRA) financing and resourcing perspective. The sector awaits the full legislation and the important detail which will come through the Government's consultation on the secondary legislation and guidance once the bill receives Royal Assent.

Current Response to the Regulatory Changes & Assurance Framework:

- 1.10 **Tenant Satisfaction Measures:** From April 2023, the Council is expected to record, monitor, and report data on a suite of Tenant Satisfaction Measures (TSM's). This new process, set up by the government, intends to make it easier for social housing tenants to hold their landlords to account in several performance areas such as repairs, safety checks and complaints. To respond to this, Berneslai Homes' Quarterly Report to the Council and Key Performance Indicator's (KPI's) has been updated to include both TSM's and updated Service Agreement Performance Indicators. The annual Survey of Tenants and Residents (STAR survey) format has also been amended to ensure that all TSM requirements are fully up to date in terms of questionnaire flow and definition. The first submission of the TSM's will be made by the Council for the financial year 2023/24 in April 2024. Cabinet will receive an annual performance report alongside a review of the annual business plan in Q1 2024.
- 1.11 **Compliance:** To ensure compliance with the Home Standard, a monthly Compliance Dashboard is provided to BMBC at Service Agreement Core Group Meetings. As well as providing a position statement on the key compliance areas (gas safety, electrical testing, fire safety, Asbestos, Water, and Lifts), information provided has recently been updated to include recording damp and mould cases, disrepair, and tracking progress in relation to condition and EPC surveys. Going forward, the Compliance Dashboard will move to the new C365 software system, which will be automated and allow the Council's clienting team real-time access. This, alongside the development of a robust asset data strategy (enabled by the acceleration of 100% stock condition and EPC surveys across stock), and a move to a new asset management database in NEC will give the Council greater assurance of data quality and enable the development of better informed and planned investment and disinvestment programmes.

- 1.12 A complaint and ASB tracker have also been added to the monthly Dashboards provided to the Services Agreement Core Group from April 2023 in line with TSM tracking. The Council's Safer Neighbourhood's Team who deal with escalated ASB issues, and reporting and recording of incidences of ASB will also be required to provide data as part of the TSM process.
- 1.13 **Tenant Engagement:** From a Tenant Engagement perspective, the Tenant Voice Panel and Scrutiny Panel are embedded into Berneslai Homes via a co-regulation approach and involved in many aspects of decision making, service design and delivery. An external SMART review of the tenant engagement model by TPAS was completed in March 2022 and found that Berneslai Homes has implemented a *"more robust and transparent, outcome focused engagement framework - demonstrated through the new channels for positioning the 'tenants voice' at the heart of service improvements, co-regulation, and the new approaches at a Governance level"*. An Action Plan was developed following the review which focusses on ensuring strengthened engagement with local groups (Tenants and Residents Associations 'TARAs' etc), better involvement of tenants with 'lived experience' when developing policies/procedures etc and improving the transparency of information and communication within the complaints processes. Stepping forward 12 months, the TVP remains engaged and active, although some members are keen to explore more independent framework models. Most importantly, existing engaged tenants, the Council and Berneslai Homes are all keen to further strengthen the tenant voice within service design and decision making both inside and outside of the formal structures. BH facilitated a workshop in April 2023 to understand how the TVP can respond and adapt to regulatory changes in representing tenants and supporting/challenging BH and the Council as landlord.
- 1.14 Whilst the new governance framework has embedded well in terms of strengthening assurance and escalation processes amongst officers, the Strategic ALMO meetings with the Tenant Voice Panel need additional focus to ensure that meetings are interactive and provide our engaged tenants with the level of assurance from their landlord that their voices are heard and that we are managing the services agreement with the ALMO effectively to achieve this.
- 1.15 **Tenancy Management:** From a tenancy perspective, Full Council approved the new Lettings Policy in March 2023, with an implementation date of 1st December 2023. The new policy seeks to make the best use of our stock and provides tenants and prospective tenants with a clear and transparent policy which enables choice, but which also provides applicants with realistic expectations. The Council has on-going oversight of the implementation of the new policy via the Policy Review Board (chaired by the Portfolio Holder for Growth and Sustainability).
- 1.16 **Rents and Financial Monitoring:** There are real and continued pressures on the HRA following significant statutory changes around enhanced compliance, building safety, and retrofit – all of which were not considered previously within HRA Business Planning nor the self-financing settlement. Whilst

enhanced standards across the housing sector are welcomed, over the last two years, the Council has funded significant proactive programmes to enhance smoke and carbon monoxide, CO alarm systems, deliver enhanced fire safety measures within our High Rise and Independent Living Schemes and accelerated delivery of electrical inspections – moving from a 10 to 5-year inspection regime. There is also a requirement to bring all stock up to EPC C or above by 2030; currently estimated to cost around £58m. To make the best use of revenues, the Council has commissioned Housing Quality Network (HQN) to undertake a review of rents and service charges and to develop a new, overarching Rent Policy.

- 1.17 Further to an overspend situation within the HRA Repairs and Maintenance Budgets during 2021/22, the Council established a Client Augmentation Team to work alongside colleagues in Berneslai Homes to develop more robust reporting, monitoring and check and challenge measures within budgets and to develop action plans to address repairs backlogs, to rebalance the delivery of responsive works in favour of planned and to generate efficiencies. As a result, revenue budgets during 2022/23 were more robustly managed. To provide the Council with further assurance of both project delivery and spend vs profile, a HRA budget tracker has been designed which will be presented to the Service Agreement Core Group monthly. This will help to ensure that sufficient progress is made in year in the delivery of priority schemes; particularly those linked to fire and building safety and ensure that our tenants feel more safe and secure in their homes.
- 1.18 Appendix B provides a narrated review of the current Assurance Framework, identifies gaps in the current reporting and governance structures and Appendix C provides an action plan to further strengthen these arrangements. The key risks for the Council, as with all ALMO arrangements across the country, is ensuring that Berneslai Homes provide timely performance management and monitoring data around customer satisfaction, repairs, complaints, compliance and building safety and hold robust asset management data on our stock to inform decency works, investment and disinvestment programmes. The Council, as an intelligent client, must be assured that data is robust and accurate, that service delivery meets all standards and is aligned to the Council's Policies. It is thus essential that governance arrangements are adequately resourced, and the assurance framework is sufficiently scrutinised. The Council must take a 'One Council' approach in its relationship management with the ALMO. The implementation of key IT system upgrades and data cleansing is essential to both enhancing customer expectations in repairs and maintenance, in generating efficiencies and the focus on planned works and in ensuring that we have a robust asset data strategy to enable continued compliance and inform the prioritisation of investments.
- 1.19 As we come to the end of the first year of the Assurance Framework, and in considering the gap analysis of the current assurance framework, it is recommended that an external review of the robustness of the Governance arrangements is undertaken by Campbell Tickell. This will give both the Council and Berneslai Homes additional assurance as we move into the new regulatory framework during 2023/24. It is also recommended that SMT note

the corporate risks to the ALMO/Council partnership and reputation of the Council in failing to meet our statutory and regulatory requirements under the new regulatory framework.

Building and Fire Safety; Governance Framework and Accountable Persons

- 1.20 In the wake of the Grenfell tragedy, the Government has published amendments to Fire Safety legislation and passed the Building Safety Act 2022 which contains a wide range of changes to the law covering building safety during design, construction and occupation, and the creation of a new regulatory framework for high-rise residential buildings.
- 1.21 The Building Safety Act which received Royal Assent on 28th April 2022 has made numerous changes to general building safety rules which include:
 - new competency requirements for building contractors and designers, and new duties to ensure building regulations compliance
 - automatic lapsing of building approvals after three years
 - new safety liabilities for corporate directors, and.
 - **a new regime for High Rise Residential Buildings (HRRB).**
- 1.22 A new Building Safety Regulator is responsible for HRRB's and there is a requirement for an Accountable Person/Principle Accountable Person to be responsible for building safety under occupation. All buildings which fall under the HRRB category will be required to have building assurance certificates.
- 1.23 At the heart of the Building Safety Act is a more stringent regulatory regime for higher-risk residential buildings. A higher-risk building is one which is over 18 metres in height or has more than six storeys and has two or more dwellings, or two or more rooms used for residential purposes, or student accommodation. Under the definition, the Council has three high rise residential buildings comprising 166 flats. These are the (previously considered mid-rise) blocks at Albion, Buckley, and Britannia House, which are off Sheffield Road close to the Town Centre.
- 1.24 To summarise, the Fire Safety Act establishes responsibility for fire safety in multi-occupied residential buildings and the Building Safety Act sets out different ways of working, recording and accountability to ensure new and existing buildings are safe from the moment they are constructed and throughout the life cycle of that building.
- 1.25 In considering the requirements under the Building Safety Act, the Council is required to appoint an Accountable Person who will be the Duty Holder in Occupation for the High-Rise Residential Buildings. There has been much confusion across councils and registered providers in relation to the definition of Principal Accountable Person (PAP), Accountable Person and Responsible Persons under fire safety; particularly given late changes to the requirements around Building Safety Managers and the Arm's Length arrangements that Barnsley and other ALMO's have in place.
- 1.26 Following advice from external specialists, Pennington's, and discussion with

other ALMO's, it is now understood that the Council must take the role of Principal Accountable Person (with the CEX as named PAP), with Accountable Persons nominated within both the Council and Berneslai Homes. It is thus proposed that under the Principal Accountable Person, the CEX delegates the Accountable Person role to Kathy McArdle who is SD lead for the Clienting Arrangement and shareholder representative on behalf of the Council on the Berneslai Homes Board. This role thus has full oversight/delegated responsibilities for all contractual and regulatory matters linked to Berneslai Homes and its Board on behalf of BMBC. Arturo Gulla is nominated as Accountable Person for Berneslai Homes given his position as Executive Director of Property Services within the ALMO.

1.27 It is the role of the Principal Accountable Person to:

- Register existing buildings with the Building Safety Regulator (between April 2023 and the end of September 2023).
- Prepare a safety case report for each building.
- Provide the safety case report to the Building Safety Regulator on request.
- Apply for a building assessment certificate when directed to do so by the Building Safety Regulator.

1.28 It is the role of the Accountable Person to:

- Prevent a building safety risk happening, with building safety risk defined as 'spread of fire and/or structural failure' and reduce the seriousness of an incident if one happens.

1.29 It should be noted that the Principal Accountable Person can delegate responsibilities for the completion of the PAP duties. To ensure clarity regarding roles and responsibilities and provide robust support to the Principal Accountable Person and Accountable Persons, a Building Safety Board has been established to ensure:

- That the Council and Berneslai Homes meets all the regulatory and legislative requirements relating to the Building Safety Act 2022, Fire Safety Act and Fire Safety Regulations.
- Provide assurance to the Council and its Members that Council properties are managed and maintained to the highest health and safety standards and in full compliance with the Services Agreement and the requirements of the Regulator of Social Housing (RSH).
- To provide a full programme update to the Council's appointed accountable person quarterly on all aspects of building and fire safety, including an update on capital/planned works, any areas of concern and tracking of fire risk assessment and other compliance actions.
- To determine where escalation to the Audit and Risk Committee is required e.g., where there are areas of non-compliance, incidents and/or significant delay in the delivery of essential planned works.

- 1.30 A copy of the terms of reference for the Building Safety Board is attached at Appendix D. The Board comprises Responsible Persons under the Fire Safety Act 2021 (Compliance Leads) who must manage and reduce the risk of fire for the structure and external walls of the building, including cladding, balconies and windows, and entrance doors to individual flats that open into common parts. The Council and Berneslai Homes have taken the decision to include its Independent Living Schemes within the definition of higher risk buildings.

2. PROPOSAL

- 2.1 It is proposed that Full Council note the updates within this report in relation to the social housing regulatory changes and the actions taken by the Council and Berneslai Homes in response. Also, the identified opportunities to enhance the current assurance framework, risks for the Council and wider partnership and the Action Plan in place to further strengthen governance and assurance.
- 2.2 It is recommended that Full Council endorse the proposed governance framework to ensure full compliance with the Council's duties under the Fire Safety Act 2021/Fire Safety Order and the Building Safety Act 2022.
- 2.3 It is recommended that Full Council endorse the independent review of the current governance framework by Campbell Tickell.

3. IMPLICATIONS OF THE DECISION

3.1 Financial

The Director of Finance has been consulted on the attached report.

Whilst there are no direct financial implications as a result of this report, it is clear that the Social Housing Regulation (SHR) Bill, which is expected to receive royal assent during 2023, will have possibly significant financial implications on the Council Housing Revenue account.

To date, significant investment has already been made including funding in excess of £8M as part of the 2022/23 HRA budget setting process to address health and safety requirements and £30M as part of the 2023/24 HRA budget to commence works to meet EPC C standards.

Upon receipt of further details, any further financial implications associated with meeting the SHR bill will be considered alongside other priorities as part of the annual HRA business plan and budget process.

3.2 Risks

Full Council must note that there are risks to the Council in meeting its statutory and regulatory requirements under the Social Housing Act and Regulator of Social Housing's new framework. The ALMO arrangement means that the Council contracts the management and maintenance of its

stock to Berneslai Homes under a Services Agreement. Whilst responsibility for service delivery is delegated, the Council retains accountability as landlord and is ultimately held to account by the Regulator of Social Housing/Building Safety, the Ombudsman and Central Government. The Council will be required to report on all aspects of service performance and satisfaction but is reliant on the ALMO to provide high quality, value for money services and robust data/KPI's in line with national Tenant Satisfaction Measures. There are also areas where the Council directly provides services to tenants via arrangements for neighbourhood services/grass cutting, addressing ASB, some IT support and the Call Centre function. It is thus important that service provision aligns with agreed SLA's (revised over the last 2 years) and that performance meets the needs and expectations of our tenants, providing a high quality, value for money service.

As identified within the Action Plan, there are key IT activities planned over the coming months which will provide the Council with greater assurance regarding the robustness of asset and data quality, record keeping and enhancements to the repairs and maintenance function which will improve the service provision to our tenants. There are risks in both the delay and implementation of these IT systems in terms of cost, resource, seamless service delivery and transparency and assurance to the Council that Berneslai Homes is delivering housing management and repairs and maintenance services to our tenants in line with the services agreement. Also, that the Council has access to robust performance management information, with sufficient data to meet our TSM requirements and allow scrutiny in a timely manner. It should be noted that Berneslai Homes has collated TSM data since 2022/23 financial year as part of the independent STAR survey.

The Council also needs to be assured that we have a robust asset management and Customer Relationship Management system and strategy which informs decision making and investments and which holds data on both people and property in one location. A full stock condition survey has been commissioned to ensure that we are able to transfer full and up to date information on all stock into our new NEC Asset Management system and the implementation and operational teams are looking at how additional customer information relating household make-up and vulnerabilities can be most effectively collated, updated and stored within NEC.

Whilst there has been significant work undertaken by both the Council and ALMO to develop a robust assurance framework and governance structure which can adapt to the new regulatory arrangements, there are still key projects/pieces of work outstanding which will improve assurance and transparency for the Council. It is thus recommended that Audit and Governance Committee are provided with a robust training session on the new regulatory framework, the associated actions and risks for the Council, and are provided with a regular update regarding progress against the Action Plan and development of a revised Assurance Framework.

3.3 Legal

As landlord, there are direct legal implications for the Council relating to both

the implementation of the Social Housing Bill and the new regulatory framework under the regulator of social housing. Whilst the Council has a services agreement with Berneslai Homes, for the management and maintenance of stock, the entity is wholly owned by the council, and accountability as the owner of the stock (and ultimate landlord to our tenants) and as Principal Accountable Person under the Building Safety Act 2022 responsibility sits with the Council. Failure to meet regulatory requirements under the regulator’s Consumer and Rent Standards or relating to building and fire safety within our stock could result in legal action/prosecutions taken against the Council.

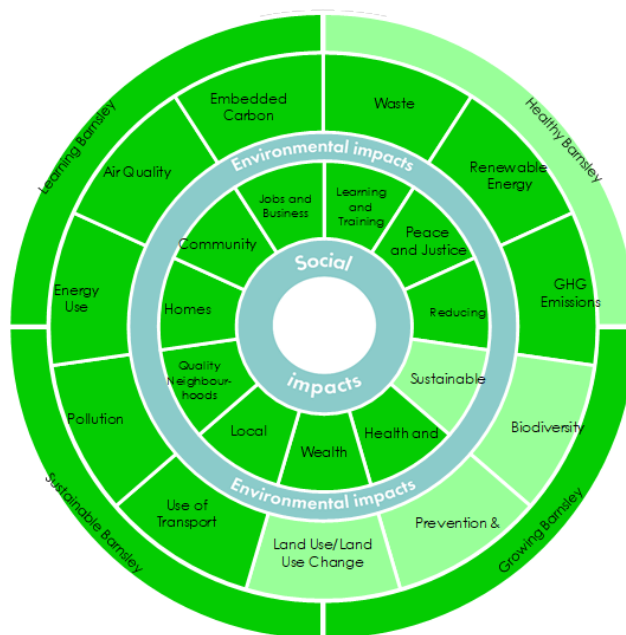
3.4 Equality

A full EIA has already been completed for the Berneslai Homes Strategic Plan and Annual Business Plan; ensuring that actions and activities align with the Council’s Corporate priorities, BH Equality, Diversity and Inclusion strategy and Customer Involvement Agreement.

3.5 Sustainability

The management and maintenance of the Council’s 18,000 stock will need significant focus, investment, and strategic asset management if it is to increase the energy efficiency of homes to an average of SAP rating C or above by 2030. A key focus for the Berneslai Homes Business Plan for 2023/24 is to ensure that there is robust data to inform the retrofit plan and to ensure that the Council and Berneslai Homes are best placed to access funding opportunities for insulation and renewable technologies, as they arise.

The Berneslai Homes Strategic Plan and Action Plan are aligned to Barnsley 2030 with a key emphasis on providing quality, affordable homes, neighbourhoods and supporting people to achieve their potential.



3.6 Employee

There are no direct employee implications.

3.7 Communications

There are no direct communications implications arising from this report.

4. CONSULTATION

Robust consultations have taken place between BMBC's Strategic Plan Management Group, Head of Risk and Audit and Berneslai Homes' Executive Management Team.

5. ALTERNATIVE OPTIONS CONSIDERED

There are no alternative options. The Council has a duty to meet its statutory requirements under the regulator of social housing. This report sets out an action plan to strengthen those arrangements further.

6. REASONS FOR RECOMMENDATIONS

It is proposed that Full Council notes the update on the regulatory landscape impacting the social housing sector and the assurances in place to ensure that we can continue to meet our regulatory requirements. It is recommended that Full Council support the Action Plan, the proposed governance proposals around Building and Fire Safety and the recommendation to allow Campbell Tickell to complete the external governance review.

7. GLOSSARY

N/A

8. LIST OF APPENDICES

Appendix 1: Annotated Review of Assurance Framework 2022

Appendix 2: Assurance Framework Action Plan

Appendix 3: Terms of Reference and Governance Structure Building Safety

9. BACKGROUND PAPERS

If you would like to inspect background papers for this report, please email governance@barnsley.gov.uk so that appropriate arrangements can be made

10. REPORT SIGN OFF

Financial consultation & sign off	Senior Financial Services officer consulted and date <i>Steve Loach 19/06/23</i>
Legal consultation & sign off	Legal Services officer consulted and date <i>Kate Gothard 06/06/2023</i>

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