

CABINET	AGENDA ITEM No. 4
23 JULY 2018	PUBLIC REPORT

Report of:	Annette Joyce, Service Director of Environment & Economy	
Cabinet Member(s) responsible:	Councillor John Holdich, Leader of Peterborough City Council Councillor Marco Cereste Cabinet Member for Waste and Street Scene	
Contact Officer(s):	Annette Joyce, Service Director of Environment & Economy	Tel. 01733 452280

ESTABLISHING A LOCAL AUTHORITY TRADING COMPANY WITH SUPPORTING BUSINESS CASE

R E C O M M E N D A T I O N S	
FROM: Annette Joyce, Service Director of Environment & Economy	Deadline date:
<p>It is recommended that Cabinet:</p> <ol style="list-style-type: none"> 1. Authorise officers to create a Local Authority Trading Company (Company), noting the Business case prepared in support of this decision. 2. Authorise officers to provide through that Company all services currently performed under the 2011 EMS/Amey contract and any other services considered as part of the Business Plan. 3. Authorise an extension to the current contract with EMS/Amey from the current contract termination date of 31 August 2018 to 1 February 2019 at an additional cost of £810,000. 4. Authorise a loan facility from Peterborough City Council of up to £1.75million (at state aid compliant interest rates and market terms) to the Company to provide working capital and cover start-up costs: <ul style="list-style-type: none"> ● Vehicles and plant (if required) - £1m ● Acquisition of ICT equipment & software - £100k ● Consultancy to prepare for go-live - £75k ● Stationery, marketing, website & contingency - £75k ● Running costs (if required) - £500k. 5. Delegate authority to the Chief Executive, in consultation with statutory officers as necessary, any decision relating to: <ul style="list-style-type: none"> ● Appointment and transfer of staff to the Company; ● Budget and financial matters necessary to support the business but with annual budget approval sought through the normal budget process. 6. Delegate authority to the Director of Governance in consultation with the Director of Resources and relevant Service Director authority to make decisions and enter into legal agreements necessary to effect the set up and future operation of the Company including: 	

- Appointment of Officers to the Company Board of Directors from incorporation;
- The agreement between Company and Council for discharging responsibilities and monitoring of performance;
- Appointment of Independent or Member representation to the Interim Board;
- Agreement of Articles of Association and shareholder agreement;
- Services and Asset Purchase Agreements;
- Leases and other property documentation;
- Secondment arrangements, pension provision and other employment matters.

7. That the Leader of the Council in consultation with the Cabinet Member for Waste & Street Scene and Service Director for Environment and Economy approve the Company name.

1. ORIGIN OF REPORT

- 1.1. The Medium Term Financial Strategy (MTFS) 2017/18 – 2026/27 presented to Council on 8 March 2017 included a proposal for the Council’s current contract for services with Enterprise Managed Services Limited (EMS) to terminate by mutual agreement and for the Council to consider alternative ways of providing those services.
- 1.2. Cabinet decision DEC17/CAB/76 authorised the entering into a Deed of Termination relating to the Council’s contract for services with EMS.

2. PURPOSE AND REASON FOR REPORT

- 2.1. The purpose of this report is to seek approval from Cabinet to formally create the Company to operate all services currently performed under the EMS/Amey contract.
- 2.2. Approval is also sought to extend the contract with EMS/Amey by five months at a cost of £810,000 to facilitate such a transfer of services.
- 2.3. This report is for Cabinet to consider under its Terms of Reference No. 3.2.1, ‘To take collective responsibility for the delivery of all strategic Executive functions within the Council’s Major Policy and Budget Framework and lead the Council’s overall improvement programmes to deliver excellent services.’
- 2.4. There is an exempt annex attached to this report that is NOT FOR PUBLICATION by reason of paragraph 3 of Schedule 12A of Part 1 of the Local Government Act 1972 because it contains commercial information. The public interest test has been applied to the information contained within this exempt annex and it is considered that the need to retain the information as exempt outweighs the public interest in disclosing it.

3. TIMESCALES

Is this a Major Policy Item/Statutory Plan?	YES	If yes, date for Cabinet meeting	23 July 2018
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4. BACKGROUND

- 4.1. The current contract with Enterprise Managed Services (EMS) was awarded after an OJEU compliant procurement process in 2011 and was to run for 23 years.

- 4.2. The services provided include Street Cleansing, Refuse Collections, Grounds and Tree Maintenance, Parks and Open Spaces, Building Maintenance, Building Cleaning and Home to School Transport Services.
- 4.3. In 2013 EMS were taken over by Amey Environmental Services (Amey) and they have been operating the service ever since.
- 4.4. During 2016 and 2017 the EMS contract had seen several operational challenges and it was recognised by both the Council and Amey that the contract was no longer fit for purpose. Amey had stated that they were making a substantial loss from operating this contract and would wish to renegotiate or end it. PCC had concerns over certain quality and performance issues such as recycling rates which were not as high as promised.
- 4.5. An agreement was therefore made to end the contract 16 years early with a termination date of 31 August 2018 and this was approved by Cabinet in December 2017.
- 4.6. At the same meeting a number of options were presented to the Cabinet as a way forward for the functions within the Amey contract. An option to bring services back in-house was brought forward but the option of a Local Authority Trading Company was not brought forward.
- 4.7. The reasons for discounting both of these options was that it was felt that breaking the contract into smaller Lots and seeking interest from those with the relevant skill set in those areas was the best way forward.
- 4.8. The final recommendation was *“to approve the award of replacement contracts or arrangement of alternative provisions for all services currently provided under the Enterprise Managed Services contract (such steps to include matters relating to contracts, leases and other relevant legal documentation and pensions arrangements).”*
- 4.9. In line with the Cabinet decision and recommendation, a plan was created to break down the existing contract into the following 4 lots:
 - Lot 1 – Procurement Process - Waste and Recycling Collection, Street Cleansing and Fleet Management;
 - Lot 2 – Procurement Process - Parks, Trees and Open Spaces;
 - Lot 3 – Joint Venture with Norfolk Property Services – Peterborough - Property Maintenance and Building Cleaning);
 - Lot 4 – Bring In-House then review - Community Link and Home to School Transport.
- 4.10. Work had commenced on each of the Lots, in accordance with the plan, however a progress review carried out in March 2018 established that the proposed arrangements would not deliver best value and would not adequately address Members concerns over quality & control provided under outsourced arrangements. In particular it was noted:
 - That a number of the potential bidders had made representations that the timescales allowed within the waste procurement were too tight. It was clear that this could potentially deter bids or adversely affect the value of any bids that were made.
 - Management fees and profit elements would still need paying to contractors with no certainty that performance would be improved given our limited control over contractor performance;

- There would be significantly less control and ability to deliver savings from adjusting service levels, under the contractor arrangement;
- There would be ties to contractors for long periods with no scope of gaining commercial advantages from these services by otherwise providing joint services or realising commercial trading opportunities with third parties.

4.11. Having considered the outcome of the review the Council decided to stop the waste procurement (Lot 1) and consider a different approach looking at a Local Authority Trading Company (Company). This is a business model that has been successfully adopted by a number of Local Authorities. This is a wholly owned company owned and governed by the Local Authority.

4.12. This proposal to consider a Company was announced by the Leader at Annual Council on 21 May 2018, where in his speech he set out the reasons why a rethink of the arrangements for the provision of all of the services had taken place.

4.13. In essence he explained that the services concerned were important to the residents of the city and that greater control over the quality and performance of those services was required. He also reflected his desire to see every penny spent devoted to providing high quality waste and cleansing services.

4.14. These factors, plus the ability for the Company to trade to a higher degree and earn income for the Council to support its services, led the Leader to conclude that such a company arrangement should be considered for the provision of all services currently performed under the EMS/Amey contract.

4.15. In addition to the above, the Company model is becoming more prevalent in local government and would allow us to adopt a more commercial culture and compete for external commercial work on a more level playing field with commercial operators. This is classed as a Teckal compliant company explored further in clauses 5.8 – 5.10 below. The advantages can be described as:

- The ability to trade in the wider market (up to 20% of its turnover);
- Savings from not having to undertake future procurement processes;
- Generation of economies of scale and greater efficiency;
- Returning revenue to the Council through profitability;
- Creation of a more commercial culture;
- Retaining people knowledge inside the Company;
- Retaining more control and a greater public sector ethos;
- Safeguarding jobs via diversifying work and contracts.

4.16. A proposal was presented and noted at Cabinet in June 2018 that an investigation into the establishment of a Company for the remaining services included within the Amey contract as well as the waste and cleansing services already announced, would be undertaken.

4.17. Cabinet also noted that the plans in place for these services would be paused whilst the investigation takes place and a business case be developed and brought back to Cabinet in July.

4.18. Paragraphs 5 and 6 set out the Business Case summary and detail, which is seeking the approval to set up the Company. Paragraph 7 sets out that if approved, a Business Plan will be developed to set out how the Company will operate and deliver services.

5. BUSINESS CASE (TO SET UP THE COMPANY) – SUMMARY

- 5.1. In considering the Business Case the Council has followed best practice Government guidelines and prepared it's Business Case to consider the proposal for establishing a Company. *“The purpose of a business case is to weigh up the costs and benefits of the suggested course of action and thereby present the argument for a new way of delivering services.”*
- 5.2. A business case provides the opportunity to undertake a comprehensive analysis of the preferred option identified as a result of the options appraisal stage.
- 5.3. The level of detail required within a business case may vary depending on how it is being used. For example, a business case that is being used to justify further exploration of a particular delivery model option might contain fairly high-level information around the likely costs and benefits of any new model.
- 5.4. However, a business case being used for the decision to proceed with a new model will need to:
 - contain well-developed costings;
 - contain clear estimates of timescales involved;
 - identify the benefits that will be delivered by the new model;
 - consider the most suitable procurement route.
- 5.5. If the business case is approved the Company will need to produce a three to five year business plan setting out how it intends to operate the Services and the budgets it will require to deliver them.
- 5.6. The Business Case (attached at Appendix A) has been prepared to fully examine the cost, benefits, disadvantages and risks of a Company operation for Lots 1 - 4 against the formerly proposed alternative options.
- 5.7. In respect of all Lots, Company operation has been established as the most efficient operating model, providing the best balance of cost and control to the Council. This report includes a summary of key points which are detailed in the Business Case
- 5.8. In order to prepare the Business Case, like for like service levels have been used to allow meaningful comparisons of the operating models available to the Council. Should the creation of the Company be approved based on these comparisons, future budgets will need to take account of:
 - Repayment of start-up capital;
 - Changes to service levels and specification that Members would like to change;
 - Contingency on the understanding that all savings and budget underspends will returned to / belong to the Council;
 - Commercial income from external trading opportunities.
- 5.9. If the establishment of the Company is approved, a detailed Business Plan will be prepared detailing how the services will be developed over the next five years and how commercial trading opportunities will provide income to the Council to help offset the cost of these services, support other services and protect jobs.
- 5.10. It would not be practical or possible to fully develop a Business Plan and expand the business prior to approval of the Company, prior to trading and prior to meeting and transferring staff who work in these services areas.

- 5.11. That said, the business ethos of our own Company will very much be focused on providing service excellence and increasing commercial opportunities and income that supports these and other services.
- 5.12. There are also a number of other Council services that could be operated through the Company. These could provide further efficiencies and economies of scale. They are out of scope for this business case but will form part of a wider review to be undertaken if the Company is set up.
- 5.13. The structure of the proposed Company is a wholly owned “Teckal” company. The “Teckal” part relates to legislation allowing Local Authorities to establish a company and deliver Local Authority functions from it without the need for external procurement. This clearly brings significant advantages in terms of cost and time.
- 5.14. Whilst there are many examples of Local Authority “Teckal” companies the Council must undertake its own legal due diligence and has therefore taken advice from external solicitors Bevan Britten. The advice is set out in detail within the business plan, it considers two key elements, which are the powers to establish a company and the Teckal compliance as set out below:

Powers to Establish the Company

- The Local Government Act 2003 enabled councils to trade in activities related to their functions on a commercial basis with a view to profit through a company.
- The Localism Act 2011 introduced a new General Power of Competence (GPC), which explicitly gives councils the power to do anything that an individual can do which is not expressly prohibited by other legislation. This activity can include charging (under section 3) if undertaken for a commercial purpose, then under section 4 it must be undertaken through a company, like under the 2003 Act referred to above.

Teckal Compliance

- “Teckal” refers to a legal case which has since been codified within Article 12 (1-6) of the EU Directive 2014/24 and Public Contract Regulations 2015. To gain Teckal exemption the council and the Local Authority Company must ensure that the company is within the Teckal parameters:
- The local authority must exercise over the Company a control which is similar to that which it exercises over its own departments;
- The company must be “inwardly and not outwardly focused”;
- At least 80% of the activity of the Teckal company must be for its public sector owners;
- The ability to trade in the wider market (up to 20% of its turnover).

5.15. The advice therefore establishes that the Council has the power to set up a Company and the Teckal advice provides clear parameters for the Council and Company to operate within.

5.16. Having considered the all of the information set out within the Business Case there are four key reasons for the recommendation to proceed with a Company:

- **Control of the Service** - The Company would be a wholly owned company of PCC meaning that the control and influence over the strategies, policies and the way the

Company delivers services would be with the Council. This has been much more difficult to exert through the outsourced arrangement.

- **Financial Sustainability** – The Company is the most cost effective option in the short term for the delivery of all of the services. In the medium term the retention of control will allow the Council to “cut its cloth” developing and driving an affordable and effective group of direct services, but most importantly having the flexibility to quickly deliver changes on the ground where policy or strategy changes are required.
- **Service Improvement** - The Company presents an opportunity to address more quickly and cost effectively areas where the service may not be as efficient as the Council expect.
- **Earning Commercial Income that supports services** – The Company would be able to compete to undertake external work on a level playing field with commercial operators without trading limits otherwise imposed on the Local Authority. Externally earned income can be used to support these and other Council services.

6. BUSINESS CASE (TO SET UP THE COMPANY) - DETAIL

6.1. The following paragraphs set out the detailed case for the Company:

Current Baseline Position

6.2. AMEY employ 402 employees (359 FTE's) across the services with the 4 Lots. Current costs of operating these services are:

Waste and Recycling	£2,968,789
Street Cleansing	£2,313,901
Parks, Trees and Open Spaces	£1,951,837
Building Maintenance & Cleaning	£1,650,498
Home to School	£ 727,961
Total	£9,612,985

Strategic Case

6.3. There are a number of ways that the Company can provide better control for and enable the Council to be more flexible in delivering services. These include:

- Members wishes to control quality & performance over these vital services which is not always possible through procured services or joint ventures;
- To reduce costs by avoiding management fees and bottom line profits charged by third party contractors or joint venture companies;
- Drive efficiencies through adoption of a commercial culture ability to compete in a competitive market;
- Provide savings and surpluses back to the Council particularly through less restricted commercial trading than is allowed under traditional direct Local Authority management;
- Facilitate a more flexible approach to changing circumstances than is possible when tied to long term contracts with commercial operators and joint venture companies.

Economic & Financial Case

6.4. A detailed option appraisal has been undertaken and is set out in the Business Case (paragraphs 10 and 11). A summary of each individual Lot is set out below along with the overall medium term financial implications compared to the budget.

Lot 1 – Refuse Collection, Recycling and Street Cleaning

- 6.5. A new procurement of this contract would result in significantly higher costs than budgeted. The level of costs necessary for the contract extension (equivalent to £1.9million pa) gives some idea of the likely cost the market would deliver. Whilst competitive bids could be lower, they are very unlikely to be as cost efficient as operating via our own Company.
- 6.6. It is worth noting that this decision has an influence on all of the remaining options. Lot 1 accounts for around 55% of the total cost of the current contract. If the Company is the preferred option then there are significant economies of scale benefits to be drawn from maximising the number of services operated from it.

Lot 2 – Parks, Trees and open Spaces

- 6.7. The conclusion of the procurement process for Lot 2 resulted in a single contractors bid. The bid has been evaluated as part of the procurement process and then further compared against the information produced for the Company.
- 6.8. The detailed evaluation is set out in the Business Case and shows the cost of the Company operation is significantly lower than the contractor.

Lot 3 – Building Maintenance and Cleaning

- 6.9. NPS (Norfolk Property Services) had been identified as a potential joint venture partner to deliver this service. NPS are a subsidiary of the NORSE Group, the corporate arm of Norfolk County Council.
- 6.10. Whilst using another Local Authority's Trading Company may have been a reasonable option, in the absence of our own Company, it is not an obvious option if we do have one.

Lot 4 - Home to School Transport & Community Link

- 6.11. These services are operated as part of the fleet management function operated across all of the other Lots. Separating it by bringing it back in-house would be more expensive as you would lose economies of scale on fuel and vehicle maintenance.

Financial Comparison against Current Budget

- 6.12. A significant amount of work has been undertaken to establish as accurately as possible the likely costs of operating the services through the Company. This has been achieved using data provided by Amey for staffing, vehicles and other direct costs, supplemented with information on likely support costs for HR, Payroll, Finance and ICT.
- 6.13. Whilst the majority of the costs have been finalised for the business case they will be subject to change between now and the proposed start date of 1 February 2019. The greatest volatility will be in the two largest cost areas of staff and vehicles and we are relying on TUPE and vehicle data provided to the Council by the current contractor.
- 6.14. The financial negotiations with Amey have now been concluded regarding the costs of extending the contract to 1 February 2019. The additional estimated costs to the 1st February is £810,000 these are set out in detail in the business case at paragraph 12.1.
- 6.15. The table below sets out the high level medium term comparison between the current PCC MTFs including the additional Amey extension costs and the proposed Company forecast based upon the 19/20 budget.

PCC MTFS 19/20 - 23/24	2019/20 £	2020/21 £	2021/22 £	2022/23 £	2023/24 £
PCC Budget	11,556,119	11,786,195	12,089,346	12,392,237	12,694,863
LATC Budget	9,999,023	10,163,036	10,330,329	10,500,968	10,675,020
Variance	(1,557,096)	(1,623,159)	(1,759,017)	(1,891,269)	(2,019,843)

6.16. The table shows clearly that the estimated costs of operating the services through a Company are significantly lower over the medium term.

The Commercial Case

6.17. Under Local Authority direct management Peterborough City Council cannot make a profit from any work it undertakes on a commercial basis. If it does so through a Company this restriction is removed since a Company can compete for more external work to ultimately provide more income back to the Council.

6.18. Under the Company, operation staff can be transferred from Amey on current pay and similar pension provisions which will enable the company to be competitive in the market place.

6.19. A full Business Plan will explore these commercial opportunities further but they could include:

- Increasing the amount of commercial waste collections;
- Providing services beyond the City boundary;
- Providing surveying, maintenance and cleaning services to residential and commercial users on a fee paying basis;
- Providing commercial / charged transport;
- Carrying out parks and ground maintenance to businesses and other agencies;
- The Company provides an exciting opportunity for the Council to trade on an equal footing to commercial partners without having to pay management fees or contribute towards third parties overheads or bottom line profits.

Analysis of Risks

6.20. A full risk analysis with mitigations has been undertaken and included within the Business Case (paragraph 14). There are no risks identified that would prohibit the Company being formed. The risks will be considered and managed through the development of the Business Plan. The major risks identified are set out below:

- Service continuity fails at the start;
- Vehicles, plant and equipment are not to the standard required;
- Not managing health and safety adequately;
- Licences to operate are not in place at the start;
- ICT systems are not in place.

7. BUSINESS PLAN – (TO SET OUT HOW THE COMPANY WILL OPERATE)

7.1. The preceding paragraphs and attached Business Case have set out the services should be operated through a wholly owned Teckal compliant Company. If approved the Company will follow Government best practice by preparing a Medium Term Business Plan.

- 7.2. The Business Plan will show how the Company plans to operate the services from 1 February 2019 and will include a budget and funding requirements for the next 5 years. The Business Plan will be presented to Cabinet for approval and will form the basis of the budgets for the Company and Council.
- 7.3. There are a number of issues, which will need to be considered prior to the completion of the Business Plan and they are set out below.

Financial Issues

- 7.4. The Council will need to consider the start-up costs of the Company and choose whether these should be funded by the Council or the Company. It will do so in the most advantageous way.
- 7.5. The Company will require working capital to enable it to cover start-up costs and establish a positive cash flow position prior to the transfer of services on 1 February 2019. The amount of the loan required is dependent upon negotiations with the contractor regarding their vehicles and plant. The maximum loan requirement (£1.25m) set out below assumes that all the owned vehicles and plant are acquired by the Company:
- Vehicles and plant (if required) - £1m
 - Acquisition of ICT equipment & software - £100k
 - Consultancy to prepare for go-live - £75k
 - Stationery, marketing, website & contingency - £75k
- 7.6. The loan interest charges by the Council to the Company must comply with State Aid requirements. The State Aid regulations are relatively complex and the Council is in the process of taking legal and financial advice to ensure that the loan is established within the State Aid rules.
- 7.7. The Company will also need to consider how it maintains a positive cash flow position once the services are transferred i.e. paying payroll costs etc. This could be through a working capital loan (of up to £500k) or by the Council making its payments in advance. This will also be done in the most advantageous way for the group and will form part of the financial advice taken to support the Companies Business Planning process.

Company and Board Membership

- 7.8. It is proposed that the structure of the Company and board membership will be considered as part of the Business Plan to be reported back later in the year.
- 7.9. There is however a need for an Interim Board to support the set-up of the Company. It is proposed this be established under the delegation of Director of Governance and that the Cabinet Member for Waste and Street Scene, Service Director for Environment and Economy and the Finance Manager for the Company be Interim Board members.

Shareholder Arrangements

- 7.10. The Council will need arrangements in place for both the strategic and performance management of the Company. This will only need to function from the point which the Company is operating (i.e. 1 February 2019).

Governance

- 7.11. Arrangements that will need to be put in place upon incorporation and prior to trading include:
- Governance and reporting arrangements including clarity over client arrangements for each service;
 - Production of financial procedures;
 - Creation of health & safety procedures;

- Staff TUPE arrangements;
- ICT including accounting and payroll software as required;
- Leases, licenses and ICT;
- Contractual arrangements;
- Banking, auditing and insurance.

8. CONSULTATION

8.1. The Council has undertaken consultation with relevant stakeholders including:

- Trade unions;
- Amey staff;
- Cabinet members;
- Corporate Management Team.

9. ANTICIPATED OUTCOMES OR IMPACT

9.1. The anticipated outcome is one that allows a smooth transfer of services upon termination of the EMS/Amey contract which would provide better value and control than previously considered.

10. REASON FOR THE RECOMMENDATION

10.1. This report seeks approval to transfer all services currently performed by Amey under the EMS/Amey contract to our own Local Authority Company.

11. ALTERNATIVE OPTIONS CONSIDERED

11.1. These have previously been considered by Cabinet as described in section 4.3 of this report.

12. IMPLICATIONS

Financial Implications

12.1. These are covered in the Business Case.

Legal Implications

12.2. A Local Authority Company can be created under section 95 Local Government Act 2003 or the General Power of Competence introduced by the Localism Act 2011 which explicitly gives councils the power to do anything that an individual can do which is not expressly prohibited by other legislation. This activity can include charging (under section 3 or it can be undertaken for a commercial purpose, under section 4 in which case it must be undertaken through a company. Where the purpose is the Council's service delivery then the company could be formed as a Teckal company pursuant to section 111 Local Government Act 1972 (the incidental power) and section 1 Localism Act.

12.3. For the Company to undertake services and works for PCC, the Company would need to be "Teckal" compliant to gain "Teckal" exemption from needing to compete with other companies under procurement legislation. "Teckal" refers to originating legal case which has since been codified within Article 12 (1-6) of the EU Directive 2014/24 and Public Contract Regulations 2015. A Teckal company is operated as an extension of the Council and is likely to be a contracting

authority meaning that it should procure under EU rules. A commercial trading company would generally be able to operate outside that framework, not being a contracting authority (and so for example would not have to follow EU rules in its procurement of works and services etc).

- 12.4. Ongoing internal and external legal advice as necessary in relation to the business case supporting the creation of such a wholly owned Company and to ensure that the Company remains state aid and procurement compliant.

HR Implications

- 12.5. A total of 402 employees (359 FTE's) are currently employed by EMS and will be affected by any decision to create a Company. Subject to approval, these employees will transfer to the Company in accordance with Transfer of Undertaking (Protection of Employment) Regulations 2006 (TUPE). Detailed consideration will need to be given to the staffing and pension implications of any proposal going forward.
- 12.6. The arrangements and consultation process for transferring staff will be undertaken as part of the detailed Business Plan as well as preparing a full staffing structure.

Equalities Implications

- 12.7. The equalities implications are addressed in the Equalities Impact Assessment (Appendix B).

Youth and Young People Implications

- 12.8. The Company will also seek to support local young people by promoting work experience and apprenticeships wherever it is practicable.

13. BACKGROUND DOCUMENTS

Used to prepare this report, in accordance with the Local Government (access to information) act 1985.

Cabinet Report 18 December 2017

Cabinet Report 18 June 2018

14. APPENDICES

- A. Business Case (Exempt)
- B. Equality Impact Assessment