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REPORT TO:	Cabinet Member for Homes and Gateway Services
SUBJECT:	Homeless & Young People Services (16-24) – Individual Contract Extensions
LEAD OFFICER:	Guy Van Dichele, Executive Director of Health, Well Being and Adults Julia Pitt Director of Gateway
CABINET MEMBER:	Councillor Alison Butler, Cabinet Member for Homes and Gateway Services Councillor Callton Young, Cabinet Member for Finance and Resources
WARDS:	ALL

CORPORATE PRIORITY/POLICY CONTEXT/ AMBITIOUS FOR CROYDON

[Corporate Plan for Croydon 2018-2022](#)

This approach supports the following corporate priorities as set out in the Corporate Plan 2018-2022:

Our Children and Young People thrive and reach their full potential – relieving homelessness and supporting young people to be aspirational, maximizing their independence and making sure they are safe, healthy and happy.

Everybody has the opportunity to work and build their career - delivering services which provide holistic support for young people and help them into employment, education and support.

Everyone feels safer in their street, neighborhood and home – providing specialist support for young offenders.

Locality Matters: Develop services that are place based and integrated within their local community and tailored to local needs.

FINANCIAL IMPACT

The recommendation is in relation to 2 separate contracts and therefore a combined amalgamated value is not appropriate.

Extending the two separate contracts to the 30th June 2021 will have the following impact:

- CAYSH: 1st Base and Supported Accommodation'; Extension by variation of 15 months to 30/06/21 at an additional cost of: £184,727
- CAYSH: The Youth Offender Housing Support Service; Extension by variation of 15 months to 30/06/21 at an additional cost of: £43,348

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The extension for each individual contract will be made under existing terms and conditions, and budgetary provision is available within the 'Accommodation and Support' budget.

FORWARD PLAN KEY DECISION REFERENCE NO.: 4620HGS

The notice of the decision will specify that the decision may not be implemented until after 13.00 hours on the 6th working day following the day on which the decision was taken unless referred to the Scrutiny and Overview Committee.

1. RECOMMENDATIONS

The Leader of the Council has delegated to the Cabinet Member for Homes and Gateway Services in consultation with the Cabinet Member for Finance and Resources the power to make the decision to extend by way of variation in accordance with Regulation 30 of the Council's Tenders and Contracts Regulations:

- 1.1 The '1st Base and Supported Accommodation' contract in accordance with Regulation 30 of the Council's Tenders and Contracts Regulations awarded to CAYSH for an extension period of 15 months to 30th June 2021 at a cost of £184,727 for a maximum aggregated contract value of £1,775,239.
- 1.2 To note a report detailing commissioning intentions, procurement strategy and any specific arrangements to end current contracts will be presented to Cabinet Member for Families, Health and Social Care, Cabinet Member for Children's, Young People and Learning, Cabinet Member Homes and Gateway Services and the Cabinet Member for Finance and Resources in November.

2. EXECUTIVE SUMMARY

- 2.1 In order to provide strategic oversight of the individual contracts this report proposes to extend with the single incumbent provider, two current contracts have been included within this report. Each contract is separate with their own set of terms & conditions, therefore, will be extended and managed on an individual basis.
- 2.2 The Council has a statutory duty to support a wide range of Croydon residents who are either homeless or at risk of homelessness from the ages of 16 to 24 as outlined within The Homeless Reduction Act 2017.
- 2.3 In order to fulfil the statutory duty and meet the requirements, the Council has commissioned two separate services, each with an individual contract in place:

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- a) '1st Base and Supported Accommodation' currently provided by CAYSH. A service providing accommodation based housing related support within a family home environment for young people aged 16 – 24. This contract is currently held by adults commissioning.
 - b) 'The Youth Offender Housing Support Service' currently provided by CAYSH. A housing related support service for young offenders. This contract is currently held by children's commissioning.
- 2.4 During the recent Ofsted inspection in February 2020 it was identified that services for homeless 16-17 years olds are significantly underdeveloped and results in poor experiences for young people.
- 2.5 CAYSH has provided a satisfactory service over the last few years for the two contracts listed. The Supported Accommodation service has reduced its scope bringing a reduction in contract value but reducing capacity. For the Youth Offending Housing Support Service, legislation and changed and a different model is needed.
- 2.6 Both of the contracts have breached Public Contract Regulations by extending beyond the original agreed extension period. There has been insufficient oversight on our housing support contracts and more contract management resource has now been allocated to undertake a strategic commissioning review across all related contracted provision. Extending the current arrangements will allow full consultation with stakeholders as part of the review.
- 2.7 Recommissioning next year will give an opportunity to revisit the service delivered, guarantee the best value for money outcome as well as ensure we are compliant with contract regulations. Extending the current arrangements will allow full consultation with service users to ensure that services remain fit for purpose and can be redesigned as required and appropriate. Extending the current arrangements will allow time to appropriately plan and implement new strategic arrangements in order to address the identified issues. An extension will also enable the Council to fulfil the statutory obligation (prevent and relieve homelessness) whilst minimising service disruption. A mixture of holistic recommissioning and in-housing will result in services that more effectively address these needs will be developed as soon as possible and well before contract expiry.
- 2.8 There is budgetary provision within the services for each of the current contracts to continue. The commissioning work on these contracts is urgent and every effort will be made to complete recommissioning work before the recommended extension end date of 30 June 2021 and exit these agreements early. Any housing related support can be commissioned very quickly via the Dynamic Purchasing System set up earlier this year. A commissioning intentions report will go to Contracts and Commissioning Board and be discussed with relevant Cabinet Members by the end of November.

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- 2.9 The content of this report has been endorsed by the Contracts and Commissioning Board.

CCB Approval Date	CCB ref. number
01/10/2020	CCB1617/20-21

3. DETAIL

Background

- 3.1 In 2013/14 the council, in partnership with the Croydon Clinical Commissioning Group, undertook a procurement exercise to establish an Integrated Framework Agreement (IFA) for care, support and health related services. This was designed to enable people to live independently in the community and/or stay within their own homes. The IFA was taken to CCB on 19th June 2014 and taken to Cabinet on the 14th July 2014. (KEY DECISION REFERENCE NO.: 1289; CCB APPROVAL REFERENCE NUMBER: CCB0914/14-15)
- 3.2 The Council developed the IFA to bring together all community based social care services under a single arrangement (organised into specific 'Lots' and 'sub-Lots'). This approach was intended to provide the Council with a more coherent and joined up approach to providing services.
- 3.3 The original IFA came to an end on the 1st of October 2018 however the decision was made to extend the arrangement due to the lack of alternative options. An 18 month extension of the IFA was secured and this allowed the council to fulfil its statutory duties whilst the new Dynamic Purchasing System was being implemented. (KEY DECISION REFERENCE NO.: 2918FR, CCB APPROVAL REFERENCE NUMBER: CCB1389/18-19). This extension expired on 1st April 2020.
- 3.4 At the time the IFA was taken to cabinet, the total value of spend that fell under the auspices of the framework agreement was £86m over a 4 year period. This comprised of £78m from the Council for social care services and £8m from the CCG specifically for continuing health care services (which has never included any supported housing contracts). Although the Council has retained the option to purchase services outside the framework agreement and has done so to various degrees across all the services.
- 3.5 At the time the IFA was extended, spend by Croydon council (not including the CCG) was an estimated £72,337,496.06 which is under the £78m projected spend. The 18 month extension was expected to add a maximum value of up to £24,861,537.72 and take the aggregated total for the IFA to an estimated £97,199,033.78.
- 3.6 These 2 CAYSH contracts were separately procured in 2013 from the aforementioned Integrated Framework Agreement, as follows:

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- a) '1st Base and Supported Accommodation' via a mini competition from the IFA for an original term of 2 years (1+1) at an original contract value of £228,667. There have been subsequent extensions outside of this term with the latest ending 31/03/2020. The current aggregated value of the contract is (excluding the proposed 15 month extension) £1,590,512.
- b) The Youth Offender Housing Support Service' previously awarded via a mini competition from the IFA at an original value of £228,667. There have been subsequent extensions outside of this term with the latest ending 31/03/2020. The current aggregated value of the contract (excluding the proposed 15 month extension) is £283,521.

3.7 Both services current and last term was due to end 31/03/20 and the proposed extensions will be deemed to have taken effect from 1st April 2020.

Context

3.8 The current contracts support a wide range of Croydon residents who are either homeless or at risk of homelessness from the ages of 16 to 24. Support can either be provided directly i.e. sourcing new accommodation or indirectly via information, advice and support.

3.9 There are a number of key reasons why this particular cohort becomes homeless or are at risk of homelessness within Croydon:

- Parental evictions
- Conflicts with the family
- Parents facing financial difficulties,
- Parental support needs
- Care Leavers

3.10 Key statistics in relation to this cohort from 2019/20 are as follows:

Overall CAYSH service user cohort	
Number of new service users	148
Number of open or repeat service users	211
Number of users at risk of homelessness	293
Number of users receiving advice/support (not homeless/at risk)	60
Current Care Leavers (age 17) who may require support in the future	163

The Homelessness Reduction Act 2017

3.11 There are three key duties that this Act places upon Local Authorities:

- Prevention: Councils must take reasonable steps to either help their residents to stay in their current accommodation or help them to secure new accommodation. All eligible households, regardless of priority need, intentionality, or local connection must be helped by the Council.
- Relief: Councils must take reasonable steps to help secure

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accommodation for any residents who are eligible, regardless of priority need. Residents in priority need are provided with interim accommodation, and the Local Authority must resolve their homelessness.

- Refer: Public authorities in England must notify the relevant Local Authority of service users that they believe are either homeless or are at risk of homelessness.

The services

- 3.12 Established in 1981, CAYSH is a London-based charity delivering accommodation, advice and support services for young people facing homelessness. They also deliver the Young Person's Care Leavers Service and the Turnaround Centre drop-in service. These contracts have been operating for a similar length of time and the intention is to also extend till June 2021. CAYSH provides a safe place to stay for more than 250 young people who would otherwise be homeless every night. They also provide advice and guidance to thousands more facing homelessness and other challenges.
- 3.13 The services The Council has commissioned from CAYSH being discussed in this report are:

1st Base and Supported Accommodation

- 3.14 The service provides homelessness prevention, accommodation and support for children and young people, aged 16 – 24, including care leavers within a home environment.
- 3.15 The aim of the service is to:
- Enable young people to begin their pathway to living independently. developing their independent living skills;
 - Maintain their tenancies or return to the family home where relevant;
 - Prevent youth homelessness through providing emergency placement responses;
 - Find suitable alternative supported accommodation;
 - Provide a safe supportive environment for young people to build their self-esteem and confidence.
- 3.16 The Supported Lodgings Pathway consists of three stages, with varying levels of support and supported lodgings for young people with high support needs.
1. Stage One - First base Lodgings, provides an alternative intervention and initial assessment service for those Young People who are particularly vulnerable and not suitable to shared accommodation service model. The service has capacity to support 10 people at one time. 80% of service users the lodgings in 2020/21 moved onto stage 2 (32 out of 40).

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2. Stage Two – General Supported Lodgings, provides a young person with a room within a family home where they are offered a range of support depending on their level of need. The service had capacity to support 40 people at one time. 16 service users left the service and 15 service users moved on in a planned into stage 3.
 3. Stage Three – Private Rented Sector, the young person would move into independent private rented sector accommodation with eight weeks access to floating support.
- 3.17 The service reports that the contract is currently service is performing adequately, however the number of available householders was not high enough for the Council's needs. This led to the provider giving a discount on the original contract price of £200,087 to £147,781, a saving of £52,300. Provision towards 16-17 year olds has also decreased dramatically. These issues are to be addressed in the recommissioning work.

The Youth Offender Housing Support Service

- 3.18 The Youth Offender Housing Support service works in partnership with Croydon Youth Offending Service (YOS) to provide a specialist outreach casework housing support for young people, aged 16 – 19, who are living with their families and need support to maintain living in the family home, or who are at risk of homeless on leaving an offender institution. The aim of the service is to provide flexible outreach response to enable and support young people through: developing independent living skills, the ability to maintain tenancies, and, providing floating support whilst in B&B and sofa surfing.
- 3.19 The service supports 15 people at one time and but again 'move-on' is an issue with only 10 service users moved on in a planned way. The current service is performing adequately, though changes in legislation since the inception of the role have seen the support worker's role drift dramatically to more generic housing prevention – for young people on remand for instance, a social worker is now a statutory requirement.

Rationale for the contract extensions and future commissioning proposal

- 3.20 **Service Stability:** Extending the current contracts for a period of 15 months will provide stability for service users whilst future commissioning intentions are fully discussed and explored. The Local Authority currently commissions a number of services from CAYSH, therefore, there is also a responsibility to ensure stability of the local supplier during the exit & transition period.
- 3.21 **Fulfil the Statutory requirement:** The current contracts have expired. There is a statutory requirement to ensure Croydon residents have access to the services that are provided. Extending the current contracts will enable the Local Authority to fulfil the statutory obligation.

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- 3.22 **Undertake an options appraisal:** Extending the current arrangements will enable sufficient time to undertake a full options appraisal with regards to the future commissioning intentions. At present it is the intention to bring the services managed by children's services in house with the view to re procure for the adult service contracts. This will not be possible unless the current arrangements are extended particularly when having to consider the continuation of statutory service provision, how these processes can be embedded within the Local Authority BAU functions and the time required to undertake an appropriate procurement process.
- 3.23 **Strive towards outstanding:** During the recent Ofsted inspection (February 2020) it was identified that services for homeless 16-17 years olds are significantly underdeveloped and results in poor experiences for young people. Whilst steps have been taken to address individual issues there is work to be done to ensure greater oversight and strategic direction. Extending the current arrangements will allow time to appropriately plan and implement new arrangements to address these issues as we continue the journey to become outstanding. Of particular note for this service is the need for any supported housing and homelessness prevention services to interface effectively with our offer to 16 and 17 year old homeless young people, and care leavers aged 16-25 who need further support at various levels before moving on to long-term tenancies with less support, or full independence if they are ready. Our plans below, which are a mixture of holistic recommissioning and in-housing will result in services that more effectively address these needs.

Future Proposal

- 3.24 Should it be agreed to extend the current individual contracts until 30 June 2021, then it will allow sufficient time for 1st Base Supported Lodgings to be re procured with new contracts in place by 1 July 2021 at the latest. The timetable is as follows:
- **By November 2020:** Undertaking of full options appraisal and review of services. Options include open procurement of existing service model, developing a new service model amalgamating existing individual specifications and delivering more service in-house. The commissioning intentions will go to Contracts and Commissioning Board by the end of November. This report will include details about the end of the current contract and how transition arrangements will be managed.
 - **January to March 2021:** Tender process (if applicable) undertaken
 - **March/April 2021:** Appropriate exit and step down arrangements to be put in place for existing contracts
 - **April/May 2021:** Relevant service structures to be in place to manage the proposed in house service and out-sources provision
 - **1 July 2021:** New service(s) go live.
- 3.25 The Youth Offender Housing Support Service will likely be brought in-house over the next few months so that contract will be ended early.

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4. CONSULTATION

- 4.1 Consultation with key senior stakeholders has taken place including The Head of Homelessness and Housing Need, Single Homeless Service manager, Lead co-ordinator Gateway Rough Sleeping, Executive Director - Children, Families and Education, Head of SPOC and Assessments and Head of Adolescent Services.
- 4.2 Stakeholders are in agreement that service delivery needs to be maintained in order to meet statutory duties to accommodate vulnerable young people whilst these implications are clarified.
- 4.3 The current service provider, CAYSH, has been consulted and they are agreeable to the 15-month.
- 4.4 Further consultation will form part of the re-commissioning of the contracts in the future. This will include market engagement and consultation with all stakeholders. This will be discussed further in the subsequent future RP1 & RP2 reports.

5 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

Revenue and Capital consequences of report recommendations

Note: Each individual contract is separate, however, for the purpose of demonstrating the financial impact on the budget a combined total has been illustrated:

	Current year	Medium Term Financial Strategy – 3 year forecast		
	2020/21	2021/22	2022/3	2023/24
	£'000	£'000	£'000	£'000
Revenue Budget available				
Expenditure	182	46	na	na
Income				
Effect of decision from report				
Expenditure	182	46		
Income	na	na		
Remaining budget	0	0		

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The effect of the decision

- 5.1 The proposal is for the existing individual contracts to be extended for 15 months by way of variation. This will be in line with the Council's standard terms and conditions that are currently in place for each separate service.
- 5.2 The impact on the current individual contracts is as follows:
- 1st Base and Supported Accommodation'; Extension by variation of 15 months at an additional cost of: £184,727. This will increase the current value from £1,590,512 to **£1,775,239** (12% increase)
 - The Youth Offender Housing Support Service; Extension by variation of 15 months at an additional cost of: £43,348. This will increase the current value from £283,521 to **£326,869** (15% increase)
- 5.3 CAYSH is a London Living Wage Supplier, however when the contract was first procured, the requirement was not present. CAYSH have subsequently, met the requirement for London Living Wage, and their contract costs were uplifted accordingly to the amount currently quoted. The cost is included within the proposed extension values highlighted within this report:

Contract title	Original Contract Values (2013)	% increase from original value	Current uplifted Contract Cost	Cost for the 15 month extension
YOS Housing Support	£33,390	3.86	£34,679	£43,348

- 5.4 The service has budget available for the continuation of the current individual contracts and the proposed increases within the Supported Accommodation budget of £2.648m within the Gateway Service Improvement department.
- 5.5 There is no impact upon service delivery as a result of implementing the proposed extension.
- 5.6 CAYSH support the proposed extension for a period of up to 15 months.

Risks

- 5.7 The following risks have been identified and are being actively managed within the service:

Risk	Mitigation
Risk that the services do not deliver	The individual contracts are rigorously monitored with challenging standards, targets and performance indicators that should mitigate against non-delivery. Performance will continue to be monitored during the extension period and the potential exit process.

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	<p>As part of the extension a 3 month break clause will be included within the contract, which will allow the Council to terminate services prior to the expiry of the requested extension should this be required.</p>
<p>Risk of challenge from another supplier</p>	<p>Officers recognise that the current proposals are not compliant with Public Contracting Regulation 72. There is therefore a potential risk of challenge from suppliers, however, this is deemed relatively low given the duration and value of the proposed extension.</p> <p>The COVID-19 pandemic, and the activity that ensued meant that the timely work that was supposed to be completed for March 2020 was not completed in time, however it also has afforded some flexibility around procurement regulations.</p> <p>In any event, following the expiry of the proposed extension period the aim is to either bring the service in house, or to retender via an open procurement exercise that will help mitigate any potential risk.</p> <p>Should the service be retendered then there is a current DPS that could potentially have an additional lot added. Should this be the case then services can be recommissioned quickly via this approach.</p> <p>The service will begin engaging with the market in the coming months and options will be fully explored in subsequent RP1 & RP2 reports.</p>
<p>Council staffing & resources</p>	<p>There is some risk to completing the options appraisal, review and insourcing proposals within the extended timeframe as this will impact 2 statutory services. There is currently insufficient resource within Gateway to deliver future proposals. This will require strong project management, alignment, a clear strategic direction and a commitment from both services to resource the project appropriately.</p>
<p>Slippage in timescales, leading to a further extension being required</p>	<p>The in sourcing of the children's element will have a dedicated officer and will be overseen by the C&I division with regular meetings and milestone meetings held with the service in relation to progress.</p> <p>There is now an identified officer who will oversee the re-procurement of the services required to meet the needs of adults. This will be managed within the C&I division.</p>

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Options

5.8 The following options have been considered and rejected. Please refer to section 12 within this report for further detail.

- Don't extend the current individual contracts: **Rejected**
- Immediately re procure the services : **Rejected**
- Extend the individual contracts with the incumbent provider: **Recommended**

Future savings/efficiencies

5.9 The extension will allow for a review of the services and re-alignment to meet statutory obligations, and changing need as well as address the issues highlighted by Ofsted. The review will also take into account opportunities for future savings/efficiencies.

5.10 The most severe extent of homelessness or rough sleeping can cost up to £20,000 per person per year. (At What Cost, Crisis 2015).

5.11 Services that relieve and prevent homelessness, and, it's most severe form, rough sleeping can create savings to the public purse, particularly when considering the impact upon other Council and public bodies.

5.12 Whilst the cost of homelessness is difficult to quantify (as it is dependent upon the length of time the homeless household is homeless, occupies temporary accommodation, and their support needs) it is envisaged that reviewing the current services and/or bringing all or parts of the service in house will generate longer term savings and efficiencies for the Council.

5.13 Future savings and/or efficiencies will be considered fully as part of the commissioning process for the future service provision from the expiry of these current contracts.

5.14 The RP1 'Make or Buy' report at that stage will explore the options to secure the future provision to ensure that the Council is achieving the best Value for Money from a new service to be in place from the expiration of these proposed extensions.

Approved by: Sarah Attwood on behalf of Josephine Lyseight, Head of Finance (Health, Wellbeing and Adults)

6. LEGAL CONSIDERATIONS

6.1 The legal considerations are as set out within this report.

Approved by Kiri Bailey, on behalf of Sean Murphy, Director of Law and Governance

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7. HUMAN RESOURCES IMPACT

- 7.1 This report makes recommendations involving service provision changes which are likely to invoke the effects of the Transfer of Undertakings (Protection of Employment) Regulations 2005 (TUPE). However, where activities are “fundamentally not the same”, TUPE may not apply, as provided for by the 2014 amendments to the Transfer of Undertakings (Protection of Employment) 2006 Legislation.
- 7.2 In this case, it is expected that the staff currently working for CAYSH on the Croydon contract will transfer to the Council under TUPE, where it applies. Once a formal decision is made, the Council will engage with the Transferor (the current employer) to assess the full implications of TUPE. The Council will ensure that the appropriate TUPE protocols are applied; particularly the duty to consult with the recognised trade unions and affected staff groups.

Approved by: Deborah Calliste, Head of HR for Health, Wellbeing and Adults on behalf of the Director for Human Resources

8. EQUALITIES IMPACT

- 8.1 A full EIA for the IFA was previously carried out prior to the tender in 2014. At the time, the award of this contract was deemed to enable service users to live more fulfilling independent lives and would incorporate an outcomes based approach so that providers are focused on the achievement of goals for service users rather than creating dependency.
- 8.2 As a full equalities impact assessment was completed in 2014 prior to tender and as any call off or extension would be a continuation of the same T&C's with the same providers, no new assessment is required.
- 8.3 A revised EA will be completed as part of the project to re-procure the same contracts at the later date referenced in the report. Renewed/re-procured contracts will include equalities clauses/requirements to ensure providers are supporting the council to meet the public sector equality duty.
- 8.4 We will ensure further consultation is accessible and includes all service users to ensure that services remain fit for purpose and can be redesigned as required and appropriate for all. Any equality and inclusion issues and findings will be incorporated and addressed in the revised EA.

Approved by: Yvonne Okiyo, Equalities Manager

9. ENVIRONMENTAL IMPACT

- 9.1 It is considered that there are no increased or decreased environmental sustainability impacts, from the proposed contract extension contained in this report.

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10. CRIME AND DISORDER REDUCTION IMPACT

- 10.1 It is considered that there are no increased or decreased crime & disorder impacts, from the proposed contract extension contained in this report.

11. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 11.1 The proposed recommendation seeks to continue the Council's statutory duties to prevent and relieve homelessness and to ensure that the future service is fit for purpose.
- 11.2 The recommendations in this report allow for stability of current service delivery whilst enabling a robust, high quality commissioning strategy to be developed and implemented in relation to the future commissioning intentions.

12. OPTIONS CONSIDERED AND REJECTED

- 12.1 Options considered for each of the individual contracts are as follows,
- **'Do Nothing'**: The current individual contracts would come to their natural conclusion, and there would be no future contract costs. The Council will retain a statutory duty to provide advice on the prevention of homelessness, and to assess its statutory duties within children's and homelessness legislation. The short timescale to manage this transition risks delivery of a reduced service to vulnerable children and young people, a risk of failure to meet the Council's statutory duties and failure to safeguard vulnerable young people.
 - **Re-procuring the services for 15 months**: The process of re-procuring the service through a competitive tender exercise would extend beyond the existing contract end date. Given the time constraints this will have a similar impact as described in Option 1
 - **Extend the individual contracts with the incumbent provider for 15 months via contract variation**: This is the recommended option, allowing for continuation of service, discharge of statutory duties and a period of time to consider recommendations and reconfigure/re-align services in order to better meet the needs of Croydon residents.

13. DATA PROTECTION IMPLICATIONS

13.1 WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?

Yes

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13.2 HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?

Yes

Approved by Julia Pitt – Director for Gateway Services

CONTACT OFFICER: Rebecca Clews, Lead Coordinator
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APPENDICES TO THIS REPORT: None

BACKGROUND DOCUMENTS: None