Housing Revenue Account Budget Monitoring Report No.1 2020-21

Meeting	10 September 2020
Report Author	Tim Willis, Deputy Chief Executive & S151 Officer
Portfolio Holder	Cllr Rob Yates, Finance, Administration and Community Wealth Building
Status	For Decision
Classification:	Unrestricted
Key Decision	Budget and Policy Framework
Reasons for Key (if appropriate)	Expenditure not in budget and exceeding virement rules
Previously Considered by	Cabinet 30 July 2020
Ward:	All

Executive Summary:

This report presents a revised 2020-21 budget and 2020-24 capital programme for the Housing Revenue Account as a result of the impact of Covid-19 and the reintegration of East Kent Housing as well as narrative on the current monitoring position and 2019-20 Provisional Outturn.

Recommendations:

That Council agrees:

1. To note the HRA 2020-21 budget monitoring position;
2. To approve the revised HRA budget estimates for 2020-21;
3. To approve the revised Housing Revenue Account capital programmes (Annex 1) for 2020-24;
4. To note the Section 151 Officer's Assurance Statement as set out in section 10 of this report;
5. To note the 2019-20 HRA Provisional Outturn position and capital programme outturn (Annex 2).

Corporate Implications

Financial and Value for Money

The financial implications have been reflected within the body of the report.

Legal

Section 151 of the Local Government Act 1972 requires a suitably qualified named officer to keep control of the council's finances. For this council, this is the Deputy Chief Executive and this report is helping to carry out this function. The requirements of other relevant statutes have been referenced within the body of this report, where relevant.

Corporate

Corporate priorities can only be delivered with robust finances. Both the draft budget and the level of reserves recommended in this report are believed to be sufficient to contribute towards meeting those priorities and to deliver services.

Equality Act 2010 & Public Sector Equality Duty

Members are reminded of the requirement, under the Public Sector Equality Duty (section 149 of the Equality Act 2010) to have due regard to the aims of the Duty at the time the decision is taken. The aims of the Duty are: (i) eliminate unlawful discrimination, harassment, victimisation and other conduct prohibited by the Act, (ii) advance equality of opportunity between people who share a protected characteristic and people who do not share it, and (iii) foster good relations between people who share a protected characteristic and people who do not share it.

Protected characteristics: age, sex, disability, race, sexual orientation, gender reassignment, religion or belief and pregnancy & maternity. Only aim (i) of the Duty applies to Marriage & civil partnership.

CORPORATE PRIORITIES

This report relates to the following corporate priorities: -

- Growth
- Environment
- Communities.

1. INTRODUCTION

1.1 Cabinet agreed to bring the Tenant and Leaseholder services function in house from East Kent Housing (EKH). This report seeks to revise the 2020-21 Housing Revenue Account (HRA) budget to take into account the necessary budgetary changes as a result of that decision as well as adding additional monies in relation to compliance and Covid-19.

1.2 The report also represents the first budget monitoring report to reflect the impact of Covid-19 on the HRA.

2. BACKGROUND

2.1 EKH was created in 2011 by the four East Kent districts in order to provide Tenant and Leaseholder services for each of the respective client councils' housing stock.

2.2 A number of failures on the part of EKH led to an improvement plan being approved by Cabinet in January 2019 and subsequently being introduced. Additional failures led to a Cabinet report on 17 October 2019 which agreed that subject to consultation, the preferred option was to bring the Tenant and Leaseholder service in house.

2.3 The main reasons to bring the service in house were:

- Long term and increasing failures to deliver the council's capital programme.
- Failure to deliver improvements set out in the Improvement Plan agreed in January 2019.
- Significant failures to comply with statutory health and safety requirements.

2.4 And more recently, consultants commissioned by Thanet District Council concluded that the East Kent Housing model is fundamentally broken.

2.5 Cabinet considered the outcome of the consultation on 17 February 2020 and agreed to implement the preferred option. The report to Cabinet highlighted the need to move to a delivery model that could address the performance issues that had been identified and, in accordance with the views expressed during the consultation, implement a new, improved tenant and leaseholder service that is more accountable to the needs of residents.

2.6 EKH will continue to deliver the Tenant and Leaseholder service until 1st October 2020 when the service will be brought in house.

2.7 The HRA budget was originally agreed by Council on 6 February 2020 and this requested members approve a budget based on the on-going management fee being paid to EKH.

2.8 However as services and staff (where possible) are to transfer to the client Council an adjustment to the 2020-21 budget is required to take account of the increased costs of the service.

2.9 Covid-19 has had a significant effect on the housing service and on the HRA. It is still too soon to know the extent of the impact, but this report provides for projections that are reflected in the monthly MHCLG returns. These estimate that housing rent income will be £630k below budgeted income this year.

3.0 Housing Revenue Account Budget Monitoring - May 2020

3.1 Covid-19 is presenting challenges within the HRA. The main impact is an increase in rent arrears caused by the potential loss of income to Council tenants as a result of the pandemic. The increase in rent arrears is forecast to be as much as £622k. By the end of May rent arrears had increased by £73k over the rent arrears increase in the prior year, although the increase in arrears is starting to slow.

This increase could be attributed to a number of factors including changes and timing of Universal Credit payments and so to estimate the true impact of Covid-19 is

almost impossible at this stage. A revision to the bad debt provision is therefore proposed as highlighted in the changes to the HRA budget.

Due to the delays experienced in completing the new build/intervention properties due to Covid-19, a delay is also forecast in the receipt of affordable rents associated with these properties. Currently it is forecast that lower voids associated with social rents will offset the impact of a delay in rent received for these properties in 2020-21.

Other impacts to the HRA have included a greater period when properties are void and are awaiting works due to contractors not being available and alternative suppliers being required to undertake lift inspections, however the impact of these is minimal at the moment and are being covered from within existing budgets.

4.0 Housing Revenue Account Capital Monitoring - May 2020

4.1 Due to construction companies ceasing works during the Covid-19 pandemic, all of the new build and intervention schemes are experiencing completion delays. This has had not only a knock on effect to tenants moving into the properties, but has also meant that the use of 1-4-1 capital receipts could not be achieved by the original deadlines resulting in a risk of repayment to the government.

4.2 The Council has been in discussions with the government about adjusting these expenditure targets and the government has now allowed authorities to slip two quarters expenditure targets to the end of December 2020.

4.3 Covid-19 has also had a detrimental effect on the rest of the HRA Capital Programme. Not only because of the contractor delays, but also because many vulnerable tenants aren't allowing access to properties to undertake works.

4.4 However the true slippage on all programmes won't fully be known until later in the financial year once discussions with contractors are at an advanced stage and the impact on supply chains is fully assessed.

5.0 Housing Revenue Account Revenue Budget

5.1 The council's responsibilities in respect of the need to keep a Housing Revenue Account (HRA) are contained within Section 74 of the Local Government and Housing Act 1989 ('The Act') and its use is heavily prescribed through statute. The HRA records all of the revenue expenditure and income relating to land, dwellings and other buildings provided under Part II of the Housing Act 1985 and corresponding earlier legislation. It must be separate from the General Fund Revenue Account and therefore is to all intents and purposes ring-fenced. Although the HRA for an individual year may result in a deficit, it is a requirement of 'The Act' that overall it must maintain a surplus, which means that expenditure must be carefully planned to remain within the limits of the anticipated income streams over the medium term.

5.2 The Housing Revenue Account Business Plan sets out the main strategic priorities for investment in homes and services over the long term. The draft strategic priorities, set out below, have been prepared as part of the review of HRA budgets ready for the launch of the new in-house service on 1 October 2020. Cabinet has

recommended that the council's tenants and leaseholders are consulted about these draft strategic priorities, before they are agreed as part of a more comprehensive review of the Business Plan, prior to the setting of new budgets for the financial year 2021/22. The draft strategic priorities are:

- To maintain a Housing Revenue Account that is self-financing and reflects both the requirements of residents and the strategic visions and priorities of the council.
- To provide opportunities for tenants and leaseholders to become involved in the management of their homes.
- To provide safe, well maintained and energy efficient homes.
- To invest in long-term improvements to the council's housing stock and provide homes that people choose to live in.
- To increase the council's housing stock through programmes of new build and refurbishment.
- To review the alternative options for homes that cannot be maintained to meet current and future standards.
- To maintain a rent and charging policy that is both affordable for residents and ensures the resources needed for investment in homes and services.
- To maintain a minimum level of HRA reserves of £1m.

Details of the HRA revised expenditure estimates

5.3 **Contract and Price Inflation** - There are no planned changes from the original budget report.

5.4 **Repairs and Maintenance -** The revenue budget has increased to reflect the increased cost associated with the staff structure for this area (£234k) and the additional costs of compliance checks (£50k)

5.5 **Supervision and Management General** – This area of expenditure includes removal of 6 months of the EKH management fee and the inclusion of 6 months of the new in-house service staff as well as associated costs inc. ICT, HR/payroll and office accommodation.

This budget has increased by £703k and is formed of one-off costs (£464k), on-going costs associated with bringing EKH in house (£131k) and an increase for additional security (£108k) at tower blocks to assist with fire safety until the main tower block capital works are completed. These additional resources will support a programme of service improvement, in partnership with tenants and leaseholders, once the new in-house service has been launched.

The £464k one-off costs include the £187k for ICT costs previously reported to Cabinet in the report dated 18 June 2020.

5.6 **Bad or Doubtful Debts Provision** – As highlighted in paragraph 3.1, Covid-19 is causing an increase in rent arrears caused by the potential loss of income to Council tenants as a result of the pandemic. An increase in the bad debt provision of £430k is prudent based on the forecast year end debt. Regular updates on bad debt will be provided as part of the quarterly monitoring reports.

5.7 **Depreciation for Fixed Assets** – There are no planned changes from the original budget report. The estimated depreciation charge for dwellings and other assets is calculated at £4.05m in 2020-21.

5.8 **Debt charges** – There are no planned changes from the original budget report. Since the self-financing settlement, the council has operated a two loan pool approach whereby the HRA and GF are each responsible for the repayment of their own apportionment of loans. As part of the self-financing settlement, the HRA had its debt capped at £27.792m, with this cap being abolished from 29 October 2018. As at 1 October 2019, following the repayment of £3.311m HRA debt on that date, the HRA had £15.9m of loans outstanding.

5.9 **Details of the HRA income estimates**

There are no revisions to income assumptions since the budget was originally approved by members.

5.10 **The Housing Revenue Account Reserves**

The council operates three HRA reserves: a HRA Major Repairs Reserve, the HRA Balance Reserve and the HRA New Properties Reserve:

5.11 **Housing Revenue Account Major Repairs Reserve** –. An amount equivalent of the actual depreciation charge for dwellings is transferred to the Major Repairs Reserve to fund capital works to the existing stock. The estimated transfer to the Major Repairs Reserve for 2020-21 is £4.05m.

This funding, together with previous allocations of supported borrowing and revenue contributions, with good management, has enabled the council to maintain the housing stock in a good condition. The council currently maintains its social housing to Decent Homes Plus standard.

5.12 **Housing Revenue Account Balance Reserve** – This reserve holds the balance of the HRA and is used to draw down to balance the revenue budget and smooth out any peaks and troughs within the 30 year business plan. It is maintained by annual contributions from the HRA. As at 1 April 2020 this reserve balance was £8.65m.

5.13 **HRA New Properties Reserve** – This reserve holds funds set aside to fund either new build properties or the acquisition of suitable properties for use within the HRA. Earmarked match funding for the Margate Intervention, New Build Programme and 141 Acquisition Programme has been set aside in this reserve as agreed by Cabinet. As at 1 April 2020 this reserve balance was £1.075m and is due to be drawn down during 2020-21 programmes. Income generated from affordable rents will continue to be set aside in this reserve for re-investment.

5.14 The original and proposed revised HRA revenue budget for 2020-21 is set out below.

Table 1: 2020-21 HRA Budget

DRAFT - HOUSING REVENUE ACCOUNT BUDGET		
Description	**2020-21**	**2020-21**

	Original	Revised
	£'000	£'000
Income		
Dwelling Rents (gross)	-12,911	-12,911
Non-dwelling Rents (gross)	-227	-227
Charges for services and facilities	-531	-531
Contributions towards expenditure	-386	-386
Income Subtotal	**-14,055**	**-14,055**
Expenditure		
Repairs & Maintenance	3,451	3,735
Supervision & Management – General	3,487	4,190
Supervision & Management – Special	779	779
Rents, rates, taxes and other charges	250	250
Bad or doubtful debts provision	200	630
Depreciation/impairment of fixed assets	4,050	4,050
Capital Expenditure funded from HRA	1,172	1,172
Debt Management Costs	9	9
Expenditure Subtotal	**13,398**	**14,815**
Net Costs of Services Sub Total	**-657**	**760**
Share of Members and Democratic Core	148	148
HRA Investment Income	-160	-160
Debt Interest Charges	997	997
Government Grants and Contributions	-300	-300
Adjustments made between accounting basis and funding basis	-97	-97
(**Surplus)/Deficit on HRA**	**-69**	**1,348**
Housing Revenue Account Balance:		
Surplus at Beginning of Year	-8,645	-8,645
(Surplus)/Deficit for Year	-69	1,348
Estimated Surplus at End of Year	**-8,714**	**-7,297**

The overall increase of £1,417k is generated from the one-off costs of bringing EKH in house £464k, additional on-going revenue costs of the same of £365k, costs of security and of additional compliance of £158k and an increase in bad debt provision to deal with the forecast additional debts associated with Covid-19 £430k. A detailed narrative of these increases is included in paragraph 5.4 to 5.6.

There are currently no assumptions about the timing or amount of monies to be handed back to the authority by EKH as part of this revised budget, as a detailed review of balances and liabilities at EKH is still on-going.

6.0 The HRA Capital Programmes for 2020-21 to 2023-24

6.1 Due to construction companies ceasing works during the Covid-19 pandemic, all of the new build and intervention schemes are experiencing completion delays. This has had not only a knock on effect to tenants moving into the properties, but has also meant that the use of 1-4-1 capital receipts could not be achieved by the original deadlines resulting in a risk of repayment to the government. The Council has been in discussions with the government about adjusting these expenditure targets and the government has now allowed authorities to slip two quarters expenditure targets to the end of December 2020.

6.2 Covid-19 has also had a detrimental effect on the rest of the HRA Capital Programme. Not only because of the contractor delays, but also because many vulnerable tenants aren't allowing access to properties to undertake works.

6.3 However the true slippage on all programmes won't fully be known until later in the financial year once discussions with contractors are at an advanced stage and the impact on supply chains is fully assessed. Members will receive an update on the progress of the Capital Programme through regular quarterly budget monitoring reports.

6.4 Therefore the HRA Capital Programme remains unchanged for 2020-21 to 2023-24. The revised table in **Annex 1** includes the actual budget b/fwd from 2019-20 as well as building an additional budget of £206k in 2020-21 and £900k in the 2021-22 Programme for lift refurbishment. The £206k is an additional increase since the report went to Cabinet at the end of July so the budget now reflects the successful tender return, however this overall cost still represents value for money as it was achieved through a competitive tender process.

6.5 The draft HRA Capital Programme for 2020-21 totals £13,529k whilst a review of Covid impact is undertaken, which will be funded from the HRA reserves, revenue contributions to capital, grant, prudential borrowing and 141 receipts. A summary of this programme and the proposed funding sources are shown in **Annex 1**.

7.0 Working Balances and Reserves

7.1 Section 32 of the Local Government Finance Act 1992 requires local authorities to have regard to the level of reserves needed for meeting estimated future expenditure. The Section 151 Officer is responsible for providing advice, so that decisions taken on reserves represent proper stewardship of public funds. Reserves should be set and maintained at a level at least sufficient to meet any unexpected increase in expenditure or shortfall in income in the ensuing year that cannot be met from within the approved budget. Any decision that fails to take into account his advice may require a report to be made to the council under Section 114 of the Local Government Finance Act 1988.

7.2 These reserves are required in order to comply with proper accounting practice, whilst others have been created to earmark resources for known or predicted

liabilities. A summary of the projected reserves, allowing for the budget proposals, is shown in Table 1 below for information.

Table 2 HRA Reserves

Reserves	31 Mar 20	Movement	31 Mar 21	Movement	31 Mar 22
	£000	£000	£000	£000	£000
HRA - Balances Reserve	8,645	-1,348	7,297	-952	6,345
HRA - New Prop/ Repairs Reserve	1,075	-1,075	0	0	0
HRA - Major Repairs Reserve	15,469	-7,664	7,805	-7,711	94
Total	**25,189**	**-10,087**	**15,102**	**-8,663**	**6,439**

8.0 30 year HRA Business Plan

8.1 When considering such a major operational change, to ensure the HRA remains sustainable in the longer term an indicative review of the HRA 30 year business plan has been undertaken.

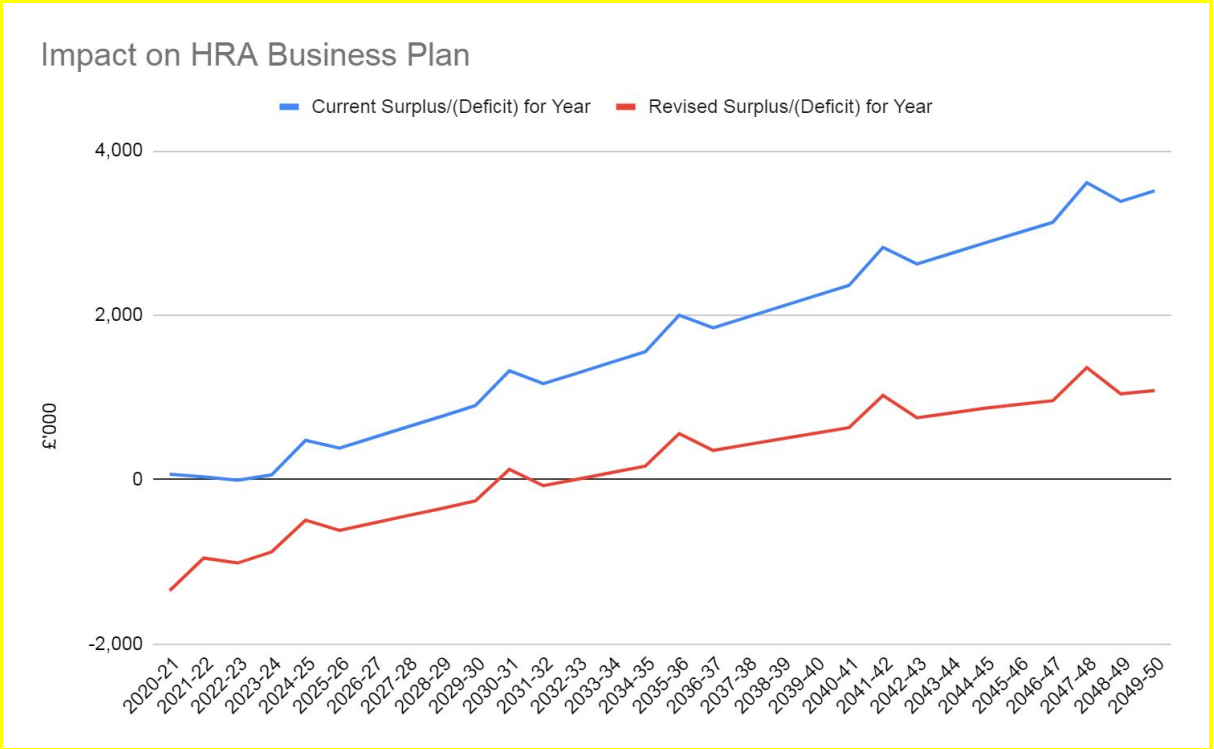
8.2 However in order to produce a business plan certain assumptions have to be made in order to forecast both expenditure and income. The two key indices used within the business plan are CPI and RPI.

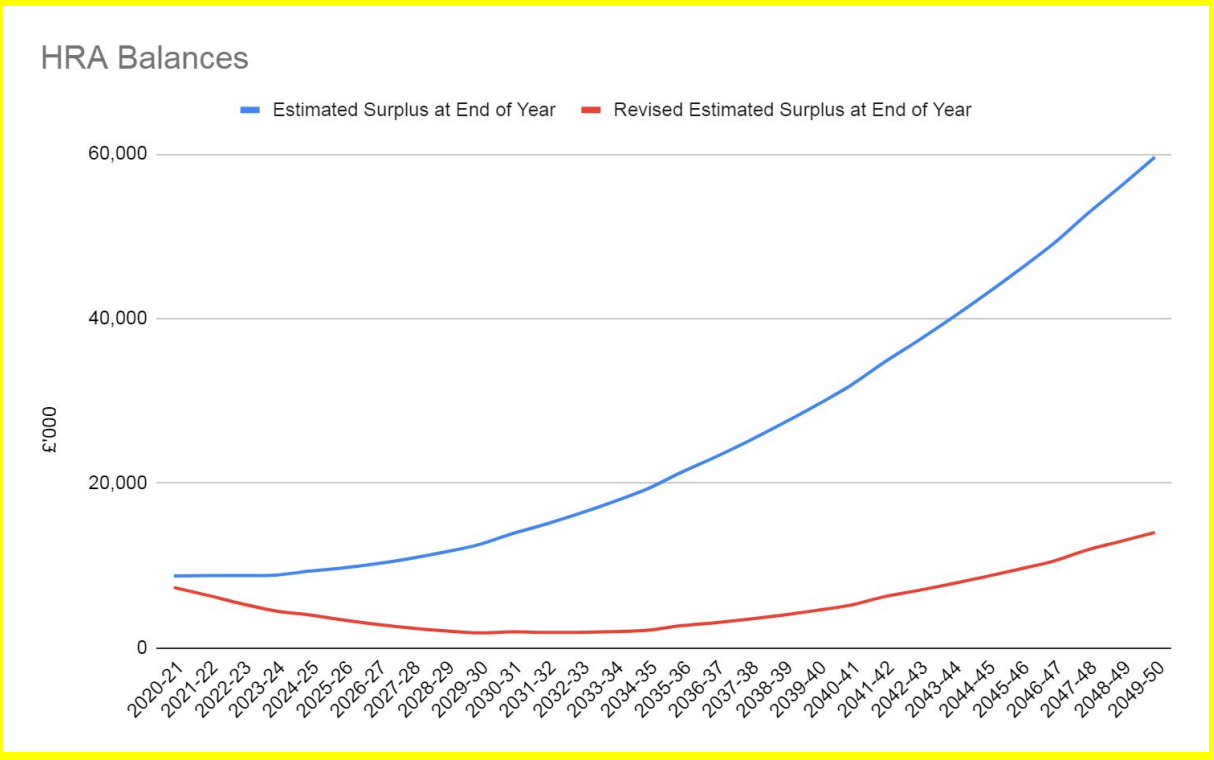
8.3 Income to the HRA is linked in the main to CPI. The current business plan assumes a CPI + 1% increase annually for rental income, the maximum allowed under statute. Members have the authority to freeze rental income or set a rent increase below CPI +1%. However the financial impact on the business plan would be significant if this was agreed and would mean the HRA would fail to make a surplus for a longer period of time.

8.4 Expenditure is mainly linked to RPI in the business plan model and this is also subject to variations over the term of the business plan. Typically RPI is higher than CPI which is why it is important to ensure that rental increases are at CPI +1% so that costs do not increase at a greater rate than income.

8.5 This budget report only sets the revised budget for 2020-21 and a further report will be presented to members in 2021 which will include a more comprehensive business plan and medium/long term budget position.

8.6 The charts below show the current overall position of the HRA based on these assumptions over the next 30 years:





8.7 The current business plan model shows that whereas the HRA would have made a regular surplus from 2023-24, the impact of bringing EKH in house and the additional costs of compliance and security, means the HRA is unlikely to make a regular surplus until at least 2030-31.

8.8 However, although the HRA is forced into a deficit over the next few financial years, the HRA balances, as demonstrated by the charts, remain healthy and the business plan demonstrates that the proposed changes to the annual budget

caused by the decision to bring EKH back in house are affordable in the longer term.

9.0 Budget Estimates

9.1 The estimates are considered to be robust and have been subject to significant review and scrutiny by the Corporate Management Team, Heads of Service and Financial Services Officers.

9.2 In general, realistic assumptions have also been incorporated with regards to inflationary increases, and where appropriate these have been reflected in both expenditure and fees and charges income.

10.0 Housing Revenue Account (HRA) - Section 151 Officer's Assurance Statement

10.1 Section 25 of the Local Government Act 2003 also requires that, when the council is considering the HRA budget and rent levels, the council's Section 151 Officer (the Deputy Chief Executive) must report on:

- The robustness of the estimates.
- The adequacy of the proposed financial reserves.

10.2 The HRA estimates are considered to be robust and have been subject to significant review and scrutiny. Realistic assumptions have been incorporated with regards to inflationary increases, and where appropriate these have been reflected in both expenditure and income.

11.0 Adequacy of HRA Reserves

11.1 The level of HRA reserves remain healthy with HRA balances far in excess of the targeted £1m even after the pressures of East Kent Housing services coming in house, which would require drawdowns from this reserve.

11.2 The New Properties Reserve is likely to be fully utilised by the end of 2020-21 due to further progression of the Council's new build housing and refurbishment schemes. This is as expected, although in future years, the reserve will continue to be replenished with affordable housing rents.

11.3 The Major Repairs Reserve is under considerable pressure over the medium term due to the large capital programme spend forecast in 2020-21 and 2021-22. This spend is forecast to reduce the reserve to £94k at the end of 2021-22, although over the following years the reserve is forecast to be replenished.

12.0 HRA Outturn Provisional Outturn 2019/20

12.1 The Housing Revenue Account (HRA) outturn shows a deficit of £662k. The budget for the HRA (as reported to Cabinet in January 2019) was a projected deficit of £419k.

12.2 Table 3 provides a summary of the key variances compared to budget.

Table 3 - HRA Main Variances

Budget	(Under)/ Over Spend £000	Explanation
Rental income	(418)	Week 53 unbudgeted rental income and lower rent voids
Day to Day Repairs Expenditure	103	Over spend as a result of Non-Price Per Property works and void works required for re-let.
Management & landlord costs	349	Increased costs of security, compliance and management fee associated with EKH compliance issues
Bad & Doubtful Debt Allowance	(32)	Decrease in allowance based on year end bad debt position
Other under or overspends	241	Various budgets / technical adjustments
TOTAL VARIANCES	**243**	

HRA Working Balance

12.3 The accumulated HRA balance at 31 March 2020 is £8,645m, the in-year deficit saw the balance reduce from £9.307m at 31 March 2019.

12.4 The HRA working balance is being managed so that it provides the flexibility to meet unexpected demands and pressures without destabilising the council's overall financial position. The level of the working balance is examined in the context of risk and also the need to replace lost rent following the increased right to buy sales of dwellings.

Major Repairs Reserve

12.5 The balance on the reserve is £15.469m and this increased in 2019/20 by £2.7m.

The reserve is increased by the calculated annual depreciation charge on HRA stock and this is offset by expenditure of a capital nature on housing stock, including repayment of borrowing.

HRA Earmarked Reserves

12.6 In addition to the Working Balance, the HRA maintains an earmarked reserve specifically for acquisition of property. The balance in the reserve is currently £1.075m (HRA New Property Reserve). This decreased by £1.452m during the year as a result of the progression of the council's new build programme, offset by the annual income from affordable rented housing stock.

Housing Revenue Account Capital

12.7 The provisional outturn of the HRA capital programme for 2019-20 is £10.586 million, compared to the revised budget of £19.664 million a variance of £9.078 million.

Table 4 below shows details of the actual spend by project.

Table 4 HRA Capital Project Spend

HRA Capital Programme	Revised 2019-20 Budget	Actual 2019-20	Variance to Revised 2019-20 Budget
	£000	**£000**	**£000**
Major Works	5,710	1,897	(3,813)
Margate Intervention	2,813	1,610	(1,203)
New Build Programme	8,266	4,973	(3,293)
141 Acquisitions Programme	2,052	1,979	(73)
Acquisitions Programme	728	0	(728)
St John's Crescent	95	127	32
Total Expenditure	**19,664**	**10,586**	**(9,078)**

12.8 Table 5 below shows how the actual spend was financed:

Table 5 Financing of HRA Capital Programme

HRA Capital Programme	Revised 2019-20 Budget	Actual 2019-20	Variance to Revised 2019-20 Budget
	£000	**£000**	**£000**
HRA Major Repairs Reserve	5,410	1,745	(3,665)
HRA Revenue Contributions/Reserve	3,555	1,904	(1,651)
Capital Grant	2,023	876	(1,147)
Capital Receipts	2,267	1,808	(459)
Prudential Borrowing	6,409	4,253	(2,156)
Total Resources	**19,664**	**10,586**	**(9,078)**

The main variances to the programme have been caused by a delay in the commencement of works at Royal Crescent, a rescoping of the lift refurbishment programme, kitchens and bathrooms and new build and intervention programmes.

The timetable for Royal Crescent works being delivered has slipped although the scope of works has now been assessed and costed by external consultants. The works will now commence in 2020/21.

The delay in the lift refurbishment programme has been caused as a result of a revisiting of the specification of replacement due to concerns about the longevity of the proposal. The revised specification has now been assessed and additional monies requested as per paragraph 4.4 of this report.

Intervention schemes have continued during 2019/20 although some of the sites already have experienced delays towards the end of 2019/20 due to Covid-19. In addition some other on-site delays have led to slippage. The remainder of the budget outside the named sites is to be used for further development and the Council continues to seek a suitable site in the intervention area.

New build programme delays were in part caused by some initial procurement timetable slippage. Phase 3 has seen the biggest delays due to required additional groundworks on-site. £1m in relation to TDCs Phase 4 New Build Programme will slip to 2020-21 as a result of a lack of suitable sites

The acquisition programme for Ramsgate has been delayed due to the urgent requirement to spend 1-4-1 capital receipts on property acquisition and therefore resources were focused on this aim and resulted in this acquisition programme being slipped to 20/21.

12.9 **Annex 2** sets out the details of the capital programme provisional outturn for 2019-20.

13.0 Options

13.1 The scenario presented in this report, and the recommendations following, have been drafted to meet the requirements of agreed budget strategies and to take account of prevailing economic conditions. Any of the assumptions could be varied; however, there would be too many possible permutations to present in this report.

Contact Officer: Chris Blundell, Director of Finance
Reporting to: Tim Willis, Deputy Chief Executive and S151 Officer

Annex List

Annex 1: Housing Revenue Account Capital Programme 2020-24 Budget
Annex 2: Housing Revenue Account Capital Programme 2019-20 Provisional Outturn

Background Papers

Cabinet 30 July 2020: Revised HRA budget and monitoring 2020-21 and HRA provisional outturn 2019-20.
Budget monitoring papers held in Financial Services.

Corporate Consultation

Finance: N/A
Legal: Estelle Culligan, Head of Legal and Democratic Services