

REPORT FOR: **CABINET**

Date of Meeting:	4 April 2012
Subject:	Shared Legal Practice
Key Decision:	Yes
Responsible Officer:	Hugh Peart, Director of Legal and Governance Services
Portfolio Holder:	Councillor Graham Henson, Portfolio Holder for Performance, Customer Services and Corporate Services
Exempt:	No
Decision subject to Call-in:	Yes
Enclosures:	Equalities Impact Assessment

Section 1 - Summary and Recommendations

This report recommends the establishment of a Shared Legal Practice to support the London Boroughs of Harrow ('Harrow') and Barnet ('Barnet').

Recommendations:

Cabinet is requested to:

1. Approve the establishment of a Shared Legal Practice with Barnet to start on 2nd July 2012, subject to the approval of Barnet's Cabinet;

2. Accept a delegation from Barnet of their legal function under section 101 of the Local Government Act 1972;
3. Authorise the Director of Legal and Governance Services in consultation with the Portfolio Holder for Performance, Customer Services and Corporate Services to:
 - Agree the terms of and execute an Inter Authority Agreement which reflects the principles outlined in this report; and
 - Implement a Shared Legal Practice in accordance with that Agreement.

Reason:

To allow the development of a resilient and cost effective legal practice which can provide improved support to both Councils at a reduced cost.

Section 2 – Report

2.1 Introduction and Background

As a large employer, service provider, regulator and landowner, Harrow has a steadily increasing demand for legal advice and advocacy. To date that has been provided mostly by its in-house practice with small elements, such as specialist advice and higher courts advocacy, being bought from the private sector.

In common with almost all local authorities, Harrow's legal practice is facing both an increased demand for its services, and an increased complexity in the issues it has to deal with. It has already made significant savings through establishing the London Borough's Legal Alliance. This has delivered joint procurement of training and knowledge resources, and the establishment of panels of solicitors and barristers who offer highly competitive rates.

It also has its own 'Lean' practitioner, which enables complex processes which operate across the Council to be slimmed down, so they are both faster and more efficient.

A review last Summer by a leading private sector law firm confirmed that Harrow's practice was operating at similar efficiency levels to a commercial law firm, making further efficiencies difficult to drive out.

Accordingly a shared service model was explored to see how it might address the 'perfect storm' of increasing demand, greater complexity of work and pressure on budgets.

Experience elsewhere suggested that creating a larger legal practice to support more than one authority could deliver the following benefits:

- A greater range and depth of legal expertise;
- More flexibility in response to Council demands;
- Reduced cost;
- Improved career opportunities for staff;
- Improved ability to recruit and retain the best staff; and
- Greater resilience.

Discussions took place between the Directors and Heads of Legal in both Barnet and Harrow last Summer to explore the possible mutual benefits of a shared legal practice. Following the discussions Harrow has undertaken legal work for Barnet.

Harrow

Harrow's legal practice was 'Highly Commended' in last year's MJ Awards and shortlisted in this year's LGC ones for innovation in service efficiency. Systematic performance management, investment in staff well-being, the application of Lean management principles, developing in-house expertise to reduce external spend, 'paper lite' working practices, Lexcel accreditation and shared procurement opportunities developed through the London Boroughs' Legal Alliance all mean that Harrow enjoys a high quality legal service at the lowest possible cost to its Council tax payers.

Barnet

Barnet's legal team has been seeking to join with another practice for some time, partly in response to the Council's ambitious One Barnet programme, which envisages the outsourcing of many Council run services.

Although both Councils have in house legal teams, a volume of work is outsourced to external suppliers (because of specialisms and/or capacity issues) and there are also pinch points in service delivery caused by workloads peaks and/or staff availability.

2.2 Proposal

The proposed shared service can deliver, by combining Barnet and Harrow's legal teams in Harrow, the same number of lawyer hours as now, from a more resilient legal service, at a reduced cost.

These benefits would be delivered through:

- Reduction in direct cost base;
- Greater range and depth of services available at a single point, with less need for onward referral;
- The active cost management of work which is outsourced to external lawyers;
- Work which is currently outsourced being done by the legal team at a reduced hourly rate;
- Managing changing workload requirements more effectively due to the greater number of staff;

- Lower management costs, as the management team can support more staff;
- Improved ability to plan work efficiently, with a wider population of staff;
- Improved ability to manage peaks and troughs in workload;
- Increased viability of employing specialists – eg, personal injury lawyers, as the demand across a wider client base is likely to make it financially sound. This will reduce the cost of external services;
- Attracting and keeping the best staff, through the greater opportunity for career progression within a larger department;
- Reduced overheads – a larger department needs to fund only one law library & case management system, the per capita training cost is cheaper with volume, overall space usage is generally less (leading to reduced overhead allocations).

2.3 Service Delivery Model

The expanded service will be hosted by Harrow, with those Barnet staff that form part of the legal service transferring to Harrow under TUPE regulations, other than the Monitoring Officer for Barnet who will remain employed by and based in Barnet.

In addition up to three corporate lawyers will be made available back to Barnet to be based on site to support the Monitoring Officer and provide corporate support to officers and members.

The 2 legal teams will be accommodated initially in Civic 3, while the first floor in Civic 1 is refurbished. In the Autumn the enlarged practice will return to Civic 1 where it will occupy 7 desks for every 10 people, by maximising the potential of agile working practices. 'Hot desks' will be provided at Barnet to allow lawyers to maximise their productive time when attending meetings, travelling to Courts etc.

The Service will be led by Hugh Peart and managed on a day-to-day basis by Jessica Farmer, supported by Principal Lawyers and by senior staff currently in the Barnet department, who will move into the new joint team.

2.4 New Practice

Harrow officers have put a lot of effort into ensuring that the merged practice is a conspicuous success. Research suggests that the main reason why mergers fail to realise their potential is a neglect of the different cultures in the merging teams. Harrow believes that at least as much attentions should be given to 'human due diligence' as to the financial and governance elements of the proposed arrangement.

The starting point of the due diligence exercise is a cultural audit which attempts to identify the key elements of and differences between the cultures in the two teams.

The results of this audit will underpin the programme for individual appraisal, team building and practice development planned for the months after the new practice starts.

The aim is to develop a unified practice which builds on the strengths brought to it by all members of staff. Transferring staff will be inducted into Harrow in the same way as all new Harrow staff, and a senior Barnet manager will be invited to explain Barnet's way of doing things and its plans for the future to Harrow staff.

Training will also be undertaken with the enlarged team in order to more quickly assimilate the combining groups into a cohesive and effective unit.

The defining characteristics of the service will be the following:

Quality

- The provision of responsive, high quality legal services at a competitive cost
- Effective quality assurance standards, including external accreditation where appropriate
- Performance management and development based on continuous improvement
- The collection and acting on client feedback, including complaints
- Bespoke service standards based on client needs
- Effective risk management
- Delivery of solutions focused advice, offering the best legal solution to deliver the client's aims
- Advice includes alternatives, options and risks
- Approach which is risk aware not risk averse.

Client Relationship Management

- regular client liaison to ensure clients' needs are met
- variety of communication methods, according to client's needs and preferences
- project management approach to casework
- identification of client relationship leads for each key client
- negotiation and agreement of service level agreements to capture scale and nature of work.

Innovation

- exploit technology to enable efficiencies in working practices
- use management techniques, such as lean, to streamline administrative processes
- develop staff in leadership and management
- reduce costs by delivering services in house where appropriate e.g. in-house advocacy & training
- exploit opportunities for income generation to deliver quality services at lower cost
- reduce carbon emissions by reducing car travel and paper use.

Collaboration

- work with other legal practices to share knowledge and best practice
- undertake joint procurement to drive down costs
- work with suppliers to develop solutions for the future and to share risks
- work with public sector and voluntary sector in our local community.

Knowledgeable and motivated staff

- staff wellbeing and development programme that attracts and keeps the highest calibre staff
- project management approach to ensure appropriate level of staff undertaking tasks
- effective knowledge management systems
- lean management structure with effective team working that encourages autonomy and creativity
- in house training
- flexible working practices to allow staff to manage work/life balance & improve productivity.

2.5 Services

The Service will offer legal services in all the major areas of local government law, including child and adult protection, procurement, employment, FOI, etc as well as training tailored to meet the needs of specific staff groups.

Initially at least it is expected that legal staff will work on 'their own' Council's projects post transfer, but as the new team settles down, teams will take on work for both Councils who will enjoy the benefits of a wider and more experienced staff team with increased resilience.

2.6 Governance

The proposal would be effected by a delegation by Barnet of its legal function to Harrow under section 101 of the Local Government Act 1972 and the relevant Executive Function Regulations. The Barnet staff will transfer to Harrow's employment then all staff in the team will be made available to Barnet under section of the 113 Local Government Act 1972 which will enable each Council to delegate decisions to them etc as if they were their own staff.

The delegation would need to be agreed by both Councils' Cabinets. The basis on which Harrow will exercise the delegation will then be captured and agreed in an Inter Authority Agreement. It is necessary to have a robust legal agreement to set out the Councils' respective obligations and responsibilities. In this respect the arrangements will cover similar ground to a commercial agreement. However, the arrangement is based on co-operation between the two Councils for their mutual benefit, recognising the shared aims of the two Councils to ensure high quality cost effective legal support – aims which they can each achieve more readily by working together.

2.7 This section of the proposal sets out the key terms of the arrangements.

Core terms

- Barnet will commit to an agreed number of legal service hours for each year of the agreement;
- All the legal work required by Barnet will be offered to the legal team (other than in specific agreed areas, eg work already externally committed or work which is outsourced as part of the One Barnet programme);
- The following year's budget hours requirement will be agreed 3 months prior to the commencement of any budget year. This should enable any changes to be implemented to the benefit of both parties;
- The agreement will run for 5 years;
- Harrow can enter into agreements with other Councils to provide legal services to them provided this does not affect the service to Barnet;
- Upon termination, the Councils will share equally any financial liabilities which have arisen as a consequence of the agreement. The main ongoing liability will be staff costs, which may be mitigated upon termination by affected staff transferring under the TUPE regulations to a new service provider.

One Barnet

- If staff in the legal team have to be made redundant as a result of the One Barnet or other outsourcing arrangements, Barnet will pay all the redundancy and other costs arising within the legal team as a result of this (capped at a sum which is the maximum which Barnet would have paid had they remained the employer).
- Following the One Barnet outsourcing, the core budget hours will be reduced in proportion to the reduction in the volume of legal work required by Barnet.
- Barnet will keep Harrow informed on the progress of One Barnet and will do what it can to explore ways of the legal team continuing to support Barnet in relation to the outsourced services

Overheads and set up costs

- An agreed element of overhead cost is included in the forecasts. The overhead base will be scaled back in the event that there is a reduction in hours needed as a consequence of the One Barnet outsourcing.
- Set up costs have been agreed, subject to finalising costs from Capita, where the finalisation is dependent upon their access to detailed information to enable them to provide the required solution. The Barnet element of these will be paid for in equal monthly instalments over 5 years.

Pension

- Barnet's pension fund will pay to Harrow's pension fund the total pension liabilities relating to the staff TUPE'd at the start of the contract period;

Billing

- The costs of delivering the basic hours service, including the agreed overhead, will be paid for by Barnet in equal monthly instalments;
- The annual hours to be provided to Barnet will be allocated into 12 months by dividing the total annual number of hours by 12;
- Any hours requested over the monthly allocation will be invoiced separately at the agreed standard blended rate;
- Once agreed in the annual budget process, the required hours will be fixed for that year, except through written agreement with Harrow. The purpose of this is to ensure that Harrow is not exposed through sudden downward changes in demand to costs that it would not otherwise bear.
- Detailed reporting of the hours worked for Barnet will be provided electronically to them each month.

Time required over the agreed contract hours

- All hours required by Barnet in excess of the agreed monthly hours will be charged at the rate of £90/hour. This rate reflects current market rate for charges between local authorities and includes the costs of hiring, redundancy, downtime, training and overheads for these staff.
- Any surplus arising on this work will be available for distribution as described below.

Surpluses

- If, after taking into account all the applicable costs expended in running the enlarged practice (and a reasonable agreed amount for "working capital" purposes) a surplus results, that surplus will be distributed to the participating local authorities on the ratio of contracted hours for each authority in that budget year.

Client relationships and reporting

- Service Level Agreements will be entered with departments in both authorities setting out areas of legal work required, resources needed to deliver services, skills and experience relevant for the service, client liaison and reporting arrangements.
- There will be designated client relationship lead officers for each of the key service areas to ensure clarity of reporting and communication lines.
- The practice management team will hold regular meeting with the department directors and senior managers and will discuss with them,

inter alia, the likely demands for time over the forthcoming weeks and months.

- To recognise the "shared services" nature of the arrangements and the importance of strong governance, there will be quarterly meetings with Barnet's Monitoring Officer to review operational efficiency, statistics, trends and projections and to ensure the service develops to meet both Councils' aims.
- Any concerns about performance or breaches of the terms of the agreement will be dealt with under the dispute resolution provisions. Either Council can take action for breach of the terms, ultimately leading to the ability to terminate the agreement.

2.8 Financial forecast

The forecast has been prepared using base data for costs and hours provided by the participating authorities together with estimates of the benefits of savings. Where this data is not known, conservative estimates have been made to seek to ensure that any benefits will not be overstated.

The summary base financial forecasts for the combined practice for the five years from April 2012 are as follows:

	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17
Harrow	v12 £	v12 £	v12 £	v12 £	v12 £	v12 £
Income	(463,770.00)	(463,770.00)	(463,770.00)	(463,770.00)	(463,770.00)	(463,770.00)
Expenditure	2,264,640.66	2,114,640.66	1,964,640.66	1,964,640.66	1,964,640.66	1,964,640.66
Net Direct Cost	1,800,870.66	1,650,870.66	1,500,870.66	1,500,870.66	1,500,870.66	1,500,870.66
Central overheads	717,000.00	717,000.00	717,000.00	717,000.00	717,000.00	717,000.00
Total	2,517,870.66	2,367,870.66	2,217,870.66	2,217,870.66	2,217,870.66	2,217,870.66
Barnet	v12 £	v12 £	v12 £	v12 £	v12 £	v12 £
Income	(606,400.00)	(606,400.00)	(606,400.00)	(606,400.00)	(606,400.00)	(606,400.00)
Expenditure	2,466,586.03	2,296,586.03	2,246,586.03	2,196,586.03	2,196,586.03	2,196,586.03
Net Direct Cost	1,860,186.03	1,690,186.03	1,640,186.03	1,590,186.03	1,590,186.03	1,590,186.03
Central overheads	594,000.00	221,000.00	221,000.00	221,000.00	221,000.00	221,000.00
Total	2,454,186.03	1,911,186.03	1,861,186.03	1,811,186.03	1,811,186.03	1,811,186.03
Combined Budget	2011-12 £	2012-13 £	2013-14 £	2014-15 £	2015-16 £	2016-17 £
Income	(1,070,170.00)	(1,070,170.00)	(1,070,170.00)	(1,070,170.00)	(1,070,170.00)	(1,070,170.00)
Expenditure	4,731,226.69	4,411,226.69	4,211,226.69	4,161,226.69	4,161,226.69	4,161,226.69
Net Direct Cost	3,661,056.69	3,341,056.69	3,141,056.69	3,091,056.69	3,091,056.69	3,091,056.69
Central overheads	1,311,000.00	938,000.00	938,000.00	938,000.00	938,000.00	938,000.00
Total	4,972,056.69	4,279,056.69	4,079,056.69	4,029,056.69	4,029,056.69	4,029,056.69

The figures above include the anticipated ongoing external legal spend for Barnet, to the extent that it is budgeted for by Barnet. Some external spend falls outside their Legal department control.

The base model assumes that Barnet will receive the same number of hours of chargeable time, as at present, and that the current Harrow capacity will remain unchanged, despite planned reductions in cost in the figures for each department separately and as a result of the operation of the Combined

Service. The effects of this in each of the five years of the contract are as shown below:

Hourly rates (excluding external legals and income)							
		£/Hr	£/Hr	£/Hr	£/Hr	£/Hr	£/Hr
Harrow	31,000	57.67	52.83	47.99	47.99	47.99	47.99
% reduction over contract term							16.78
Barnet	33,400	52.68	47.59	46.09	44.59	44.59	44.59
% reduction over contract term							15.35
Combined service	64,400	55.08	50.11	47.00	46.23	46.23	46.23
Hourly rates (with overheads)							
Harrow	31,000	80.79	75.96	71.12	71.12	71.12	71.12
% reduction over contract term							11.98
Barnet	33,400	70.46	54.20	52.71	51.21	51.21	51.21
% reduction over contract term							27.32
Combined service	64,400	75.43	64.67	61.57	60.79	60.79	60.79

2.9 Benefits to Harrow

In summary, this proposal will enable Harrow to continue to benefit from at least the same volume of in-house legal service but with greater depth and resilience, at a reduced unit cost.

The table above indicates that on departmental controllable costs alone (the effect of external legal fees and department income are omitted here), Harrow is planning a reduction in the cost base of 16.7%. With current overhead allocation (assumed to remain constant for the purposes of this projection) the percentage saving reduces by just under 12%. These savings are increased with the implementation of the shared legal practice so that the current year hourly cost of £80.79 is projected to reduce to £51.62 at the end of the 5 year contract term, a saving of 36%.

The combination offers greater opportunities than purely synergistic and efficiency-driven cost savings. Harrow has a well-respected legal department and the successful implementation of this proposal will underline its strategic innovation, potentially attracting more participants which in turn will drive down further the effective cost of delivering legal services to Harrow. A larger department will attract better quality staff who will see the department as a 'centre of excellence' which offers good experience and career progression.

2.10 Barnet outsourcing projects

Barnet has already committed to two major outsourcing projects. It is not clear whether the legal services aspects of these will be part of the final contract but the possibility exists that a number of legal staff will be TUPE'd to the new provider in January 2013, or will be made redundant.

If this occurs, it is proposed that the base hours in the contract will be reduced proportionally to the reduced headcount compared to that transferred to Harrow and the direct costs (the costs of the legal department except for those costs allocated to the department as part of the central costs of the authority) will also reduce proportionally.

2.11 Overheads

Overheads are calculated in a different way by different organisations. The costs which are included also vary by organisation. The basis adopted in establishing the increased overheads of the enlarged practice has been to consider what costs might be required if the service were to operate semi-autonomously. This results in a notional charge for accommodation, light heat etc, departmental management but a true charge for IT, as this is outsourced by Harrow. The charges are calculated to cover only the costs of the contracted hours, as the rate for additional time is calculated to include an element for overheads.

Set up costs

The set up costs include the transfer of data, people and archives and setting up operations in Harrow. Integration and training costs are also included to accelerate the integration and efficiency of the enlarged practice. Barnet's share of these costs is £200,289, subject to confirmation of the Capita initial costs. It has been agreed that these costs will be paid by Barnet in equal instalments over the life of the contract.

2.12 Options considered

Option 1

Reduce the budgets in Harrow legal practice. Given the increasing demand for legal services, this is likely to result in more work being put out to the private sector, at rates which are much higher than the costs of employing legal staff. Reducing the size of legal practices also reduces their resilience, depth of expertise and overall efficiency.

Option 2

Put all legal work out to private practice. Assuming at least a constant demand for legal work, and noting the efficiency levels at which the in-house practice is operating, this would increase the overall cost to Harrow of their legal function.

Option 3

Second Barnet staff to Harrow. The Local Government Act 1972 allows a local authority to agree with another authority to place its officers at the disposal of the other authority, subject to consultation with the staff concerned and negotiation about any changes in terms and conditions. Staff who are made available under such an arrangement are able to take binding decisions on behalf of the body at whose disposal they are placed, although they remain an employee of their original authority for employment and superannuation purposes. This arrangement cannot however, be put into place with respect to any officer without consulting them first. This option would reduce the potential benefits that a new entity offers, but it does reduce the risk to Harrow.

2.13 Recommendation

That a shared legal practice is implemented to support Harrow and Barnet in accordance with the principles in this report.

2.14 Implications of the Recommendation

2.14.1 Staffing/workforce

Staff from Barnet will transfer under the TUPE Regulations to become Harrow employees, but retaining their current terms and conditions, and may apply to join Harrow's pension scheme. Staff and union representatives from Harrow and Barnet have been briefed on the proposal and initial staff views have been positive.

Once staff have been transferred and the service is up and running the Practice will review its structure to ensure that it is fit for purpose and can maximise future opportunities. Harrow management posts may be reviewed to take into account additional responsibilities, but there would be no net increase in costs to Harrow as a consequence.

2.14.2 Legal comments

Governance

The Council has the power to provide legal services by virtue of s111 of the Local Government Act 1972.

Each authority, by virtue of the 1972 Act, has the power to arrange for the discharge of their functions by another authority. Under the Inter Authority Agreement Barnet will agree to delegate their legal function to Harrow.

There is a legal basis for the sale and purchase of legal services between local authorities using Section 1 of the Local Authority (Goods and Services) Act 1970.

The new practice would need to comply with all Solicitors' Regulatory Authority regulations in relation to acting for Barnet.

Employment

As noted above, the proposal involves Barnet staff transferring to Harrow and becoming Harrow employees. Under the Transfer of Undertakings Protection of Employment Regulations 2006 ('tupe') both Councils are required to inform and (if appropriate) consult with recognised trade unions or elected employee representatives in relation to any affected employees.

Both Harrow and Barnet's unions were notified of the proposals in October last year.

Equalities

Members should have due regard to the public sector equality duty when making decisions. The equalities duties are continuing duties they are not duties to secure a particular outcome. Consideration of the duties should precede the decision. It is important that Cabinet

has regard to the statutory grounds in the light of all available material such as consultation responses. The statutory grounds of the public sector equality duty are found at section 149 of the Equality Act 2010 and are as follows:

A public authority must, in the exercise of its functions, have due regard to the need to:

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:

- (a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- (b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
- (c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.

Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:

- (a) Tackle prejudice, and
- (b) Promote understanding.

Compliance with the duties in this section may involve treating some persons more favourably than others; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.

The relevant protected characteristics are:

- Age
- Disability
- Gender reassignment
- Pregnancy and maternity
- Race,
- Religion or belief
- Sex
- Sexual orientation
- Marriage and Civil partnership

An EIA has been completed and it will be reviewed throughout the implementation of the new practice.

As the practice will be hosted at Harrow, this may have implications for Barnet staff who have caring responsibilities and may negatively impact their ability to undertake these due to the increased travel time to work.

The need for increased travelling within the working day (i.e. between sites) may disadvantage those with disabilities.

These impacts will be mitigated through remote working capabilities, and sensitive line management.

2.15 Financial Implications

In the Council's MTFS, this project is projected to deliver £300,000 efficiency savings by 2013-14. Notwithstanding the delayed start date, this target is still expected to be met.

2.16 Performance Issues

The enlarged practice will comply with Lexcel, the Law Society's international practice management standard, and plans to secure IIP Gold in its first year. These initiatives will ensure that a high quality legal service is provided by motivated and well-managed staff. Specific targets will be established for both Councils' work and incorporated in the respective SLAs.

2.17 Environmental Impact

The new practice will seek to minimise its environmental impact by implementing agile working practices, cutting down on the need for journeys to and from work. Maximising its case management system will cut down the use of paper, and video conferencing will minimise the need to travel between Harrow and Barnet.

2.18 Risk Management Implications

A full risk register has been maintained throughout this project.

Risks identified include:

Adequate accommodation

The channelling of new work through the new practice;

Staff support for the new practice; and

IT and data transfer issues as files are moved to Harrow;

All risks on the register have been actively monitored, and controls put in place.

2.19 Corporate Priorities

The shared practice will mean that both Councils can reduce the cost of their legal support, to the potential benefit of all residents.

Section 3 - Statutory Officer Clearance

Name: Steve Tingle	<input checked="" type="checkbox"/>	on behalf of the Chief Financial Officer
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Date: 23 March 2012

Name: Jessica Farmer	<input checked="" type="checkbox"/>	on behalf of the Monitoring Officer
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Date: 26 March 2012

Section 4 – Performance Officer Clearance

Name: Alex Dewsnap	<input checked="" type="checkbox"/>	Divisional Director Partnership, Development and Performance
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Date: 23 March 2012

Section 5 – Environmental Impact Officer Clearance

Name: John Edwards



Divisional Director
Environmental Services

Date: 16 March 2012

Section 6 - Contact Details and Background Papers

Contact: Jessica Farmer Head of Legal Practice

Background Papers: None

**Call-In Waived by the
Chairman of Overview and
Scrutiny Committee**

NOT APPLICABLE

[Call-in applies]