

Report Title:	Rough Sleeping Support and Anti-Social Behaviour Strategy
Contains Confidential or Exempt Information?	NO - Part I
Member reporting:	Cllr Grey, Lead Member for Environmental Services (including Parking & Flooding)
Meeting and Date:	Cabinet - 22 February 2018
Responsible Officer(s):	Andy Jeffs, Executive Director David Scott, Head of Communities, Enforcement & Partnerships
Wards affected:	All

REPORT SUMMARY

- 1 The Royal Borough has observed increases in the numbers of those rough sleeping, street-dwelling and subsequent reports of antisocial behaviour from an element within this cohort.
- 2 This report seeks to establish a Rough Sleeping Support and Antisocial Behaviour Strategy; to both strengthen the current offer of support afforded to those rough sleeping, and at the same time ensuring there are consequences for those who behave antisocially and or fail to engage with the support offered.
- 3 The strategy proposes a multi-agency approach to increase the support available to include outreach workers, housing support officers and a team of enhanced community wardens and a Make Every Adult Matter (MEAM) Coordinator (subject to separate cabinet approval), in addition to external partners including Thames Valley Police (TVP). It is proposed that a strategy be developed quickly so that the benefits for the vulnerable individuals can be realised as soon as possible.
- 4 The strategy will adopt a supportive approach to address the root causes of the issues leading to people sleeping rough on the streets. Where support is however, not engaged, and individuals behave antisocially, an enforcement approach including Community Protection Notices (CPN) and a revised Public Space Protection Order (PSPO) in a transparent and proportionate way will be used.

1 DETAILS OF RECOMMENDATION(S)

RECOMMENDATION: That Cabinet notes the report and delegates authority to the Executive Director, in consultation with the Lead Member for Environmental Services (including Parking & Flooding) to:

- i) Fully develop and implement a Rough Sleeping Support & Anti-Social Behaviour Strategy, working with external partners including TVP, Health Services and third sector groups, based upon a 'Support before Enforcement' model.
- ii) Undertake a PSPO community consultation (one month duration) to address potential offences including begging, leaving bedding, urination and defecation in town centres.
- iii) Review current Fixed Penalty Notices (for offences such as dog fouling and littering) and establish a standardised £100 maximum fine (reduced to £50 on early payment) for all antisocial behaviours enforced across the Royal Borough.

2 REASON(S) FOR RECOMMENDATION(S) AND OPTIONS CONSIDERED

Background

- 2.1 Over the last six months, the Royal Borough has seen an increased volume of reports regarding people who are rough sleeping and begging on the Borough's town centre streets, and there has been an increase in the type and frequency of anti-social behaviour. Many of these individuals are rejecting support with housing and their substance misuse, instead bedding down overnight on the streets, and in a number of cases maintaining their pitch location through the leaving of personal belongings at specific sites, even when not present.
- 2.2 Complaints over the last six months (significantly over 50 unique events/reports) in the large majority of cases relate to anti-social behaviour including street drinking and drug taking, begging, urinating and defecating in public, being hassled and threatened, and bedding down in public locations or buildings with the result of feelings of intimidation, distress and harassment by the general public.
- 2.3 This local position in the Royal Borough is reflected by a range of visitor destinations, including Oxford, and many other town centres, and occurs within the context of reported increases in rough sleeping nationally.
- 2.4 Part of the increased day to day engagement by the Community Wardens and Housing Options teams has shown that at the current time, there are in the region of 14 known individuals who are regularly in Windsor with a smaller cohort of about another four or five individuals who are less regular and less well known. The period over which these 14 individuals have been known to borough services varies, with some only observed in the last three months (two), others up to six months (eight) and the remainder (four) being known for 12 months or more. There is a similar but smaller cohort in Maidenhead, this number is also growing.
- 2.5 The level of rough sleeping and street dwelling is in spite of increased support mechanisms being available by the council. These include both permanent placements and short term facilities such as the John West Night Shelter and the use of emergency accommodation placements secured in and out of the borough. Every individual has a different set of circumstances and our approach must seek to recognise the individual's needs and their unique combination of factors which are behind their situations. The individuals are all very vulnerable and our approach to support them in dealing with the complex range of issues they face must be taken fully into consideration.
- 2.6 Cases involving individuals who are rough sleeping and street dwelling are always complex, often involving multiple issues which include substance abuse, tenancy issues, previous victims of violence and links with criminal exploitation. Such factors often contribute to the anti-social behaviours observed by residents, businesses and visitors to the town centres. Many of the individuals feel very isolated and unable to change their lifestyle.
- 2.7 Unfortunately there are no simple means of solving the behaviours reported. The best methodology to address both rough sleeping and anti-social behaviours is likely to sit within a joined up approach; this should ensure that vulnerable members of our community are given the best possible tailored support for accessing services and, only if support is declined, to challenge anti-social behaviours through a strategic / partnership enforcement approach.

- 2.8 A Rough Sleeping Support and Anti-Social Behaviour Strategy is now therefore required to set out the Royal Borough's approach to supporting individuals rough sleeping and street dwelling, thereby protecting all users that frequent the town centres; with potential scope to expand wider into the Borough should the need arise.
- 2.9 A multiagency partnership working group has been formed to consider the issue, and has proposed that a 'support before enforcement' model sits at the heart of a new strategy. This seeks to coordinate existing services, together with internal and external partners, to maximize the effectiveness of the current support offer to borough residents living on the streets and target the support to reflect individual needs. This approach seeks to build on good practice for this vulnerable group of adults. Working closely with third sector organisation to provide coordinated support is essential for the strategy to be as effective as possible.

Rough Sleeping & Street Dwelling

- 2.10 The Borough has seen an increase in the number of cases of rough sleepers and street dwellers with complex needs, with the common theme of alcohol and or drug dependency prevalent.
- 2.11 The Housing Options Team undertook a count of rough sleepers on the night of 1 November 2017 into the morning of 2 November 2017 to establish a count of persons who are bedding down on our streets as part of the national government requirement on all local authorities to complete this count. The Count was eleven persons across the whole of the Royal Borough; seven bedding down in the Windsor area and four in the Maidenhead area. Two of the eleven were females. (In 2016 the count was eight in total, of which two were female). Based on this national count by every local authority, there has been a reported increase of 14% across the country, although based on a small cohort the increase in recorded rough sleepers was 37% increase.
- 2.12 There is an additional cohort outside of those identified by the count, who choose to vacate the town centre at night. Similarly, there is a cohort without a local connection that choose to occupy areas within the borough within daytime hours and street-dwell for begging purposes in areas of high footfall (such as near the guard change route). Information sharing is in place to allow greater understanding of the different cohorts encountered. Numbers being seen this month are higher than at the start of November 2017. There are currently 14 regular individuals known to the Community Wardens with an additional small cohort of another four to six who are less well known and more transient.

Support Mechanisms

- 2.13 The Royal Borough has invested in overnight accommodation provision and wider support for vulnerable people, whilst providing on an on-street warden presence to problem solve, reach out and reassure. This paper seeks to consolidate that approach alongside extended partnership activity.
- 2.14 Support for those living on the street can be accessed via the Housing Options team seven days a week through service hubs at Windsor or Maidenhead libraries, as part of the extended access and remodelled Library and Resident Services. Support for alcohol & drug dependencies can also be accessed via the Resilience team at Reform Road, Maidenhead, or via practitioner referral. The Borough uses its discretion and offers emergency accommodation during the winter period irrespective of the weather

conditions, and so exceeds that which is required under the national Severe Weather Emergency Protocol (SWEP) arrangements, where the guidance suggests that SWEP will be activated when three or more nights of consecutive temperatures of zero degrees or below are present. As a result RBWM have been offering emergency accommodation continuously since it was activated with effect from 30 November 2017.

- 2.15 Separate to the Rough Sleeping Support and Anti-Social Behaviour Strategy set out in this paper; in January 2018, the Borough has adopted the Homelessness Reduction Act implications early (ahead of scheduled April national delivery). This will ensure the root cause of homelessness is assessed at the first instance, with support referrals made to other agencies where appropriate, as well as accessing Royal Borough commissioned services. This will result in a Personal Homeless Plan (PHP) being constructed within 56 days for each individual client.
- 2.16 As part of the entirely separate Homelessness Reduction Act actions, the client will be expected to sign and engage with their PHP, agreeing the actions set out. Appropriate and reasonable steps will include actions such as attending Resilience (treatment plans), health services which may include Community Mental Health support, Citizens Advice Bureau (CAB) advice, active accommodation searches, debt advice and engaging with requests from community wardens etc. Such engagement will show willingness to reduce anti-social behaviours and avoid the need for further enforcement action being required. The new Act places more emphasis on Prevention and Intervention at a much earlier stage.
- 2.17 In addition, it is proposed high-demand individuals will be discussed at the Chaotic Lifestyles Workgroup, currently facilitated by the Police. This will ensure all support and enforcement actions can remain coordinated throughout. This approach is similar to the Intensive Family Support project set up nine years ago for families.
- 2.18 Support for rough sleepers with a local connection will always be available, however for those persons choosing to dwell on our streets from outside the Borough, these persons will not be supported to stay in the Royal Borough and will instead be encouraged to return to their local authority where they have a connection, or risk enforcement action being taken where appropriate.
- 2.19 Further work is needed to develop the support from the NHS Services and the joint team for Community Mental Health support. The improved data sharing approach being progressed needs to inform and add to the targeted support on a case by case basis. The Royal Borough will work with the local CCGs to develop the necessary support for the wide range of factors these individuals have and who do not fall within the current access criteria to be eligible for support. It is intended that this partnership approach will enable and support the individual to change their circumstances, and help them to access appropriate support.

Enforcement Options

- 2.20 Powers at the disposal of the Royal Borough cannot achieve the removal of individuals participating in anti-social or criminal behaviour. The power to detain sits with TVP and is exercised according to local need and priority. The partnership group will ensure that cases are managed so that where accommodation and support is refused, the most appropriate enforcement action is taken. These are both civil and criminal and are summarised in Table 1.

2.21 If the ‘support before enforcement’ model is approved, a number of subsequent actions are required to support this strategic approach. These include: ongoing assessment of accommodation and support requirements, the setting and rationalisation of enforcement Fixed Penalty Notice (FPN) levels and re-consideration of the current community warden functions to encompass the required increased enforcement capability, to work with the police in addressing anti-social behaviour.

2.22 A policy position with TVP needs to be obtained with regard to the use of a new PSPO alongside provisions within the 2014 Anti-Social Behaviour, Crime and Policing Act, in order to set out with clarity, the local policing priority to be given to anti-social and criminal behaviours.

Table 1: Existing Enforcement Powers Available.

CIVIL	Community Protection Notice “CPN” (ASB, Crime and Policing Act)	Tailored to an individual’s specific behaviours & needs (“stop begging / go to this support programme”)
	Public Space Protection Order “PSPO” (ASB, Crime and Policing Act)	Currently applies to street drinking only. New PSPOs are available following consultation and consideration at PSPO panel. PSPO will apply to all in a geographic area and does not distinguish between those requiring support & those rejecting support offers.
	Byelaws (Local Government Act)	Urination / Defecation
CRIMINAL / CIVIL	Injunction (ASB, Crime and Policing Act)	Prohibits a specified list of behaviours / activities, based upon a lower standard of evidence (although criminal standard required for breach).
CRIMINAL	Vagrancy (Vagrancy Act)	Persistent Begging Sleeping Rough
	Dispersal “s.35” (ASB, Crime and Policing Act)	Causing harassment, alarm or distress
	Public Order “s.5” (Public Order Act)	Disorderly behaviour Causing harassment, alarm or distress
	Criminal Behaviour Order “CBO” (ASB, Crime and Policing Act)	Prohibits a specified list of behaviours / activities, based upon a criminal standard of evidence.

2.23 No single power provides a simple solution that can address all the issues raised. Most civil powers should be seen as a tool to disrupt activity, rather than prohibit. For high-profile cases a Criminal Behaviour Order (CBO) represents the best tool available – with a custodial penalty potentially the most effective method of breaking the cycle of dependency that keeps people on the street when all other efforts have been unsuccessful.

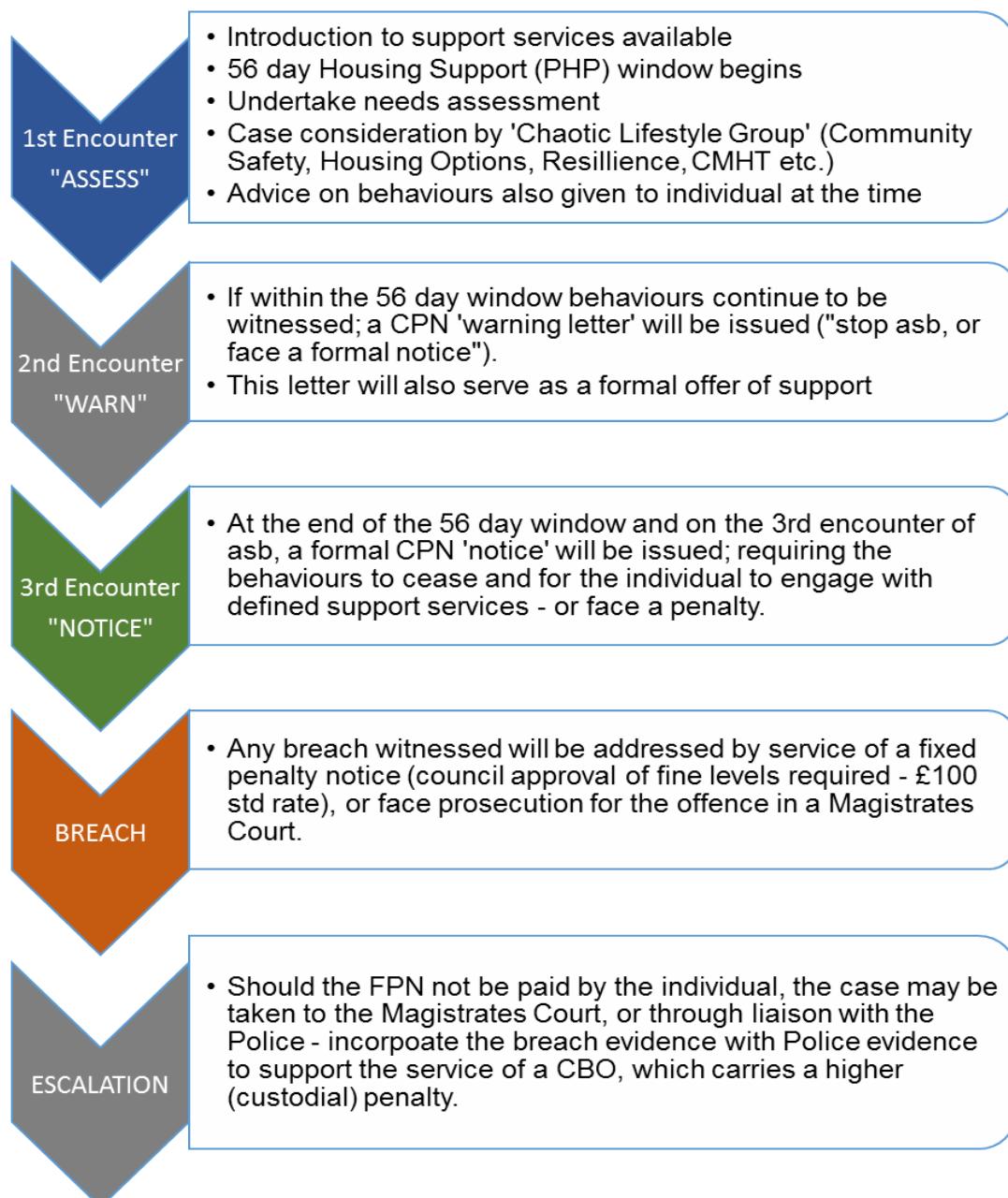
2.24 To ensure any enforcement mechanism can be aligned to the support available, the civil Community Protection Notice (CPN) route is recommended for the majority of cases – as opposed to a PSPO approach which covers a defined geographic area, and would not address the individual needs on a case by case targeted basis.

2.25 The PSPO option can however be well used for wider town centre issues such as cycling on pavement, graffiti, street drinking etc. in addition to the alcohol restrictions the existing PSPO provides. A community consultation, required by law, is proposed on this basis and is set out below. The current charge for the Fixed Penalty Notice (FPN) of £75 will be standardised for all anti-social behaviour issues across the whole of the borough at £100 (reduced to £50 on early payment as currently).

2.26 The approach set out would allow a 'Support before Enforcement' model to be adopted by the Council, whereby enforcement action is only taken by the Borough where anti-social behaviour persists and where support has either been refused or exhausted.

2.27 Support before Enforcement Model:

Table 2: 'Support before Enforcement' Model



2.28 The Support before Enforcement model ensures that enforcement mechanisms are only targeted at those rough sleeping or street dwelling who are causing the most harm and ensures their complex needs are considered and they are safeguarded.

2.29 In addition to the Community Protection Notice ('Support before Enforcement') pathway; it is proposed a PSPO consultation be launched to gather community feedback on the following proposed conditions:

- No person shall aggressively or proactively beg. This includes begging near a cash machine or begging in a manner reasonably perceived to be intimidating or aggressive.
- No person shall make any verbal, non-verbal or written requests for money – including the placing of hats or containers.
- No person shall, for any duration of time, leave unattended in a public area any bedding, belongings, personal effects or any other material or paraphernalia - including anything that may be considered discarded or waste material.
- No person shall urinate or defecate in a public place (repealing previous byelaw).

2.30 Once consultation feedback is obtained, formal consideration of the proposed new PSPOs will be heard by the appropriate PSPO Panel prior to implementation. A three month timescale (proposal to implementation) can be expected for new PSPO types, which this would be.

'Support before Enforcement' Delivery

2.31 It is recommended that the Rough Sleeping Support and Anti-social Behaviour Strategy firstly addresses the town centre locations with the highest footfall and the highest reported issues in Windsor, Maidenhead, Ascot and Eton.

2.32 Work has already begun in partnership with TVP to create a proactive individual needs assessment process or profile. This ensures a multi-agency needs plan is now considered for all rough sleeping and street dwelling individuals identified.

2.33 The profile specifies whether there are key safeguarding elements that need to be addressed for each individual, including: housing support, drug and or alcohol dependency support and mental health concerns. This will then subsequently be discussed at the Chaotic Lifestyles working group, currently chaired by TVP.

2.34 Through this assessment, the Royal Borough will be able to distinguish those individuals coming into our town centres purely to exploit the begging opportunities due to the high footfall in these areas, from those individuals with other priority needs and a local connection.

2.35 Should an individual continue anti-social or dangerous behaviours within the town centre environment, having been offered (and declining to engage with) support services; consideration of this individual will be undertaken by the Chaotic Lifestyles group from an enforcement perspective. This group will then decide on the best enforcement option/route available for that individual to reflect their individual circumstances.

2.36 In order to deliver the implementation of both CPN and PSPO enforcement mechanisms, increased enhanced enforcement activity will be required by council frontline staff. A review of the current Community Warden's work programmes will be

completed to inform how the current resources should be configured and deployed. This will include continued and increased disruptive street presence.

- 2.37 It is proposed that a Making Every Adult Matter (MEAM) Coordinator be explored to support the coordinated support for the rough sleepers and ensure relevant support is identified and provided in a timely and targeted manner. The MEAM Coordinator approach is now in place in a number of other Local Authorities around the country and would be progressed in conjunction with the TVP, and funding be sought from the Community Safety Partnership (CSP).
- 2.38 Additional warden training and accreditation is also required to enable this new enforcement mechanism. To this end, the first community warden cohort completed their Community Safety Accreditation Scheme (CSAS) training at the end of January 2018. All those who attended the training passed the accreditation exam.
- 2.39 Additional Personal Protective Equipment (PPE) will also be required in the form of 'stab vests' and the provision of body worn cameras. This has been addressed within existing capital provision.

Communication and Community Engagement

- 2.40 Care will be taken over how this 'support before enforcement' model is communicated to both the rough sleepers, street dwellers and the wider community. This is a complex issue and must be managed accordingly.
- 2.41 Initial community events may be held within shelters and facilities. These events will serve to both highlight the approach being taken and consequences of the anti-social behaviour impacts of aggressive begging and to maximise the ability to signpost members of the community to support services.
- 2.42 It is proposed that a multi-agency event also be undertaken, as the best mechanism for consulting with town centre stakeholders on future approaches. This could include a group of invited stakeholders including: residents, businesses, elected members, town centre managers, pub watch attendees, tourist information, hotels, taxi representatives, homeless project centres and partners such as TVP and Health as well as others such as the Street Angels.
- 2.43 This workshop would focus on the rough sleeping issue facing the towns and allows attendees to discuss and put forward ideas on the best mechanisms available to address and be solution focused.
- 2.44 Such a model is useful to allow for all stakeholders to correctly understand the more significant hurdles the Police and Local Authority face on a daily basis. Each subject would be hosted by a subject matter expert, allowing for any debate/discussion to be fully informed.
- 2.45 The overall communications would need to demonstrate the ongoing role that residents, businesses and visitors can play in linking people into positive support and understand the options available when the described supportive interventions have been exhausted. Complementing this approach, we will seek to work actively with partners to demonstrate actions that can support people in a sustainable manner. This will include public support through donating to local charities and promoting volunteering support rather than single donations to individuals. Central to this strategy

is the need to, where possible, run joint communications from the council and other key local partners.

Table 3: Options considered

Option	Comments
<p>Develop and implement a Rough Sleeping Support & Anti-social Behaviour Strategy.</p> <p>Undertake a PSPO community consultation to address potential offences.</p> <p>Review current Fixed Penalty Notices for all antisocial behaviours enforced across the Royal Borough.</p> <p>This is the recommended option</p>	<p>A robust strategy will ensure that no borough resident rough sleeping or street dwelling will be left unsupported. An individual package of support will be offered to each individual in an effort to help change their circumstances. Where support is rejected however and anti-social behaviour evidenced, the strategy will ensure appropriate enforcement is able to occur, with appropriate financial disincentives set.</p> <p>A new PSPO will be created to address the wider ASB issues</p> <p>The current Fixed Penalty will be standardised at £100 discounted to £50 for early payment.</p>
<p>Adoption of increased enforcement powers targeting evidenced anti-social behaviour, without accompanying strategy.</p> <p>This is not recommended</p>	<p>Enforcement of extended powers is possible, upon accreditation, for many of the anti-social behaviours reported to the borough in the town centres. To pursue enforcement without taking into account individual needs would not go to the heart of the issue and address why an individual is in that particular circumstance.</p>
<p>Do Nothing.</p> <p>This is not recommended</p>	<p>The borough can pursue with current CPN powers focussing purely on high demand individuals without addressing need or the wider scale of the issues in the town centres.</p>

3 KEY IMPLICATIONS

- 3.1 The implementation of the strategy would ensure that multi-agency partners work together to focus on an individual's need and aims to tackle the root cause of why a person is rough sleeping or choosing to dwell on the street.
- 3.2 Success of the strategy will relate directly to a reduction in related antisocial behaviours reports as well as a reduction in those sleeping or dwelling on the streets.

Table 4: Key implications

Outcome	Unmet	Met	Exceeded	Significantly Exceeded	Date of delivery
Reduction in rough sleeping	No reduction in rough sleeping by 31/03/19	50% reduction in rough sleeping by 31/03/19	60% reduction in rough sleeping by 31/03/19	Zero persons rough sleeping on Royal Borough Streets.	31/03/19

Outcome	Unmet	Met	Exceeded	Significantly Exceeded	Date of delivery
Reduction in rough sleeping / street dwelling ASB reported	No reduction in ASB reported by 31/03/19	50% reduction in ASB reported by 31/03/19	60% reduction in ASB reported by 31/03/19	No ASB reported	31/03/19

4 FINANCIAL DETAILS / VALUE FOR MONEY

- 4.1 The implementation of the strategy is recommended to be undertaken by a coordinated use of existing resources and a bespoke new Town Centre Community Warden cohort, subject to a separate cabinet report and approval. This team is proposed at a zero net revenue cost. A Making Every Adult Matter (MEAM) coordinator will be progressing through a joint bid to the CSP with TVP. Although the Borough receive a Homeless Grant which is based on identified need, this is already committed in full.

5 LEGAL IMPLICATIONS

- 5.1 Enforcement of powers such as PSPO, under the Anti-social Behaviour, Crime and Policing Act 2014, will require community consultation prior to implementation. This consultation exercise will need to be progressed once the strategic approach outlined has been endorsed. Work will be required with TVP to identify an appropriate PSPO. It is anticipated that such a consultation would be published in April 2018.
- 5.2 If there is an increase in the numbers of Fixed Penalty Notices (FPN) issued, in respect of the enforcement approach outlined in this report when the support offered is not taken up, there is a risk that they could be an increase in the numbers of FPN that are not paid within timescales, and this will require follow up activity to address the failure to pay issues.

6 RISK MANAGEMENT

- 6.1 The risks associated with the adoption of a Rough Sleeping & Anti-Social Behaviour Strategy are identified below:

Table 5: Impact of risk and mitigation

Risks	Uncontrolled Risk	Controls	Controlled Risk
Risk of negative public perception from tackling rough sleeping.	Strategy seen as a 'crack-down' on those rough sleeping or street dwelling, without supporting individuals who are very vulnerable.	Development of an effective Rough Sleeping and Anti-Social Behaviour Strategy, focussing on enhancing support offer whilst at the same time disrupting any associated anti-social behaviours. This will be combined with a robust communications campaign.	Public and stakeholder confidence achieved and maintained.

Risks	Uncontrolled Risk	Controls	Controlled Risk
An absence of an effective approach to dealing rough sleeping and addressing Anti-Social behaviour.	Strategic policy and plan further increases in the numbers rough sleeping and street dwelling in our town centres.	Support before enforcement model deployed consistently and effectively to tackle the complex needs which drive the behaviours.	Coordinated work by the multi-agency services will provide effective support
MEAM Coordinator Funding	CSP Bid unsuccessful to fund coordinator role.	Partnership buy-in to the cross-partner benefits of the role undertaken.	Coordinator role supported and funding granted.

7 POTENTIAL IMPACTS

- 7.1 The impact of the strategic approach outlined, is seeking to provide a new policy context within which to provide support for some the most vulnerable members in our community. The strategy seeks to provide a coordinated approach to address a complex issue engaging a number of key stakeholders. The approach is seeking to provide the necessary balance between the various groups of individuals including those who are rough sleeping, resident, visitors and businesses who are in the town centres.
- 7.2 As part of the further development of the Strategy a full EQIA will need to be completed.

8 CONSULTATION

- 8.1 Views and input on this issue have been obtained from a number of stakeholders, to help inform the approach to developing a new strategy to date. The stakeholders include TVP, a number of internal council services and teams, third sector organisations, and other interested parties. This input has generally been through face to face meetings.
- 8.2 The views of Crime and Disorder Overview and Scrutiny Panel will be sought on 7 February 2018.

9 TIMETABLE FOR IMPLEMENTATION

- 9.1 Implementation stages for implementing the recommendations as below:

Table 6: Implementation timetable

Date	Details
15 March 2018	Multi-agency working group to progress strategy detailed support plans.
15 March 2018	Recruitment begins for new wardens begins (to conclude May 2018) Subject to separate Cabinet paper.
31 March 2018	Progress application with the Chief Constable's Office for CSAS accreditation powers.
31 March 2018	Bid submitted to CSP for MEAM Coordinator funding (to be awarded April 2018) Subject to separate Cabinet paper.
30 April 2018	PSPO Consultation begins for antisocial behaviour enforcement mechanisms (to conclude May 2018).

Date	Details
30 June 2018	CSAS training for new warden staff cohort, ensuring all fully trained.
31 June 2018	CSAS Accreditation obtained from Chief Constable.
31 July 2018	New town centre warden team active and able to implement new Rough Sleeping Support and Antisocial Behaviour Strategy.

9.2 Implementation date if not called in: Phased implementation from March 2018 onwards.

10 APPENDICES

None.

11 BACKGROUND DOCUMENTS

11.1 The Council has received an increasing number of contacts from residents, business and visitors about the issues the Strategy seeks to address. These are not for publication but have helped to shape the key issues the strategy is seeking to address.

12 CONSULTATION (MANDATORY)

Name of consultee	Post held	Date sent	Commented & returned
Cllr Grey	Lead Member for Environmental Services (including Parking & Flooding)	04/02/18	05/02/18
Alison Alexander	Managing Director	04/02/18	05/02/18
Russell O'Keefe	Executive Director	04/02/18	
Andy Jeffs	Executive Director	04/02/18	04/02/18
Rob Stubbs	Section 151 Officer	04/02/18	
Terry Baldwin	Head of HR	04/02/18	05/02/18
Mary Kilner	Head of Law and Governance	04/02/18	05/02/18
Louisa Dean	Communications and Marketing Manager	04/02/18	

REPORT HISTORY

Decision type: Key decision	Urgency item? No
Report Authors: David Scott, Head of Communities, Enforcement and Partnerships – 01628 796748 Chris Nash, Community Protection Principal - 07976 594501	