

Committee Name and Date of Committee Meeting

Improving Places Select Commission – 09 May 2023

Report Title

Scrutiny Review Recommendations – Selective Licencing

Is this a Key Decision and has it been included on the Forward Plan?

No

Strategic Director Approving Submission of the Report

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Ward(s) Affected

Borough-wide

Report Summary

This report summarises the findings and recommendations of a scrutiny review into the impact of the selective licencing scheme in Rotherham at its halfway point. The selective licencing scheme, which runs from 2020-2025, focusses on alleviating deprivation and poor housing conditions in specific residential areas of Parkgate, Thurcroft, Maltby, Dinnington, Eastwood/Town Centre and Masbrough. The review sought to assess the impact of the scheme so far and identify further steps and risk mitigations that will help to build positively upon the accomplishments of the scheme to date.

Recommendations

- 1) That the response to mould and damp hazards in housing be considered for inclusion in work programme for 2023/24.
- 2) That the following recommendations be submitted to Overview and Scrutiny Management Board for consideration and endorsement.
 - a) That reinspection be prioritised for landlords whose properties have required action previously.
 - b) Due to the shortage of experienced inspectors, that consideration be given to how the Council may support recruitment and development of trainee inspectors and retention of experienced inspectors.

- c) That consideration be given to incentivising responsible landlords, and, where there is a proven track record, empowering landlords to self-assess, provided that the Service can still obtain assurances that decent standards are maintained.
- d) That consideration be given to managing expectations around selective licencing as a measure focused on the health of residents rather than beautification or regeneration.
- e) That consideration be given to how uptake of the cost-of-living support offer among families in selective licencing areas may be further promoted and monitored with a view to identifying gaps and promoting financial inclusion.
- f) Given the complexity of measuring impact on deprivation and difficulty in improving relative levels of deprivation, that consideration be given to how internal metrics may better reflect the real impact of the scheme.
- g) That a joined-up approach be sought with relevant Council strategies and services, with partner and voluntary sector organisations and with resident-led initiatives prior to any future selective licencing declaration.
- h) That engagement with landlords and with tenants be considered alongside any response to the above recommendations, and that the response to the above recommendations be subject to the learning derived from continued engagement with landlords and tenants.

List of Appendices Included

None

Background Papers

Policy Paper: A Fairer Private Rented Sector. 2 August 2022. <<https://www.gov.uk>> Selective Licencing and Landlords. Briefing.

Selective Licencing and Landlords. Presentation. 15 November 2022.

Kulakiewics, Aaron and Wendy Wilson. Housing and health: a reading list. House of Commons Library. <commonslibrary.parliament.uk> 17 October 2022

Consideration by any other Council Committee, Scrutiny or Advisory Panel

None

Council Approval Required

No

Exempt from the Press and Public

No

Scrutiny Review Recommendations – Selective Licencing

1. Background

1.1 This review falls under the remit of Improving Places Select Commission which supports the Council in achieving its Council Plan 2022-25 theme of Every Neighbourhood Thriving, specifically furthering the objective within in this theme to ensure people are safe, healthy and live well. Members of Improving Places Select Commission had concerns about living conditions and absentee landlords in specific areas of deprivation. These concerns led to a review of the impact of the Selective Licencing scheme in place from 2020-2025 to address deprivation and housing conditions in specific residential areas of Parkgate, Thurcroft, Maltby, Dinnington, Eastwood/Town centre and Masbrough.

1.3 All councillors whose wards have selective licencing areas were invited to participate in the review. Improving Places Select Commission subsequently undertook an in-person meeting with Service leads from the community safety and enforcement team and the Private Sector Housing Coordinator within Strategic Housing on 15 November 2022.

1.4 Prior to this meeting, Scrutiny Councillors had background knowledge of several areas:

- The function of selective licencing in Rotherham.
- The general role of the private rented sector in Rotherham's housing market.
- Proposed social housing reforms described in the Government White Paper, *A Fairer Private Rented Sector, 2022*.
- Recent proceedings of the National Residential Landlord's Association (NRLA), which Rotherham MBC has attended and presented.
- The seven Indices of Multiple Deprivation (IMD) whereby deprivation is measured, which include health as a primary factor and housing as a secondary factor.
- Local knowledge of Selective Licencing areas within their wards.

The review examined:

- 1.5
- The role of private sector housing in national and local contexts.
 - How selective licencing gives the Council additional powers to raise standards in areas of greatest deprivation.
 - Misconceptions around selective licencing in Rotherham.
 - The role of partners in raising standards

1.5 In examining the role of partners in raising standards, the review also considered the perspective of South Yorkshire Police (SYP) partners and made note of the consultations with landlords and tenants which are currently in progress by the Service. The results of the landlord surveys are being analysed by the Service, and the engagement with tenants will be completed in April 2023, with outcomes available after this report has been submitted; therefore, it is acknowledged that recommendations

from this review will be subject to any insights garnered from these engagement exercises. The Service may be invited to share the results of these surveys and the response of the Service as part of a future update to scrutiny.

1.6 Whilst anti-social behaviour is often mentioned as an issue of concern when discussing selective licencing areas, the topic of anti-social behaviour was determined to be outside the scope of this review. This is because Rotherham's selective licencing scheme was initiated to address deprivation and poor housing conditions. Therefore, any review of the impact of the scheme should examine the extent to which the scheme is alleviating the conditions it set out to address. Crime, however, was considered in this review insofar as it is the fifth domain within the Indices of Multiple Deprivation (IMD), which is the national framework by which deprivation is measured. Complexities inherent in assessing impact on deprivation will be discussed in the next section. IPSC has previously agreed that anti-social behaviour will be the focus of a separate piece of scrutiny work in 2023/24.

1.7 **Selective Licencing in Rotherham**

1.8 Private Sector Housing plays an increasingly important role in Rotherham. As housing market conditions delay home ownership for many families, and as the cost of living leads more families to join the register for council housing, private sector housing will play an increasingly important role. Private Sector Housing is all housing which is not Council-owned, including private lettings, Registered Housing Associations, and owner-occupied housing. This sector comprises approximately 94,000 properties in Rotherham. The Council, along with the Community Protection Unit are responsible for monitoring and enforcement actions where there is private sector housing.

1.9 The Private Rented Sector (PRS) is the portion of the Private Sector Housing market which is most at risk for deprivation and poor housing conditions. The PRS remains largely unregulated, which means that anyone can be a landlord. The PRS has grown by 320% in the last 20 years. In Rotherham, this sector, based on the Census 2021, now contains slightly more than 17,000 properties and makes up 15% of the total housing market. A proportion of these properties are below decent standards.

1.10 Councils have various powers to raise and enforce standards throughout their local authority areas, including areas where there is private sector housing. In addition to these powers, under Part 3 of the Housing Act 2004, Councils can add a selective licencing scheme to enable further interventions in a designated area where there are any of the following issues:

- Low housing demand (or is likely to become such an area);
- A significant and persistent problem caused by anti-social behaviour;
- Poor property conditions;

- High levels of migration;
- High level of deprivation;
- High levels of crime.

- 1.11 Based on several small geographical areas within the borough that have a high proportion of private rented sector housing, Rotherham applied for the current selective licencing scheme based on the criteria of deprivation, or a lack of basic necessities. Following and expanding on a previous scheme from 2015-2020, the current declaration was designated in 2020 and will continue until April 2025.
- 1.12 The scheme offended some landlords at first. Then improvement was seen, as penalties were only for landlords not doing things right. Since then, 1,074 landlords have applied for 2,083 licenses. 69% of landlords have responsibility for only one property. Over two thirds of applications are managed by landlords with portfolios of less than five properties. Only a handful of landlords have portfolios larger than 20 properties; these landlords are responsible for 8% of applications. 93% of applications are managed by individuals rather than letting agents. Income from licences is equivalent to £36,167 per area per year. To date, 346 Housing Health and Safety Rating System (HHSRS) inspections had been completed, with 129 rebates offered to be returned to landlords when their properties passed. 832 notices had been served where houses were not up to the legal standard. 66 properties had Category 1, or serious, hazards. There had been 17 successful prosecutions. A National Federation of Residential Landlords (NFRL) training package was offered alongside all civil penalties assessed.
- 1.13 Support offered to landlords under the scheme has continued to expand as the scheme was continued and extended. To provide Rotherham's landlords with a resource for clear information around licencing expectations, the Service created dedicated web pages. The Service also produces newsletters to increase added value to landlords by sharing sector specific information, intelligence and inspection trends. The Service introduced an improved inspection protocol and undertook a landlord and tenant survey.. The Service offers access to training for landlords and provides NRLA Corporate membership for those landlords who want/need to improve their knowledge of the private rented sector as well as attending and presenting at locally organised residential landlord association meetings. The Service produces tenancy advice packs, enforces Minimum Energy Efficiency Standard (MEES), and performs letting agent compliance checks. These efforts recognise the valuable contributions of responsible landlords and managing agents. The support offer will evolve further as the Service reacts to the current Government White Paper.
- 1.14 Rotherham participated in the consultation on the White Paper, which proposes several reforms to the PRS in response to an increasingly unsettled housing market. Among these reforms is a plan to abolish Section 21 'no-fault' evictions and introduce a simpler tenancy structure through a Rental Reform Bill; to apply the Decent Homes Standard to the

PRS for the first time; to enforce a strict liability offence requiring landlords to offer decent accommodation; to introduce a new Property Portal to help landlords understand their obligations; and to introduce a housing ombudsman covering all PRS landlords and providing redress for tenants.

1.15 **Measuring deprivation with the Indices of Multiple Deprivation (IMD)**

1.16 Deprivation has proven a challenging category on which to base the scheme, because so many factors contribute to deprivation, and the value of Rotherham's deprivation rating can be influenced by the activity or lack of activity of other local authorities. This is reflected in how the Government measures deprivation via seven indices. The Indices of Multiple Deprivation (IMD) are seven domains, each comprising a range of indicators. These indicators are:

1. Income;
2. Employment;
3. Education, Skills and Training;
4. Health and Disability;
5. Crime;
6. Barriers to Housing and Services;
7. Living Environment.

1.17 A selective licencing scheme focussed on alleviating deprivation may involve interventions in each of these 7 domains. With so many factors contributing to deprivation, however, impact is hard to achieve without joined up approaches to improving each of the domains. As articulated in *The English Indices of Deprivation 2019*, a technical report by the Ministry of Housing Communities and Local Government, many people assume that deprivation is synonymous with poverty, but it is important to note that income and finances make up only one domain of the IMD. Deprivation encompasses much more than low income and is characterised by "a lack of resources of all kinds," including basic necessities.¹ Alleviating deprivation requires improved access to multiple types of resources, including those recognised within the IMD indicator.

1.18 For the purposes of this review, the IMD are a useful and relevant framework, but should be considered a starting point for measuring the impact of selective licencing. The IMD cannot be used to measure *absolute* change in deprivation over time, because deprivation is measured as a range of small geographical areas from most deprived to least deprived. However, the IMD are useful for delving into how Rotherham residents may be experiencing the domains of deprivation, and for thinking about whether these experiences are changing faster or slower than areas of the country where people are also experiencing a lack of basic necessities. The findings of the review, outlined in the next section, identify some impacts of Rotherham's selective licencing areas that are not named in the IMD, but benefit residents nonetheless.

¹ McLellan et al. 9.

1.19 To assess the impact of selective licencing on alleviating deprivation, the review examined how the scheme has prompted current and recent interdisciplinary work (across Council services and partner and community organisations across Rotherham) targeting one or more of the IMD. The aim of the review was to maximise the effectiveness of this work for the remainder of the 2020-25 scheme and to consider ways to expand positive impact in these areas of the Borough in the medium and longer term.

2.0 Findings

2.1 The review identified four key risk factors to the success of the scheme: 1) pandemic-related delays, 2) a shortage of experienced inspectors, 3) a rising cost of living and 4) complexity of measuring impact on deprivation.

2.2 Risk 1) – Pandemic-related delays

2.3 Restrictions during the pandemic required inspections to pause because inspectors could not enter homes. The impact of this meant that the Service had to scale back its ambition from inspecting every house twice to inspecting every house at least once during the duration of the scheme. It is the goal of the Service that all properties receive inspection by December 2024.

2.4 Over one third of properties have been found not to have any hazards at all; however, learning from past schemes locally and nationally has shown that landlords whose properties required action following an inspection are more likely to be again non-compliant later. This means that properties which have not met the minimum legal standards in the past are at greater risk of falling below the minimum standards again. *It is therefore recommended that reinspection be prioritised for landlords whose properties have required action previously.*

2.5 Risk 2) – Shortage of experienced inspectors

2.6 Skilled inspectors, especially those qualified to undertake the Housing Health and Safety Rating System (HHSRS)², are key to the success of the programme, combining precision, speed, and tact. Experienced inspectors understand how properties are put together and how they fall apart. Having this knowledge aids inspectors in identifying areas where things are going wrong. Being able to identify early signs can help make rectifying these faster, easier and less expensive for landlords.

2.7 The review examined how selective licencing fees are collected and utilised. In 2019, the fee was lowered, and the rebate was introduced to incentivise responsible landlords. The application fee is £68 per property (this is not for houses of multiple occupancy). The maintenance fee is

² HousingHealthSafety.qxd (publishing.service.gov.uk)

£453 for 5 years. Where applicable, a late fee of £136 is assessed by the Service. A rebate of £127 is given back to the landlord if the property passes.

- 2.8 The review found that the Selective Licencing fees currently pay for an additional inspector, one of four inspectors on staff. No funds are left over to pay for improvements or projects within the selective licencing areas. To stakeholders expecting visible improvements from the scheme, this could give the impression that the Declarations are not adding value. *For this reason, it is recommended that the Service consider how expectations among landlords and within communities may be managed around selective licencing as a measure focused on the health of residents rather than beautification or regeneration.*
- 2.9 By nature of the role, inspectors must be highly skilled and experienced to conduct the inspections and navigate the interpersonal demands of the role. Legislation governs how notices are served regarding private sector properties. Communication around this process has to be done with precision, creating a high training requirement for inspectors. Skilled inspectors are therefore key to the success of the programme, combining precision, speed, and tact. Identifying defects, experienced inspectors understand how properties are put together and how they fall apart, aiding them in identifying areas where things are going wrong. Being able to identify early signs can help make rectifying these faster, easier and less expensive for landlords.
- 2.10 The outlook for the Service suggests that highly skilled inspectors are in increasingly high demand. Proposed social reforms described in the Government White Paper, *A Fairer Private Rented Sector, 2022*, will reinforce the need for highly trained inspectors, as new legislation and long-standing laws will require enforcement by local authority officers.
- 2.11 The Service has had to scale back its inspection targets as noted in Section 1.18 above because of combined effects of pauses during COVID-19 restrictions and the shortage of skilled inspectors. A skilled inspector can independently conduct as many as four inspections per day, including paperwork. This rate drops to around two inspections per day where there are significant differences house to house. A less experienced inspector may complete one inspection per day. The Service is currently developing trainee inspectors to be able to conduct inspections independently, but development takes time. As tightening resources and shortages of skilled workers are being experienced across many sectors nationally, a mitigation undertaken by some local authorities is to empower landlords to self-assess. Many local authorities go a step further to incentivise accredited landlords, provided they maintain the accreditation throughout the duration of the scheme. Further discounts are granted for proactive landlords who have met standards for energy efficiency, for example. *Due to the shortage of experienced inspectors, it is recommended that consideration be given to what the Council can do support recruitment, development, and retention of trainee inspectors. It is also recommended that consideration*

be given to empowering landlords to self-assess, and that consideration be given to rewarding responsible landlords.

2.12 Risk 3) – Rising cost of living

2.13 For many families throughout the country, rising cost of living follows on from a financially challenging period during the pandemic. Prices have risen faster than wages. Rising cost of living is felt in areas of high deprivation where income margins were already thin. The pandemic also caused increased risk for some residents relating to IMD domains 1) income, 2) employment, and 3) health and disability. Deterioration in these domains can have follow on effects on other indices, such as cold or crowded living conditions. Homes which are inadequately heated and insulated can become damp and mouldy, with potentially serious health implications for residents.

2.14 In view of these wider challenges which have come about after the initiation of the scheme, housing inspections delivered under scheme have only limited ability to prevent deprivation from worsening. As the cost of living rises, more residents are at risk of not being able to afford basic necessities. *It is therefore recommended that the Council's response to damp and mould, as a health hazard for families affected by rising cost of living, be considered for inclusion in the scrutiny work programme for 2023/24. It is also recommended that consideration be given to how the uptake of the cost-of-living support offer among families in selective licencing areas may be further promoted and monitored, with a view to identifying gaps and promoting financial inclusion.*

2.15 Risk 4 – Complexity of measuring impact on deprivation

2.16 It is commendable that six declarations have been undertaken under the heading of deprivation, but as outlined above, deprivation is an extremely difficult category to influence. A joined-up approach targeting all seven indices would have maximum impact on deprivation.

2.17 It should be noted that, although the links between poor housing conditions and poor health have been well established, the IMD do not identify poor housing conditions as a primary domain. Exposure to damp, cold, mould and noise is strongly associated with poor mental and physical health, yet Living Environment Deprivation - which includes indicators for housing without central heating and housing in poor condition - is one of the lesser weighted IMD domains. This means that improvement in indoors living environment alone cannot sway these measures, even when serious hazards are being addressed that will improve healthy life expectancy for residents. As stated in section, 1.18, the IMD cannot be used to measure absolute change in deprivation over time, because it is measured as a range of small geographical areas ranked from most deprived to least deprived. The IMD is however useful for considering the ways people in selective licencing areas may be experiencing the various domains of deprivation, and in thinking about how Rotherham might leverage more of its unique assets and strengths

beyond the Council and within communities to accelerate the rate of change.

2.18 *Given the complexity of measuring impact on deprivation and difficulty in improving relative levels of deprivation, it is recommended that consideration be given to how internal metrics may better reflect the real impact of the scheme on specific indices included in the IMD, and in other indicators of quality that are not included in the IMD. Furthermore, it is recommended that a joined-up approach be sought with relevant partner and voluntary sector and resident-led organisations prior to introducing any further scheme, especially in the category of deprivation.*

2.19 **Potential areas for further interventions**

2.20 Maximising the effectiveness of the remainder of the current selective licencing scheme, and any future scheme established under the category of deprivation, may involve several areas for potential further interventions:

- supporting actions by CPU and SYP to the reduce rates of violence, burglary, theft and criminal damage, which are indicators of deprivation within the IMD;
- eliciting buy-in from stakeholders regarding focused interventions relating to IMD indices 1-3 which are Income Deprivation; Employment Deprivation; and Education, Skills and Training Deprivation;
- strengthening links with the Housing Strategy of the Council and with other Council service areas and community services, such as those which support homelessness prevention and financial inclusion.

2.21 The review found that the interventions associated with the HHSRS inspections have had a positive if limited impact on health and safety of residents within selective licencing areas. Housing inspections delivered under the scheme have directly led to actions which eliminated hazards relating to IMD Index 7, Living Environment Deprivation and Index 4, Health Deprivation and Disability.

2.22 The review also found evidence that partnership working with South Yorkshire Police in selective licencing areas had a beneficial impact relating to organised crime around illicit drug cultivation. This kind of illegal activity is not listed as an indicator of deprivation, however, and is not included in the IMD. The review found that, notwithstanding the profound results of Operation Grow which have been widely publicised, further police and community protection work is required in order to reduce 'recorded crime rates of violence, burglary, theft and criminal damage', which are indicators of deprivation. The indirect effect of Operation Grow reduces instances of other kinds of crime through increased police presence, monitoring and reporting, but there will be further work to do to improve and maintain the safety and wellbeing of residents in selective licencing areas.

- 2.23 The review found potential for the current scheme focussed on safer housing to give rise to more coordinated interventions around IMD Indices 1-3: Income Deprivation; Employment Deprivation; or Education, Skills and Training Deprivation. Interventions being delivered by the Council, its partners, or third sector organisations which target these Indices could be better integrated within the delivery of this scheme. The range, uptake, and impact of these within selective licencing areas was not identified within the review and may be an area for further work, subject to analysis of the latest census data, and forthcoming results of engagement activity with residents. Through a joined-up approach targeting all indices of deprivation, maximum impact can be achieved.
- 2.24 Furthermore, the review ascertained that more interventions relating to Index 6, Barriers to Housing and Services, may be possible within the remainder of the present scheme. For example, stronger links with the Council's Homelessness Prevention and Financial Inclusion Services would help alleviate pressure on temporary accommodation caused by preventable evictions. Early intervention can help raise the chances of avoiding crisis. This adds value for landlords and tenants alike. Proactive landlords benefit from staying informed, but it is acknowledged that working with less active landlords can be more challenging.
- 2.25 It is important to note that 88% of small geographical areas (LSOAs) that were among the most deprived in 2015 were again among the most deprived in 2020. This was an incredibly difficult category to impact prior to the pandemic and cost-of-living crisis. This does not mean that Rotherham should abandon its attempts to shift deprivation in view of the additional economic challenges and risks. Improving access to resources of all kinds for people living within selective licencing areas remains a worthy aspiration, and if a further scheme were to be undertaken in the future, this should be done with key actions in place to secure buy-in from all stakeholders and partners – and especially residents, who have a vested interest in the revitalisation of their neighbourhoods and communities.
- 2.26 The review found there may be room to infuse good practice into operations by applying lessons learned from previous schemes locally, as well as learning from other local authorities and from local stakeholders. Recognising that the IMD does not provide an absolute measurement but rather a range, it would be of interest to note where positive and negative shifts occurred within Rotherham LSOAs between 2015 and 2020 and the reasons for these shifts, if these are known. The use of Selective Licencing within these areas would be relevant. It is understood that Selective Licencing is not a quick fix.
- 2.27 Should any perpetuation of selective licencing declarations be considered for Rotherham after April 2025, it will be important for the Service to consider carefully the appropriate category for the scheme. No matter the category that is chosen, a joined-up system-wide approach should be taken prior to activation of any scheme. The optimal approach will be data-driven based on the needs and desires of residents, and will

be undertaken in partnership with residents and members of the communities where there is Selective Licencing. This includes businesses and organisations who have a stake in improving these areas. This involves going into communities and supporting or co-producing resident-led initiatives that complement the objective of the selective licencing scheme, whether that be reducing crime or extending tenancies within these areas.

- 2.28 The review noted that the Service is currently engaging with landlords and residents, for example, through newsletters, local and regional landlord forums, and surveys, which are all positive. Scrutiny will be keen to receive an update exploring how insights gathered will inform the future Service offer and future engagement. Preliminary considerations prior to any further scheme of selective licencing should include engagement activities to form a baseline from residents and landlords. With buy-in from residents and stakeholders, system-wide actions can be organised around priorities. For example, if a proposed scheme aimed to reduce rates of short-term tenancies, the Service might join up with teams across the Council and the wider borough who are best placed to alleviate the issues and barriers currently preventing people from seeking or sustaining their tenancies. Working with town or parish councils where there is interest may yield additional momentum from community members who are willing to lead grassroots efforts. For example, Dinnington Town Council has made representations regarding desire to organise around improvements. It is acknowledged that actions related to any category of declaration will come down to addressing deprivation.

3. Options considered and recommended proposal

- 3.1 The review considered how best to include the perspective of residents living within the selective licencing areas. This was left to the Service as part of the engagement activity that concludes after April 2023. For this reason, the results of this piece of work and the response of the service to insights received through the engagement work will be considered as part of the response to the recommendations. All other recommendations agreed as part of the outcomes of this review are subject to the findings of the engagement work with residents.

4. Consultation on proposal

- 4.1 Members consulted with Service Leads, Partners, and Landlords as part of their considerations in developing these. Members also have due regard to the expressed views of their constituents in their formulation of scrutiny priorities and lines of enquiry. Recommendations from scrutiny are produced as outcomes of consultation by Members in their role as elected representatives of Rotherham residents.

5. Timetable and Accountability for Implementing this Decision

- 5.1 The accountability for implementing recommendations arising from this report will sit with Cabinet and relevant officers. The Overview and Scrutiny Procedure Rules require Cabinet to consider and respond to recommendations from Overview and Scrutiny Management Board and the Select Commissions in no more two months from the date that Cabinet receives this report.

6. Financial and Procurement Advice and Implications

- 6.1 No financial implications arise directly from this report, although the response to the review will take account of any such implications.

7. Legal Advice and Implications

- 7.1 There are no legal implications directly arising from this report.

8. Human Resources Advice and Implications

- 8.1 There are no HR implications directly arising from this report.

9. Implications for Children and Young People and Vulnerable Adults

- 9.1 There are no implications for children and young people and vulnerable adults directly arising from this report.

10. Equalities and Human Rights Advice and Implications

- 10.1 Furthering equalities and human rights is a key objective in undertaking scrutiny activity; therefore, Members have due regard for equalities implications in the development of scrutiny work programmes, lines of enquiry and in their derivation of recommendations designed to improve the delivery of council services for residents.

11. Implications for CO₂ Emissions and Climate Change

- 11.1 There are no climate or emissions implications directly associated with this report.

12. Implications for Partners

- 12.1 There are no implications for partners directly arising from the report.

13. Risks and Mitigation

- 13.1 Members have due regard to the risks and mitigation factors associated with the services under scrutiny and have made recommendations accordingly.

Accountable Officer(s)

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