

Committee Name and Date of Committee Meeting

Cabinet – 23 November 2020

Report Title

Equalities Review – going for “Excellent” accreditation

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

Yes

Strategic Director Approving Submission of the Report

Sharon Kemp, Chief Executive

Report Author(s)

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Ward(s) Affected

Borough-Wide

Report Summary

The Council is committed to seeing a borough based on equality and social justice where all residents have a good quality of life and able to achieve their potential.

In pursuit of that end, this report brings forward a comprehensive and wide-ranging programme of action structured around achieving nationally accredited status for equalities aligned with a range of measures to tackle inequalities, discrimination and prejudice in partnership with other organisations and communities, as set out in the Council’s Year Ahead Plan.

Recommendations

1. To approve and endorse the programme of work to review and further strengthen the Council’s approach to equalities.

2. To note that the equalities work will be framed around the four key lines of enquiry of the Equalities Framework for Local Government:
- Understanding and working with your communities.
 - Leadership and organisational commitment.
 - Responsive services and customer care.
 - Diverse and engaged workforce.

List of Appendices Included

Appendix 1 Equality Framework for Local Government (EFLG) 2020 version (LGA)

Background Papers

Equality and Diversity Plan (October 2018)

<http://modgov-p-db/documents/s115820/Appendix%20B%20DRAFT%20Equalities%20and%20Diversity%20Programme%20Plan%20v.3.pdf>

Peer review final report

<http://modgov-p-db/documents/s115819/Appendix%20A%20-%20EFLG%20Report%20Rotherham%20MBC%20Developing%20Final%20Report.pdf>

Consideration by any other Council Committee, Scrutiny or Advisory Panel

Overview and Scrutiny Management Board – 23 October 2020

Council Approval Required

No

Exempt from the Press and Public

No

Equalities Review – going for “Excellent” accreditation

1.	Background
1.1	The Council is committed to see a borough based on equality and social justice where all residents have a good quality of life and able to achieve their potential.
1.2	As part of this commitment, the Council’s Year Ahead Plan makes “Equalities and Social Justice” a cross-cutting priority.
1.3	<p>To this end the Council is seeking to use the Equality Framework for Local Government to demonstrate its progress in addressing inequalities and social justice namely:</p> <ul style="list-style-type: none"> • Overcoming unfairness caused by lack of access to economic opportunities. • Seeing an improvement in the life chances and opportunities of disadvantaged communities facing social barriers and affected by poverty and unemployment. • Making sure that services and information are accessible to all and taking action when decisions or policies are unfair or discriminatory. • Developing a positive environment and removing barriers to participation so that residents are able to contribute to decisions that affect their lives and their communities. • Inclusive communities where people feel safe, have a sense of ownership, and feel confident in reporting incidents of abuse or discrimination.
1.4	A multi-faceted programmed approach will achieve “Excellent” accreditation under the “Equality Framework for Local Government” (EFLG) building an evidence base and actions to tackle inequalities and deprivation.
1.5	The recommended approach will seek value outcomes as part of the process of the EFLG, aligning work around socio-economic inequalities, community wealth building and social value together with Health and Wellbeing Board actions to address inequalities in health. It will also incorporate an approach to the Public Sector Equality Duty and relate to the Council’s “Black Live Matter” resolution.
2.	Key Issues
2.1	Equalities affect every person in society. Everyone has at least three protected characteristics under the provisions of the law – gender, ethnicity and age. Many in society have additional protections depending on their circumstances.

2.2	The key message underpinning equalities in Rotherham and the driving force behind the equalities review is that equalities affect everyone and is everyone's business.
2.3	A combination of economic, social and cultural factors impacts on equalities and drive inequalities in society. Prejudice and disadvantage can combine to have compound impacts that result in long term disadvantage that result in deep rooted issues such as child and family poverty, passing poverty from one generation to the next, and impacts on poor health.
2.4	<p>Taking forward equalities in Rotherham now combines achieving "Excellent" accreditation under the EFLG along with a proactive approach to tackling those issues that create inequalities and discrimination and prejudice. To this end, the Equalities review will positively act on and promote the four key lines of enquiry of the Equalities Framework for Local Government linking in a range of activity around tackling inequalities as set out in the Council's Year Ahead Plan:</p> <ul style="list-style-type: none"> • Understanding and working with your communities. • Leadership and organisational commitment. • Responsive services and customer care. • Diverse and engaged workforce.
2.5	The review process will be underpinned by good data and intelligence including Joint Strategic Needs Assessment (JSNA) baselines and benchmarking. It will bring to the fore delivering the Public Sector Equality Duty, and the commitments demonstrated by the Council in its "Black Lives Matter" resolution, putting communities at heart of everything the Council does.
2.6	The scope and governance of the review will be dynamic, engaging the Council's staff and bringing about change in culture of the organisation. Driven by outcomes it will build a deeper understanding and empathy about equalities and social justice, and the confidence of staff to incorporate equalities into service design and delivery.
2.7	<u>Black Lives Matter</u>
2.8	<p>At its meeting on 22nd July 2020, the Council passed the following motion.</p> <ul style="list-style-type: none"> • This Council commits to making Rotherham an anti-racist town and will: <ul style="list-style-type: none"> ○ Stand in solidarity with our black and minority ethnic communities, in Rotherham and around the world. ○ Work with local communities, listen to them, so we can better understand the racism they experience and the challenges that they face, including in areas such as local policing and the increased risks from Covid-19.

	<ul style="list-style-type: none"> ○ Strengthen our anti-racism approach and ensure all staff participate in activity/training that supports them to address prejudice and bias, including where necessary their own. ○ Report annually on how council services are responding to the different needs of people with protected equalities characteristics, setting out an annual plan to meet the needs of people from different backgrounds, addressing inequalities, and ensuring that the Council is meeting its obligations.
2.9	<u>The Equality Framework for Local Government</u>
2.10	The Equality Framework for Local Government is the national benchmark for equalities good practice, with accreditation undertaken by peer review.
2.11	Use of the framework will provide the platform to align all aspects of the Council's work around equality, inequalities and the Public Sector Equality Duty, promoting quality outcomes and best practice.
2.12	Accreditation under the framework follows four key lines of enquiry: <ul style="list-style-type: none"> ● Understanding and working with your communities. ● Leadership and organisational commitment. ● Responsive services and customer care. ● Diverse and engaged workforce.
2.13	There are then three levels used for assessment: <ul style="list-style-type: none"> ● Excellent ● Achieving. ● Developing.
2.14	A peer review undertaken in 2017 placed the Council at the "Developing" level. Under the Equalities Review, the Council is aiming to achieve "Excellent" by 2022.
2.15	Full details of the Equality Framework for Local Government (EFLG) and its key lines of enquiry at attached at appendix 1.
2.16	The EFLG has been updated since the 2017 peer review to reflect the latest legislation affecting equality such as gender pay gap reporting, GDPR, the changing context of local government and equality in Britain and other issues that might affect equality including the UK's decision to leave the EU.
2.17	<u>Theme: Gender pay gap</u>
2.18	In collecting, analysing and publishing workforce data different criteria levels now include the gender pay gap. Within the developing criteria for collecting, analysing and publishing workface data organisations are expected to report annually on the gender pay gap. For the achieving level criteria organisations are expected to be reducing the gender pay gap and

	addressing any race pay gap. Additionally, the achieving level criteria specifies there is evidence that the organisation is actively working on reducing its gender pay gap. The excellent level criteria does not specify the gender pay gap, however, it specifies the organisation must consider pay gaps across other areas of inequality such as religion, belief, race/ethnicity, age, disability etc.
2.19	Theme: GDPR
2.20	The developing criteria expects authorities to be compliant with GDPR legislation in its collection, analysis storage and use of data and information. For developing level criteria, the authority must be complaint with GDPR legislation, analysis and use of data and information. In developing level criteria, organisations must ensure GDPR processes are in place and regulations are being met. Both excellent and achieving levels do not mention GDPR criteria due to it being a basic requirement that is expected of excelling organisations.
2.21	Baselines and benchmarks
2.22	<p>A revised self-assessment against the key lines of enquiry from the 2017 review has been completed which shows:</p> <ul style="list-style-type: none"> • The peer review undertaken in 2017 placed the Council at the “Developing” level. There has been significant progress to action the recommendations from this peer review. Examples include that: <ul style="list-style-type: none"> ○ The equalities training offer has been refreshed, including the compulsory e-learning for all staff. ○ The equality analysis process and guidance has been developed, including making it a requirement that an initial screening is undertaken as a minimum for all Cabinet and OSMB reports. OSMB have taken a proactive and leading role in ensuring that equality analyses are undertaken. ○ Equality implications are now considered as part of all Cabinet reports, which is helping to embed consideration of equalities within decision-making. ○ Performance management arrangements have been strengthened in relation to the equality duty. This has included the development of Council Plan measures relating to equalities, as well as the inclusion of equalities within service planning. ○ A Consultation and Engagement Strategy and Toolkit has been developed, outlining clear standards for the consultation process. ○ The Thriving Neighbourhoods strategy and approach is fostering meaningful and positive engagement with communities. This was also integral to the Council’s response to COVID-19. ○ The Social Value Policy has been developed, which includes a specific outcome and measures around equality of opportunity for disadvantaged people and communities including disabled people.

2.23	Self-assessment 2020
2.24	An initial assessment against the key lines of enquiry has been undertaken, with opportunities for improvement outlined below. This will be the basis of a more comprehensive self-assessment, which will shape the development of the programme plan.
2.25	Understanding and working with your communities
2.26	Excellence criteria requires a comprehensive set of information about local communities and protected characteristics needs and outcomes. A key for excellence is the council having demographic and ward level data. There is a need to update figures on a regular basis and currently this criterion is not being met. Examples include updating the JSNA website regularly and inputting census 2021 data when it's published.
2.27	A systematic and consistent approach is also needed to address issues around the quality and collection of equality data in all services. Corporately, officers need to be upskilled to utilise Power BI's analytics to predict and target service interventions allowing services to take a tailored approach to tackling equalities issues.
2.28	There is currently a lack of evidence available around RMBC's communication channel engagement, particularly those from under-represented backgrounds. Equality data needs to be consistently recorded to understand whether more targeted approaches are needed to reach as many service users as possible.
2.29	Whilst many elected members have participated in training around equalities, there is an opportunity to further embed this and promote this training for all elected members as part of the member development programme.
2.30	COVID-19 has exacerbated inequalities, with the Trussell Trust forecasting a 61% increase in food parcels needed across its UK network in October to December amongst the most deprived communities. It is therefore crucial that the council continues to engage with VCS and elected members to tackle these issues. Building on the learning from the pandemic, there is an opportunity to improve engagement and awareness of grassroot community groups and networks.
2.31	Leadership and Organisational Commitment
2.32	A key action point raised in this area is that the corporate equality objectives need to be refreshed, as the Equality for All Strategy 2016-2019 has now come to end. This will be embedded as an integral part of all service delivery, as highlighted by the Equality Peer Review Self-Assessment.

2.33	The equality peer review also suggested that the equality objectives should be annually reviewed to track performance and emerging priorities. Since the peer review, this recommendation has been actioned, but reporting arrangements could be strengthened to enhance strategic and member oversight of the delivery of the equality objectives. The peer review further recommended specific outcome-oriented objectives as helpful in implementing equalities at service level. This recommendation will inform the refresh of priorities.
2.34	The peer review also highlighted that action should be taken to ensure equality and diversity are key components of the Workforce Strategy, including defining relevant outcomes and objectives. A new workforce strategy will be developed to align with the Council's 3 year plan from May 2021 with explicit links to inequalities. In the meantime an interim Organisational Development plan is currently in place and will prioritise activity in relation to inequalities.
2.35	Leadership from members, including Cabinet and senior officers is critical to the whole of the equalities process, not just the key lines of enquiry for the EFLG and there is full leadership support to achieving 'excellence.' There is full support and commitment from the Cabinet and Strategic Leadership Team to the Equalities Review and achievement of 'Excellent' accreditation.
2.36	<u>Responsive services and customer care</u>
2.37	Excellence level criteria states the council must demonstrate that commissioned/procured services are helping it achieve its equality priorities. The council signed off the use of social value to be included in all contracts awarded over £100,000 since October 2019 with implementation occurring in December that year. From November 2020, data produced from the Social Value Portal will feed into an annual report looking at social value benefits in the local economy.
2.38	Looking ahead, it is important to capture the policy developments and new practices around co-design through commissioning practices. This includes how stakeholders and communities are engaged to embed equalities and tackle inequalities and deprivation as an embedded part of the process.
2.39	<u>Diverse and Engaged Workforce</u>
2.40	In order to ensure an engaged and diverse Council workforce, there are some key actions to be taken. In particular, workforce equalities data needs updating, with this work currently ongoing and a full analysis to be included in annual reports. Previous work, such as the previous self-assessment and workshops undertaken with staff have suggested that the Council's workforce does not currently mirror the local population in all areas.
2.41	It is also a priority to build a more consistent understanding around equalities within the Council's workforce. The Peer Review suggested that the extent to which Council staff understand and implement equalities

	principles is unclear, which has been reiterated through more recent workshops undertaken with staff. Suggestions for improvement focus on embedding and centring equalities in Council activities while also improving equality and diversity learning opportunities, with the need for greater staff learning and development. Whilst compulsory e-learning has been introduced for staff covering a range of equality issues, there is a commitment to make this training much more inter-active to aid a deeper understanding
2.42	<u>Joint strategic needs assessment</u>
2.43	The Joint Strategic Needs Assessment for Rotherham (JSNA) underpins much of the work being taken forward to tackle inequalities, achieve thriving neighbourhoods and produce profiles at ward levels.
2.44	Refreshing and updating the JSNA is a critical piece of work being undertaken to support progressing the priorities and objectives of the Year Ahead Plan.
2.45	The JSNA will also provide an ongoing resource of data and intelligence, underpinning the work on equalities and tackling inequalities.
2.46	<u>Public sector duty regarding socio-economic inequalities & Public sector equality duty</u>
2.47	<p>It is broadly recognised that there are duties relating to the “Protected Characteristics set out in the Equality Act 2010 (c. 15):</p> <ul style="list-style-type: none"> • Age. • Disability. • Gender reassignment. • Marriage or civil partnership. • Pregnancy and maternity. • Race. • Religion or belief. • Sex. • Sexual orientation. <p>Other aspects of the Equality Act duties often receive less attention.</p>
2.48	As Part of the Equality Review, other duties will also be addressed.
2.49	<u>Public sector duty regarding socio-economic inequalities</u>
2.50	An authority, when making decisions of a strategic nature about how to exercise its functions, have due regard to the desirability of exercising them in a way that is designed to reduce the inequalities of outcome which result from socio-economic disadvantage.
2.51	<u>Public sector equality duty</u>

2.52	<p>A public authority must, in the exercise of its functions, have due regard to the need to:</p> <ul style="list-style-type: none"> (a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited. (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.
2.53	<u>Community challenges and outcomes</u>
2.54	<p>As part of the Equalities Review, it will be necessary to ensure that Rotherham residents and organisations are engaged effectively in order to understand from their perspective, what is working well and the areas of activity that need further attention. The engagement should also incorporate a co-design process to identify with communities the relevant equalities approaches and priorities that would make most impact.</p>
2.55	<p>The engagement will be underpinned by an open and honest dialogue with communities on current issues and priorities. This will help to understand any concerns and build on the positive relationships that exist within different directorates over a long period of time, as well as most recently from the experience of joint working across public and voluntary sectors to support local communities during the pandemic.</p>
2.56	<p>When thinking through the issues around community engagement it is important to bear in mind that a 'one size fits all' approach will not be effective - engagement needs to be flexible and adaptable to fit the requirements of different communities and groups.</p>
2.57	<p>At one level it is possible to look at all Rotherham residents as a single community. However, there are a wide range of perspectives and individual backgrounds below this level. It would be useful to look at engagement for communities of geography (e.g. neighbourhoods) and communities of interest/identity (e.g. LGBTQI, disabled, faith). Even at this level there should not be an assumption of homogeneity – individuals may identify themselves by a combination of characteristics such as sexual orientation, sex, age, race, faith, disability, residential neighbourhood, income level or profession. At a minimum, engagement with the protected characteristics groups will be undertaken.</p>
2.58	<p>The ongoing impact of the COVID pandemic will need to be taken into account but it is envisaged that there will be a number of digital and face to face approaches to engagement for the Equalities Review, dependent on the government guidance and restrictions in place during the next few months. Many local residents came forward as volunteers to support the Rotherham Community Hub and there is potential to further support these Rotherham Heroes through ongoing engagement activity.</p>

2.59	<p>To support the development of an engagement plan, a stakeholder analysis is being undertaken to:</p> <ul style="list-style-type: none"> • Map the range of communities and groups currently in touch with directorates within Rotherham MBC. • Design appropriate methods to engage different subsets of groups incorporating generic and targeted approaches. • Identify gaps where further tailored development work may be required.
2.60	<p>Work will be undertaken through existing groups and new contacts will also be developed through this process. The promotion of genuine and diverse local voices and active citizenship will be among the aims of the engagement. This will help to strengthen engagement arrangements for future work and to build community confidence and resilience.</p>
2.61	<p><u>Members engagement</u></p>
2.62	<p>Further to their consideration of the VCS Infrastructure Cabinet report on 16th September 2020, including its references to the Equalities Review, OSMB have set up a member working group to contribute to and inter-relate with the Equality Review. An initial meeting of scrutiny members held on the 23rd October 2020 considered how they can be involved, not just in scrutinising recommendations but also contributing to developments in the review.</p> <p>Further consideration will involve:</p> <ul style="list-style-type: none"> • Members aligning with KLOEs and other actions within the review. • Acting as a “sounding board” for potential actions ahead of formal reports and recommendations. • Identifying how scrutiny reviews can contribute to taking forward the equalities agenda.
2.63	<p><u>Governance of review</u></p>
2.64	<p>Strategically, the Review will be led and co-ordinated by the Chief Executive’s Policy, Performance and Intelligence Service, forming a core team which will then engage across services, community and partners.</p>
2.65	<p><u>Programme of review</u></p>
2.66	<p>The full programme of review will be framed around eight key lines of enquiry Four are the thematic blocks of the EFLG:</p> <ul style="list-style-type: none"> • Understanding and working with your communities. • Leadership and organisational commitment. • Responsive services and customer care. • Diverse and engaged workforce.

	The approach to the review would also build value by linking quality outcomes around wider inequalities work including health and inclusive growth through social value. It would firmly incorporate the Public Sector Equality Duty, addressing discrimination and prejudice, linking to the Council's "Black Lives Matter resolution. This option is recommended because it aligns with and supports wider ambitions set out in the Council's Year Ahead Plan.
2.67	Given the scale of the review together with different timelines it will be important to ensure that a robust programme and project management approach is in place. As such the equalities work will be underpinned by a programme plan including key milestones and timelines for delivery and achievement.
2.68	This approach will enable the complexity of the review to be broken down into manageable components and assist with reporting on progress.
2.69	Given the two-year timeline to achieving "Excellent" accreditation under the EFLG, and potentially longer timescale to achieve some interventions that will be needed to tackle inequalities, a programme for two years will be developed. This approach will enable short term actions to be included along with medium term and longer-term outcomes in a comprehensive and strategic approach.
3.	Options considered and recommended proposal
3.1	Two options have been considered.
3.2	Option 1
3.3	This option would not pursue accreditation under the EFLG. Should this option be approved, the Council could not satisfy itself that best practice was being achieved or that broader policy priority objectives were being fully realised.
3.4	Option 2
3.5	This option takes forward the EFLG key lines of enquiry to seek "Excellent" accreditation. In doing so, it will build on that process by linking quality outcomes around wider inequalities work including health and inclusive growth through social value. It would also firmly incorporate the Public Sector Equality Duty, addressing discrimination and prejudice. It would firmly incorporate the Public Sector Equality Duty, addressing discrimination and prejudice, linking to the Council's "Black Lives Matter resolution. This option is recommended because it will ensure that the Council achieves best practice accreditation in addressing equalities and inequalities integral to achieving policy priority outcomes.
4.	Consultation on proposal

4.1	Initial consultation has been undertaken with Members and key VCS organisations as part of developing the VCS Infrastructure report presented to Cabinet on 21 st September 2020.
4.2	OSMB considered the headline issues as part of their consideration of the VCS Infrastructure report on 16 th September 2020. A further meeting was held with scrutiny members on 23 rd October 2020 to discuss the equalities review and it was agreed to establish a working group to engage in the review. Details of scrutiny engagement are set out in 2.61 to 2.62 above.
4.3	Engagement of partners through the Rotherham Together Partnership will promote the approach of the review, achieving broader ownership of, and participation in delivering the review outcomes.
4.4	The work of the review will also seek to engage with and consult the Sheffield City Region / Mayoral Combined Authority to promote equality outcomes as part of delivering the Devolution Deal through the commitment to inclusive growth.
4.5	A stakeholder analysis is being undertaken, as set out in 2.59 to 2.60 that will work towards the production of an engagement plan and future consultation as part of the review.
5.	Timetable and Accountability for Implementing this Decision
5.1	Preparatory work has been undertaken to commence the Review once agreement has been given
5.2	Given the dynamic and multi-faceted nature of the Review, there will be a series of reports and recommendations over a period of time.
5.3	Whilst some aspects of the review will report fairly soon, achieving “Excellent” accreditation under the EFLG is projected for autumn 2022.
5.4	Overall, projects will have timetables for completion along with periodic programme assessment of the Review and forward plans.
5.5	Details of both governance and programme of the review are covered in 2.63 to 2.69 above.
6.	Financial and Procurement Advice and Implications (to be written by the relevant Head of Finance and the Head of Procurement on behalf of s151 Officer)
6.1	There are no financial implications from this report, the work that is required will be carried out within existing budget provision. Any finance implications that are identified within specific KLOEs will be included in future reports making recommendations as part of the review.

6.2	Whilst there are no direct procurement implications associated with the recommendations detailed in this report, delivery of the Council's Social Value Policy will contribute to the outcomes of the Equalities Review.
7.	Legal Advice and Implications (to be written by Legal Officer on behalf of Assistant Director Legal Services)
7.1	Undertaking the programme of work proposed by this report will support the Council in complying with its duties under the Equalities Act 2010, in particular the Public Sector Equality Duty.

8.	Human Resources Advice and Implications
8.1	There will be significant human resources implications arising from the review of equalities. These will relate to protected characteristics and equalities in the employment of staff. Outcomes of the review will also produce recommendations around culture and development including staff training to advance and embed the equalities recommendations.
9.	Implications for Children and Young People and Vulnerable Adults
9.1	Both age and disability are protected characteristics under statutory provisions. The review will address these as an integral part of the work. Tackling health inequalities will be a significant factor in the work of the review along with recognition of and addressing the impacts of hidden disabilities.
9.2	Child poverty is a growing issue nationally, which is likely to be worsened by the economic shock arising from COVID. Actions to address inequalities that drive child and family poverty will be key outcomes.
10.	Equalities and Human Rights Advice and Implications
10.1	The whole review is about the advancement of equalities and tackling inequalities.
10.2	Full Equality Assessments will be undertaken for each project in the Review and assessment against equality outcomes will be monitored as part of programme management of the Review.
11.	Implications for Ward Priorities
11.1	The work of the Equality Review will interrelate with the "Thriving Neighbourhoods" agenda set out in the Year Ahead Plan.
11.2	The production of Ward Profiles alongside developing the JSNA will better identify issues at the ward level and inform action that contribute to tackling inequalities.
12.	Implications for Partners

12.1	The engagement of partners is integral to achieving the Equalities objectives and tackling inequalities and deprivation.
12.2	Many of the statutory provisions apply to all partners.
13.	Risks and Mitigation
13.1.	The key areas of risk relate to: <ul style="list-style-type: none"> • A lack of understanding about the importance of equalities and tackling inequalities as part of achieving the overall strategic priorities for Rotherham. • A failure to engage in the process of the review including agreeing and implementing recommendations. • Externally driven factors including economic trends and outcomes that disproportionately and adversely impact the communities of Rotherham.
13.2	Communications will be a significant mitigating factor, securing understanding, buy-in and commitment across the Council, partners (local, sub-regional and further afield) and communities.
	Regular updating of data and intelligence will enable the Review to be agile to changing circumstances.
14.	Accountable Officers
	Jackie Mould, Head of Policy Performance & Improvement Chief Executive's Jackie.mould@rotherham.gov.uk
	Steve Eling Policy and Equalities Manager Chief Executive's Steve.eling@rotherham.gov.uk

Approvals obtained on behalf of Statutory Officers:-

	Named Officer	Date
Chief Executive	Sharon Kemp	Click here to enter a date.
Strategic Director of Finance & Customer Services (S.151 Officer)	Named officer	Click here to enter a date.
Head of Legal Services (Monitoring Officer)	Named officer	Click here to enter a date.

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