AGENDA ITEM

REPORT TO
CORPORATE
PARENTING BOARD

11 DECEMBER 2020

REPORT OF DIRECTOR OF CHILDREN'S SERVICES

POST 16 AND CARE LEAVERS SUPORT AND ACCOMMODATON REPORT AUGUST 2019 – SEPTEMBER 2020

SUMMARY

This report provides Corporate Parenting Board with:

- 1. An overview of the use of and the monitoring of supported accommodation for our care leavers, young people 16 and over, who may be looked after or children in need and are at risk of becoming homeless.
- 2. An overview of the options currently being explored regarding the development of supported accommodation following the commissioned contract which in part has been extended and will be coming to an end in October 2021.
- 3. Information regarding the monitoring of supported accommodation that provides assurance that our young people are placed in good quality accommodation.

RECOMMENDATIONS

Members of Corporate Parenting Board are asked to note the detail below.

DETAIL

1. Introduction

1.1 Stockton-On-Tees Borough Council is committed to ensuring appropriate accommodation and support is available for this vulnerable group of young people. Annual monitoring visits are conducted by the Accommodation Officer or another suitable officer from within the Resource Team. These monitoring visits provide the Resource Team and the wider Local Authority an overview of the needs of this group as a cohort. Trends can be identified, and a picture of providers is built, all of which supports the ongoing development of the service and individual plans for young people and provides the assurances or identifies gaps/issues. The aim is to ensure that providers are working towards supporting our young people, in achieving their goals and aspirations, as they move towards independence in good quality, cost effective provision.

- 1.2 This report will outline how Stockton-On-Tees Brough Council offers an effective and robust response to the housing needs of young people aged 16 plus who are in care, leaving care or are homeless. This service is delivered by a strong joint working protocol between Social Care and Housing for the assessment of homeless 16/17 year olds, a pathway through accommodation services to achieve independence, directly commissioned supported accommodation services for young people and a range of other services offered to care leavers who require ongoing housing assistance and support.
- 1.3 The legislation and framework that underpins our approach and model includes:
 - Homelessness Reduction Act 2017
 - Children Act 2004
 - Children (Leaving Care) Act 2000
 - Provision of Accommodation for 16 and 17 year old young people who may be homeless and/or require accommodation
 - M vs LB Hammersmith and Fulham 08 and G v Southwark 09

2. Commissioned Services

- 2.1 Stockton-On-Tees Borough Council has had, up until Oct 2020, access to 3 commissioned supported accommodation provisions. These provisions are:
 - Parkfield Hall (provided by North Star) 10 flats/units plus one emergency crash pad
 - 155 Norton Road (provided by Sanctuary) 6 flats/units plus one emergency crash pad
 - St James House (provided by Sanctuary) * 6 flats/units (came to an end in Oct 2020)
- 2.2 All of the Local Authority's commissioned housing services provide self-contained one-bedroom flats/bedsits with their own facilities (such as bathroom/kitchen/living area etc.) in a building in with 24-hour staffing on site. Staff on site are there to appropriately assist our young people in managing a tenancy, build skills and prepare for independent living. In addition, they will, in consultation with the young person and their lead worker, signpost/refer to other agencies to support with other needs (i.e. substance misuse, mental health services).
- 2.3 Children's Services share the provision at 155 Norton Road and St James House* with the Homelessness and Housing Solutions Team whom also use flats in the building to house homeless single people and families.
- 2.4 Aside from these commissioned services, the Local Authority does, on occasion, spot purchase supported accommodation from other providers. This is dependent on factors such as the needs of the young person and ability or capacity from commissioned services to respond, and any identified risk factors that may impact on the young person or others that can be influenced by placement location, peers etc. Any provision that is spot purchased is monitored in the same way as commissioned services to ensure our young people are not placed in substandard accommodation.
- 2.5 In addition to supported accommodation provisions that are commissioned, the Local Authority operate a Supported Lodging Scheme and has done so successfully for several years. Supported Lodgings placements are available to care leavers and

^{*}Until 31st October 2020

young people in care 16 or over and young people 16 to 18 who are at risk of becoming homeless. In addition, young people in foster placements can 'Stay Put' in their foster placement after the age of 18. Other arrangements include 'Staying Close' arrangements. The Local Authority have 2 children's homes with adjoining flats and 2 flats in the same block as another of its homes which are used flexibly dependant on need including for care leavers who become parents and may need the additional support or oversight.

- 2.6 Staying Close arrangements allow young people to transition into less supported environments whilst retaining an element of support that is already based on trusted relationship's with staff from their residential home. These have been forged by converting existing spaces within our homes (i.e. converting a garage) or by sub-letting the properties close by from a registered social landlord.
- 2.7 The monitoring visits that have been completed have highlighted good working procedures, paperwork, robust support plans and recordings and risk management plans.

3. Access to housing and the role of the Accommodation Panel

- 3.1 Key to effective support for housing of young people is strong partnership and multiagency working. Stockton-On-Tees Brough Council operates a model that has a well-established Accommodation Panel that meets monthly to discuss and advise workers around housing options for young people aged 16 25 who are receiving a service from Children's Services. The Panel uses the knowledge and expertise of the members to provide a holistic approach to resolving a young person housing situation, whether that be due to homelessness, release from custody, move on from care placement or fragile tenancies.
- 3.2 The Panel consists of representatives from:
 - Resource Team
 - Supported Lodgings
 - Leaving Care Team
 - Youth Offending
 - Youth Direction
 - Homelessness and Housing Solutions
- 3.3 Young people can only be referred into supported accommodation services (commissioned or spot purchased) via the Panel and the young person must be open to either a Social Worker or Personal Advisor. An assessment of need must have been carried out by the lead worker and presented to the Accommodation Panel to consider and recommend the resources to support the plan in terms of meeting the housing and as appropriate the wider needs of the young person that are likely to impact on housing needs. This ensures that referrals for supported accommodation are appropriate and gives additional scrutiny to ensure providers can meet the need of young people. From this, a further meeting will be held with the young person, the lead worker, Resources/Accommodation Officer and provider to discuss the detail of the support plan and agreements in order the young person is given every opportunity to contribute and gain a full understanding of expectations from provider, themselves and others prior to admission.

3.4 The flowchart below outlines the (typical) referral process for a young person in need of accommodation via the Accommodation Panel:

Progression of Plan

•Young Person is identified as ready for move on into alternative accommodation arrangement (i.e. residential to supported) in line with Care Plan/Pathway Plan

Assessment

•Needs/skills/risks identified and Request & Support Plan for Post 16 Accommodation/Valuing Care Assessment completed

Panel

- Request is presented at Accommodation Panel and most suitable accommodation arrangement is agreed
- •Social Worker/Personal Advisor to discuss outcome of Panel with Young Person and arrange move in/meet and greets with provider

Ongoing Support

- •Provider delivers ongoing support in line with plan
- Accommodation placement reviewed within 8 weeks of commencing
- Ongoing reviews of the plan take place in line with Looked After reviews/Pathway Plan reviews

Move on

- •Lead worker (Personal Advisor/Social Worker) identifies Young Person is ready to move on to alternative arrangement (in line with Care Plan/Pathway Plan)
- Request is re-presented at Accommodation Panel to agree move on plan

4. Capacity Data

4.1 Between 1st August 2019 and 30th September 2020, the commissioned supported accommodation providers have been running at full capacity. During this time 30 young people have been placed in either Parkfield Hall, 155 Norton Road or St James House. The numbers of young people who started a placement in this period for each service are:

Parkfield – 13 155 Norton Road – 9 St James House – 8

4.2 Providers can work with young people and their workers to achieve their desired outcome which may be securing their own tenancy, returning to family/parents or moving on to less intense supported accommodation arrangements.

MOVE ON OUTCOMES FROM SUPPORTED ACCOMMODATION

11

5

3

2

5

3

1

OFFICE SUPPORTED ACCOMMODATION

12

14

5

OFFICE SUPPORTED

OFFICE S

4.3 The outcomes for the young people placed in commissioned services are below:

Other* - relates to a YP who was moved to a family assessment unit with baby

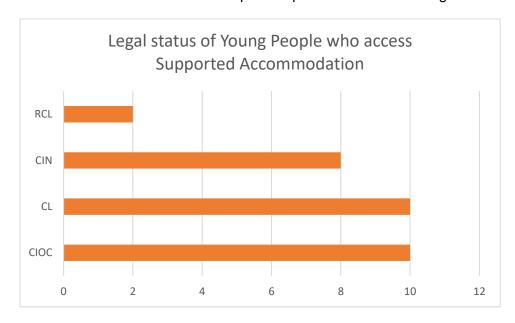
Other supported accommodation -3 of these YP moved to alternative arrangements due to closure of St James allowing their support to continue in another provision (2 within commissioned services)

- 4.4 The detail above demonstrates a high level of stability within our commissioned supported accommodation services and highlights the positive outcomes these services have achieved. Stability allows young people to feel safe and secure in their homes and ensures a higher level of engagement with services. The Accommodation Panel provides an opportunity for young people to be appropriately matched to the commissioned services to avoid/reduce elements that can create instability in the buildings. For example, it avoids a 'cluster' of young people with similar needs who may negatively impact on each other. It also allows the Local Authority to play to the strengths of the staff teams within these services and appropriately consider which service is better placed to meet the individual's need.
- 4.5 Our commissioned services have not served notice/evicted any young person during the period shown. The commissioned services are running well and have in place resilient staff. A major factor in this positive outcome is the robust working relationships between Children's Services and providers, using the Accommodation Panel as a gateway to access these services that has strengthened this area.
- 4.6 Recently, our commissioned service at 155 Norton Road (provided by Sanctuary) was acknowledged for the excellent work that staff provide to young people and one of the support workers received the 'Housing with Care award' at the 2019-2020 Great British Care Awards. More info can be found here: https://www.sanctuary-supported-living.co.uk/news/awards/double-success-at-national-care-awardsThis is a further

testimony to the high quality of service that our young people receive in our commissioned services.

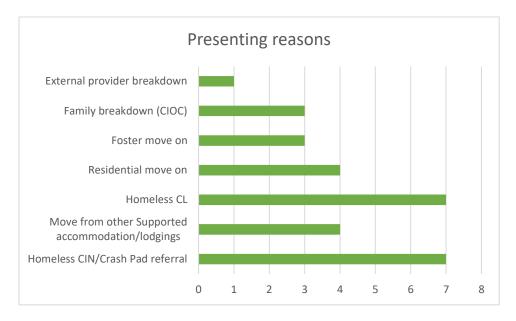
5. Who has accessed the Services and why

5.1 The chart below shows the status and number of young people that accessed commissioned services at point of placement commencing:



From this information, we can see that services are evenly split between care leavers and CIOC with CIN (homeless 16/17-year olds).

- 5.2 It is of note that Stockton-On-Tees Borough Council offers the same supported housing services to all the borough's young people under the age of 18, regardless of their legal status. This is in line with case law derived from the Southwark judgement. This good practice has been highly regarded in Ofsted inspections and peer reviews over a number of years.
- 5.3 Children in Need are generally young people who have been assessed as homeless and in need of accommodation. CIN cases account for 26% of placements made in supported accommodation. In line with the judgment M vs LB Hammersmith and Fulham 08 and G v Southwark 09, it is this Local Authority's policy that young people who are provided with supported accommodation because they are homeless, are offered 'looked after status' under sec 20 of the Children Act. However, for various reasons, many will decline Looked After status. It is our policy that these young people are supported to remain in our supported accommodation services with a view to moving them on to suitable alternative arrangements shortly after their 18th birthday.
- 5.4 The chart below shows the need/reasons that young people have accessed supported accommodation during this period.



- 5.5 The primary reason for accommodation is to relieve homelessness for children in need (aged between 16/17 years old) and care leavers. Many children in need and care leavers who approach the service as homeless are provided with temporary accommodation in the commissioned crash pads within the main building of our supported accommodation. This provides safe, suitable accommodation whilst a plan is formulated to look at most the suitable long-term options. The type of accommodation is then ratified by the Accommodation Panel.
- Although 7 care leavers were deemed as homeless, this was not due to eviction from existing supported accommodation arrangements. Many of these were due to care leavers making their own arrangements prior to becoming homeless (i.e. returning to parents/family/friends) and subsequently becoming homeless or at risk of homeless. Through close relationships with the relevant Personal Advisors, the young people they were able to make known their circumstances and ask for support. The requests for supported accommodation are always discussed at the Accommodation Panel and because the panel is multi-agency there is less chance of young people 'slipping through the net'. This approach allows us to 'catch' our most vulnerable young people and offer them the support that they need to get back on track and stabilise, before moving on to more appropriate arrangements.
- 5.7 Although 3 YP have accessed supported accommodation whilst in care due to family breakdown, these young people returned to family arrangements and subsequently found themselves at risk of homeless.
- 5.8 The data also shows that only a small proportion of young people have required accommodation due to an external provider serving notice. In these cases, it was the same provider from out of area that asked the young person to leave. The Local Authority was able to safeguard these young people by offering a safe and stable option in the local area.
- 5.9 Overall, the data demonstrates that Stockton-On-Tees Borough Council have in place effective approaches, policy and procedures to support and respond appropriately to the needs of young people in need of supported accommodation, regardless of age or legal status, and avoid rough sleeping or inappropriate arrangements.

6. Crash Pad Usage

- 6.1 Stockton-On-Tees Borough Council commissions 2 crash pads one at Parkfield Hall and another at 155 Norton Road. These services are emergency, short term rooms (with access to support) that allow the Local Authority to provide safe accommodation for those at most risk and avoid the inappropriate use of unsuitable accommodation such as bed and breakfast. Between August 19 and September 20, the crash pads have been accessed by 19 young people. These consisted of:
 - 3 x Homeless Care Leavers 2 moved on to longer term supported accommodation whilst one made their own arrangements with friends
 - 14 x Homeless CIN (16/17-year olds) 5 moved on to places within the commissioned services, 2 moved on to Supported Lodgings, 4 made their own arrangements (i.e. returned home) and 3 moved to other arrangements (1 accessed NASS accommodation, 1 was owed a duty under homelessness services and 1 moved on to an external supported accommodation arrangement)
 - 2 x Homeless CIOC presented due to family/relationship breakdowns. 1 made their own arrangements and 1 moved into longer term supported accommodation.
- 6.2 During the period this report covers, Stockton Borough Council has not placed any 16/17-year olds in B&B accommodation.

7. External/spot purchased supported accommodation

- 7.1 In addition to our commissioned services, Stockton Borough Council accesses external supported accommodation providers under 'spot purchase' agreements. These services are monitored in the same way as our commissioned services via the Resource Team. Our commissioners are currently working on a 'framework' for these types of provisions in the future.
- 7.2 The need for spot purchased provision varies, however, they are most used by young people whose needs exceed what our commissioned services are able to provide for(i.e. intense level of support, respond to high levels of aggression from young people) and/or are the young person needs to be placed out of area as a result of exploitation. The recent increase in risk of Child Criminal Exploitation in the borough of Stockton-On-Tees has impacted on this.
- 7.3 Between Aug 19 and September 20, Stockton-On-Tees Borough Council has used 20 external supported accommodation placements. However, these placements relate to only 10 young people and are detailed below:

Young Person	Legal status	Reason for external provision	OOA placement	No. of placements
1	CIOC	High risk of CCE, links to OCGs, high levels of aggression	Y – due to risk in Stockton	5
2	CIOC	High risk of CCE, links to OCGs, high levels of aggression	Y -due to risk in Stockton	5
3	CIOC	High risk of CCE, links to OCG	Y – due to risk in Stockton	2
4	CIN	No capacity in commissioned	N – placed in Stockton	1
5	CIOC	High level of need, unsuitable for commissioned	N – placed in Stockton	1
6**	CIN	No capacity in commissioned	N – placement in Stockton	1
7	CIN	High risk of self-harm, risk of CCE	N – placement in Stockton	1
8	CIN	High needs, unsuitable for commissioned	N – placement in Stockton	1
9**	CIOC	Bail conditions prevented residing in Stockton	Y – placed OOA	1
10	CIOC	High need, wished to remain OOA	Y – placed OOA	1

**YP 6 and 9 were moved to commissioned services once capacity reached/barriers to being house in Stockton removed.

YP 10 had lived outside of Stockton for 3 years and wished to remain in the local area he had been placed.

7.4 This information demonstrates that Stockton-On-Tees Borough Council continues to respond to the needs of the young people it is responsible for by using spot purchasing and working closely with providers that are not commissioned. However, there is an acknowledgement that the number of placements YP1 and YP2 have had, would suggest that that such provision does not always offer stability for our more complex and challenging young people and often providers deem the risk associated with our young peoples as too high and 'pass them back'. Further work is required and is being taken forward in Stockton-On-Tees Borough to address this sort of situation for some

- young people. This is via the CIOC Group, commissioning of supported accommodation and Tees Valley work in regard to the range of residential provision.
- 7.5 The data demonstrates that it is very rarely due to capacity issues that young people are placed in external provision, confirming that we have appropriate numbers of accommodation commissioned already. However, this will be impacted upon by the closure of St James in the short term and we may see an increase in the use of spot purchased provision (more info below).
- 7.6 The increasing risk of young people at risk of Child Criminal Exploitation is something that Stockton-On-Tees Borough Council is working on with other agencies in the context of ongoing work around Contextual Safeguarding. While out of area placements may be appropriate for some young people, it must be acknowledged that being out of the area alone is not likely to be a successful intervention and can lead to multiple moves for young people.
- 7.7 At the 30th September 2020, there were 5 young people who were placed in spot purchased placements.
- 7.8 Providers that Stockton-On-Tees Borough Council spot purchase with include:
 - Prefer Homes Stockton
 - Forever Care Sunderland
 - Indigo Support North East
 - Crystal Care Solutions Stoke
 - Sweethope Supported Lodgings Ashington
 - Jigsaw Recovery Project Gateshead
 - Rocsolid Newton Aycliffe
- 7.9 These providers are monitored via the Resource Team in the same way our commissioned services are, and none are Bed and Breakfast or unregulated Childrens Homes. It is our experience that all offer good quality and appropriate supported accommodation, although at times, some struggle to manage complex behaviours.
- 7.10 During monitoring visits, keys areas of focus includes the support plan for the young person, the providers risk management plans, the overall standard of accommodation and the providers ability to demonstrate that they have a clear definition around support to ensure that the provider is not slipping inappropriately into providing care and risking becoming an unregulated children's home. The Covid-19 pandemic has impacted on the Local Authority's ability to carry out monitoring visits in person and as a result, two external providers are still outstanding visits as of December 2020. However, in order to mitigate this, steps have been put in place such as social workers conducting regular visits/maintaining contact, sharing of paperwork/support plans and references from other Local Authorities that have used the placements have been obtained.

8. University Accommodation for Care Leavers

- 8.1 As part of our ongoing support offer to Care Leavers, Stockton-On-Tees Borough Council has a policy and procedure in place to support and assist care leavers attending Higher Education which includes the offer of financial support towards accommodation costs.
- 8.2 The policy has been in place since March 2019, and the Local Authority will contribute towards rental costs in line with the one bedroomed Local Housing Allowance (LHA) rate for the area that the young person is residing in. Stockton-On-Tees Borough

Council's contribution is capped at the LHA rate but if a care leaver wishes to reside in a more expensive property the policy is flexible enough to allow the young person to top up the difference themselves. This allows our care leavers' choice in where they want to live and freedom to access different accommodation arrangements ranging from student halls, self-contained flats or house shares.

8.3 As of September 2020, we were supporting/in the process of supporting 22 young people via this policy.

9. Ongoing support to care leavers living independently

9.1 Children's Services have robust methods in place to continually support young people once they move on from supported accommodation arrangements. This includes access to a Weekend Support Worker based in the Resource Team for out of hours visits on weekends, access to Tenancy Sustainment officers from the Homelessness and Housing Solutions Team, Personal Advisor support and advice and guidance from the Accommodation Officer.

10. Impact of Valuing Care on Post 16 accommodation and support

- 10.1 The Valuing Care model of assessing need has begun to feed into the work being done for young people aged 16 and over who require accommodation and support. As part of the recommissioning exercise and Children's Services wider implementation of Valuing Care, the approach has been piloted as part of the assessment and referral process for supported accommodation.
- 10.2 The response to these pilots has been overwhelmingly positive, with providers praising the assessments and the level of detail contained within them, providers believe that the Valuing Care assessments gives them a clear picture of the young person's needs and who they are as a person. It is felt that the implementation will ensure that our young people will be better matched to provider's who are able to meet their needs and who in turn will create improved support plans that achieve the desirable outcomes for our young people, reducing further the risk of evictions or placement breakdown.

11 Commissioning/re-tendering process 2020

- 11.1 In March 2020, the Resource Team, alongside our colleagues in the Homelessness and Housing Solutions Team and Commissioning, commenced a tender process in which new services and models of delivery for post 16 young people would be commissioned to commence from October 2020. Our usage tells us that there is a steady demand for the existing 22 units of accommodation (plus 2 crash pads) but it was felt that the model of service delivery needed to change to better meet the needs of our young people. The existing range is narrow as all the commissioned accommodation is delivered from building bases with a set level of support hours.
- 11.2 As part of the tender process, Resources and other areas of Children's Services, looked at appropriate delivery models and ways to improve the outcomes for young people accessing supported accommodation. Using the Valuing Care assessment tool to underpin this, a support model was developed in which young people would access direct support based on the level of need.
- 11.3 It was also felt that the building-based models, while for many was absolutely appropriate, it did not always fully meet the need of all our young people effectively. Whilst there is a need for services that are staffed 24/7 in a building-based provider, it

was felt that a dispersed model of flats/houses in the community with a floating support package could better meet the needs of some of our young people and would provide a range of options and more choice for young people. We know this is something our young people want as they often tell us they want 'their own place'.

- 11.4 Following market engagement, the Valuing Care assessment and the proposed accommodation models were well received and thus, this was inputted into our tender plan.
- 11.5 The tender was successful in securing building-based service of 10 units and a crash pad, this was awarded to Parkfield Hall. However, we were unable to secure 12 dispersed properties. As a result, an extension on the existing arrangements at 155 Norton Road and St James respectively was requested whilst further market consultation was undertaken. It is planned that the remaining 12 units will be retendered by Children's Services over the next year and further engagements sessions have taken place with more planned.
- 11.6 We have retained the usage of 2 crash pads during this time.

12. Decommission of St James House

- 12.1 As part of the contract extension for the existing units at 155 Norton Road, St James' contract came to an end as the provider felt unable to offer the service for another year. This was in the main due to financial pressures placed on them as a result of the Covid-19 pandemic.
- 12.2 The building was closed by the end of October 2020.
- 12.3 In the interim, this does leave the Local Authority with 6 less units of accommodation. Work has already begun at looking at alternative supported accommodation arrangements with existing landlord and support providers and we will likely see an increase in the use of spot purchased provision over this period.

13. Future Plans and Challenges

- 13.1 Stockton-On-Tees Borough Council is well prepared for changes in demand for the services and is actively looking at how we can meet these challenges. Some elements to consider are:
 - Recommissioning the remaining 12 units of accommodation with a proposal that
 can meet the needs of our young people journeying through and leaving care.
 This includes working with providers to ensure they can provide a service that we
 and our young people want/need whilst continuing to offer high standards of
 support to promote positive outcomes.
 - Revising our Supported Accommodation policy to reflect new guidance published by the government to ensure our care leavers continue to receive the appropriate support and accommodation. This includes liaising with Care Leavers to gather their experiences to help shape our policies. More info re the new guidance can be found here:

https://www.gov.uk/government/publications/joint-housing-protocols-for-care-leavers

Work on this is underway and focus groups and surveys will help inform any changes to our current working practices.

- The loss of 6 units is likely, in the short term, to lead to an increase in use of spot purchased provision to meet demands of the service. This will shift the cost from the commissioned service to the spot purchased which will see an increase in costs in the short term whilst also increasing the demand on officers in carrying out the robust monitoring task.
- Continue to work with local providers to explore a range of accommodation options that work for our young people (including longer term lets, floating support services, etc).
- Young people at risk of Child Criminal Exploitation or those with links to known Organised Crime Gangs continue to rise. The vulnerabilities of these young people cannot be discounted, and we need to work with all agencies to ensure we have appropriate accommodation and services that can monitor and manage these risks in area. We know that out of area placements is not always the solution.
- Continue to implement and review the Valuing Care assessment process and use
 this to effectively measure progress and outcomes for young people and the
 changing needs of this cohort of young people in Supported Accommodation will
 assist in measuring progress on an individual level and also shape future service
 development.
- Continue to avoid the use of B&B accommodation for 16/17-year olds and care leavers.
- Continue to strengthen our relationship and partnership working with the Homelessness and Housing Solutions Team, providers of accommodation and other agencies that work with our YP.
- Food for thought the following are links to articles that provides further evidence
 of why it is important that Stockton-On-Tees Borough Council continues to work
 hard on improving accommodation and support in the borough for this vulnerable
 group of our local community.

A Sigh of Relief: https://www.csnetwork.org.uk/en/publications/a-sigh-of-relief-a-summary-of-the-phase-one-results-from-the-securing-safety-study-1

The children no-one knows what to do with: https://www.childrenscommissioner.gov.uk/report/the-children-who-no-one-knows-what-to-do-with/

FINANCIAL IMPLICATIONS

14. There are no direct implications from this report

LEGAL IMPLICATIONS

Homelessness Reduction Act 2017
 Children Act 2004
 Children (Leaving Care) Act 2000
 Provision of Accommodation for 16 and 17 year old young people who may be homeless and/or require accommodation
 M vs LB Hammersmith and Fulham 08 and G v Southwark 09

RISK ASSESSMENT

16. No additional risks

COMMUNITY IMPACT IMPLICATIONS

17. There are no specific implications from this report

COUNCIL PLAN POLICY PRINCIPLES AND PRIORITIES

18. The provision of supported accommodation contributes to the Council Plan Priorities and Sufficiency Plan

CONSULTATION, INCLUDING WARD/COUNCILLORS

17. There are no requirements for consultation at this point

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