

	REPORT TO CABINET TO BE HELD ON 15 MAY 2018	
	Key Decision	YES
	Forward Plan Ref No	
Corporate Priority Aim 3 – Creating Healthy and Vibrant Communities	Cabinet Portfolio Holder	Cllr Bill Chatt Cabinet Member for Public Health and Housing

REPORT OF: DIRECTOR (NE) 18/097

WARDS AFFECTED: CASTLE AND CENTRAL

**SUBJECT: CONSULTATION ON SELECTIVE LICENSING OF
PRIVATE RENTED ACCOMMODATION**

RECOMMENDATION (S):

Cabinet is recommended to:

- 1) Approve the business case for the introduction of Selective Licensing in the area known as Scarborough Central (**Appendix B**) and instruct officers to commence a detailed programme of public consultation on this business case in accordance with the consultation plan set out within the report (**Appendix C**).
- 2) Instruct officers to bring a further report to Cabinet on conclusion of the consultation. That report will inform Cabinet of the outcomes of this consultation along with further recommendations as required.

REASON FOR RECOMMENDATION

Selective Licensing is a useful tool to help better regulate management standards within private rented accommodation. It can help complement and support the Council's wider vision for the regeneration of the Borough.

Taking forward any such scheme needs to be carefully considered and various affected parties must be fully consulted. The need, justification and potential benefits of such a scheme need to be considered as part of a business case. In addition a comprehensive programme of consultation is required before any final decision can be made.

HIGHLIGHTED RISKS:

See attached risk matrix

1. INTRODUCTION

1.1 In April 2016 Cabinet considered report **16/98**. That report gave approval to the development of a phased approach to the introduction of Selective Licensing in three separately designated areas within the Borough. These areas are:

- Scarborough North (made up of parts of Castle and North Bay Wards)
- Scarborough Central (made up of parts of Castle and Central Wards)
- Scarborough South (made up of parts of Ramshill Ward)

1.2 Report **16/98** also gave approval to a programme of consultation for the first of these areas, Scarborough North. Following the consultation in 2016, Cabinet gave approval in February 2017 in report **17/31** to the designation of Scarborough North as the first area for Selective Licensing.

1.3 Report **17/31** also gave approval to work up the business case for the next area of designation, Scarborough Central.

1.4 This report now sets out the detailed business case for Selective Licensing for Scarborough Central and seeks approval to undertake a full programme of public consultation in respect of this area.

2. CORPORATE AIMS/PRIORITIES AND THE COMMUNITY PLAN

2.1 The provision of safe affordable homes on this development contributes to Aim 3 of the Council's Corporate Plan, 'Creating Healthy and Vibrant Communities'.

3. BACKGROUND AND ISSUES

- 3.1 The Housing Act 2004 allows local authorities to introduce Selective Licensing of private rented accommodation. This works by requiring all private rented landlords within a designated area to be licensed by the local authority.
- 3.2 Local authorities are able to designate areas where they can demonstrate that areas meet one or more of the following conditions:
- The area is one which is experiencing (or is likely to experience) low housing demand and the local housing authority is satisfied that 'designating' an area will, when combined with other measures, lead to improved social and economic conditions in the area.
 - The area is experiencing a "significant and persistent" problem caused by anti-social behaviour and that some or all private landlords in that area are not taking appropriate action to tackle this. Moreover, the designation in combination with other measures would lead to a reduction in or elimination of the problem.
- 3.3 In 2015 these criteria were extended to include areas with 'poor property conditions, high levels of inward migration, a high level of deprivation or high levels of crime'.
- 3.4 Authorities have discretion to set the precise conditions of the licence. These can include conditions relating to the use and occupation of the house, and measures to deal with anti-social behaviour of the actual tenants or those visiting the property. They also typically include conditions around the provision of basic amenities and basic standards regarding the physical condition of property.
- 3.5 There are also certain mandatory conditions which must be included in a licence. For example, licensees are required to:
- Present gas safety certificates annually to the Council
 - Keep electrical appliances and furniture in a safe condition;
 - Keep smoke alarms in proper working order;
 - Give tenants a written statement of the terms of occupation; and
 - Demand references from prospective tenants.
- 3.6 In deciding whether or not to grant a licence the authority must consider whether the landlord (or the managing agent) is a 'fit and proper' person. This means the authority must have regard to any previous convictions relating to violence, sexual offences, drugs or fraud; whether the proposed licence holder has contravened any laws relating to housing or landlord and tenant issues; and whether the person has been found guilty of unlawful discrimination practices.

- 3.7 As is the case with the granting of licences for HMOs, if the authority determines that the landlord is not 'fit and proper', it can refuse to grant a licence. The Local Authority can also withdraw a licence after issue if the licensee is no longer considered a 'fit and proper' person.
- 3.8 If an authority believes that a landlord has breached licence conditions they can issue a fine of up to £5,000 for each offence. Operating a property without a licence in a designated area can attract a fine of up to £20,000. In addition the act allows authorities to step in and take over the management of property where conditions are being breached. These powers complement existing enforcement measures used by authorities such as the use of Improvement Notices and Prohibition Orders.
- 3.9 As with the HMO licensing regime, landlords must pay a charge for a licence issued under a Selective Licensing scheme. Authorities can set the level of the fee, the intention is that the rate should be 'transparent' and should cover the actual cost of the scheme's administration.
- 3.10 Fees cannot be used by the local authority as a method of generating additional revenue or be used to help offset the cost of core funded activity. Fee income can only be used to pay for the actual cost of the schemes administration. Fee income cannot be used to cover the cost of enforcement activity.
- 3.11 The benefits of Selective Licensing were detailed extensively in report **16/98**. Within this report officers highlighted the benefits that were identified from a visit to Blackpool Council in 2015 who had at that time introduced 2 Selective Licensing designations. Key benefits identified by Blackpool Council were that:
- Standards of management within their area are improving following the introduction of their existing schemes. Indeed Blackpool are seeking to take forward a third designation this year.
 - Key to the success of their scheme has been very close partnership working between agencies.
 - Blackpool Council embraced a 'single residential enforcement' model to support the delivery of their scheme. In essence they have created a single dedicated unit of officers who have a full remit of powers at their disposal to deal with all issues relating to enforcement activity within residential dwellings (e.g. these officers enforce licensing conditions and have full use of housing, environmental health, planning and ASB tools to undertake their roles).
 - There has been little evidence in Blackpool that households are being displaced or that the scheme has had a knock on impact on homelessness within their area.
 - The scheme has worked for them as it has complemented a much broader range of initiatives.
- 3.12 Members may also recall from report **16/98** that a variety of studies have been undertaken to evaluate the impact of Selective Licensing schemes

including an *Evaluation of the impact of HMO and Selective Licensing*.
Building Research Establishment 2010

3.13 Key findings from that evaluation were that:

- Larger than average increases in house prices occur in areas where a Selective Licensing scheme operates
- It helps to safeguard investment in regeneration by dissuading the purchase of property by short term investors with little interest in providing decent homes for people in the local community.
- There are indications that standards of management improve and that landlords are compelled to 'raise their game'.
- It helps to control anti-social behaviour. Landlords are compelled to provide written tenancy agreements together with tenant referencing and vetting.
- Licensing works best when effective joint working arrangements within Councils and between agencies are in place.
- Schemes are most effective where detailed property inspections are undertaken before awarding a licence and where the enforcement of standards is dealt with robustly.
- There is little evidence from the research that licensing simply displaces problems into neighbouring areas.

3.14 The first designation was adopted by the Council in February 2017 and came into force on 1st July 2017. This designation, which is known as Scarborough North, covers parts of the Castle and North Bay Wards in Scarborough. A review of this designation was recently presented to Overview and Scrutiny Board (**Report 18/083**). The designation lasts for 5 years and will expire on 30th June 2022.

3.15 The key findings from the review are as follows:

- 413 licences have been issued in the first 8 months of the designation, against a projected estimate of 315 for that period and an overall estimate of 463 for the entire 5 year designation
- 102 licensed properties have been inspected to date, which covers 230 individual properties, as some licences cover multiple dwellings.
- 143 Category 1 hazards, which present a risk to the health and safety of tenants. Landlords have been issued with schedules to address these hazards
- A further 595 lower level issues have also been identified as part of the inspection process
- 57 landlords who were understood to have properties in the area and had not applied for a licence have been issued with an initial "warning" letter as the first part of the enforcement process for non-compliance. Over 20 of

these landlords have subsequently applied or contacted the Council. The landlords who have failed to respond are to be invited in for an “Interview under Caution” as part of the next stage of the process.

- Licensing fee income of £234K had been received in the first 8 months of the scheme, against an estimate of £243K for the same period and an overall income estimate of £328K for the entire 5 year designation.
- Within the area there are still a considerable number of properties whose tenure status is not currently known and it is believed that there are still a significant number of privately rented properties in the area which are yet to be licensed

3.16 The focus over the next 12 months on the initial designation is as follows:

- Completing all the initial inspections for properties where licences have been issued
- Undertaking follow up compliance inspections to ensure that landlords have carried out any works required following the initial inspection
- Identifying all the outstanding private rented properties and landlords in the proposed area who have not yet applied
- Enforcement and prosecution of landlords who fail to apply or comply with the licensing conditions

3.17 This report sets out the business case for the second area proposed for Selective Licensing; Scarborough Central, which covers the remaining parts of the Castle Ward and parts of the Central Ward. A map of the proposed area is included as **Appendix A** of this report and the detailed business case is included as **Appendix B**.

3.18 The proposed Scarborough Central area covers parts of the Scarborough town centre plus surrounding residential streets. The town centre area, has a significant concentration of privately rented properties, amounting to 60% of all households in the locality. Many of the privately rented properties within this area are converted blocks of flats. A significant proportion of these were previously guest accommodation, which were converted into residential accommodation mainly in the 1980's and 1990's, when domestic tourism started to go into decline. This was especially the case within streets such as Alma Square, Albemarle Crescent and Aberdeen Walk. The demographics of the area have changed as a result with an increased residential population, of which a significant proportion have moved in from outside the Borough.

3.19 The impact of these changes has been largely negative within this area and has resulted in higher levels of crime and anti-social behaviour, high levels of deprivation and high numbers of persons out of work and in receipt of out of work benefits.

- 3.20 Also included are some of the residential streets running north off Victoria Road and Castle Road. These are mainly traditional Victorian terraced housing, ranging from small 2 bed houses to larger 5-6 bedroom houses, some of which have been split into blocks of flats. The proportion of private rented stock has increased by almost 60% in this area in recent years and makes up over 40% of the housing stock in this locality.
- 3.21 There is also a smaller residential area south west of the town centre based around Westwood and Valley Road, which is a mix of houses and large blocks of flats, with around 60% of the stock being privately rented.
- 3.22 The overall proposed area covers a total of 1650 households (2011 census) of which almost 900 (54%) are privately rented. There is a total population of 3448 persons living in the Selective Licensing area (2011 census) equating to approximately 2.1 persons per household.

4. CONSULTATION

- 4.1 Within its guidance document *Approval steps for additional and selective licensing designations in England* the Government sets out the procedural steps that need to be followed prior to any potential designation.
- 4.2 It is best practice for local authorities to prepare a business case setting out the reasons for a designation in a given area. A business case for Scarborough Central has been developed (**Appendix B**). This business case sets out:
- The detailed case for selective licensing within the area including the benefits of such a designation
 - A detailed profile of the proposed area including the evidence base needed to justify a designation
 - The strategic context, including an explanation of how selective licensing in this area supports and complements wider initiatives
 - An explanation as to how the scheme would be delivered including the conditions for licensing that would be used.
- 4.3 A plan has been developed to support the consultation process (**Appendix C**). This plan sets out the range of residents and organisations to be consulted. In summary these include all local residents and business within the proposed area; all private landlords, letting agents and estate agents who own or manage property within the proposed area; key public sector stakeholders; community and voluntary groups; and local ward members.
- 4.4 It is proposed that consultation takes a variety of formats including a questionnaire, one to one meetings and events with key stakeholders, community drop-in sessions etc. It is proposed that the consultation period runs from June onwards for a period of 12 weeks.
- 4.5 At the end of consultation period, Cabinet will be provided with a further report summarising the outcome of the exercise. Cabinet will then also be asked to

take a decision on whether to approve the implementation of a Selective Licensing scheme for the area.

5. ASSESSMENT

5.1 DETAILED ASSESSMENT OF PROPOSED AREA AND KEY FINDINGS

- 5.1.1 Officers originally undertook a detailed assessment of the whole Borough when preparing the case for Selective Licensing in 2016. The methodology used for this assessment was included in report **16/98**. The assessment included a wide range of data including use of census data, Index of Multiple Deprivation (IMD) rankings, housing enforcement information, Police/Safer Communities data and Council Tax/Housing Benefit records.
- 5.1.2 The area based approach was adopted through the use of the Government's recognised Lower Super Output Areas (LSOAs), which cover neighbourhoods of around 500-1000 households. Further more detailed street level analysis has also been possible using Census Output Area (COA) data, which enables proposed areas for Selective Licensing to be refined as much as possible. Census Output Areas usually cover neighbourhoods of around 100-150 households.
- 5.1.3 That assessment resulted in the identification of the 3 areas: Scarborough North, Scarborough Central and Scarborough South covering parts of the Castle, Central, North Bay and Ramshill wards.
- 5.1.4 This assessment identified the area known as Scarborough Central covering parts of the Castle and Central wards as the second area to be designated for Selective Licensing. It was proposed that this would include the LSOA's of Castle 010A, a small part of Castle 006B and a small part of Central 008C.
- 5.1.5 This proposal was based on the data available in 2016. As part of the business case for Scarborough Central further assessment was undertaken of the proposed area plus surrounding area using more recent data, where available, across key indicators.
- 5.1.6 The assessment used in the business case was as follows:
- % of households living in privately rented accommodation: Census 2011
 - Population Change: 2001-2011: Census 2001 and 2011
 - % of households: more than 2 deprivation indicators: IMD 2015
 - Housing Enforcement: SBC Private Sector Housing : 2016-2018
 - All recorded crime incidents: SBC Safer Communities: 2015-2017
 - ASB incidents: SBC Safer Communities: 2015-2017
- 5.1.7 The use of more recent data, especially housing enforcement actions and crime and ASB data has resulted in a refining of the proposed Scarborough Central area to include more of the Central 008C LSOA and

also a very small part of the Central 008A LSOA. The outcome of the detailed assessment can be found in the business case (**Appendix B**).

5.1.8 The key findings from the assessment for the proposed Scarborough Central area are as follows:

Housing stock:

- 54% of the housing stock is privately rented, in comparison with 19.5% for the whole Borough
- 64% of the housing stock are flats compared to 25% for the Borough
- Almost 12% of households have no central heating compared to 4.5% for the Borough

Population Change:

- The population of the proposed area increased by 14.5% from 2001 to 2011, an increase of 6 times that of the Borough. The increase of the population in the proposed area accounted for 17% of the increase in the whole Borough population during that period

Deprivation

- All of the area is within the most deprived 20% nationally on the IMD with the Castle 010A LSOA being within the most deprived 10%.

Income and Employment

- 19.4% of 16-64 year olds are receiving “Out of work benefits” compared to 10.8% for the Borough
- Castle 010A LSOA is within the most 10% deprived nationally on both the Income and Employment domains of the IMD

Crime and ASB

- Castle 010A and Central 008C both within 5% most deprived nationally on crime domain of IMD
- Recorded crime and incidences of ASB are more than 3 times higher than the Borough average (note that some of town centre area is removed from recorded crime figures and ASB incidences for proposed area to provide a realistic comparison)

Housing Enforcement and Conditions

- 98 separate enforcement actions taken within proposed area over previous 2 years and number of compliant have risen compared to previous 2 years

- Proposed area is within the most 3% deprived nationally on the Living Environment (indoors) domain of the IMD, which is based on property conditions

5.1.9 The overall key findings from the assessment of the area are very similar to those identified in the initial area designated for Selective Licensing.

5.2 DELIVERY OF THE SELECTIVE LICENSING SCHEME

5.2.1 The delivery of the proposed scheme will be along very similar lines to the delivery of the current Scarborough North designation. In the current scheme 2 Selective Licensing Officers are employed who are responsible for processing licence applications, issuing licences, undertaking inspections and dealing with landlords who have failed to apply or comply with the licensing conditions.

5.2.2 In addition to the Selective Licensing Officers there are a number of wider tasks and general administration requirements relating to the management of the scheme, which add to the cost of running the scheme. The cost of managing and administering the scheme is met through the licence fee income. A detailed cost calculation was carried out for the current Scarborough North scheme in advance of the scheme starting, which arrived at an overall cost of £328K for the Scarborough North scheme.

5.2.3 It is estimated that the number of licensed properties for Scarborough Central is in the region of 380, which is slightly lower than the estimate for the Scarborough North area, which was 463 properties. As a result the estimated total cost of the scheme is likely to be in the region of £285K. However, this figure will be subject to a detailed cost calculation along the same lines as was done for the Scarborough North designation.

5.2.4 The detailed cost calculation will also determine the base licence fee for the scheme. The base licence fee for the Scarborough North designation was calculated at £550. This fee level was based on actual hourly rates for each proposed element of activity within the administration of the scheme. The same process will be undertaken for the Scarborough Central designation to determine the base licence fee.

5.2.5 Subject to public consultation, it is also intended that a fee structure be proposed along the same lines of the Scarborough North designation, which will comprise of the following:

- A base licence fee for a single household
- An additional fixed sum for every additional household within a dwelling, which will be capped at 10 dwellings
- A range of discounts for accredited landlords, multiple licence applications and “early bird” applications
- Penalties for late applications and landlords who fail to apply

- 5.2.6 The key benefit of the scheme is that the licensing process requires that all properties within the designated area are inspected by the Council. Inspections are undertaken to ensure that properties comply with Licence conditions (see 5.3 below). It also provides the opportunity for the Council to check whether the property is free of 'Hazards' under the Housing Health and Safety Rating System (HHSRS).
- 5.2.7 This physical inspection of properties is also the biggest undertaking in terms of workload, because each inspection is undertaken using a set format and the findings of such inspections are carefully documented. Each licenced property may contain several separate dwellings that need to be inspected. Where licensing conditions have not been complied with then Officers will provide the licence holder with a schedule to advise them of what they need to do to ensure compliance. They are given a timescale to ensure compliance and often a follow up or compliance inspection is required.
- 5.2.8 When applications for a licence are received they are risk rated. Higher risk properties are inspected prior to a licence being awarded, however the majority of properties are inspected after the licence has been awarded.
- 5.2.9 Enforcement of HHSRS hazards identified as part of the inspection process cannot be paid for from the existing fee income. The cost of this enforcement will be borne through use of the Council's existing resources and will be undertaken by the Council's Environmental Health Officers. The Selective Licensing Officers and the Environmental Health Officer responsible for residential premises are located within the Council's Residential Regulation Team which enables effective joint working between officers.
- 5.2.10 One of the key objectives of the scheme is to reduce the incidence of anti-social behaviour within the proposed area. The theory being that Licensing forces landlords to act more responsibly and manage issues within their properties more effectively. A specific licensing condition relating to anti-social behaviour is included in the licensing conditions.
- 5.2.11 The key to enforcing the licensing regime and addressing anti-social behaviour within properties is the need to work effectively and closely with other agencies, particularly the Police and Fire and Rescue Service. The Council already benefits from existing structures that help this to happen through its Community Impact Team.
- 5.2.12 Joint inspections will be undertaken with the Community Impact Team where a property has been identified as having higher levels of ASB by the Community Impact Team and where they have been identified as a high risk from the application process. The idea being that pooled use of resources and enforcement powers is a more effective way of tackling issues in a joined up and holistic way.
- 5.2.13 In addition, in relation to larger multi-occupied properties and other higher risk properties, the Council will, as part of the licencing conditions, be asking landlords to produce a written action plan in relation to how they will tackle

anti-social behaviour within their properties. The purpose of this is to ensure landlords are aware of their responsibilities and work with agencies when a problem arises.

5.3 LICENSING CONDITIONS

5.3.1 The scheme will have a range of licensing conditions, which will be a mix of mandatory conditions as required by the Housing Act 2004 plus a range of discretionary conditions. The draft licensing conditions for the scheme have been included within the Business Case (**Appendix B**).

5.3.2 The mandatory conditions will include conditions on the following:

- A requirement to have an annual Gas Safety Certificate, if gas is supplied to the property.
- A requirement to ensure that all electrical appliances and furniture supplied in a safe condition.
- A requirement that furniture and fittings supplied must comply with the Furniture and Furnishings (Fire) (Safety) Regulations 1988
- A requirement that smoke alarms must be installed and kept in proper working order
- A requirement that carbon monoxide alarms must be installed and kept in proper working order
- A requirement that the licence holder must supply occupiers with written tenancy agreements
- A requirement that the licence holder must demand references for all prospective tenants

5.3.3 The proposed discretionary conditions that the Council wishes to introduce will be based on the Licensing Conditions for the current Scarborough North designation and will include conditions relating to the following:

- Number of Occupiers
- Energy Performance Certificate
- Property Management
- Security
- External Areas, refuse and waste
- Training
- Anti-Social Behaviour
- Notification/Change of Circumstance
- Tenancy Deposits
- Electrical Safety

5.3.4 In drafting the licensing conditions for the proposed scheme, the Council needs to be mindful of a recent Court of Appeal judgement on use of Selective Licensing conditions (Paul Brown v Hyndburn Borough Council) where the judge determined that under Selective Licensing, local authorities cannot within the conditions (under Section 90) attached to a

licence, require provision of facilities or equipment that should be properly required via Part 1 of the Housing Act 2004.

5.3.5 In effect this means that the Council must take care to ensure that:

- Not to have a condition that specifically addresses property conditions
- Not to have a condition which can be dealt with under Part 1 of the Act
- Not to have a condition which we would be unable to enforce

The draft licensing conditions will be reviewed as part of the wider consultation process and the licensing conditions for the proposed area will be confirmed with the designation should it be approved.

6. IMPLICATIONS

Policy

6.1 There are no new policy implications for the Council that arise from this report at this time.

6.2 However following public consultation, should the Council decide to introduce a scheme for the Selective Licensing then this would require an agreed policy to be worked up and approved. This policy would cover the key elements of the process including an agreement on the area of designation, the adoption of licensing conditions and the setting of a fee structure.

Financial

6.3 There are no financial implications for the Council that arise from this report at this time. However should the Council decide to introduce Selective Licensing then this would have some key financial implications for the Council.

6.4 The costs of administering Selective Licensing (primarily additional staffing costs) would need to be recouped through an administration fee levied to landlords. The base licence fee for the scheme is likely to be in the region of £550 per individual property. Licensed properties covering more than one unit will be subject to extra charges for the additional units.

6.5 Fee income charged would need to be at a sufficient level to pay for additional staffing costs of administering such a scheme and would of course vary depending on the scale of any proposal

6.6 It is estimated that the cost of running such a scheme shall be in the region of £285K per designation and that average fee income shall be around £700 per property. A range of discounts are also proposed.

6.7 It is also important to note that costs associated with enforcement activity cannot be recouped through licence fees.

Legal

- 6.8 The Housing Act 2004 enables Local Authorities to introduce Selective Licensing in certain circumstances.
- 6.9 Should the Council on consideration of a business case decide to pursue a Selective Licensing scheme then there are various steps that it would need to take including a full and comprehensive consultation and the issuing of a public notice of designation.

Equalities and Diversity

- 6.10 There are no implications at this time. An Equalities Impact Assessment will be undertaken as part of the designation.

Staffing Issues

- 6.11 No implications at this time. However the introduction of the scheme will mean that dedicated Selective Licensing Officers will need to be employed to administer the scheme on the same basis as the current designation.

Planning, Environmental, Health and Safety, Sustainability, Crime and Disorder

- 6.12 The introduction of Selective Licensing would have a positive impact in terms of environmental, sustainability and crime and disorder issues. The proposed scheme is intended to help contribute to tackling these issues in a planned way by uplifting standards of housing management and through close partnership working between key agencies.

Nicholas Edwards

Nick Edwards
Director

Author: John Burroughs - Housing Strategy and Development Officer
Telephone No: 01723 383649
Fax No: 01723 365280
E-mail address: john.burroughs@scarborough.gov.uk

Background Papers:

<http://democracy.scarborough.gov.uk/documents/s68090/16098%20CONSULTATION%20ON%20SELECTIVE%20LICENSING%20OF%20PRIVATE%20RENTED%20ACCOMMODATION%2020160412.pdf>

<http://democracy.scarborough.gov.uk/documents/s72960/1731%20-%20selective%20licensing%2020161018.pdf>

<https://democracy.scarborough.gov.uk/documents/s81271/18083%20-%20Selective%20Licensing%20Review%20-%202020180425.pdf>

IF YOU HAVE ANY QUERIES ABOUT THIS REPORT OR WISH TO INSPECT ANY OF THE BACKGROUND PAPERS, PLEASE CONTACT JOHN BURROUGHS ON 01723 383649 OR E-MAIL john.burroughs@scarborough.gov.uk

Risk Matrix

Risk Ref	Date	Risk	Consequences	Mitigation	Current Risk Score	Target Score	Service Unit Manager/ Responsible Officer	Action Plan
1	April 2018	The consultation process is inadequate and leaves the Council vulnerable to challenge	Potential judicial review	Adoption and implementation of comprehensive consultation plan	A1	A1	Housing Manager	

