



Overview and Scrutiny Task Group - Private Rented Housing Inspection

Agenda and Reports

For consideration on

Thursday, 22nd March 2012

In Committee Room 2, Town Hall, Chorley

At 6.00 pm

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16 March 2012

Dear Colleague

OVERVIEW AND SCRUTINY TASK GROUP - PRIVATE RENTED HOUSING INSPECTION - THURSDAY, 22ND MARCH 2012

You are invited to attend a meeting of the Overview and Scrutiny Task Group - Private Rented Housing Inspection to be held in Committee Room 1, Town Hall, Chorley on Thursday, 22nd March 2012 commencing at 6.00 pm.

AGENDA

1. **Apologies for absence**
2. **Minutes of meeting Tuesday, 21 February 2012 of Overview and Scrutiny Task Group - Private Rented Housing Inspection (Pages 1 - 4)**
3. **Declarations of Any Interests**

Members are reminded of their responsibility to declare any personal interest in respect of matters contained in this agenda. If the interest arises **only** as result of your membership of another public body or one to which you have been appointed by the Council then you only need to declare it if you intend to speak.

If the personal interest is a prejudicial interest, you must withdraw from the meeting. Normally you should leave the room before the business starts to be discussed. You do, however, have the same right to speak as a member of the public and may remain in the room to enable you to exercise that right and then leave immediately. In either case you must not seek to improperly influence a decision on the matter.

4. **Scoping Document for the Review (Pages 5 - 6)**

The scoping document for the review was approved by the Overview and Scrutiny Committee on 12 March 2012 and is attached for information.

5. **Private Rented Sector Housing Inspection, Accreditation and Licensing (Pages 7 - 14)**

Joint report of the Heads of Housing and Health, Environment and Neighbourhoods (attached).

6. **Any other item(s) that the Chair decides is/are urgent**

Yours sincerely



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Chief Executive

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Distribution

1. Agenda and reports to all Members of the Overview and Scrutiny Task Group - Private Rented Housing Inspection (Beverley Murray (Chair) and Matthew Crow, Alison Hansford, Harold Heaton, Steve Holgate, Paul Leadbetter and June Molyneaux for attendance.
2. Agenda and reports to Simon Clark (Head of Health, Environment & Neighbourhoods), Zoe Whiteside (Head of Housing), Kath Knowles (Housing Manager (Strategy)) and Carol Russell (Democratic Services Manager) for attendance.

This information can be made available to you in larger print or on audio tape, or translated into your own language. Please telephone 01257 515118 to access this service.

આ માહિતીનો અનુવાદ આપની પોતાની ભાષામાં કરી શકાય છે. આ સેવા સરળતાથી મેળવવા માટે કૃપા કરી, આ નંબર પર ફોન કરો: 01257 515822

ان معلومات کا ترجمہ آپ کی اپنی زبان میں بھی کیا جاسکتا ہے۔ یہ خدمت استعمال کرنے کیلئے براہ مہربانی اس نمبر پر ٹیلیفون

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یکھیے:

Overview and Scrutiny Task Group - Private Rented Housing Inspection

Tuesday, 21 February 2012

Present: Councillor Beverley Murray (Chair) and Alison Hansford, Harold Heaton, Steve Holgate, Hasina Khan, Paul Leadbetter and June Molyneaux

Also in attendance: Simon Clark (Head of Health, Environment and Neighbourhoods), Chris Moister (Head of Governance), Zoe Whiteside (Head of Housing), Kath Knowles (Housing Strategy Manager), Carol Russell (Democratic Services Manager).

12.RHI.7 APOLOGIES FOR ABSENCE

There were no apologies for absence.

12.RHI.8 MINUTES OF THE LAST MEETING HELD ON THURSDAY, 2 FEBRUARY 2012

RESOLVED – that the minutes of the last meeting be approved subject to revised wording on paragraph 4 of minute 12.RHI.3 to read:

“There is no statutory duty to have a programme of inspection except in relation to Houses in Multiple Occupation...”

12.RHI.9 DECLARATIONS OF ANY INTERESTS

There were no declarations of interest.

12.RHI.10 ADVICE ON THE USE OF DATA HELD BY THE COUNCIL

Further to a request at the last meeting for advice on whether Council departments could share information in order to ascertain where the estimated 4100 private rented properties are located in the Borough, Chris Moister, Head of Governance presented a report which advised on the legality of information sharing within the Council. The estimated number of private rented properties in the Borough was based on the most recent housing conditions survey.

The report indicated that where legislation did not specifically authorise the sharing of information, then there was no authority to do so. Specific information gained from, for example housing benefit applications, was restricted by data protection legislation. However claimants could sign a form to say they had no objection to their information being used by other departments.

Members discussed other mechanisms for gaining addresses to enable a register of private rented property in the borough to be drawn up. Suggestions included:

- Councillors often have a good idea which properties in their ward are privately rented
- Estate agents could be asked for private rented addresses – although may not be willing to disclose that information
- Existing knowledge of officers in environmental health who currently inspect properties.

- Use of information on the housing register maintained by the housing team.

It was acknowledged that a register of private rented accommodation in the borough would not be either wholly complete or accurate but would provide a good basis with which to introduce a more proactive inspection regime or run a landlord accreditation scheme.

RESOLVED - that the following sources of information for the addresses of private rented properties in the borough be considered:

- **Councillor knowledge**
- **Officer knowledge**
- **Estate agents**
- **Housing Register**
- **Housing Benefit – requires claimants agreement.**

12.RHI.11 POWERS UNDER SECTION 3 OF THE HOUSING ACT 2004

Simon Clark, Head of Health, Environment and Neighbourhoods reported that once private rented properties had been identified in the borough, his staff had powers to inspect any private rented property under Section 3 of the Housing Act 2004.

Enforcement action, if required, could take place under health and safety, environmental health or building regulation powers, depending on the defects identified. Such a programme of inspection would require additional staff resources if it were pursued. In addition it would be beneficial if a housing policy was developed providing minimum housing standards against which the Council could inspect.

Members were advised that the rented housing market was very sensitive and whilst a more proactive inspection regime could help improve housing conditions in the private rented sector, those landlords who did not provide good standards of accommodation could decide to move out of the borough. This could reduce the supply of rented housing available, particularly for those on the lowest incomes.

RESOLVED - that the development of a policy for minimum private rented housing standards be considered as part of the Task Group's recommendations.

12.RHI.12 INFORMATION ON LANDLORD ACCREDITATION SCHEMES

Kath Knowles reported on authorities operating Landlord Accreditation Schemes (LAS) in the north west. Landlord Accreditation Schemes provide a set of standards for the condition or management of privately rented accommodation. Landlords who join a scheme and meet the standards are then accredited. Joining a scheme is purely voluntary but there are some advantages for the landlord. Landlords can advertise themselves to tenants as accredited – showing their emphasis on good quality accommodation. There may be other incentives, depending on the scheme in operation.

In terms of local authority benefits, encouraging landlords to be accredited can improve private rented housing conditions overall, however generally speaking the

better landlords will be the ones attracted to the scheme with landlords with lower standards of accommodation being unlikely to join.

Kath Knowles circulated information about the Residential Landlords Association Accreditation Scheme (RLAAS) which is a national landlords accreditation scheme which local authorities can join. Authorities locally who use this scheme are Blackpool, Fylde and Wyre, with West Lancashire currently signing up to the scheme. Key points were:

- Joining the scheme was likely to cost around £4000. This is purely an estimate based on West Lancashire's fee which has a similar number of private rented properties.
- This is a very cost effective way of running a LAS with landlords undertaking an online self assessment application on the condition of their properties.
- There are 2 options for joining the scheme, with the Strategic Partnership option being the most appropriate for Chorley. Under this scheme the RLAAS would inspect 10% of all accredited properties for compliance.
- The commitment would be for 5 years with an option to review at the end of years 1 and 3.
- The cost to landlords to join the scheme varied from free (up to 5 properties) to £180 (for more than 30 properties).

Members discussed the value of a Landlord Accreditation Scheme in helping to improve housing standards in the private rented sector. They expressed interest in considering other types of schemes including the use of RSLs and a partnership arrangement with Wigan Council's LAS.

RESOLVED – that in order for the Working Group to consider a range of options, officers work together to produce a report for the next meeting which provides the following information :

- 1. Potential sources of information in order to compile a register of private rented properties in the borough (see previous minute) with a view to introducing a low level inspection regime, including the estimated resources required to support this.**
- 2. The main issues to be addressed in a private rented housing conditions policy which would enable the Council to establish a set of housing standards against which housing inspection officers could work under a more proactive inspection regime (see previous minute); and**
- 3. Options for a Landlord Accreditation Schemes, including the RLAAS and potential partnership arrangements with other LASs (including Wigan and RSLs), information about Selective Licensing and any other similar schemes. Potential costs to administer and support such schemes to be included.**

12.RHI.13 DRAFT SCOPING DOCUMENT

Members considered the draft scoping document drawn up at the last meeting.

RESOLVED – that the scoping document be revised in line with discussion detailed above.

12.RHI.14 DATE OF NEXT MEETING

Thursday 22 March 2012 at 6.00pm.

Chair

Scrutiny Inquiry Project Outline Template

OVERVIEW AND SCRUTINY REVIEW - PROJECT OUTLINE

Review Topic: PRIVATE RENTED HOUSING CONDITIONS

Objectives:

To identify and tackle poor housing standards in some private rented properties in the borough.

Desired Outcomes:

Improved housing conditions for tenants of private rented property in the borough

Terms of Reference:

1. To identify methods to establish the location of the estimated 4100 private rented properties in the borough.
2. To identify methods to establish those landlords in the borough who provide accommodation which is below acceptable housing standards
3. To look at inspection schemes, landlord accreditation and other similar schemes in place elsewhere in the north west.
4. To consider whether an inspection regime which is more proactive than just responding to complaints, should be further investigated.
5. To look at other mechanisms for informing tenants of their rights in relation to reporting poor housing standards to the Council.
6. To consider the appropriateness of a policy providing a Council approach to privately rented housing conditions.

Equality and diversity implications:

Risks:

Improving private rented housing standards may mean that landlords pass on the costs of improvements to tenants through increased rents. It may also reduce the supply of private rented housing stock in the borough.

Venue(s):

Town Hall, Chorley

Timescale:

Start: 2 February 2012

Finish: April 2012

Information Requirements and Sources:

Documents/evidence:
DCLG Decency Standards

Witnesses: (who, why?)

Consultation/Research: (what, why, who?)

Landlord Accreditation Schemes operating in other authorities

Site Visits: (where, why, when?)

Officer Support:

Lead Officer: Simon Clark

Democratic &
Member Services Officer: Carol Russell

Likely Budget Requirements:

<u>Purpose</u>	£
Total	_____

Target Body¹ for Findings/Recommendations	Executive Cabinet
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¹ All project outcomes require the approval of Overview and Scrutiny Committee before progressing



Report of	Meeting	Date
Head of Housing Head of Health Environment and Neighbourhoods	Overview and Scrutiny Private Rented Housing Task Group	22 March 2012

PRIVATE RENTED SECTOR HOUSING INSPECTION, ACCREDITATION AND LICENSING

PURPOSE OF REPORT

1. To provide Members with information and options relating to the improvement of housing standards in the private rented housing sector in Chorley

RECOMMENDATION(S)

2. Members should note the report and determine the most appropriate options for further consideration to assist the task group in drawing final conclusions from the overview and scrutiny inquiry.

EXECUTIVE SUMMARY OF REPORT

3. Members of the task group have discussed a number of issues in relation to the means of improving housing conditions in the private rented sector in Chorley. This report draws those discussions together and provides options for consideration.
4. In terms of a proactive housing standards inspection regime, three options are proposed within the main body of the report.
5. Landlord accreditation schemes have been assessed and should be seen as only one aspect of a strategy to improve standards in the private rented sector. Of the schemes considered the RLAAS scheme, at an approximate cost of £4k per annum, appears to offer the cheapest / best value for money as it would not entail the Council incurring further costs in terms of staff time and systems/administration which for an in house accreditation scheme are conservatively estimated to be circa £50k. When West Lancs looked at an in house option they suggested the total cost could be as much as £100k. The RLAAS scheme does present a cost to landlords of £45 per annum plus a further fee depending on their stock holding. Consequently, in order to be successful the scheme needs to present landlords with a positive business advantage. A benefit to the Council is that RLAAS will inspect 10% of properties accredited.
6. Selective licensing is considered in this report but is very much a last resort option and there does not appear to be the evidence of low demand and ASB in any part of the borough to support the introduction of such a scheme. In addition there is the risk that these schemes discourage private landlords and reduce the number of private rented sector properties.

Confidential report Please bold as appropriate	Yes	No
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CORPORATE PRIORITIES

7. This report relates to the following Strategic Objectives:

Strong Family Support		Education and Jobs	
Being Healthy	X	Pride in Quality Homes and Clean Neighbourhoods	X
Safe Respectful Communities	X	Quality Community Services and Spaces	
Vibrant Local Economy		Thriving Town Centre, Local Attractions and Villages	
A Council that is a consistently Top Performing Organisation and Delivers Excellent Value for Money			X

BACKGROUND

8. Members discussions to date have focussed on the provision, collation and acquisition of data relating to the private rented housing sector in Chorley together with three particular areas relating to providing a means of improving housing standards in the sector. These are:

- Housing standards inspection regimes
- Landlord accreditation schemes
- Selective licensing provisions

9. Each is considered below

HOUSING STANDARDS INSPECTION REGIME

10. Under s:3 Housing Act 2004 the local authority has powers to inspect housing accommodation on a proactive basis to ensure they are free from category 1 hazards as defined by the Housing Health and Safety Rating Scheme (HHSRS).

11. Historically Chorley Council has relied on a reactive methodology to inspect properties in the private rented sector relying on direct complaint, landlord enquiry or any other intelligence to generate an inspection for category 1 hazards.

12. It is thought that there are currently 4,000 private rented households in the Chorley area and a recent house condition survey (Private Sector House Condition Survey 2010) estimated that around 180 properties may be overcrowded, over a third below the 'decency standard' including around 600 private rented sector homes having a category 1 hazard.

13. Relying on a reactive means of tackling hazards and overcrowding will inevitably mean properties go uninspected and landlords are not challenged regarding the condition of properties they let.

14. This can be addressed by the introduction of a private rented sector house inspection programme which uses current intelligence, street survey data and existing databases to inform and categorise properties according to risk.

15. There are three basic options for such a private rented sector housing inspection scheme which are outlined below together with advantages and disadvantages to each, as well as indicative costs.

Scheme	Advantages	Disadvantages	Indicative Costs
<p><u>Fully Proactive</u> – aiming to assess all private rented sector properties which on current volumes would be a 10 year programme using 1 FTE inspection resource.</p> <p>The reactive service would continue with properties fed into the inspection programme following an initial assessment.</p>	<ul style="list-style-type: none"> • Comprehensive and ensures a consistent approach. • All accommodation types covered • Will ensure new property lets are picked up and meet standards • Comprehensive knowledge of private rented housing standards in Chorley is available • A fully populated database providing detailed housing letting and standards information would be available 	<ul style="list-style-type: none"> • Expensive • Reliant on a well maintained and comprehensive property database • Work in default levels could expose Council to financial risk • Unknown impact on low cost rented market but could deter prospective good landlords wishing to make provision in Chorley • May adversely impact on private rented sector housing market with increased rent levels and removal of low cost options for prospective tenants. • A knock on effect to existing Housing Options services with potential capacity issues. 	<p>1 FTE inspection team - £40K pa provides a 10 year inspection programme</p> <p>2 FTE inspection team - £75K pa provides a 5 year inspection regime</p> <p>Work in default costs are difficult to predict but an average individual property might cost is in the region of £8K to bring up to standard</p>
<p><u>Reactive Scheme</u> – this option is ‘as is’ where tenant complaints or landlord enquiries are reacted to with an initial assessment and a determination made as to whether a full HHSRS inspection is required</p>	<ul style="list-style-type: none"> • No additional cost burden to Council • Little anticipated impact on the private rented sector housing market 	<ul style="list-style-type: none"> • Ad hoc approach to housing standards inspection means poor standards may remain undetected. • No service improvement for private rented sector • Reliant on specific complaint only. 	<p>Nil</p>

Scheme	Advantages	Disadvantages	Indicative Costs
<p><u>Partial Proactive Scheme</u> –</p> <p>Use current intelligence and data to target inspections but continue to predominantly provide a reactive service respond to tenant complaints</p>	<ul style="list-style-type: none"> • Likely to target bedsit and multi occupied property where the standards are anecdotally poorer than other types of private rented sector • Less expensive than full proactive regime • Not reliant on full database of properties • Provides a base service from which a full programmed inspection regime can be developed. 	<ul style="list-style-type: none"> • Reliant on sound intelligence and knowledge of poor housing hotspots • Would require additional resource to provide inspection capacity • May not capture all poor standard accommodation 	<p>0.5 to 1.0 FTE</p> <p>£22K to £40K pa</p>

LANDLORD ACCREDITATION SCHEME

16. Wigan MBC has been operating a landlord accreditation scheme for 3 years and to date have accredited 40 landlords. They do not have an up to date figure for the total number of private landlords operating in the borough. In 2003 which was the date of the last stock condition survey they estimated there were 5,999 privately rented properties in the borough. Wigan have set up a data base of private landlords which started with the 150 landlords who were on the contact list for the private landlords forum. This data base is up dated whenever a contact is made with a new private landlord. Currently, Wigan have email contact details for 550 private landlords on the data base, including 40 lettings agents. Landlords no longer operating in the borough tend to notify the Council and are subsequently removed from the data base. The private landlords’ forum meets twice a year and approximately 80/100 landlords attend.
17. The Wigan scheme is part of the Greater Manchester Landlord Accreditation Scheme (GM LAS).The GM LAS scheme has been set up to provide a unified service to all landlords operating across the City Region. The scheme is based on the standards and practices of A & List NW which is a regional body of local authorities and landlords who work together to improve standards in the North West. When asked about a possible partnership the manager Kath Knowles spoke to referred her to the GM LAS arrangement and explained they would not be looking to partner with Chorley as we are not a Greater Manchester authority.
18. The Wigan accreditation scheme is fully funded by Wigan MBC and free for landlords to join. Once accredited landlords remain so for 5 years. Following application to the scheme 10% of a landlord’s properties are inspected to ascertain standards. The Housing Strategy team run the accreditation scheme and estimate that a minimum of one full time member of staff is needed to operate the scheme in addition to administration, publicity and set up costs.

19. The Residential Landlords Association Accreditation Scheme (RLAAS) has been running for one year and there are currently five local authorities in the scheme – Leeds, Fylde Coast (Blackpool, Wyre and Fylde) and West Lancashire.
20. Members of the scheme are expected to sign up for 5 years with break clauses at the end of years one and three. The scheme is web based and landlords are required to self assess their properties according to certain criteria and to self certify that they are a 'fit and proper person'. Landlords are required to undertake certain training and continuous professional development. Landlords are also required to declare the number of properties they manage, including the postcodes, and notify the scheme of any changes in their portfolio. At least 10% of all members will have their rental premises inspected by RLAAS for compliance. All properties owned by accredited landlords must comply with the following standards:
- Absence of any category 1 hazards under the HHSRS
 - Be compliant with all legislation
 - Have reasonably modern facilities with regard to kitchens and bathrooms
 - Be compliant with the RLA Code of Management

If landlords are found not to comply with the above RLAAS will invoke the disciplinary code. RLAAS provide resources to landlords to give to their tenants which includes information about their responsibilities as well as their rights.

Each scheme with a local authority is individually branded. Both the Leeds and Fylde Coast schemes have been running since May last year. In Leeds 222 landlords have been accredited to date with 129 applications in the process of being approved. It should be noted that RLAAS took over an existing accreditation scheme from Leeds. On the Fylde Coast 6 landlords have been accredited and 20 applications are in the process of being approved. The West Lancashire scheme was only recently launched on 28th February 2012 and therefore no data on take up is available as yet.

21. In terms of cost RLAAS can tailor the scheme to suit a local authority's requirements and the cost will vary accordingly. West Lancashire Council have adopted the basic scheme (outlined above) for which they pay £4k per annum on a 5 year contract basis with break clauses after years one and three. The cost is based on the individual Council's private rented sector stock. West Lancashire have a private rented stock of 5,580. Private rented stock in Chorley is 4,123, therefore the cost to us should be similar if not slightly less, depending on our requirements.

22. The costs to landlords in the RLAAS scheme are as follows:

Annual membership fee £45 per year, plus an annual fee based on the landlord's stock holding:

- 1 to 5 properties nil
- 6 -10 properties £45
- 11-20 properties £90
- 21 – 30 properties £135
- more than 30 properties £180

23. In addition to the above landlords may have to pay for a one day introductory development course and for continuing professional development.

24. Other schemes include one run by Preston City Council who operate an accreditation scheme through their housing advice and housing standards team, this scheme has been running for approximately 10 years. Once accredited the accreditation lasts for one year, currently 12 landlords are accredited with 5 applications in the pipeline. Preston don't have a data base of private landlords. The scheme is free to join for landlords. Preston Council inspect all of a landlords' properties before issuing an accreditation certificate. The only

discount / incentive offered to accredited landlords is 25% discount on membership of the National Landlords Association(NLA).The officer contacted at Preston explained that they had insufficient resources to dedicate to actively developing the accreditation scheme further and had chosen to devote resources to monitoring the higher risk area of private sector housing i.e. the 120 HMOs in the borough.

25. South Ribble Borough Council do not currently have an accreditation scheme.
26. Finally, the National Landlords Association run an accreditation scheme which costs the landlord £80 per year, plus a joining fee of £18. This scheme accredits the landlord not the properties and is based purely on landlord development and good management practice.
27. Potential benefits of accreditation schemes for landlords include:
 - Recognition by the Council and tenants of the landlords' commitment to good standards and a professional service
 - Up to date information on the key issues of property management and landlord/tenant legislation
 - Discounts on a range of goods and services
28. In terms of benefits for the Council the existence of an accreditation scheme shows a commitment to the desire to improve property and management standards in the private sector. However, there is no legal requirement for a landlord to become accredited and therefore landlords need to see being accredited as a benefit to them and their business.

SELECTIVE LICENSING

29. Part 3 of the Housing Act 2004 gives local authorities the discretion to introduce selective licensing schemes to cover private rented property in areas which suffer ,or are likely to suffer, from low housing demand and or significant and persistent anti social behaviour(ASB).
30. Secretary of State approval to such schemes is no longer required .The use of this discretionary power is subject to local consultation and the consent of the local authority under 'general consent'. In order to satisfy the legislation local authorities wishing to introduce a selective licensing scheme must gather sufficient evidence to support the application and undertake consultation with residents and landlords prior to introducing the scheme. A selective licensing area cannot be borough wide but must be limited to a specific area suffering low demand / ASB.
31. Once designated if a property falls within a selective licensing area a landlord is required to apply to the local authority for a license. Landlords in the specified area must apply for a license for 5 years, the cost of which is £500 (£100 per annum). If a landlord does not apply for a license they are liable, on summary conviction, to a fine of up to £20k. The aim of these schemes is to improve both the physical and management standards in major private rented neighbourhoods by setting minimum standards of quality and management.
32. Blackburn with Darwen have two selective licensing schemes operating in the borough - one covering the Infirmary area and the other covering central Darwen. In the Infirmary area of Blackburn the Selective Licensing scheme was designated in 2008 and after 12 months operation out of 300 privately rented properties 90 were still to be licensed. The central Darwen scheme was introduced in 2009 and after 9 months operation 25 landlords were on their final warning before formal court action was proposed.
33. There are significant costs involved in setting up a selective licensing scheme in terms of agreeing the scope of the area to be licensed, gathering evidence in terms of low demand

and/or ASB, consultation with residents and landlords, setting up a database of landlords, monitoring compliance and taking legal action for non compliance. Selective licensing is often seen as an act of last resort and can be used as a tactic to discourage private renting in areas which are seen to have an over supply of poor quality privately rented accommodation.

REGISTERED PROVIDER RESOURCES

34. Following Member suggestions enquiries have been made with a local Registered Provider as to the capacity and competencies within their housing team to provide an inspection resource. Currently the level of inspection competency means such a resource would be unable to inspect to the current statutory hazard rating standard ,neither does the Registered Provider have spare capacity to undertake such inspections.

COMMENTS OF THE STATUTORY FINANCE OFFICER

35. From a purely financial perspective the RLAAS scheme offers the best value to tax payers and if recommended to the Executive could be funded from Council resources. Any other schemes of a more costly nature would require additional resources to be identified

COMMENTS OF THE MONITORING OFFICER

36. No comments

There are no background papers to this report.

Report Author	Ext	Date	Doc ID
Simon Clark / Kath Knowles	5732/5320	13 March 2012	O&S PRS

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