



City of Westminster

Cabinet Member Report

Meeting or Decision Maker:	Cabinet Member for Housing Services
Date:	29 December 2023
Classification:	Part Exempt - the Part B report is exempt from publication under Paragraph 3, Part 1, Schedule 12A Local Government Act 1972 (as amended)
Title:	Temporary Accommodation (TA) Programme Overview and Update
Wards Affected:	All
Policy Context:	Fairer Communities Fairer Housing
Key Decision:	Yes – decision is likely to result in significant expenditure or savings
Financial Summary:	The budget for the programme is £178.3m.
Report of:	Sarah Warman, Strategic Director for Housing and Commercial Partnerships

1. Executive Summary

- 1.1 As part of the Fairer Westminster Delivery Plan the council is committed to increasing the number and quality of affordable housing available in the city.
- 1.2 The demand for Temporary Accommodation continues to increase and the sourcing of suitable properties is becoming more challenging with considerable cost to the Council. The Temporary Accommodation Acquisition programme will support the purchase of properties to alleviate the council's reliance on third party providers. By looking to purchase as many properties as possible in-borough the council can place more households in homes that remain close to their existing networks such as family, schools and employment.
- 1.3 This report details the Council's approach to acquiring Temporary Accommodation (TA) for an accelerated and expanded programme. For the purpose of this report, it should be noted that the acquisitions process begins with evaluating the market and ends with completing void (refurbishment) works.
- 1.4 The Capital Strategy Report, which was approved by Cabinet 13 February 2023 confirmed an extra £85 million has been added to the capital programme for TA acquisitions. The original TA capital allocation was £92.6m. An additional £85.7m was added in the most recent capital strategy. This brings the total allocation for TA acquisitions to £178.3m.
- 1.5 To deliver this programme, the project team has:
 - Commissioned a report providing market analysis setting out the available pool of properties within a defined catchment area.
 - Worked with each process stakeholder to confirm the current end-to-end process. Furthermore, identified opportunities to improve the process to reduce time taken to add new TA to our portfolio and improve governance, making the process proportionate to the risks whilst streamlining each stage.
 - Developed a team structure that addresses changes in organisational configuration, brings in further expertise, builds in resilience and capacity and is capable of delivering the ambitious programme.
- 1.6 If the recommendations are granted, next steps will be to:
 - Implement the process and approval changes within two months (some of the changes have dependencies i.e. IT).
 - Commence permanent recruitment, it is anticipated that it will take up to six months to appoint permanently into roles (due to running the recruitment process and accounting for notice periods).

- Please note, the team are already working to the location and other selection criteria stipulated in this report and where applicable recruitment has commenced.

2. Recommendations

- 2.1 That the Cabinet Member for Housing Services, in consultation with the Cabinet Member for Finance and Council Reform:
- 2.1.1 Approves the proposed catchment area in section 4.11 of this report for acquiring TA;
 - 2.1.2 Approves the acquisition of properties for the purpose of TA subject to meeting the criteria as per this report and supporting appendices (and that properties which do not fully meet the criteria may still be pursued subject to Cabinet Member consultation);
 - 2.1.3 Delegates the approval of each individual acquisition that meets the criteria in 2.1.2 above to the Strategic Director for Housing and Commercial Partnerships (or such officer whom they delegate to) as described in 4.36 and as reflected in the memo provided in Appendix 5;
 - 2.1.4 Approves the proposed team structure and associated costs of the team;
 - 2.1.5 Notes the updated financial information provided in this report (budget and purchase);
 - 2.1.6 Delegates approval to the Executive Director of Democracy, Law and People, subject to 2.1.3 above, to enter into any legal agreements required (and settle payment for SDLT/other payments incurred with the purchase, if required) to facilitate the acquisitions of the TA properties.

3. Reasons for Decision

- 3.1 The Council has a statutory obligation to provide housing for those in housing need. The on-going purchase of units for use as TA (and the extension of this programme) has two key benefits. Firstly, it helps the Council to meet increasing demand from homeless households by providing a ready supply of accommodation. Secondly, it provides security for the Council in terms of the cost of this provision and leaves it less exposed to fluctuations in rent costs in the private market and using hotel accommodation.

4. Background, including Policy Context

4.1 Existing Temporary Accommodation Purchase Programme

- 4.2 The previous Council funding approval of £92.6m was deployed towards the delivery of 223 property acquisitions for use as TA and to be delivered during the period 2021/22 to 2024/25

4.3 The programme of acquisitions included a mixture of in-borough (IB) and out-of-borough (OOB) homes. The budget profile and the detail of these schemes broken down by volume of purchase per year, as originally approved are set out below:

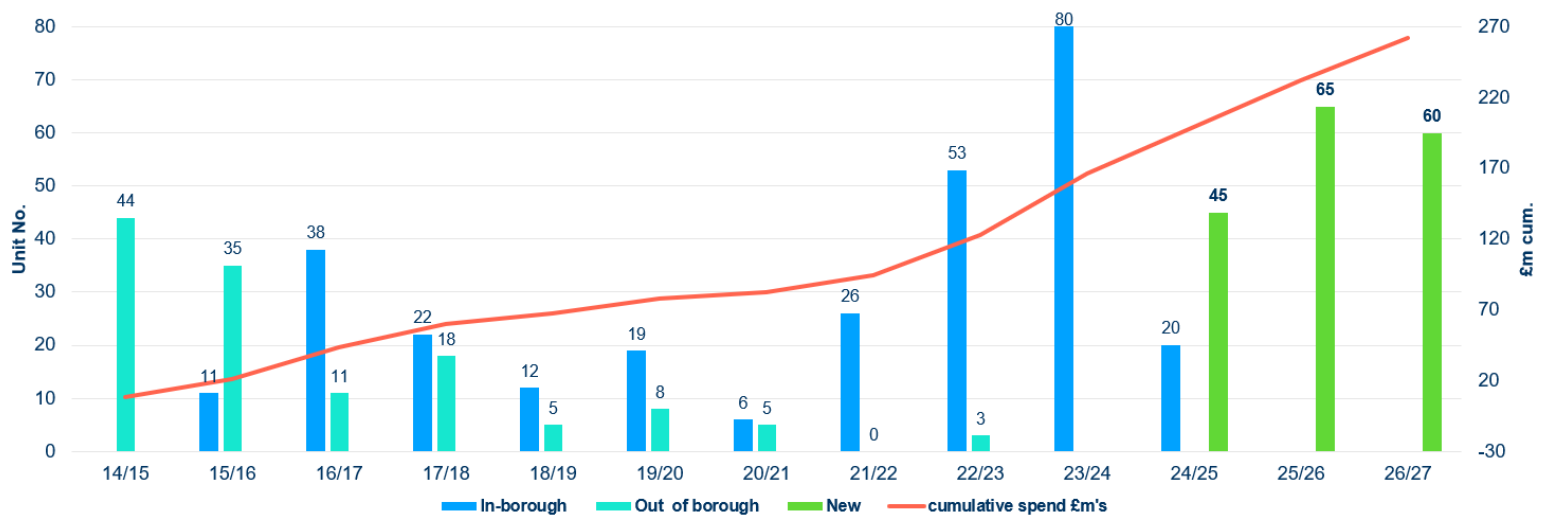
- 3/4 bed in borough (15 units, £10m)
- 2 bed in borough (44 units, £25m)
- 2 bed out of borough (71 units, £25m)
- In borough (20 units, £10m)
- Targeted purchase scheme out of borough (73 units, £22m)

4.4 Table 1: Previously forecasted volume of purchases per year

Year	3/4 IB	2 bed IB	2 bed OOB	IB	Targeted OOB	Total
21/22	4	3	3	20	25	55
22/23	5	3	3		48	59
23/24	6	19	32			57
24/25		19	33			52
Total	15	44	71	20	73	223

4.5 Below is the full set of information on acquisitions up to 31 March 2023 alongside the forward-looking position (please note the forecast information (green bars) within this graph has been superseded by the information provided in Section 5 Financial Implications):

4.6 Figure 1:



- Since 2014, 289 properties purchased, 159 in borough and 130 out of borough at £112.4m

- From 2023 – 26/27 the programme to be significantly expanded and expected to complete 270 properties
- Total investment of £178.3m during the period 2021/22 to 2026/27

4.7 Current Status

4.8 The current programme is being enhanced to deliver more homes and faster. A series of workshops have brought all stages and colleagues of the process together for the first time. This provided visibility for stakeholders and allowed the project team to identify and reduce inefficiencies and outline potential process improvements.

4.9 A Senior Asset Investment Manager has been recruited and the project team is already ramping up acquisitions based on the market analysis, updated processes and new management information (MI) regime. The process map and MI work undertaken and in train is detailed further in the following section of this paper.

4.10 Table 2: High Level overview as at 28 September 2023.

TA Acquisitions Programme	Financial Year	IB	OOB
		Units	
Actual Units Completed	2021-22	26	0
	2022-23	44	5
Total		70	5
Current Pipeline (FY 23/24)			
Completions this year		38 (5 OOB)	
With legal to be completed		40 (9 OOB)	
Internal review and approvals process (Before legal stage)		15 (6 OOB)	
In negotiation (Before internal review and approvals stage)		9	
Total Pipeline		102	
No void works required		1	
Void works commenced		7	
Awaiting void works		28	

4.11 **Potential future purchase locations**

4.12 There is a requirement to focus purchases within the borough to help residents maintain connections with their community and minimise the impact that moving out of borough may have on their lives.

4.13 The basis for this locational targeting is mainly in consideration of resident needs. It is felt that the support network (family, friends and general connections within the area) combined with practical needs (e.g. work, school, healthcare) present a significant benefit to reducing the distance of accommodation from the borough.

4.14 The Accommodation Placement Policy for Homeless Households (provided as a background paper) sets out the locational requirements in greater detail, a summary is provided below:

4.14.1 This policy is intended to ensure that we (WCC) prioritise those who have the greatest need to be in or close to a particular location.

4.14.2 In addition, the Council assesses the suitability of every offer of accommodation that is made to individual homeless households, in line with legal requirements, including legislation and regulation, associated case law and statutory guidance.

4.14.3 Band 1 covers Westminster and adjoining boroughs, however some households within Band 1 who have a compelling need to remain in Westminster will be prioritised for properties in borough. This will be assessed on a case-by-case basis having regard to whether the reasons for awarding Band 1 priority demonstrate a compelling need to remain in Westminster.

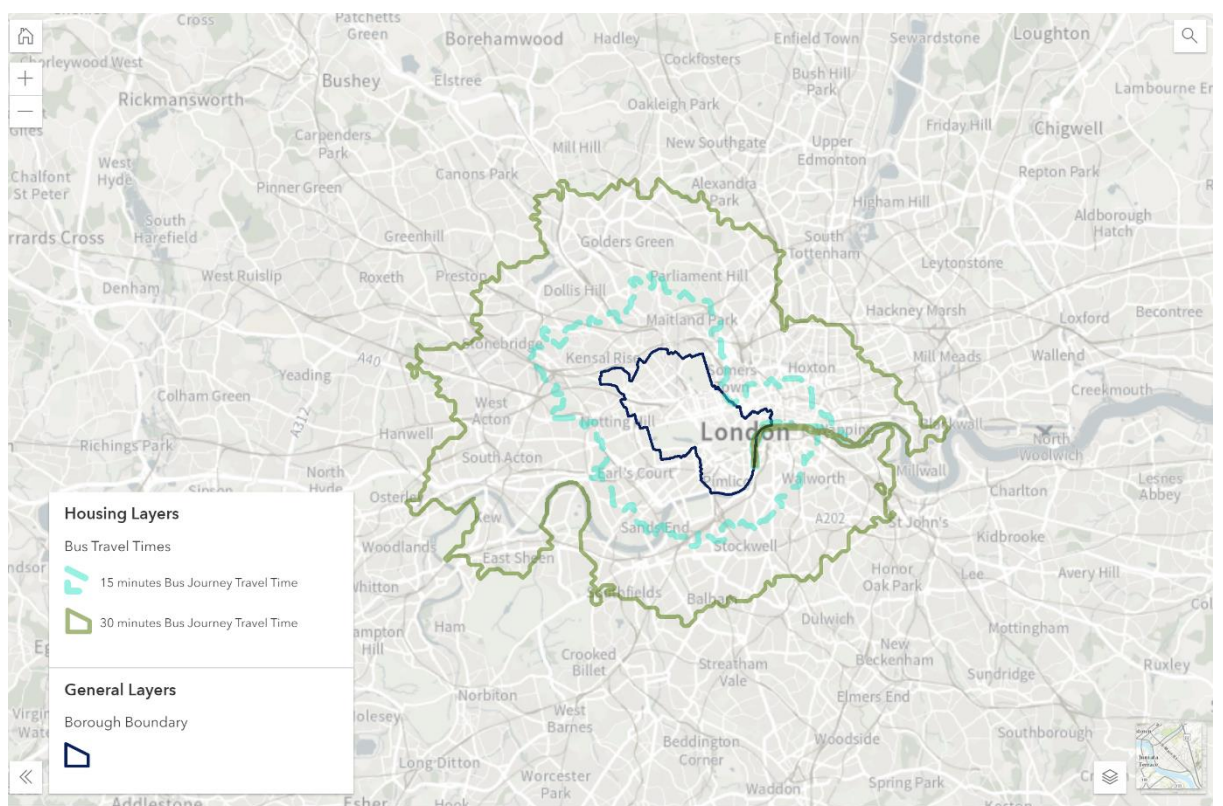
4.14.4 Where a household is awarded Band 2 priority, the council has the discretion to offer accommodation outside Greater London where this is within a reasonable commuting distance of the school, college or workplace (as applicable).

4.14.5 Priority banding is not a guarantee of placement within the relevant area and is subject to suitable accommodation being available.

4.15 Officers have looked at possible locations for future purchases. Following the market analysis report provided by Savills, it is considered feasible that a pool of properties of sufficient size exists within Westminster and within a 30 minute bus ride of Westminster's borough boundary. There is a more detailed analysis and overview found in the Briefing Note in Appendix 1 and the Savills report in Appendix 2.

4.16 To understand the catchment area, Savills were commissioned to undertake market analysis within different geographic limits. Through modelling it has been established that the following geographic areas will form the "red line" for TA acquisitions (with a priority placed on properties within or closer to Westminster). Homes will be sought within the borough boundary in the first instance, moving out to 15 and 30 minute boundaries as availability drives activity:

4.17 Figure 2*:



**Please note this map has been created by our internal GIS team based on the map provided by Savills in their report to WCC. An interactive version that can be zoomed in/out of can be found here: [Bus Travel Times Analysis \(rbkc.gov.uk\)](#)*

- 4.18 It should be noted that, though priority will be placed on properties within WCC and proximity to WCC that purchases outside of this area may also be needed. The cost pressure of providing accommodation, demand increasing (related to the cost of living issues being faced) on TA has changed dramatically in the last 12 months. For the Council to effectively address these issues, there is a requirement to deploy an open approach in considering all opportunities.
- 4.19 The service has experienced an increase in demand for TA over the past 12 months with the loss of a private rented sector (PRS) property continuing to be

the highest cause of homelessness. The number of households in TA in Westminster has risen from 2,833 in July 2022 to 3,061 in July 2023 and the rate of increase is currently running at c.20 per month.

- 4.20 TA supply is increasingly scarce and procuring sufficient accommodation is the largest challenge facing authorities. Many landlords are leaving the TA market, which is reducing the volume of PRS supply, forcing authorities to increase the use of hotels for emergency accommodation to meet statutory duties, with the use of hotels doubling in the last 12 months.
- 4.21 These supply pressures are driving up the weekly cost of TA and Westminster has seen an increase in reliance on “high cost” hotel provision due to a lack of alternative supply. Within this context, the Council should consider acquisitions outside of the geographic limits to increase availability and speed of acquisition.
- 4.22 Current mitigations include speeding up the number of acquisitions WCC can achieve by increase personnel resource and implementing process efficiencies. This will enable the Council to secure this accommodation in the most effective, efficient way possible to maximise all the opportunities available to Westminster.
- 4.23 In addition to relieving the reliance on hotel provision, opportunities outside of the geographic range set out in 4.17 above may be borne of the need to match suitability requirements or special needs of prospective tenants. Further, there may be opportunities to buy blocks of homes which will offer reduced costs (potentially no void and reduced stamp duty costs and efficiencies in ongoing management and maintenance costs). These opportunities might also be offered at significant discount. Should these scenarios arise, a separate process for assessment and justification will be routed through to the Director of Housing Services (in consultation with the Cabinet Member for Housing Services) and with reference to the Council’s governance process, for final approval. Whilst the budget allocations have been predominantly earmarked for acquisitions, their primary purpose is to increase the level of TA supply owned by WCC. As such, non-acquisition opportunities (e.g. conversion) may also be supported where they offer value for money and increase the number of properties owned by the authority for use as TA.
- 4.24 Following a successful bid to the GLA under the Right to Buy Back programme (Homes for Londoners 2016-21), the Council secured a grant allocation of £6.4m towards the delivery of 71 in borough properties for use as TA. As a condition of funding, these properties needed to be acquired and commenced void works by 31 March 2023. Further engagement with the GLA is ongoing to establish if a new grant programme will be available, it is expected that an outcome will be given by the end of Q3 of this financial year. The availability of grant funding significantly improves the purchasing power of the programme.
- 4.25 **Process Maps**
- 4.26 Following the expansion of the programme, the Housing team worked with colleagues to establish the end-to-end process of TA delivery from identification

to refurbishment and occupation. The process had not previously been quantified nor had all the process stage owners had full visibility.

- 4.27 Through the use of group workshops and one-to-one sessions the process has been defined. Using the same approach, efficiencies have been identified that will make the process faster, more resilient and enable the provision of more detailed management information without increasing risks to overall governance integrity.
- 4.28 The new process hopes to improve communication and collaboration between the new Acquisitions team, Housing Solutions, Legal and Finance and other stakeholders. We are implementing regular meetings between key stakeholders to discuss demand and requirements and they will be kept updated regularly through a reporting dashboard so they can see the current status of acquisitions and can plan accordingly. The current and proposed process maps can be provided if required.
- 4.29 We are proposing to streamline the approvals process by reducing the number of roles signing off the property once an offer has been agreed. Housing Solutions will continue to be consulted but approval will be given by the Head of Property Planning and Asset Management and Senior Asset Investment Manager in consultation with the Property Investment Panel.
- 4.30 There will be early engagement with relevant teams once a property is purchased to advise on projected timescales for handover. Potential clients can be targeted for these properties early and requirements for any adaptations will be captured so that once works are completed, tenants are able to move in quickly.
- 4.31 As part of the process review, issues have been raised regarding gaps in information provided to create a new property on Orchard which has caused delays. We have reviewed all the documentation and consolidated them to make it more efficient, working with IT to ensure we have captured all the information required to reduce time and errors. They will be stored on a Sharepoint site so that they are easily available to all stakeholders that require access.
- 4.32 As part of the implementation of the new process, all roles and responsibilities will be clearly outlined and if necessary, training will be provided, there will be regular reviews to ensure the process is working as efficiently and effectively as possible keeping the programme on track.
- 4.33 The new process will reduce timescales from accepting an offer on a new property by a vendor to tenant occupation. It will also improve and help accelerate the overall TA acquisitions programme.
- 4.34 The Housing team are currently working to develop the management information into a format that drives the Power BI dashboard. This dashboard will be available by the end of October 2023 and follows the format established for other areas of the Housing directorate. The dashboard will at-a-glance, show price paid/how many units per month have been acquired/mix of units/location

of the units shown on a map etc. This information will be regularly updated so the team will be able to keep track of real time progress.

4.35 The updated Approval Process and Governance Structure can be found in Appendix 3. There is a current and proposed process. The proposed process reflects changes in roles and responsibilities within the Housing directorate. It also incorporates changes that will shorten the number of steps whilst placing responsibility at the appropriate officer level.

4.36 **Governance**

4.37 **Delegated Authorities**

4.38 As outlined in Appendix 3, it is recommended that the Head of Property Planning and Asset Management and Senior Asset Investment Manager approve individual acquisitions of TA properties based on the criteria set out in Table 3 below.

4.39 To enhance diligence whilst maintaining agility and pace, access to the dashboard will be provided giving almost real-time information on each property in the acquisition programme and status. This will be combined with trialling additional governance to improve transparency and rigour. The business case information, per proposed TA acquisition, will be provided to the Property Investment Panel to enable six-weekly review and achieve confirmation to proceed. The review will confirm purchases reflect the criteria agreed and fall within the financial case forecasted.

4.40 Further, a monthly TA Working Group (Finance, Housing Solutions, Voids, Acquisitions Team) to review TA profiling and prioritisation, monitor financial performance and the acquisitions tracker and dashboard will be set up to enable better visibility and scrutiny.

4.41 Table 3: Criteria for Purchase

Description	Measure
Meeting waitlist requirements	Matching the properties purchased to the requirements of the individuals and families on the waitlist, this includes number of bedrooms
Location	As described in 4.7
Purchase price	Within break-even price points (this is commercially sensitive)
Vacant	Vacant possession is preferred, the majority of acquisitions are completed with vacant possession however we do sometimes purchase with existing WCC tenants in situ (only when legal confirm that a secure tenancy won't be created on completion)

For non-WCC freehold the freehold status and freeholder (large freeholder preferred)	Landlords with multiple properties are generally easier to transact with, this would be considered on a case by case basis
Service charge level and ongoing management costs	Costs to be aligned to the break-even financial analysis
Lease length	To be considered on a case by case basis with cost vs risk and legal advice key elements in making a judgement
EPC	Pathway to reach B for WCC freeholds, for non-WCC freeholds the expectation to achieve C

4.42 The table at 4.43 below provides the high-level approvals framework proposed for the release of funds for TA Acquisitions.

4.43 Table 4: Release of Funds

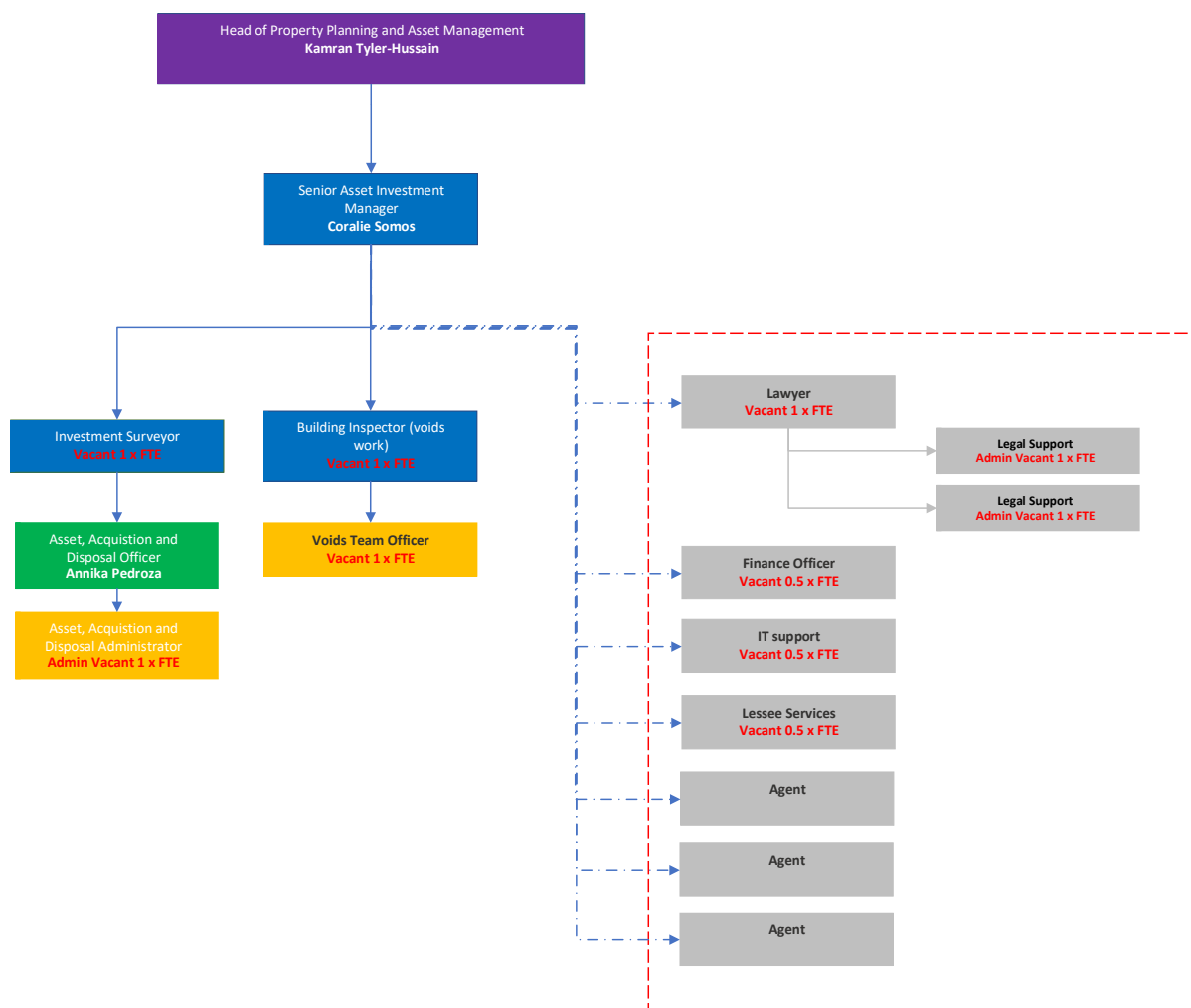
Value of property	Officer Approval
> £1m	Strategic Director for Housing and Commercial Partnerships
> £750k	Director of Housing Needs
< £750k	Head of Property Planning and Asset Management

4.44 Team Structure

4.45 Currently, the TA programme ownership sits across the Housing Needs and Sustainability and Major Works Divisions. Following changes in personnel and organisational structure within these Divisions, it is proposed the TA acquisitions programme is led by the Head of Property Planning and Asset Management within the Sustainability and Major Works division.

4.46 Given the increase in volume of acquisitions and changes in process, roles and responsibilities and to incorporate more resilience the following team structure is proposed:

Figure 3:



4.47 It should be noted, that the dotted line refers to officer colleagues in different Divisions/Departments/Directorates, whom all contribute to the delivery of the programme. Figure 3 also includes these adjoining team's resource requirements to facilitate delivery. The direct team structure represents a net increase in 4 FTEs, a cost plan can be found in the Part B report. The roles and responsibilities can be found in Appendix 4.

4.48 Risks and Contingency

4.49 Though Savills have provided a report indicating the pool of properties within a given area that should fulfil the programme requirements it should be noted, the following risks have not been accounted for in their analysis:

- 4.49.1 Market distortion created by WCC's (and other purchasing Local Authorities) entering the market and changes in market conditions generally;
- 4.49.2 The demand observed by the Housing Needs teams is for c.10% 1 bed, 10% 4 bed with the remaining 80% for 2/3 bed. A large proportion of the available properties as calculated by Savills are 1 bed;
- 4.49.3 The availability of grant funding for the RTB homes (these homes are the most likely to fall into our purchase thresholds however if grant is not available then WCC's thresholds will reduce);

4.49.4 Void (refurbishment) works, costs are generally increasing but within construction the inflated rates are higher than in other sectors. Added to cost increases are the availability of personnel/contractors to undertake the work.

4.50 Void (refurbishment works) are of particular concern. The increase in volume of homes means that the current internal and external (contractor) resource is insufficient to deliver the anticipated pipeline of properties. Separate procurement of these services is underway to reduce the risk of a block at this stage of the process. There is a risk that the costs of these services increase and this reduces our break-even purchase thresholds. There is a more intrinsic risk that we are unable to appoint a reliable contractor with the capacity to handle the workload at an acceptable price point.

4.51 To mitigate the above risks, the team will continuously review progress and issues as they emerge. With the new dashboard, it will be possible to pinpoint issues more quickly, allowing us to respond effectively. The team will work with procurement colleagues to test the market and improve the chances that a reliable supplier partner is appointed in due course.

4.52 It is suggested that an update paper is provided in six months to review the risks and set out a remedy to any issues encountered.

4.53 **Communications**

4.54 WCC's internal communications team has visibility of the overall programme but will be engaged to help increase awareness of the programme. This awareness may translate to buy-back sales from WCC's estates. Separately, the communications plan will celebrate our successes and showcase how WCC is striving to help those in need.

5. Financial Implications

5.1. The budget for the programme is £178.3m over the period 2021 to 2027. Financial implications as per attached Part B under Paragraph 3, Part 1, Schedule 12A of the Local Government Act 1972 (as amended)

6. Legal Implications

6.1 The Council has a statutory duty under Section 8 of the Housing Act 1985 to consider housing conditions in its district and the needs of the district with respect to the provision of further housing accommodation.

6.2 When a family or individual presents to the Council as homeless, the Council has a statutory duty under Part 7 Housing Act 1996 to consider this application and make a decision as to whether the family/ individual is homeless, eligible, in priority need, and not homeless intentionally. If the decision is that the criteria is met, then a duty is owed to that family/individual under section 193 Housing Act 1996 (often referred to as the full housing duty).

- 6.3 Once that duty is accepted, the Council must ensure that suitable temporary accommodation is provided pending discharge of the duty. This duty can be discharged in a number of different ways.
- 6.4 Section 206 Housing Act 1996 states that a local housing authority may discharge their housing functions under Part 7 of the Act only in the following ways;
- (a) by securing that suitable accommodation provided by them is available
 - (b) by securing that he obtains suitable accommodation from some other person, or
 - (c) by giving him such advice and assistance as will secure that suitable accommodation is available from some other person.
- 6.5 In addition to the above, section 208(1) Housing Act 1996 states that 'so far as reasonably practicable a local housing authority shall in discharging their housing functions under Part 7 of the Act secure that accommodation is available for the occupation of the applicant in their district'.
- 6.6 The Homelessness (Suitability of Accommodation) (England) Order 2012 states 'that in determining whether accommodation is suitable for a person, the local housing authority must consider the location of the accommodation, including;
- (a) where the accommodation is situated outside the district of the local housing authority, the distance of the accommodation from the district of the authority;
 - (b) the significance of any disruption which would be caused by the location of the accommodation to the employment, caring responsibilities or education of the person or members of the person's household;
 - (c) the proximity and accessibility of the accommodation to medical facilities and other support which (i) are currently used by or provided to the person or members of the person's household; and (ii) are essential to the well-being of the person or members of the person's household; and
 - (d) the proximity and accessibility of the accommodation to local services, amenities and transport.
- 6.7 The recommendations within this report seek to acquire properties in and out of the borough for the purposes of temporary accommodation to enable the Council to discharge its duty as above. The Council has a general power of competence under section 1 of the Localism Act 2011; this is the power to do anything an individual can do provided it is not prohibited by other legislation. In addition to this the Council can rely on its powers under section 111 which provides the council with the power to do anything (whether or not involving the expenditure, borrowing or lending of money or the acquisition or disposal of any property or rights) which is calculated to facilitate, or is conducive or incidental to, the discharge of any of their functions. Furthermore, section 120 of the Local Government Act 1972, provides a further statutory power for the Council to acquire land, whether situated inside or outside their area, where this is to enable the fulfilment of Council functions (in this case housing functions).

Legal implications provided by Varuna Bhuruth, Principal Lawyer of the Legal Development and Property Team.

7. Carbon Impact

- 7.1 The Strategic Asset Management Plan (SAMP) for Housing is currently being renewed. In completing this renewal, the Council's carbon objectives will be considered and a plan to work towards these objectives set out. Part of this work will be reviewing the standards to which TA homes are refurbished to identify ways to reduce their carbon footprint.
- 7.2 Where appropriate and deemed necessary, the project team commits to carrying out carbon impact assessments to quantify the effects on the Council's carbon footprint.

8. Equalities Impact

- 8.1 The Council already has a TA acquisition programme, this paper sets out the plan to increase and accelerate the number of homes acquired. It does not impact on protected groups negatively. Where required, the project team will carry out equality impact assessments.

9. Consultations

- 9.1 Consultation with individual wards is not considered as required at this time.

If you have any queries about this Report or wish to inspect any of the Background Papers, please contact:

Kam Tyler-Hussain (ktyler-hussain@westminster.gov.uk)

APPENDICES

- **Appendix 1 230421 Temporary Accommodation acquisitions area**
- **Appendix 2 Savills Report Westminster Temporary Accommodation**
- **Appendix 3 Governance and Approval Process**
- **Appendix 4 230622 Roles and Responsibilities**
- **Appendix 5 – Delegated Authority Memo**

BACKGROUND PAPERS

- Capital Strategy 2023/24 to 2027/28, Forecast Position for 2022/23 and Future Years Forecast to 2036/37
- 2022/23 Housing Revenue Account 30-Year Business Plan and Housing Investment Plan
- Minutes of Cabinet meeting held on Monday 13 February 2023

- Statement of Decision: HRA Business Plan and Asset Management Strategy (23/7/2013)
- Statement of Decision: Open Market Purchases of Homes for Affordable Use (4/11/2015)
- Accommodation Placement Policy for Homeless Households

For completion by the **Cabinet Member for Housing Services**

Declaration of Interest

I have no interest to declare in respect of this report

Signed:



Date: 18 December 2023


NAME: **Councillor Liza Begum**

State nature of interest if any:

(N.B: If you have an interest, you should seek advice as to whether it is appropriate to make a decision in relation to this matter)

For the reasons set out above, I agree the recommendation(s) in the report entitled Temporary Accommodation (TA) Programme Overview and Update and reject any alternative options which are referred to but not recommended.

Signed:



Cabinet Member for Housing Services

Date: 18 December 2023

If you have any additional comment which you would want actioned in connection with your decision you should discuss this with the report author and then set out your comment below before the report and this pro-forma is returned to the Secretariat for processing.

Additional comment:

If you do not wish to approve the recommendations, or wish to make an alternative decision, it is important that you consult the report author, the Director of Law, City Treasurer and, if there are resources implications, the Director of People Services (or their representatives) so that (1) you can be made aware of any further relevant considerations that you should take into account before making the decision and (2) your reasons for the decision can be properly identified and recorded, as required by law.

Note to Cabinet Member: Your decision will now be published and copied to the Members of the relevant Policy & Scrutiny Committee. If the decision falls within the criteria for call-in, it will not be implemented until five working days have elapsed from publication to allow the Policy and Scrutiny Committee to decide whether it wishes to call the matter in.