



CABINET MEMBER DELEGATED DECISION REPORT 17 DECEMBER 2021

Report title: Digital Lambeth Programme Project Capital Budget Allocation

Wards: All

Portfolio: Cabinet Member for Finance and Performance: Councillor Andy Wilson

Report Authorised by: Fiona McDermott: Strategic Director for Finance and Investment

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REPORT SUMMARY

This report seeks approval to drawdown a further £575,000 to support the delivery of the Digital Lambeth Strategic Programme approved by Cabinet in March 2021. The projects focus on digital access for all, creating economic advantage and innovating public services.

FINANCE SUMMARY

The projects set out within this report will be delivered under the Digital Lambeth Strategic programme and are estimated to cost £575,000 and will be delivered within the £17m Capital allocation approved by Cabinet on 15 March 2021.

RECOMMENDATIONS

1. To approve a programme of works and projects as summarised in section 2
2. To approve the allocation of £575,000 from the approved capital budget

CONTEXT

- 1.1 Our digital vision is to have a Lambeth that is vibrant, connected, inclusive place for people and business to thrive, where everyone has access to excellent services enabled by modern technology and modern ways of working.
- 1.2 Digital technology as a vehicle to transform the lives of residents, support businesses, help local economic growth and contribute towards reducing our carbon footprint. These aims are evident within the planned outcomes of the Digital Strategy.
- 1.3 On 15 March 2021 Cabinet approved the Lambeth Digital Strategy including the Digital Lambeth Strategic Programme, allocating £17m from the Capital Investment Programme and provided delegated authority to the Cabinet Member for Finance and Performance to approve individual schemes within the Digital Lambeth Strategic Programme.
- 1.4 The Digital Lambeth Strategic Programme was formed to deliver the Digital Strategy and will embrace the principles of private enterprise, income generation and grants. The capital bid supporting the programme contains all projects eligible for capital funding and the estimated costs to deliver the Digital Strategy and meet our digital vision. It is anticipated that as the programme progresses there may be opportunities to attract private investment (financial and non-financial), grants, and many of the projects will enable us to generate income. This has not been quantified and is not contained within the current medium term financial planning.
- 1.5 All decisions put forward for approval on 15 March 2021 Cabinet were agreed and schemes and projects for approval under the programme will now being put forward for approval by the Cabinet Member for Finance and Performance.

PROPOSAL AND REASONS

- 2.1 The schemes stated below are proposed under the Digital Lambeth programme to aid in the delivery of outcomes from the Digital Strategy.
- 2.2 This phase of delivery is focused on the Digital Lambeth Strategy objectives of, “Digital Access for All”, “Creating Economic Advantage” and “Innovating Public Services”
- 2.3 Digital access for all is centred around removing barriers to access devices and the internet to keep people connected. Examples include:
 - Libraries Device Loan scheme
- 2.4 Creating economic advantage is focused on a digitally skilled workforce for a thriving, modern economy, creating high value jobs. This area of the Digital Strategy will aid in the support of business growth and economic prosperity. Examples include:
 - Science Technology Engineering Mathematics (STEM) Innovation Hub

2.5 Innovating Public Services is focused on improving service offerings and better customer experience to service users and enabling more services to be accessible online and through self-service. Examples include:

- Digital Advertising
- Street Fault Reporting
- Waste and recycling data collection and mapping
- Online form for resident gully reporting

Libraries Device Loaning

- 2.6 This libraries device loaning comprises two projects, 1) loaning digital devices to support job seeking activities for those who are unemployed and 2) loaning iPads with data allowances to elderly and disabled residents where devices will allow them to connect more effectively with families or carry out on-line shopping.
- 2.7 Project 1 – seeks to work with the unemployed, who come daily to the library to do job searches and increasingly need to do online interviews. The library public network computers are limited in how they can provide support as they are unsuitable for online interviews and demand for computers is high, so bookings are limited.
- 2.8 The project will allow seven libraries across the borough to loan iPads with data allowances to unemployed residents or those seeking to improve their employment opportunities and get into better paid work. This will deliver a geographical spread across Lambeth and help support people in their local neighbourhood and where resources are most needed.
- 2.9 The project will follow a successful pilot run by Somerset Libraries to support jobseekers. For this group the loan will be for a six to eight-week period.
- 2.10 The project allows a holistic approach where jobseekers can also access other services provided by the library such as ESOL support, joining online events, loan of workwear for interviews, CV advice and a range of books and online resources. Library staff will be able to support both groups, linking people through job clubs or bibliotherapy reading groups, helping borrowers develop digital skills and also sign-posting them to other partners and activities.
- 2.11 This project will be delivered at the following libraries: West Norwood, Streatham, Brixton, Clapham, Minet, Durning and South Lambeth, as well as by the Home Visit Library team. The library service will support current library customers but also work with referrals from partner organisations.
- 2.12 Project 2, looks to engage with elderly and disabled housebound residents, who are visited by the home library service and are currently digitally excluded. They would benefit from having devices to keep in touch with families, shop online, use e-books or access council and health services.
- 2.13 This project will provide a group of housebound residents with iPads and data allowance. They will be supported by the librarians who already visit them regularly and who will tailor the digital support to each person's interests and needs.

- 2.14 The loans to housebound residents will be semi-permanent depending on each person's situation and need. iPads will be used as they allow greater flexibility in addressing concerns around security of devices, management of forgotten passwords, remote tracking of devices and protecting people's personal data. Once the device is returned it will be wiped by library staff using Jamf software. Each device will have a custom designed web portal to help the borrower use the device. The portal will have links to relevant sites such as job-searching, e-books, accessing Lambeth services or health support. The iPads will be provided with cases, keyboards, headphones and microphones. They will also have sufficient data to meet each borrower's needs.
- 2.15 The loan scheme will be evaluated throughout to monitor its impact on borrowers and to make sure it is responsive and targets resources where there is the greatest need and demand.
- 2.16 Both project groups are particularly impacted by lack of access to devices, data and often skills. The two projects will provide a comprehensive support network to help them get online successfully. For the unemployed group the iPads will be able to be loaned multiple times and will be able to reach a wide range of people.

The cost of delivering both projects is estimated to be £55,000.

The funding will be used for equipment, data, software, some project set-up support, marketing and publicity.

- 2.17 The benefits will be
- delivering targeted support in the heart of local neighbourhoods across the borough
 - helping people gain employment or access to better paid jobs
 - addressing loneliness and providing connections for housebound residents
 - supporting mental health
 - Increasing digital skills and access to services
 - Supporting 10 high support needs housebound residents a year
 - Supporting 100 unemployed residents a year

STEM Innovation Hub

- 2.18 The need for a focus on STEM skills, for example, coding and software skills, is a need that is reflected locally. STEM industries have shown consistent growth in the borough, with scientific and technical jobs accounting for 7.9% of all jobs, or 12,000 jobs in Lambeth (NOMIS). Lambeth's Digital Strategy has highlighted the risks of digital exclusion with only 15% of the local tech workforce coming from Black, Asian and Multi Ethnic backgrounds, despite making up 47% of the community. There is also a need to provide routes of entry into this sector for Lambeth's adults aged 25 – 55 currently in insecure employment or low skilled work to get into good work.
- 2.19 We propose to setup Coding Academies over a trial period of 6 months. The academies will feature a mix of tutored/supervised sessions on coding and sessions of unstructured innovation and experimentation. The sessions will be open to all, subject to available resources. This initiative will also fund a part time business start-up advisor. This will provide business start-up advice to coding academy participants who show an interest or desire to start their own business.

2.20 This initiative requires a sum of £100,000 to fund the following:

- Software and hardware (that supports coding)
- 2 onsite support staff (1 for each active venue), 0.75 FTE equivalent
- 2 Part-time tutors, 0.75 FTE equivalent
- 1 Part-time business start-up advisor, 0.38 FTE equivalent
- 10% Contingency

2.21 The coding academies will be based in four libraries over a 6-month trial period starting in March 2022. The academies will be based in Streatham, West Norwood, Tate South and Durning libraries to provide full coverage in both the north and south of the borough. The 6-month trial period will allow the council to:

- Understand need and take up
- Assess feedback of participants on the quality and effectiveness of the tutored curriculum and non-structured sessions
- Explore potential collaboration and support from private enterprises
- Assess the medium/long-term sustainability and benefit of coding academies

2.22 For the trial period the proposed availability is as follows:

- Streatham (Monday, 1 – 5pm and Wednesday, 4 – 8pm)
- Tate South (Tuesday, 1 – 5pm)
- Durning (Thursday, 10 – 2pm)
- West Norwood (Saturday, 1 – 5pm)

The proposed schedule provides accessibility to a wide range of residents due to the breadth of locations and varied opening hours. Academies will operate within existing library opening hours and no extended hours will be provided at any locations as part of this scheme.

2.23 Existing networks established by the Libraries Service with schools and further education e.g. Lambeth College and LSBU will be used to encourage take up and will also be used to finalise the tutored curriculum over the trial period.

2.24 The Coding Academy initiative will deliver the following benefits that support the Digital Strategy:

- Support underrepresented groups within the community to develop skills in coding and knowledge of the wider STEM sector.
- Improve career prospects in coding and STEM for Lambeth residents to utilise coding skills to access the gig economy
- Offer FE opportunities, associated traineeships, apprenticeships, and other learning opportunities to residents.
- Upskilling in coding skills to improve pathways into further employment in STEM related subjects.
- Supporting the wider aims of the Creating Economic Advantage workstream by the funding of the business start-up advisor.

Note: this proposal does not overlap with digital support for job seekers, or the loaning of devices being proposed by the Libraries Service.

Digital Advertising

- 2.25 The council has a substantial asset base, including its fleet of vehicles and its buildings, that provide the opportunity to reach a wide range of audiences, but which are currently under-utilised in terms of exploiting the opportunity they afford as an additional communications channel.
- 2.26 To facilitate the potential these assets offer as a communications channel, and to provide additional revenue income streams through third party advertising, digital infrastructure will be installed across the council's vehicle fleet, its libraries and housing estates to provide suitable platforms that give a flexible and efficient means to deliver valuable Council information and to support wider national campaigns, along with advertising content to residents, local businesses and visitors. The cost of delivering this project is estimated to be £240,000.
- 2.27 A phased approach to the installation of the digital infrastructure across the assets identified as within scope, allowing for the commencement of overarching Lambeth and also service specific campaign communications. Alongside this, a sales strategy will be developed, in accordance with Lambeth's advertising policy, for the sale of advertising space to third parties which, once approved, will allow for the introduction of third-party content.
- 2.28 The project will create a new channel for communicating with our residents, businesses, and visitors, providing a digital communications platform across our fleet of vehicles, housing estates and libraries to promote services, support initiatives and target specific areas using geo-located messages, as well as providing additional income streams for the Council through the selling of third part advertising space on assets not currently utilised, to deliver a 25% increase on current advertising income.

Street fault reporting

- 2.29 This project aims to provide a modern, accessible, and user-friendly front end for customers wishing to report Highways issues. It would integrate with existing line of business back-end systems creating a seamless, efficient and effective end to end solution.
- 2.30 At present customers wishing to report a highways issue must do so by phone or email. Under the Customer Experience and Digital strategies Lambeth have committed to offering customers channels of choice, and providing services that are digitally enabled, convenient and accessible for residents. This project will enable customers to report Highways issues online. The project will also support end to end efficiencies through system integration. The cost of delivering this project is estimated to be £108,000.
- 2.31 The project approach will include working with incumbent suppliers to connect new front-end technology to the existing back-end line of business system. Business case/options appraisal including benefits mapping. Development will be delivered against set requirements and fully tested before product launch. The launch will be backed up with staff training and a full communications plan.
- 2.32 The project benefits include an improved customer experience, a reduction in calls and duplicate calls, channel shift and automation in front and back-office processes leading to efficiencies for re-investment.

Waste and recycling data collection and mapping

- 2.33 This project will provide updated and accurate records for the waste service of the number of refuse containers currently in use at domestic properties across the borough.
- 2.34 The completion of surveys of domestic bins will provide an accurate inventory of bin stock allocated to properties, providing improved management information for the delivery of the refuse collection service, as well as ensuring accurate information to inform the invoicing to managing agents and developers. The creation of an accurate bin database will improve operational scheduling and management information and facilitate the correct invoicing to managing agents and developers. The cost of delivering this project is estimated to be £65,000.
- 2.35 The project approach will require a full survey of all existing bin stock to individual addresses, to provide an up to date and accurate database, which is essential in facilitating the improvements sought in management information and income recovery.
- 2.36 The project will deliver improved management information in managing and scheduling refuse rounds; an accurate inventory will also ensure accurate invoicing for bins to managing agents and developers, ensuring income recovery is maximised.

Online form for resident gully reporting

- 2.37 Previously the maintenance of gullies across our estates had been undertaken by Pinnacle, but is now being incorporated within the street cleansing contract delivered by Serco; as the cleansing contract previously only incorporated gullies on highways, whilst there is a database of highways assets, there are currently no records of the number and location of gullies across our estates; establishing an accurate database will allow for a consistent approach both in works scheduling and also the customer experience, regardless of whether the asset is highway or estate based.
- 2.38 The maintenance and cleansing of gullies has now been included as part of the new recycling, waste and cleansing contract. The surveys are required to provide a database of gullies across estates to inform maintenance scheduling as this information does not currently exist. In addition, this information will allow for the creation of a GIS layer leading to an enhanced and easier customer experience when reporting gully issues, improving customer access and providing a consistent user experience when reporting issues on either highways and estates.
- 2.39 The project will commence with a full survey of all estates to record the location of all gullies, which will provide the data to allow for customers to report issues online, rather than via phone or email. The cost of delivering the project is estimated to be £7,000.
- 2.40 The creation of a full database of estate gullies, which does not currently exist; an enhanced customer experience; improved maintenance scheduling and easier identification of location of reported issues.

FINANCE

- 3.1 The schemes and projects set out above are being delivered within the Digital Lambeth Strategic Programme as approved by Cabinet in March 2021.
- 3.2 The capital drawdown request for the schemes can be found in the table below

Objective	Project	Finance £ (000)
Digital Access for all	Lambeth libraries device loaning	55
Creating Economic Advantage	STEM Innovation Hub	90
Innovating Public Services	Digital Advertising	240
	Street Fault reporting	108
	Waste and recycling data collection and mapping	65
	Online form for resident gully reporting	7
Total		575

- 3.3 As the programme progresses there may be opportunities to attract private investment (financial and non-financial), grants, and projects may enable the generation of income. However, these have not been quantified as yet and do not currently form part of the council's medium term financial plan.

3.4 Benchmarking Value

Each of the identified projects have passed through internal governance processes for approval. Where relevant this has included and ensured VFM through:

- Project initiation documents
- Business cases
- Procurement reports
- Benefit profiles

LEGAL AND DEMOCRACY

- 4.1 There are no legal implications pursuant to this report's recommendations but officers should remain mindful of the Contract Standing Orders and, where relevant, the statutory procurement law regime, if there is a requirement to contract with third parties in order to carry out any of the schemes cited.
- 4.2 This proposed key decision was entered in the Forward Plan on 15 November 2021 and the necessary 28 clear days' notice has been given. In addition, the Council's Constitution requires the report to be published on the website for five clear days before the proposed decision is approved by the Cabinet Member. Any representations received during this period must be considered by the decision-maker before the decision is taken. A further period of five clear days - the call-in period - must then elapse before the decision is enacted. If the decision is called-in during this period, it cannot be enacted until the call-in has been considered and resolved

CONSULTATION AND CO-PRODUCTION

- 5.1 Workshops have taken place in each workstream within the Digital Lambeth programme to tease out the details of potential bids which are all designed to resolve problems encountered by departments in the council or improve services for residents.
- 5.2 A wide degree of consultation has taken place in formulating this project. The workstream group where the project sits in the programme has representation from across their relevant Strategic Directorate and the project has been reviewed at programme board.
- 5.3 Colleagues in Finance have reviewed the details of the projects as part of the programme board and have confirmed that the project can be capitalised in addition to providing feedback on the financial timescales.
- 5.4 Consultation with key members whose portfolios will be impacted by projects delivered has taken place and feedback has been taken on board.

RISK MANAGEMENT

Table 1 – Risk Register

Item	Risk	Likelihood	Impact	Score	Control Measures
LIB LOAN 01	Damage to device	2	2	4	Security cases, security settings
LIB LOAN 02	Loss of device	1	2	2	Security settings and remote management of devices
LIB LOAN 03	Device used for non-compliant or illegal reasons	2	2	4	Security settings and remote management of devices
LIB LOAN 04	Failure to wipe device	1	4	4	Software, staff training and procedures
STEM HUB 01	Attendance and participation	3	2	6	Using existing local relationships to generate interest
STEM HUB 02	Theft of equipment	3	2	6	Onsite security already in place for library use
STEM HUB 03	User safety	3	2	6	Dedicated staffing resource and onsite security in place
DIG ADV 01	Escalating costs based on changing business specifications	2	2	4	Application of project/programme governance and control measures
DIG ADV 02	Objectives and benefits are not fully realised as business processes are not	2	1	2	Skilled project resource to be onboarded, ensuring the project focuses on all

	changed in the background				aspects of delivery and change
DIG ADV 03	3 rd party providers will not allow installation of signage to fleet	2	1	2	Early engagement
STR FLT 01	Complexity and knowledge required to build forms that integrate into Symology and Open Maps	1	1	1	Currently working with suppliers and developing a proof of concept
STR FLT 02	Objectives and benefits are not fully realised	1	1	1	As Is and to be states mapped and calculated benefits through process efficiencies
WAS DATA 01	Completing on time for start of waste and street cleansing contract	4	1	4	Continue with use of existing data
GUL RPT 01	Mapping identifies far greater quantity of gullies than has been allowed for in cleansing contract	1	1	1	Sense check undertaken as part of contract works, ensuring any discrepancies will have a minimal impact

Key

Likelihood	Very Likely = 4	Likely = 3	Unlikely = 2	Very Unlikely = 1
Impact	Major = 8	Serious = 4	Significant = 2	Minor = 1

EQUALITIES IMPACT ASSESSMENT

7.1 An Equalities Impact Assessment (EIA) had been drafted for the Cabinet report which is attached under Appendix A. This has been completed considering implications on each workstream of the Digital Lambeth Strategic Programme as advised by our colleagues in the Equalities Impact Assessment Service. Four EIAs (one for each workstream) were presented at EIA panel on 23rd February 2021, there were no additional recommendations from this meeting. For the purposes of this report, the contents of each have been captured in one report under Appendix B. The projects in all workstreams in the Digital Lambeth Strategic Programme are being designed to have a positive impact on Lambeth residents, especially the most vulnerable and those with the highest need. They will have a positive impact on the Council's ability to fulfil our duty to promote equality of opportunity. Residents will also benefit from new opportunities, improvements in services, and quality of life.

7.2 Key groups impacted:

- Residents and Businesses
- Lambeth housing residents
- Council staff
- Unemployed residents and jobseekers
- Residents with no internet access at home

- Elderly and disabled residents
- Children and young people
- Businesses

7.3 Key mitigations for impacted groups:

- Strategic targets are set in the Digital Strategy and detailed benefits mapping will be carried out for each project during the planning stage. Projects in progress will be reported on monthly and benefits realisation reviews will take place at appropriate intervals. As part of project closure and handover to BAU, methods of measuring the impact of each project will be agreed, including new PIs and reporting measures and post-project reviews.
- Communications are also an integral component of the workstream plans, especially given that many of those who will benefit the most from the projects won't be reached by our usual online communications.
- The Digital Lambeth Programme Board is ultimately responsible for ensuring delivery of the strategic outcomes and reporting on progress to Management Board.
- Project leads will be accountable to the workstream steering group and the Digital Lambeth Programme Board and required to report on progress monthly, using project management tools including highlight reports, RAID (risks, actions, issues and decisions) logs, benefit profiles and benefits realisation plans.
- Each project will have measures set to monitor impact and establish baselines. This will include gathering equalities monitoring data for beneficiaries, where appropriate, and the use of surveys and other forms of consultation.

COMMUNITY SAFETY

8.1 Not applicable

ORGANISATIONAL IMPLICATIONS

Environmental

9.1 The increased reporting and mapping of gullies will make the cleaning of them more efficient which will reduce the potential environmental and health & safety issues posed by flooding. Environmental considerations will be included at individual project level and recorded and monitored at the programme level by the Digital board.

Health

9.2 Improved wellbeing of isolated housebound residents for recipients of devices on Library device loaning scheme through access for jobseekers to custom designed web portal that will have a link to sites to support mental health and well-being

Corporate Parenting

- 9.3 Not applicable for purposes of this report. Corporate parenting considerations will be included at individual project level and recorded and monitored at the programme level by the Digital board.

Staffing and accommodation

- 9.4 Fixed-term project management resource will be resourced externally. This cost is included within our proposed funding envelope.

Dedicated staffing resource allocated to the STEM innovation hub. Use of existing Library space where capacity and availability has been established.

Responsible Procurement

Good Quality Jobs with Fair Pay and Decent Working Conditions

- 9.5 All procurement and recruitment exercises carried out as part of this programme will meet London Living Wage standards.

The library device loaning scheme will support not only jobseekers but also residents looking to get into better paid work and build skills.

Quality Apprenticeships, targeted Employment for Lambeth residents and Lambeth Priority Group

- 9.6 Not applicable for purposes of this report. Responsible procurement considerations will be included at individual project level and recorded and monitored at the programme level by the Digital board.

Reduce Emissions: Lambeth Council has a commitment to being Zero Carbon by 2030

- 9.7 Not applicable for purposes of this report. Responsible procurement considerations will be included at individual project level and recorded and monitored at the programme level by the Digital board.

Single Use Plastics

- 9.8 The purchase of any new equipment and delivery packaging will adhere to current Lambeth IT and corporate procurement guidelines. Responsible procurement considerations will be included at individual project level and recorded and monitored at the programme level by the Digital board.

Positive Health and Wellbeing

- 9.9 Not applicable for purposes of this report. Responsible procurement considerations will be included at individual project level and recorded and monitored at the programme level by the Digital board.

Other Offers (Innovation)

- 9.10 Not applicable for purposes of this report. Responsible procurement considerations will be included at individual project level and recorded and monitored at the programme level by the Digital board.

TIMETABLE FOR IMPLEMENTATION

- 10.1 For the purpose of this report the timetable is relevant only to the approval as recommended in order to allow draw down from the capital budget and align project level funding within the current financial year.

10.2 Each of the identified projects through its governance holds detailed delivery plans to ensure projects remain on target.

10.3 The table below details the stages and deadlines for implementing the recommendations:

Activity	Proposed Date
Date published on Forward Plan	15/11/2021
Publication on Decisions online	9/12/2021
Officer or Cabinet Member Decision	17/12/2021
End of Call-in Period (key decisions only)	24/12/2021
Begin draw down from Capital finance to start project delivery	20/12/2021

Audit Trail				
Name and Position/Title	Lambeth Directorate	Date Sent	Date Received	Comments in paragraph:
Councillor Andy Wilson	Cabinet Member for Finance & Performance	03/12/21	06/12/21	
Councillor Matthew Bennett	Cabinet Member for Planning, Investment and New Homes	03/12/21	06/12/21	
Fiona Mcdermott, Strategic Director	Finance and Investment	02/12/21	02/12/21	
Dami Awobajo, Director of Performance & Business Improvement	Finance and Investment	02/12/21	02/12/21	
Hamant Bharadia, Corporate Finance	Finance and Property	11/11/21	11/11/21	Input throughout
Michael O’Hora, Legal Services	Legal and Governance	11/11/21	11//11/11	4.1
Farah Hussain, Democratic Services	Legal and Governance	11/11/21	11/11/11	4.2

Report History	
Original discussion with Cabinet Member	01/11/21
Report deadline	22/11/21
Date final report sent	N/A
Part II Exempt from Disclosure/confidential accompanying report?	No
Key decision report	Yes
Date first appeared on forward plan	15/11/21
Key decision reasons	2. Expenditure, income or savings in excess of £500,000.
Background information	March 2021 cabinet report Digital Strategy and Digital Capital Bid EIA
Appendices	Appendix A – Digital Strategy and Digital Capital Bid EIA

APPROVAL BY CABINET MEMBER OR OFFICER IN ACCORDANCE WITH SCHEME OF DELEGATION

I confirm I have consulted Finance, Legal, Democratic Services and the Procurement Board, and taken account of their advice and comments in completing the report for approval:

Signature: _____ **Date:** _____

Post: Dami Awobajo
Director Performance and Business Improvement

I approve the above recommendations:

Signature: _____ **Date:** _____

Post: Fiona Mcdermott
Strategic Director Finance & Investment

I confirm I have consulted the relevant Cabinet Members, including the Leader of the Council (if required), and approve the above recommendations:

Signature: _____ **Date:** _____

Post: Councillor Andy Wilson
Cabinet Member for Finance and Performance

Any declarations of interest (or exemptions granted): N/A

Any conflicts of interest: N/A

Any dispensations: N/A