

EAST RENFREWSHIRE COUNCILCABINET24 October 2019Report by Director of EnvironmentHOUSING SERVICES PERFORMANCE REPORT 2018/19 and ANNUAL ASSURANCE STATEMENT (SCOTTISH SOCIAL HOUSING CHARTER)**PURPOSE OF REPORT**

1. The purpose of this report is to advise the Cabinet of East Renfrewshire Council's performance in respect of the Annual Return on the Scottish Social Housing Charter (SSHC or "The Charter") to the Scottish Housing Regulator (SHR), in relation to performance in 2018/19. In addition it seeks approval for the Annual Assurance Statement (this outlines Housing Services' compliance with the Charter standards and our statutory obligations, and is a new annual requirement introduced this year by the SHR).

**RECOMMENDATIONS**

2. It is recommended that the Cabinet:
- (a) Note the performance for 2018/19 as outlined in the Annual Return on the Charter (ARC) submitted to SHR, and to be published via Housing Services Annual Performance Report detailed at Appendix 1; and
  - (b) Approve the Annual Assurance Statement prepared by Housing Services self-evaluation detailing compliance with Charter standards and with our statutory obligations, as detailed at Appendix 2 for submission to SHR by 31<sup>st</sup> October 2019.

**BACKGROUND**

3. The Scottish Social Housing Charter (SSHC) requires each landlord to provide the SHR with details of performance against 37 performance indicators and information for 32 contextual indicators by 31<sup>st</sup> May each year. This is known as the Annual Return on the Charter (ARC). This detail has been submitted to Cabinet each year since its introduction in 2013/14.

4. Upon receipt of this information the SHR will produce a summary Landlord Report for every social landlord in Scotland and publish this on their website by the end of August each year. They also produce an Engagement Plan for each landlord, which outlines the areas of scrutiny they will focus on, based on the prior year's reported performance. East Renfrewshire's performance information from 2017/18 can be viewed at: <https://www.scottishhousingregulator.gov.uk/landlord-performance>.

5. Each social landlord is then responsible for publishing a report on their performance against the Scottish Social Housing Charter over the previous year for tenants and customers. This report has to be provided by October each year.

6. A new requirement introduced by SHR this year is for every social landlord to produce an annual Assurance Statement confirming compliance with the Charter standards and with statutory obligations, and on approval by committee/board, to submit this to SHR for consideration by 31<sup>st</sup> October each year.

7. The annual Assurance Statement:

- Requires a self-evaluation to be undertaken by each landlord looking at performance and the quality of services provided.
- Should be accompanied by an appropriate action plan, where any areas of non-compliance with standards are identified.

8. The SHR will use the information from the ARC as well as the Assurance Statement and their published Engagement Plan to determine the key areas of risk identified in the Local Scrutiny Plan for each Local Authority.

## REPORT

9. Data collection for the ARC allows the SHR to assess all landlords' ability to meet the outcomes set in the Scottish Social Housing Charter. The Scottish average refers to performance of all social landlords in Scotland including Councils and Housing Associations. The Scottish Council average refers to performance of Scottish Councils only.

10. Given that there are multiple indicators it is not possible to form a view as to performance of a landlord based upon one indicator alone.

11. In 2018/19 East Renfrewshire performed above average for Scottish Councils in approximately 70% of the indicators. East Renfrewshire also performed above the Scottish average for all landlords in key areas including maintaining its homes, completing adaptations and tenancies sustained.

12. The Annual Performance Report (Appendix 1) details the Council's performance and progress across key indicators, as outlined below in comparison to 2017/18:

- Rent Levels: East Renfrewshire Council house rents have increased from a historical low to allow us to invest in improvements to existing stock. Rent levels still remain £2 per week lower than the average rent for all landlords, but £2 per week higher than the Scottish Local Authority average.
- Rent Arrears. Although our rent arrears levels have increased from 2.9% to 3.5% as a percentage of rent due, this reflects the challenges associated with the introduction of Universal Credit. Rent arrears still remain below the average for Scottish Local Authorities and for all landlords.
- Tenant Satisfaction. Satisfaction is measured on key aspects of the housing service. We have improved our performance in relation to overall tenant satisfaction with the service (up from 81.6% to 84.8%); in keeping tenants informed (85.2% to 88.2%); and opportunities for tenants to participate (80.4% to 91.1%). These improvements reflect the work undertaken to strengthen and improve work on tenant and customer engagement.

- Quality and Maintenance of Homes. East Renfrewshire Council achieved the 2015 target for the Scottish Housing Quality Standard and continues to perform well above the Scottish average at 97.4%. The Scottish Government target to meet the Energy Efficiency Standard for Social Housing (EESH) in all homes by 2020 is much more of a challenge with 74.4% of our homes currently meeting this standard. Considerable focus is required to improve remaining homes, where possible, towards full compliance.
- Housing Maintenance. Housing Services is performing substantially better than the Scottish average in the delivery of our emergency and non-emergency repairs services. Our performance keeps us in the top quartile for all landlords. However, satisfaction with our repairs service has fallen slightly (from 86% to 85.5%) as has the satisfaction of new tenants with the standard of their home when moving in (88.5% to 83%).
- Neighbourhoods. East Renfrewshire Council continues to perform well above average in relation to the percentage of tenants sustaining their homes successfully for more than a year. Increases in performance (from 91.9% to 95.7%) set us well above the Scottish average of 88.7%. The percentage of homeless households sustaining their tenancy is also above average (93.3% compared to 87.8%) for all landlords and this is an improvement of 4% on 2017/18 performance. This reflects the housing support as well as the choice we provide to applicants.
- Access to Housing. Despite a high demand for housing in the authority our average length of time taken to relet properties remains significantly above the Scottish average of 32.8 days, despite an improvement in our performance (from 47.1 to 42.9 days on average from 2017/18 to 2018/19). Void rent loss has also increased as a result and at 1.4% rent lost sits above the Scottish average. Staff turnover and staff shortages have had an impact on performance and void management will remain an area of focus for improvement in the coming year.

13. In addition to the ARC return, the SHR also highlights other areas of concern through its Engagement Plan and this year will continue to focus on ensuring that the Council is able to ensure that emergency temporary accommodation being available at all times to those who require it. This will be the subject of a future Cabinet report.

14. The annual Assurance Statement (Appendix 2) outlines the Council's evidence based evaluation of the quality of our housing service against the Charter and our legal obligations.

15. The Assurance Statement highlights the key areas for improvement identified and an action plan which will be delivered in 2019/20 to address these. The outcomes of our evaluation reinforces that the quality of our service is good and reflects the performance information contained within the ARC.

16. To deliver on our vision to be "a modern, ambitious council creating a fairer future with all", we pledge to focus on:

- Ensuring we can provide temporary accommodation in all emergency homeless situations;
- Improving efficiency in our management of void properties and ensure the service provides value for money for the rent tenants pay.

## **FINANCE AND EFFICIENCY**

17. Housing Services must demonstrate annually that the service it provides meets the needs of its customers and provides value for money. The rent setting for next year is underway in consultation with tenants and will consider the balance to be found in keeping rents affordable whilst also ensuring we can make the necessary investment in people's homes.

18. The improvements identified in relation to the annual Assurance Statement will also contribute towards improving the efficiency of the service and reinforce that tenants' rents are both collected effectively and spent wisely.

## **CONSULTATION**

19. In line with the national publication of Charter results, East Renfrewshire Council is required to produce an annual performance report to tenants by October each year. The detail of our performance will be distributed to each tenant through our tenant's newsletter as well as making the full report available online and on request to other customers.

20. The details of the annual Assurance Statement and action plan will also be considered by our Registered Tenants Forum as part of their performance scrutiny and made available more widely with the annual Performance Report.

## **PARTNERSHIP WORKING**

21. Many of the services provided by East Renfrewshire Council's Housing Services are provided in partnership with internal and external bodies. Services continue to work together to demonstrate that the outcomes of the Charter are met. The outputs from these partnerships form a key part of our evaluation of service performance and quality. Key partners include:

- East Renfrewshire's Health & Social Care Partnership
- Our Corporate & Community Services Department

## **IMPLICATIONS OF THE PROPOSALS**

22. There are no implications associated with this report in terms of staffing, finance, property, legal, IT, equalities and sustainability.

## **CONCLUSIONS**

23. In approximately 70% of the performance indicators measured by the Scottish Social Housing Charter East Renfrewshire performs above the Scottish Council average.

24. East Renfrewshire also performed above the Scottish average for all landlords in key areas including maintaining its homes, completing adaptations and tenancies sustained.

25. Appendix 2 - Assurance Statement, addresses the areas required for improvement. The priority is focused on void property repairs and standards along with the provision of emergency homeless accommodation.

**RECOMMENDATIONS**

26. It is recommended that the Cabinet:

- (a) Note the performance for 2018/19 as outlined in the Annual Return on the Charter (ARC) submitted to SHR, and to be published via Housing Services Annual Performance Report detailed at Appendix 1; and
- (b) Approve the Annual Assurance Statement prepared by Housing Services self-evaluation detailing compliance with Charter standards and with our statutory obligations, as detailed at Appendix 2 for submission to SHR by 31<sup>st</sup> October 2019.

Director of Environment

Further details can be obtained from Phil Daws Head of Environment (Strategic Services) on 0141 577 3186.

Convener contact details

Councillor Danny Devlin  
(Convener for Housing and Maintenance Services)

Home: 0141 580 0288  
Office: 0141 577 3107/8

September 2019

BLANK PAGE

## Housing Services Annual Performance Review 2018/2019

This report highlights East Renfrewshire Council Housing Services performance over 2018/19, and identifies key strengths and areas in need of improvement. As our customer, it is important we keep you up to date about how we are performing and how we plan to improve the services we provide.

This report considers our performance against key performance indicators and measures.

Our new [Annual Assurance Statement](#) also sets out the key improvements we will make in the next year, based on a detailed evaluation of our service undertaken recently.

### How do we assess performance?

The Scottish Housing Regulator (SHR) is the independent regulator of Council and Housing Associations across Scotland. We must measure our performance against the SHR's Scottish Social Housing Charter (SSHC) standards each year - the standards of performance that all social landlords should aim to achieve and the outcomes that should be expected by tenants and customers. These standards are set for the range of housing services we provide.

We must also judge our performance against our key legal obligations – for example ensuring gas safety in our homes, allocating our homes in line with legislation and having a clear focus on equalities.

### Annual Assurance Statement

This year a new requirement has been placed on all Councils and Housing Associations to start producing an annual Assurance Statement. Each landlord is responsible for delivering good outcomes and services for its tenants and service users. Landlords need to be self-aware, analytical, open and honest about their performance and identify and drive improvement.

From 2019 landlords must prepare and publish an Annual Assurance Statement, to confirm to their tenants and to SHR that they are meeting regulatory requirements for local authorities and RSLs.

### About this Report

The detail of this shows how East Renfrewshire Council's Housing Services performs on average for 2018/2019, against all social landlords in Scotland, both Councils and Housing Associations, and specifically against other Scottish Councils. We also show a comparison with how we performed in the previous year.

Each section also sets out where we are doing well and where we need to improve, in line with our Annual Assurance Statement and more generally our Business Improvement Plan.

**Rents, Voids and Value for Money**

At April 2019, East Renfrewshire Council own or manage 2958 homes across the area including 244 sheltered properties and 24 temporary and supported properties.

**Housing Stock**

Area	Flat	House	Sheltered	Total
<b>BARRHEAD</b>	1066	388	43	1497
<b>NEILSTON</b>	250	138	28	416
<b>NEWTON MEARNS</b>	128	128	36	292
<b>BUSBY/ NETHERLEE/ CLARKSTON</b>	83	155	77	326
<b>THORNLIEBANK</b>	161	46		207
<b>EAGLESHAM</b>	53	76	24	153
<b>GIFFNOCK</b>	22		36	58
<b>UPLAWMOOR</b>		9		9
<b>Grand Total</b>	<b>1763</b>	<b>940</b>	<b>244</b>	<b>2958</b>

We have completed the construction of **23 new homes in Barrhead**. We also lost 4 properties through completing Right to Buy purchases by tenants.

We let 234 properties to homeless households; people on the council's waiting list; and existing tenants transferring home.

**Rents**

Average Weekly Rent	2018/2019 East Renfrewshire Council	2018/2019 Scottish Council Average	2018/2019 Overall Scottish Average
<b>All properties</b>	£76.50	£74.60	£78.23

East Renfrewshire Council rent levels are £2 lower than the Scottish landlord average rent.

Rent setting for 2020/21 onwards is underway in consultation with registered tenants' organisations and will balance the need to continue to invest in our homes with keeping rents affordable for tenants.

**Value for Money**

The services we provide to you as your landlord are funded by the rent you pay. As a service we must ensure that we spend this money wisely and fairly.

Indicator	2017/2018 ERC Performance	2018/2019 ERC Performance	2018/2019 Scottish Council Average	2018/2019 Overall Scottish Average
Gross rent arrears as a percentage of total rent due	5%	5.8%	6.9%	5.7%
Rent collected as a percentage of total rent due	98.9%	98.1%	98.7%	99.1%
Percentage satisfied that rent represents value for money	82.8%	87.04%	81.8%	83.2%



Rent arrears have increased slightly this year by 0.8%, and this is due to the impact of the introduction of Universal Credit. However rent arrears still remain in line with the Scottish average and well below the average for Councils.



We continue to engage with tenants at the earliest opportunity if they are experiencing difficulties paying their rent, to ensure issues are resolved as quickly as possible.

Through our biennial tenants survey in 2018 an increasing proportion of tenants have also told us that they are satisfied the rent we charge is Value for Money for the services they receive.

### Void Properties

Indicator	2017/2018 ERC Performance	2018/2019 ERC Performance	2018/2019 Scottish Council Average	2018/2019 Overall Scottish Average
Average length of time to re-let properties	47.1 days	42.9 days	33.8 days	31.9 days
Percentage of tenancy offers refused	44.1%	51.4%	41.3%	35.9%
Percentage of rent due lost through empty properties	0.9%	1.35%	0.9%	0.9%
Percentage of new tenants satisfied with standard of home when moving in	88.5%	83%	83.2%	90.8%

— Our average time to re-let empty properties has decreased to 42.9 days; however our relet times remain significantly higher than other landlords across Scotland.

The amount of rent due which is lost through properties being empty has increased also to above the average. We are working hard to make improvements and this year will focus on ensuring our processes for managing voids are as efficient as possible and provide value for money to tenants.


Work will be undertaken to make void standards clearer for customers so that they know what they should expect when offered a property, and to understand the concerns they have. Satisfaction of new tenants with their home on moving in has gone down to 83%, and although it is still in line with the Council average, we will strive to bring this in line with the overall Scottish average.

Our Choice Based Lettings System only introduced in February 2019 is expected to reduce the number of offers refused this year, as applicants are provided with more choice.


**Repairs and Maintenance**

We must work to ensure tenants' homes are well maintained, with repairs and improvements carried out when required, and tenants given reasonable choices about when work is done.

Indicator	2017/2018 ERC Performance	2018/2019 ERC Performance	2018/2019 Scottish Council Average	2018/2019 Overall Scottish Average
Average length of time taken to complete <b>emergency</b> repairs	<b>2.5 hours</b>	<b>2.3 hours</b>	<b>4.1 hours</b>	<b>3.7 hours</b>
Average length of time taken to complete <b>non-emergency</b> repairs	<b>4.8 days</b>	<b>5.2 days</b>	<b>7.5 days</b>	<b>6.6 days</b>
Percentage of reactive repairs completed 'Right First Time'	<b>95.4%</b>	<b>98.4%</b>	<b>92.8%</b>	<b>92.5%</b>
Percentage of repairs appointments kept	<b>97.6%</b>	<b>98.8%</b>	<b>96.3%</b>	<b>95.9%</b>
Percentage satisfied with repairs service	<b>86.0%</b>	<b>85.5%</b>	<b>90.6%</b>	<b>92.1%</b>

 Our repairs timescales continue to improve for both emergency and non-emergency jobs, and our performance remains significantly quicker than the Scottish council and overall average.

The number of repairs completed Right First Time is also above average, indicating our repairs process is efficient - both in identifying the correct repairs and responding to repairs which have been reported by tenants.

 Tenants' satisfaction with the repairs service has dipped slightly and remains lower than the overall average for Scottish Landlords.

We have identified a need to refresh and review our service standards in relation to our repairs service, with tenants and other customers. This work will be undertaken this year and will help us to make changes where requires to improve satisfaction with the service.

**Maintenance and Improvement works**

Housing Services undertake a range of work to improve and invest in our homes to ensure they are in good condition now and for years to come.

Targets set by the Scottish Government - to achieve the Scottish Housing Quality Standard (SHQS) by 2015 and beyond and the Energy Efficiency Standard for Social Housing (EESH) by 2020 - shape our investment alongside the priorities identified with our tenants.

Indicator	2017/2018 ERC Performance	2018/2019 ERC Performance	2018/2019 Scottish Council Average	2018/2019 Overall Scottish Average
Percentage of existing tenants satisfied with quality of home	85.4%	86.5%	85.1%	88.1%
Percentage of annual gas safety checks carried out in all properties where this is required	100%	100%	100%	100%
% Properties meeting the SHQS – (housing quality target)	97.5%	97.4%	94.9%	94.2%
% Properties meeting the EESSH – (energy efficiency target)	72.2%	74.4%	87.6%	88.3%



Good progress has been made to meet the SHQS and maintain compliance with this standard each year since.

We continue to work on maintaining the level of compliance we have as major elements such as roofs, electrical wiring etc. come to the end of their lifespan. Our performance remains above average for landlords across Scotland.

The safety of our tenants remains paramount in ensuring that annual gas safety checks are carried out when required.



Our biggest challenge for the year ahead is in achieving EESSH compliance by 2020, which is aimed at improving energy efficiency in all Council and housing associations homes.


A proportion of properties will be unable to meet the standard and considered exemptions. However, our progress to date remains below the average for other landlords across Scotland in the proportion of our stock meeting EESSH.

Although we have improved slightly in levels of satisfaction of current tenants with their home - and are just above the average for Councils – we will continue to work with tenants to consider service standards and ways to improve satisfaction.

### Tenancy Sustainment

Satisfaction with the safety of and management of neighbourhoods - as well as making sure support is available to customers who need it - is the key to our tenants remaining in their homes happily and successfully. The help that people need can vary - from information and advice, physical aids and adaptations or increased support visits for vulnerable customers or to resolve neighbourhood issues.

Indicator	2017/2018 ERC Performance	2018/2019 ERC Performance	2018/2019 Scottish Council Average	2018/2019 Overall Scottish Average
Percentage of all new tenants housed who were still in their tenancy 12 months later	91.9%	95.7%	89.1%	88.8%
Average time taken to complete medical adaptations	19.6 days	21.9 days	42.2 days	48.8 days


 We are substantially quicker than both the Scottish council and overall average to complete medical adaptations to properties, allowing residents to live in homes which suit their needs and remain at home as long as possible.

We continue to prioritise funding towards assisting those with particular needs, through our adaptation of existing homes as well as the types of homes we are delivering through our Council House New Build Programme.

Tenancy sustainment has increased since last year with 95.7% of people housed in the previous year remaining in their tenancy beyond 12 months. This is significantly above the Scottish Average and reflects the support we offer to tenants through our new tenant journey process.

### Estate Management and Anti-Social Behaviour

Indicator	2017/2018 ERC Performance	2018/2019 ERC Performance	2018/2019 Scottish Council Average	2018/2019 Overall Scottish Average
Percentage satisfied with management of neighbourhood	86.6%	88.9%	83.6%	87.1%
Percentage of anti-social behaviour cases resolved within locally agreed targets	99.2%	99.3%	87.4%	87.9%


 The number of anti-social behaviour cases resolved within our locally agreed targets remains consistently high, substantially quicker than the Scottish average.

Satisfaction with management of neighbourhoods also remains above the Scottish average. However in striving to continually improve we have identified a need to refresh and review our estate management standards, in conjunction with tenants and other customers.


### Housing Options and Access to Housing

We work to ensure people looking for housing find it easy to apply for available housing and get the information they need on how the landlord allocates homes and their prospects.

Indicator	2017/2018 ERC Performance	2018/2019 ERC Performance	2018/2019 Scottish Council Average	2018/2019 Overall Scottish Average
Percentage of lettable houses that became vacant in the year	8.9%	9.2%	8.4%	8.7%

 Introduction of our **Homeseeker** Choice Based Lettings service is providing more choice to applicants waiting on rehousing, to bid for the homes that they are interested in. It also allows customers to see the homes that are available through our weekly adverts.

We have delivered 23 new council homes in Barrhead at April 2019 - catering for families, single people and amenity housing for older people – and increasing choice for tenants and other seeking rehousing.


 The number of properties becoming vacant each year is above average; however we expect movement through transfers of existing tenants to new build homes will continue to impact on this.


We have identified the need to more regularly review and communicate on waiting list applications to promote housing options. More work will be undertaken this year to gather customer feedback on our service and to develop the range of housing options available.

### Homelessness and Temporary Accommodation

We have a duty to meet the needs of households who are facing homelessness through provision of suitable temporary and permanent accommodation, advice and support.

Indicator	2017/2018 ERC Performance	2018/2019 ERC Performance	2018/2019 Scottish Council Average	2018/2019 Overall Scottish Average
Percentage of households needing temporary accommodation to whom an offer was made	100%	99.37%	90.64%	-
Percentage satisfied with the quality of temporary accommodation	100%	94.83%	88.5%	-

 Our performance in terms of providing temporary accommodation and levels of satisfaction with it remains high, and above the Scottish Council average.

 We have identified a need to review and refresh our homelessness procedures to ensure ongoing compliance with national standards and changes in policy. We will also work to ensure emergency accommodation is available at all times to those requiring it.

## Overall Satisfaction and Engagement


We must measure satisfaction of tenants and customers with the services we provide, and how we keep tenants informed. This also means allowing an opportunity to influence how our services are delivered.

We must also make sure tenants and other customers find it easy to participate and influence decisions about our landlord service.

We undertake a large scale satisfaction survey every 2 years as per the SSHC guidance with further supplementary surveys carried out locally across our service, giving tenants the opportunity to tell us what they think.


Our biennial tenant satisfaction survey was completed in summer 2018 and provided us with updated results on customer satisfaction.

Indicator	2017/2018 ERC Performance	2018/2019 ERC Performance	2018/2019 Scottish Council Average	2018/2019 Overall Scottish Average
Percentage satisfied with overall service	81.6%	84.8%	85.7%	90.1%
Percentage satisfied with keeping tenants informed	85.2%	88.2%	85.5%	91.6%
Percentage satisfied with opportunities to participate	80.4%	91.1%	80.4%	86.5%

 We remain higher than the Scottish council average for keeping tenants informed, though slightly below Scottish average. However this is an improvement of 3% on the previous survey.

In providing opportunities to participate for tenants and customers we have seen an 11% improvement on the previous survey results, and now sit above average for other Councils and all landlords across Scotland.

This reflects the work we have undertaken in the last couple of years to build on tenant representatives feedback about the quality of our engagement with them, and to look at new ways of involving a wider group of interested tenants.

 Overall Satisfaction with the service has improved by 3%; however it still sits just below the overall Scottish average.

We will continue to push for improvements across the business deliver an increased level of satisfaction across our Landlord service.

## East Renfrewshire Council (Housing Services)



### Annual Assurance Report 2019

#### Our Annual Assurance Statement

✓ We comply with our legal obligations, and the regulatory requirements set out in Chapter 3 of the Scottish Housing Regulator's Framework. However additional work is required in the areas set out below to ensure a more satisfactory level of performance.

#### We:

➤ Pledge to address the following, in relation to the Scottish Social Housing Charter standards for tenants, people who are homeless and others who use our services:

- ! Void Management & Maintenance
- Improving efficiency and Value for Money

➤ Pledge to address the following, in relation to our legal obligations concerning housing and homelessness, equality and human rights, and tenant and resident safety:

- ! Homeless Temporary Accommodation
- Ensuring accommodation is always available in emergency homeless situations.

We have seen and considered sufficient evidence to give us this assurance.

As such, this statement has been approved at the meeting of our Cabinet on 24th October 2019.

Signed: (Convenor)



BLANK PAGE



### Assurance Statement 2019 – Improvement Plan

Compliance Issue	Service Area	What we need to address	When will we do it?	Who is responsible?
Legal Obligations	Homeless Temporary Accommodation	<p>We need to ensure accommodation is always available in emergency homeless situations.</p> <p><b>We will do this by reviewing our temporary homeless accommodation provision, in line with the commitments made in our Rapid Rehousing Transition Plan.</b></p>	By March 2020	Senior Housing Manager
Meeting Charter Standards	Void Management	<p>We need to make sure our void management process is as efficient and customer focused as possible and continues to provide Value for Money.</p> <p><b>We will do this by considering elements of the void process where efficiency can be improved, and in particular using IT system improvements.</b></p>	By March 2020	Senior Housing Manager



BLANK PAGE