To: Employment Committee
10 February 2021

Reform of Local Government Exit Pay
Director of Resources

1 Purpose of Report

1.1 With the Government's recent introduction of a cap on Public Sector exit payments, this report outlines the legislative changes already passed and the subsequent effect on discretionary compensation payments and Local Government Pension scheme regulations.

2 Recommendation

2.1 That the Employment Committee note the contents of the report which provides an update on national changes affecting severance entitlements for local government employees.

2.2 Endorses the view of the Corporate Management Team that any significant restructure proposals be temporarily put on hold in the current financial year to ensure that individual employees are not adversely affected by the current uncertainty around exit cap implications for LGPS employees.

3 Supporting Information

<u>£95k cap on exit payments</u>

3.1 Members will recall that the Exit Payment Cap (£95k cap) has been a topic of Government discussion since 2015. There was little movement on the details until they were reconsidered in 2019/2020, which led to changes being officially passed by parliament in October 2020, with new arrangements coming into law from 4 November 2020. The changes were passed with an element of speed leaving employers with a very short notice period for implementation.

3.2 The Exit Payment cap has introduced limits to the total exit package which is payable by Public Sector employers to £95,000. This is relevant to exit packages for Severance, Efficiency of Service and most Settlement agreements. It does not apply to Ill Health Retirement or Flexible Retirement.

3.3 The Cap applies to the total amount paid to the employee, including the pension strain cost (capitalised cost) and notice periods in excess of three months. It will not include the employer NI contributions.

3.4 The potential changes and challenges have been outlined in previous reports from Human Resources, however not all elements of the reforms have been implemented. Most notably, the initial proposals raised in 2015 included a requirement for high earners to repay exit payments, if they return to Public Sector employment within a defined period. There has been no indication to date if and when this will be implemented.

Subsequent impact

3.5 The original intention of the exit cap was to curtail perceived excessive severance arrangements for senior public sector workers, following some high profile instances around that time. Although the figure of £95,000 initially appeared to be relatively high, feedback to Government from many parts of the public sector including local government was that it could easily be reached by employees on average salaries with long service, since it included the capitalised costs of unreduced pension payments. It could therefore affect a much broader range of staff than the senior employees who were understood to be the target of the measure.

3.6 A specific challenge of the legislation coming into effect on 4 November 2020 is the conflict with the terms of the national Local Government Pension Scheme and statutory redundancy pay. There is also a potential impact at local level with the discretionary redundancy policy used by the Council.

National Impact – Local Government

3.7 Currently the Local Government Pension scheme regulations require that where an employee is over age 55 and is made redundant, their pension is automatically released (unreduced), with the employer liable for the capitalised cost. There are also statutory redundancy entitlements for employees. Should the sum of both entitlements be greater than £95,000, this causes a problem for the employer as well as affecting the employee and has resulted in the current position of having pension scheme rules that appear at odds with the Exit Cap regulations.

3.8 This conflict has been recognised by the Ministry of Housing, Communities and Local Government (MHCLG) who have been consulting on further changes to the Local Government Pension Scheme to allow release of reduced pension, or for an employee to defer their pension. The consultation ended on 9 November 2020. The Director of Resources submitted a response on behalf of Bracknell Forest Council, following a discussion with the Chairman of Employment Committee, which is attached as Appendix B. This highlighted the challenges and potential impact of the proposed arrangements, which have also been raised by Solace, who have threatened the Government with legal action.

3.9 The Government's response to the consultation is awaited. If introduced, the proposals outlined by the MHCLG would introduce further limitations to restrict exit payments below £95,000. The proposals are extremely complex and the table below seeks to provide a simplified summary.

	Current position	Proposed position
Employees below 55 (not entitled to immediate payment of LGPS pension)	• Statutory redundancy pay • Discretionary payment (BFC enhancement = actual weeks' pay and 1.75 multiplier) Will also have a deferred pension if in the pension scheme	• Statutory redundancy pay • Can be enhanced (discretionary payment) but limited to: a) Max of 3 weeks' pay per year of service (ours is not over this) b) 15 months' pay c) Max Salary of £80k to be used in calculation (limited to whichever is the lower of b and c) Total is capped at £95k
Employees 55 and over (entitled to immediate payment of unreduced LGPS pension)	• Statutory redundancy pay • Discretionary payment (BFC enhancement = actual weeks' pay) • Immediate payment of LGPS with no adjustment for early payment • Employer funds "strain" cost calculation, set locally by each LGPS fund	• Standard strain cost calculation across all LGPS funds. Total cost is limited to the GREATER of: a) Strain cost (max £95k) OR b) Discretionary redundancy payment within the new limits above (max £95k)

3.10 The current situation is very unclear. There appear to be 3 options for a pension scheme member whether or not the £95k cap has been breached:

Strain cost is UNDER £95k	
Option 1	Employee receives Statutory redundancy payment (SRP) and LGPS pension REDUCED based on SRP amount) **or** Employee gives up SRP in exchange for unreduced LGPS pension * Where the strain cost is less than the discretionary payment (rarely the case) the employer will be able to pay the strain cost and make a cash payment to the employee equal to the difference between the strain cost and discretionary payment.
Option 2	Employee receives SRP and discretionary payment based on new limits but defers LGPS therefore no immediate release of pension and no strain cost payable
Option 3	Employee receives SRP and discretionary payment based on new limits (as with option 2) but has immediate release of ACTUARIALLY REDUCED (full reduction) pension LGPS therefore no strain cost payable

Strain cost is OVER £95k	
Option 1	Employee receives SRP plus immediate release of pension PARTIALLY reduced so that strain cost is £95K less SPR (so if SPR was £10k the pension would be reduced so that the strain cost was £85K) – BUT the employee can give up their SRP and use their own funds to lower some or all of the reductions.
Option 2	Employee receives SRP and discretionary payment based on new limits but defers LGPS therefore no immediate release of pension and no strain cost payable
Option 3	Employee receives SRP and discretionary payment based on new limits (as with option 2) but has immediate release of ACTUARIALLY REDUCED (full reduction) pension LGPS therefore no strain cost payable

3.11 The table in Appendix A shows the current percentage reductions for early release of pension.

A worked example:

Employee strain cost is £65k and their Statutory Redundancy Pay (SRP) is £30k. The total is £95k but the total the employer can pay out is £65k.

The member must choose to either take an unreduced pension with no SRP or a reduced pension with the SRP. The total that the employer can pay out is £65k so if the employee takes their SRP we need to reduce the strain cost of £65k to £35k and pay the £30k SRP to the employee. There remains the balance of a £30k strain cost that the employee cannot pay and so there is a reduction to the pension benefits actuarially calculated to the value of £30k.

More simply put:

Option 1 – Employee chooses unreduced pension with no SRP – employer pays £65k strain cost to the Pension Fund OR Employee chooses to take SRP of £30k. This is taken from the strain cost and the employer pays the Fund £35k as a strain cost. £35k is not sufficient to cover the loss in funding, the difference being £30k (£65k - £35k). The pension benefits are reduced by an equivalent actuarial value to the sum of £30k.

Option 2 – Employee chooses to defer pension and receive £35k redundancy payment

Option 3 – Employee receives SRP and discretionary payment but opts for actuarially reduced pension

3.12 In certain restricted circumstances, the employer can apply for a Waiver of the cap. However, this is tightly controlled and a lengthy process. Indications from the Local Government Association are that waivers will only very rarely be considered.

Local impact

3.13 A restriction on early release of pension will have a fundamental effect on the Council's severance policy, which is based around access to pension. It will therefore be necessary, once the proposed national policy changes are finally confirmed, to review the severance policy.

3.14 Currently the Bracknell Forest Council redundancy policy is as follows:

- Access to pension on redundancy (over age 55 and in the pension scheme) = Statutory redundancy pay using Actual weekly pay rather than the capped pay of £538
- No access to pension (under 55 or not in the pension scheme) = 1.75 multiplier of the Statutory redundancy pay using Actual weekly pay rather than the capped pay of £538

3.15 The difference in the Council's redundancy calculation has been scrutinised in the past during organisational changes and has been justified by the Capitalised Cost being made to the pension scheme to release pension before normal retirement age, instead of an enhanced redundancy calculation. Where this is no longer being paid there is little justification for the two different redundancy calculations.

3.16 Whilst the redundancy policy does not stipulate that the distinction in redundancy calculations are based on unreduced pension and simply that there is access to pension, it could leave the Council open to challenge on grounds of age discrimination, especially should someone choose to defer their pension and not have it released – which is one of the proposed options.

3.17 In addition, as the current pieces of legislation are conflicting and could lead to a position which leads to financial risk for the employee or pension fund, the Berkshire Pension fund have made a policy decision to suspend all cases of unreduced pension entitlements. Instead, employees will be given the opportunity to:

- Defer their pension to normal retirement age
- Receive a fully reduced pension

3.18 The lack of clarity and conflicting legislation means that the Council is currently unable to release any redundancy calculations, as these could be misleading to the employee. Although there are no new staff savings in the 2020/2021 budget proposals, there are in-year restructures in the People Directorate which could potentially be affected.

3.19 The Council has previously considered standardising redundancy calculations, with the potential to remove the 1.75 multiplier used for staff who do not have access to pension. It is now imperative that this is considered again once the national policy changes have been fixed. A further report will be brought to Employment Committee at that time, outlining costs and implications.

Impact on Teachers Pension scheme

3.20 The Teachers' pension scheme does not have the same regulatory processes as the Local Government Pension scheme, as pension is not released in the same way when an employee is made redundant. It is anticipated that the Department for Education (DfE) will be providing guidance for employers in scope of the

Compensation Regulations, in due course. This will need to be considered further and, where appropriate, a report submitted to the Education Employment Committee.

4 Consultation and Other Considerations

4.1 Legal Advice

The government introduced powers to cap exit payments in the public sector at £95,000 in the Small Business, Enterprise and Employment Act 2015 (as amended by the Enterprise Act 2016). This cap was brought into effect on 4 November 2020 by the Restrictions of Public Sector Exit Payment Regulations 2020 ("the Exit Cap Regulations"). The cap applies to the total amount payable when someone exits and so applies to the total of severance payments, any pension strain cost and notice payments in excess of three months.

As the £95,000 cap has come into force before corresponding amendments are made to the Local Government Pension Scheme, there is an uncertainty as to how this impacts on employees who are already in the process of exiting employment from local authorities. The MHCLG's consultation on changes to the Local Government Pension Scheme rules required to accommodate the £95k cap was not concluded before the cap came into effect. This means that the Authority could be faced in, certain circumstances, with an obligation under the LGPS rules to make a pension strain payment which exceed £95,000 to an LGPS Fund to cover the cost of early retirement on redundancy, but, at the same time, local authorities are prevented by the Exit Pay Cap Regulations from making that payment. It means that from 4 November 2020 up to the enactment of the MHCLG further reform proposals there is a position of legal uncertainty due to the apparent discrepancy between the obligations on LGPS scheme employers under the Exit Cap Regulations to limit strain cost payments, and the requirement for administering authorities to pay unreduced pensions to qualifying scheme members under existing LGPS regulations. There is currently no guidance on this matter from the government, although this is awaited. Recommendation 2.2 seeks to mitigate this possibility.

4.2 Financial Advice

There are no direct implications at this time, since this report provides an update on proposed national changes to severance payments that have not yet been confirmed. If introduced, the changes will reduce severance payments which may save the Council some one-off moneys, but may well result in any organisational changes becoming more difficult to implement in the future.

4.3 Other Consultation Responses

None at this stage.

4.4 Equalities Impact Assessment

None at this stage.

4.5 Strategic Risk Management Issues

The national changes to Local Government Exit Pay arrangements can be expected to have a significant impact on the Organisational Change process for the Council.

Background Papers

- Appendix A – Early Retirement Actuarial Reductions matrix
- Appendix B – Exit pay reform MHCLG exit pay response from Bracknell Forest Council
- LGA Guidance Reform of Local Government Exit Payments | Local Government Association
- Berkshire Pension Fund Statement of Policy Concerning payment of Pensions where the £95K Exit cap is breached.

Contact for further information

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APPENDIX A

Early Retirement Reductions

The actuarial percentage reductions from the age of 55 onwards are as follows:

Number of years early	**Annual Pension**	**Lump Sum**
0	0%	0%
1	5.1%	2.3%
2	9.9%	4.6%
3	14.3%	6.9%
4	18.4%	9.1%
5	22.2%	11.2%
6	25.7%	13.3%
7	29.0%	15.3%
8	32.1%	17.3%
9	35.0%	19.2%
10	37.7%	21.1%
11	41.6%	N/A
12	44.0%	N/A
13	46.3%	N/A

For example, if a male scheme member retired at age 60, a full 7 years before his Normal Retirement Age of 67, his annual pension would be reduced by 29% and his lump sum by 15.3%.

The above actuarial percentage reductions are set by the **Government Actuary's Department (GAD)**.

The current factors quoted in the above table are effective from **8 January 2019**.

APPENDIX B

Exit Pay Reform Consultation Response
Bracknell Forest Council

Question 1
Are there any groups of Local Government employees what would be more adversely affected than others by our proposed action on employer funded early access to Pension?

If so, please provide data/evidence to back up your views

How would you mitigate the impact on these employees?

Response

Clearly the proposals impact all members of staff who come to be made redundant who are over 55 and in the LGPS as they will no longer be eligible for an unreduced pension and redundancy payment. More specifically:

1) The proposals to change employer funded early access to pension will adversely affect those on low incomes who are relying on their unreduced pension if they are made redundant. If their pension is reduced it may force them to investigate other sources of benefit from the Government. This is especially likely if they can no longer receive an unreduced pension **and** redundancy payment together and are required to choose between then.

2) As the reduction to pension is calculated on a graduated basis, those people who are aged 55 will be more adversely affected than those nearer normal retirement age, eg 65/66, as their pension will potentially be reduced by 46% and have a larger strain cost, whereas those who are aged 65/66 may only have a 5% reduction and smaller strain cost. (table of actuarial reductions can be found at https://www.berkshirepensions.org.uk/bpf/members/active-members/retirement/bpf/retirement/early-retirement)

3) Those employees with longer Local Government service are likely be more adversely affected as their pensions are traditionally larger (based on length of service) and therefore the strain cost will be higher.

More specifically, the proposals would lead to local government staff in the LGPS receiving differential and significantly less favourable settlements in redundancy situations that other local government staff in different pension schemes, e.g. Health (public health and other staff) and teachers. Such differential treatment for different groups of staff employed by the same organisation, solely due to the different funding arrangements for their pensions schemes over which they have absolutely no choice over, would be inexplicable and unjust.

Question 2
What is the most appropriate mechanism or index when considering how the maximum salary might be reviewed on an annual basis?

Response

We would firstly contend that it is inequitable that the proposed maximum salary has

remained unchanged since the exit cap proposals were first announced in 2015. The starting point should be increased to reflect pay increases since that point, equating to around £88,000.

Although the Local Government pension scheme uses CPI each year as their percentage increase, it would be more appropriate to review the capped salary in line with Local Government pay award to ensure salary data is being reviewed consistently. CPI 12-month inflation rate was 0.2% in August 2020 whereas the national pay award was 2.75%. It is recognised that not all Local Authorities utilise the NJC / JNC Chief Officer pay scales, however it would seem appropriate to base any increase on the "maximum salary" proportionate to the national salary increase and pay data.

It would be useful to understand whether the proposed maximum salary in intended to include any additional payments such as London Weighting. With salaries being traditionally higher in the south of England, to reflect the additional cost of living in and around London, a fixed blanket approach would be more generous to staff working in local government in other regions.

Question 3

Are there any groups of local government employees that would be more adversely affected than others by our proposed ceiling of 15 months or 66 weeks as the maximum number of months' or weeks' salary that can be paid as redundancy payment?

If so, please provide data/evidence to back up your views

How would you mitigate the impact on these employees?

Response

When calculating redundancy payments for those employees over age 55 who have access to their pension, the maximum number of weeks Bracknell Forest Council uses is 20 weeks pay. Therefore, this area of the proposal would not affect Bracknell Forest employees in this age bracket.

For staff who would not be entitled to draw their pension in a redundancy situation (i.e. those under 55) the proposal would most affect those on the highest salaries. Further commentary on this is provided in our response to question 4.

Question 4

Are there any groups of local government employees that would be more adversely affected than others by our proposal to put in place a maximum salary of £80,000 on which an exit payment can be based?

If so, please provide data/evidence to back up your views

How would you mitigate the impact on these employees?

Response

The proposals purely relate to staff in the Local Government Pension scheme and therefore would not affect those staff in the Teachers (including Soulbury staff) and NHS pension schemes. As we have noted in our response to question 1, this situation is a

consequence of historic Government decisions on how different pensions schemes will be funded and it is inequitable that some staff should be disadvantaged on this basis.

The proposals to apply a maximum salary, exacerbated by a proposed maximum number of weeks redundancy payable, will most adversely affect Senior Managers. Whilst this forms a very small proportion of the local government workforce, these staff are more at risk of facing redundancy situations due to the continual requirement to seek efficiency savings through reducing management costs as a consequence of reduced funding and increased demand for local government services. Such staff are also facing increased public and Political pressure and scrutiny and there are regular instances of Chief Executives and Directors being pushed to leave their positions as a result of local Political tensions. These staff are already adversely impacted relative to others by the £30,000 tax free cap on redundancy as many Directors / Assistant Directors / Heads of Service have long Local Government service, and may be paying 50% income tax. A further cap on these staff therefore seems to be unreasonable.

It is worthwhile highlighting that the current statutory redundancy pay is capped at £538. We would suggest that consideration be given by Government to increasing that amount and introducing one redundancy calculation for all Local Authorities. This would help mitigate the perception of some people that there are regular, large golden handshakes to retiring senior local government staff. While there have been a few high profile instances of this, in reality these payments are very much the exception and should not be used as justification for significantly reducing financial protection for the vast majority of senior staff who undertake high profile and challenging roles for a fraction of the rewards received by their equivalents in many sectors.

Local government simply will not be able to attract and retain talented leaders into the future if its rewards and protections fall even further below those of private and other public sector organisations, which the cumulative impact of the exit cap and further proposals in this consultation will lead to.

Question 5

Do you agree with these proposals? If not, how else can the Government's policy objectives on exit pay be delivered for Local Government workers?

Response

No. We believe that the cumulative impact of the exit cap and the current proposals that are the subject of this consultation are unjust and inequitable for staff in the LGPS, compared with other local government and public sector workers.

Whilst it is recognised that the exit payment reforms are necessary to comply with the £95K exit Cap and managing tax, these proposals are overly complex, draconian and will affect the vast majority of local government staff aged 55 and over in a redundancy situation. This significantly contradicts what Local Authorities were expecting from the cap, which was intended to limit excessive exit settlements.

The proposals significantly reduce the amount <u>all</u> LGPS employees may be eligible for under the current arrangements, which in simplistic terms seems to be a choice of pension or redundancy pay. These measures were not suggested during the significant amount of time the £95k cap has been discussed (2015 to date) and are now being consulted on very quickly and without allowing employers to prepare for the changes.

Any perception that Local Government employees all receive a gold-plated pension and

redundancy payment is simply incorrect. The vast majority of staff do not have a large pension and redundancy payment when they leave.

A large number of councils practice the option of voluntary redundancy – especially when an organisation change is being followed, which has become a regular and almost constant situation in recent years. An "attractive" but by no means "excessive" exit package can help reduce the management time spent on such organisational changes, as some staff opt to leave voluntarily. These proposals will significantly reduce the number of volunteers and therefore mean additional cost in management time as well as most likely placing additional pressure on employment tribunals from appeals against perceived unfair dismissal.

Not only would the impact of this be costly to the public finances overall, it would significantly delay councils' efforts to transform services in order to reduce costs and remain financially sustainable. Whilst the reforms are stated as being intended to balance tax payer expectations, there should be the awareness that most councils (including Bracknell Forest) only justify making severance payments under existing arrangements by having regard to the payback period of the one-off costs against the recurring, resulting savings.

The removal of an unreduced pension may ultimately force local authorities to increase their redundancy payments to the maximum allowed under the proposals in recognition that a strain payment (capitalised cost) would not be paid by the employer. The proposed maximum 66 week redundancy calculation could become the norm, which could place a greater strain on the public purse in many situations.

The Council agrees that Ill Health dismissals and Flexible retirement are not included in the reforms. However further discretion should be applied to settlement agreements which may otherwise go to an Employment Tribunal (at the moment it seems these are limited to whistleblowing and discrimination claims) allowing for matters to be settled outside a tribunal

Question 6
Do you agree that the further option identified at paragraph 4.8 should be offered?

Response

The option to defer pension would be welcomed as the Council has had staff who have been made redundant around 55/56 years of age, who would have preferred not to take their pension automatically.

Many employees wish to carry on working rather than access their pension, therefore this option would be a good measure to introduce to widen the potential choice for Local Government staff, with the redundancy payment bridging the gap whilst they are looking for another role.

Question 7
Are there any groups of local government employees that would be more adversely affected than others by our proposal?

If so, please provide data/evidence to back up your views

How would you mitigate the impact on these employees?

Response

As with question one, the proposals impact all members of staff who are over 55 and in the pension scheme but especially those on the lower incomes and part time salaries, which are traditionally women, will be more adversely affected as they would no longer be eligible for an unreduced pension and redundancy payment together. Based on data in December 2019 82% of the council's workforce are Women

Similarly, those people who are only just eligible for pension release under the current arrangements are adversely affected as there would be a large reduction to their pension. Based on data in December 2019, 27% of the Council's workforce are aged 50-59 which is a large proportion of the workforce (37% are over age 50).

In addition the most experienced employees with long service with the Council would be most adversely affected. These proposals therefore remove the incentive to remain in local government service, meaning a potential loss of skills which can have a significant impact and be expensive to replace – with suitable skills often only available in very expensive private sector contractors. This is a significant risk to Local Government and whilst the aim is to reduce costs, the indirect impact may be to increase costs by increasing turnover with a subsequent impact on recruitment and onboarding costs.

Question 8
From a local government perspective, are there any impacts not covered at Section 5 (impact analysis) which you would highlight in relation to the proposals and/or process above?

Response

Section 5 of the impact analysis touches on the additional administrative cost of implementing the new changes into the redundancy and compensation arrangements. However, this does not take into account the significant changes necessary to amend the pension scheme database which provides the calculations. In addition it does not take into account the significant time which will take to communicate and explain the complex options that staff will now have to take.

Section 5 does not take into account that it is likely most staff will now need to source independent financial advice as to which option would be better for them. This is an additional source of pressure and cost for the employee to bear whilst potentially creating a delay and therefore additional costs for an organisational change.

Question 9
Are these transparency arrangements suitably robust? If not, how could the current arrangements be improved?

Response

The transparency arrangements outlined are suitably robust however this is only relevant where a Chief Officer is made redundant from the same Local Authority and potentially re-employed.

The Council will not know the personal financial arrangements of a candidate who has voluntarily applied for a role. For example - there may be an occasion where Chief Officers may have taken Flexible Retirement at a previous Authority, but move Authorities and therefore will be receiving a pension and salary.

Question 10
Would any transitional arrangements be useful in helping to smooth the introduction of these arrangements?

Response

In relation to the pay policy statement and transparency, there is not necessarily a need for transitional arrangements to be introduced. However there should be clear guidance as to how and what information should be included in the pay policy statement.

In terms of the wider proposals, there should be a period of delay before these proposals are implemented, if Government decides after the consultation period that this remains its intention. The uncertainty for employers and employees caused by the current proposed timing relative to the introduction of the exit cap should not be underestimated.

Question 11
Is there any other information specifically to the proposals set out in this consultation which is not covered above which may be relevant to these reforms?

Response

As above, transitional arrangements are essential as many employees may already be being consulted regarding organisational changes and may have received exit package figures. Organisational Changes can be a difficult time for staff and it would therefore cause additional pressure and stress to significantly change those figures and expectations

Question 12
Would you recommend anything else to be addressed as part of this consultation?

Response

In terms of the overall exit package reform, transitional arrangements are essential to allow a period of time where staff who are already being consulted regarding organisational changes and may have received exit package figures, retain the option to have the figures rather than having this withdrawn. Organisational Changes can be a difficult time for staff and it would therefore cause additional pressure and stress to significantly change those figures and expectations.

In terms of a transition period this should take into account the further process changes that are required for Local Authorities to implement the changes in their own severance policies – in other words there is a requirement for a period of adjustment. This should take into account the modification of the pension scheme databases which are not currently able to adjust to the changes and will take some time to develop.

Consultation responses to be completed online
https://forms.office.com/Pages/ResponsePage.aspx?id=EGg0v32c3kOociSi7zmVqDX2xIA9hPhJv2EHTx_8-_ZUQTdZUkIxOFBJTjU2RjFEQzY4WllHSUoyNy4u

or sent by email to LGExitpay@communities.gov.uk