

# **HRA Cost Allocation Methodology Statement**

The purpose of this document is to advise Tenants of the methodology for calculating and allocating HRA costs (including internal costs charged by the Council to the HRA).

February 2019

# West Dunbartonshire Council Housing Revenue Account (HRA) Allocation Methodology

## <u>Contents</u>

| Section |  | Pages |  |
|---------|--|-------|--|
| 1       | Supervision & Management Costs                         | 3-4   |  |
| 2       | Repairs & Maintenance Costs                            | 5-6   |  |
| 2       | Misc Expenditure (Bad Debt Provision, Lost rents, Void |       |  |
| 3       | Council Tax)   | /     |  |
| 4       | Loan Charges   | 8     |  |
| 5       | Year end Recharges                                     | 9     |  |
| 6       | Central Support Allocation in detail                   | 10-11 |  |

## 1. Methodology for calculating and allocating HRA costs - Supervision and Management

|                |     | Description  | Explanation  |  |
|----------------|-----|--|--|--|
|                | 1.1 | Salaries & Wages, Overtime,<br>Superannuation & National<br>Insurance Costs and other<br>employee costs. | Employee costs including wages, superannuation, national insurance etc. Work patterns are maximised to avoid overtime payments but some overtime can be incurred when covering for vacancies and / or urgent out of hour duties. Other employee costs include staff training costs and allowances paid to staff for the likes of call out and/or standby by duties.                                  | Emp<br>grad<br>turn<br>the<br>the<br>dep |
| Employee       | 1.2 | Apprenticeship Levy  | The apprenticeship levy is a UK tax on employers which can be used to fund apprenticeship training.  | It is                                    |
| costs          | 1.3 | Employee cost charges <b>from</b><br>other council departments   | Some employees that work within the General Services side of the council, carry out duties on behalf of the HRA and as such a % of their time is recharged to the HRA, for example, the HRA pays for a share of the costs for managing the HMTO service and the procurement service. This will include wages, superannuation and national insurance costs  | As of<br>eac<br>This<br>of th            |
|                | 1.4 | Employee cost charges <b>to</b><br>other council departments   | Some employees that are initially charged to the HRA in the first instance, carry out duties on behalf of other departments within the authority, as described above in 1.1. An agreed % of their time is recharged out of the HRA for example time spent on HRA capital projects or duties on behalf of the Homeless Service. This will include wages, superannuation and national insurance costs. | As o                                     |
|                | 1.5 | Rates, Electricity & Gas   | This includes the cost of energy costs for communal areas, the electricity & gas associated with close lighting, lighting in and around the Multi Storey Flats and Standing Charges on void properties.  | Cha                                      |
|                | 1.6 | Rents  | The HRA pays the rental value on all caretaker flats and show flats  | The<br>the<br>eac                        |
| Property Costs | 1.7 | Contract Cleaning  | Cleaning of the offices used by the HRA staff, is carried out by the Council's internal cleaning service. Some properties are also used by the HMTO teams and a proportion of costs is recharged out to the HMTO at the year end, to reflect the joint use of the properties.  | Clea<br>that<br>pres<br>area             |
|                | 1.8 | Property insurance   | This includes the cost of insurance premiums for the block insurance policy for mixed tenure blocks, housing properties insurances, public and employers liability insurance and engineering inspection charge.  | Insu<br>insu                             |
|                | 1.9 | Other Property Costs   | This charge reflects the cost of HRA staff using the office buildings paid for by the General Service Fund, for example Bridge Street, Church Street and Aurora House.   | Cha                                      |

#### Charging methodology

nployees are paid based on a salary scale, allowing for increments until the top of a salary ade is reached. Costs are inflated each year according to the agreed payaward and a 4% mover reduction is assumed. The list of staff known as the "establishment list" is sent to e Senior Managers to review each year, to check that the posts are correct and agreeing e % of costs that are to remain within the HRA or that should be recharged out to other epartments. Other departments being General Services or HRA capital.

s charged at a rate of 0.5% of the paybill as set by the Government.

described above in 1.1, the General Services establishment lists will also be reviewed the year by Senior Managers, agreeing the % of costs that should be recharged to the HRA. his list is also provided to the Senior Housing Management Team for review and agreement the charges being levied on the HRA.

described above in 1.1, an agreed % of time per employee is reviewed each year.

narges based upon usage and billed by the relevant utility supplier.

ne associated rental value of the relevant properties are charged direct to the HRA based on e rental value of each properties which is also increased by the associated rent increase ach year.

eaning is charged per an hourly rate, with the level of service taking into account, the fact at the properties are multi purpose premises with offices and bothy facilities. This is esently a mixture of alternate day cleaning in the office areas and daily cleaning in the bothy eas, toilets etc.

surance costs are allocated to the HRA based upon set allocation criteria. Property surance is based upon the valuations of assets.

narges are reflective of the number of HRA employees using each of the different buildings.

## 1. Methodology for calculating and allocating HRA costs - Supervision and Management

|                      |      | Description   | Explanation  |  |
|----------------------|------|---|--|--|
| Transport<br>Costs   | 1.10 | Total Transport Costs   | Employee travel costs for business and study. It also includes the hire of caretakers vehicles and the associated costs such as fuel.  | Cha<br>veh                               |
|                      | 1.11 | Uniforms, Office Equipment,<br>Stationery, Telephones           | Expenses incurred for office equipment, stationery and general office running costs.   | Pur<br>paic                              |
| Supplies &           | 1.12 | IT Systems  | Purchase of IT related software and hardware for all IT functions within Housing Services.<br>Includes software licences and annual maintenance costs to 3rd party software suppliers.   | Curr<br>the<br>beir<br>the<br>use<br>the |
| Services             | 1.13 | Printer rationalisation - lease<br>and copy costs               | Relates to the cost of printing and photocopying   | In re<br>a re<br>copy                    |
|                      | 1.14 | Tenant Participation Costs                                      | This includes the cost of free lets which are the lets associated with providing premises for tenants and resident's associations. It also includes the running costs for TRAs and any publicity and communication costs ie satisfaction surveys and the production of housing news. | The<br>on t<br>eac                       |
| Support Costs        | 1.15 | Total Central Support<br>Charges to HRA                         | This is the HRA's share of the costs for using the council's internal services such as IT,<br>Human Resources and Finance etc.   | This see                                 |
| Other                | 1.16 | Payments to other bodies  | As the title suggests, charges under this heading are payments to organisations external to the council. This includes the costs of legal expenses in relation to court actions and bank charges. It also includes the costs of membership and conference fees.                      | Cha<br>led,                              |
| Other<br>Expenditure | 1.17 | Cost of rent abatements   | Relates to the cost of rent abatements due to void initiatives.  | The<br>chai                              |
|                      | 1.18 | Payment to Women's aid in<br>relation to Tenancy<br>Sustainment | The council's contributions towards Women's Aid.   | The<br>prov                              |

#### Charging methodology

narges are applied direct, via HRA employee travel claim form, per the hire costs of specific hicles and their associated running costs ie fuel, insurance, repairs & maintenance.

irchases are made direct via the normal procuring method where orders are placed and id for via invoice or made electronically via the use of the purchase card system or we-buy.

urrently, the IT software budget is held centrally, with a recharge of costs being charged to e HRA at year end. The cost of the system was calculated at the time when the budget was sing centralised and it is this same amount which is re-charged back to the HRA. This is for e specific Housing Systems only. However, it is acknowledged that the HMTO service also e parts of the system and therefore a proportion of costs is recharged out to the HMTO at e year end.

relation to printer rationalisation across the council, the printer budget is held centrally, with recharge of costs being charged to the HRA at the year end for the use of the printers and pying costs. The cost is recharged to the HRA based on an historic actual usage.

he associated rental value of the "free let" properties are charged direct to the HRA based the rental value of each properties which is also increased by the associated rent increase inch year. All other costs are charged direct via invoices, purchase card or we-buy payments.

is is covered within a specific Central Support Recharge Methodology Statement. Please e Section 6 on page 10.

harges for Legal expenses, bank charges, membership & conference fees are all demand d, which means that the council will pay for the level of services received.

he rent value not being paid by the tenant, due to agreed abatement, is calculated and arged here

ne payment WDC makes to Women's Aid is made up of several parts for different services ovided. The element that relates to tenancy sustainment is charged to HRA with the maining payment paid by the general fund

#### 2. Methodology for calculating and allocating HRA costs - Repairs and Maintenance Expenditure

|                        |      | Description   | Explanation  |   |
|------------------------|------|---|--|---|
|                        | 2.1  | Jobbing repairs   | The Council is responsible for keeping their homes in a good state of repair which<br>benefit both current and future tenants. The majority of repairs are carried out by<br>the Council's Building Services (HMTO). Repair categories include routine and<br>emergency. This also includes the costs associated with making vacant properties<br>into a suitable state to be relet. | Jobbing repa<br>repair reques<br>follows the na                 |
|                        | 2.2  | Tenants Priority Budget   | As the name suggests, this budget was set aside to be spent according to the priorities as identified by Council Tenants.  | Repairs are of schedule of r                                    |
| Recharges from<br>HMTO | 2.3  | Maintenance Contracts<br>managed by the HMTO on<br>behalf of HRA          | Cyclical works that are carried out to Council homes on a planned basis via an external contract but managed internally by the HMTO. Includes the Gas Maintenance Contract & Ventilation Systems.  | Charged per<br>from HMTO  |
|                        | 2.4  | Cyclical Planned<br>Maintenance works                                     | Cyclical works that are carried out to Council homes on a planned basis by the HTMO Team ie Refuse Chute Cleaning, Smoke Detectors   | Repairs are c<br>schedule of r                                  |
|                        | 2.5  | Other repairs   | This includes the cost of decants, special uplifts   | Repairs are of schedule of r                                    |
|                        | 2.6  | Adaptations for Disabled  | This is the costs associated by making structural changes to properties for example replacing a bath with a walk in shower, an external ramp, widening of a door frame to allow access or fitting lower work surfaces  |   |
|                        | 2.7  | Garden Tidy Scheme  | The Garden Tidy Scheme includes the costs associated with the upkeep of grounds in relation to void properties, first cuts and temporary accommodation properties.   | Based on a s  |
| Recharge from          | 2.8  | Open Space Maintenance  | A contribution towards the cost of open space maintenance across our housing areas. The main tasks involve grass cutting, paths, litter collection and hedges.   | The charging<br>charge set fo<br>grass cutting<br>& fence lines |
| Greenspace             | 2.9  | Recharges relating to<br>Housing Environmental<br>Improvement Team (HEIT) | The team is split into various squads, providing deep cleans, litter picking and environmental improvements.   | Pays for the a 100% of their                                    |
|                        | 2.10 | Ad hoc Grounds<br>Maintenance Works                                       | Additional grounds maintenance orders as requested by the housing operations team  | Jobs are cos  |
|                        | 2.11 | Cleansing - bin recesses  | Cleansing of the bin recesses  | Annual fixed  |

## Charging Methodology

bairs are demand led and are therefore carried out according to ests. Repairs are charged based on a schedule of rates, which national schedule of rates less an agreed % discount

e charged based on a schedule of rates, which follows the national f rates less an agreed % discount.

er contract with supplier plus an additional management charged

e charged based on a schedule of rates, which follows the national f rates less an agreed % discount.

e charged based on a schedule of rates, which follows the national f rates less an agreed % discount.

e charged based on a schedule of rates, which follows the national f rates less an agreed % discount.

a standard cost per property, multiplied by the number of properties

ng methodology stems from an Service Level Agreement, with a for a specific level of service received. For example, frequency of ng in open space areas or high amenity areas, weed killing channels es, maintenance of shrub beds.

e associated cost of 8 full time employees, which are recharged at eir time.

osted according to specific request

d charge from Greenspace

## 2. Methodology for calculating and allocating HRA costs - Repairs and Maintenance Expenditure

|  |      | Description  | Explanation  |                                |
|--|------|--|--|--------------------------------|
| Recharge from<br>Environmental<br>Health | 2.12 | Pest Control   | Cost of Pest control; a service provided by General Services   | Charged acc                    |
| Recharge from<br>Waste Services          | 2.13 | Bin replacement  | Purchase of new bins   | Charged at a                   |
|  | 2.14 | Specialist Jobbing Repairs,<br>Cyclical Planned<br>Maintenance and other<br>repairs carried out by<br>external contractors | External contractors are used for specialist works, for example woodworm or dampness. External contractors are also used for some specialist cyclical works ie Communal Washing Equipment maintenance, Lift & CCTV Maintenance, communal TV aerials, Community alarms etc  | Charges levi                   |
| Charges from<br>external<br>Companies    | 2.15 | Tenancy Sustainability<br>Purchases  | The tenancy sustainment budget is used to assist tenants to set up their tenancies<br>and become settled. It is also used to enable our tenants to overcome difficult<br>situations that are impacting on their tenancy and their ability to remain. This<br>avoids abandonment and terminations which are costly to the council and more<br>importantly detrimental to the tenants and their families and also unsettles<br>communities when we see high turnover of properties | Costs are ch<br>on behalf of t |
|  | 2.16 | Care & Repair Payment  | Maintenance service provided by an external organisation "Care & Repair" for small minor repairs and maintenance work ie replacing light bulbs for tenants, hanging curtain rails etc  | Agreed Annu                    |

# Charging Methodology

ccording to a Service Level Agreement with Environmental services

a price per bin

vied by external contractor.

charged direct to the HRA for purchases made by Housing Officers of tenants via purchase cards.

nual fixed sum

## 3. Methodology for calculating and allocating HRA costs - Miscellaneous

| -   | Description                                | Explanation  | Charging Methodology   |
|-----|--|--|--|
| 3.1 | Bad Debt Provision                         | HRA balance sheet) for rent arrears. The amount that<br>is included within the budget each year is the additional<br>amount required to ensure that there is enough<br>provision to cover the anticipated arrears. | Information is gathered on the amount of current and former tenant arrears for both houses and lockups. A calculation is then made to estimate how much of this debt is likely to be repaid. The chance of repayment is broken down into different debt level bandings, with different associated percentages of recovery. ie for debt > $\pounds$ 1,000, a provision is made that 80% of this debt will not be repaid, while it is assumed that debts < $\pounds$ 100 are likely to be repaid and therefore no provision is made. The percentages are consistent with percentages used for the General Service Bad Debt Provision. The figure calculated for the current financial year, is then compared to the figure that has already been set aside within the balance sheet. The charge to the HRA, is the difference in values. |
| 3.2 | Rents - Unlet Period<br>(Houses & Lockups) | Rental charge per property, for the length of time a property remains unlet.   | Void HRA properties are charged per their associated weekly rental value.  |
| 3.3 | Council Tax on void<br>houses              | The associated council tax charge of unlet properties  | The charge is based on the council tax rate per property, as determined by the Assessors. In some cases, an exemption or a discount is applied. An unoccupied property is exempt from the start of the account for a maximum period of 6 months, a 10% discount is applied once the 6 month period of unoccupied exemption runs out. A double charge is applied to properties which are empty, not ear marked for demolition and are not going to be let.  |

## 4. Methodology for calculating and allocating HRA costs - Loan Charges

Loan Charges comprise of 3 elements which are repayments of principle sums and payments of interest and expenses.

|     | Description                                      | Explanation   | Charging Methodology  |
|-----|--|---|---|
| 4.1 | Principle<br>Repayments                          | To build and upgrade council homes over the years, the Council has borrowed money just like a homeowner with a mortgage.                          | The repayments are calculated on an asset by asset basis and vary depending on how long the asset is expected to last, before it would require to be replaced.  |
| 4.2 | Interest Payments                                | Just like with a mortgage, that debt has to be repaid with interest.  | A proportion of the overall interest paid in the<br>year for external borrowing, is charged based on<br>the proportion of capital expenditure (financed by<br>borrowing) paid for by the HRA, in comparison to<br>the General Fund. |
| 4.3 | Expenses   | The HRA also pays a fee for Treasury<br>Management to brokers for arranging the loans,<br>know as Loan Charges Expenses.                          | These are calculated in the same way as interest payments above   |
| 4.4 | Capital funded from<br>Current revenue<br>(CFCR) | CFCR is funding from the HRA towards building<br>new council homes, and other capitalised<br>programmes such as some repairs and IT<br>investment | Figure is determined by the HRA Business plan,<br>which is used to facilitate the proposed rent<br>increase.  |

#### 5. Methodology for calculating and allocating HRA costs - Year end Recharges

By law, the council has to maintain a separate account for the running and management of its housing stock. These accounts are prepared in accordance with proper accounting practices. These practices primarily comprise the Code of Practice on Local Authority Accounting in the United Kingdom and the Service Reporting Code of Practice and is supported by International Financial Reporting Standards (IFRS).

While adhering to the specific principles and practices of accounting, there are several year end recharges which are charged direct to the HRA as explained below:

|     | Description           | Explanation   | Cha   |
|-----|-----------------------|---|---|
| 5.1 | Holiday Pay Accrual   | The council is required to gather information on the number of days of untaken<br>leave as at the end of the financial year, to allow us to measure the additional<br>amount that the HRA is expected to pay as a result of unused Holiday entitlement.   | Costs of paying HRA staff for leave<br>that this is not actually paid to emp  |
| 5.2 | Pension Costs (FRS17) | FRS 17 is a complex financial reporting standard, but it is based on a simple principle - that an organisation should account for retirement benefits when it becomes committed to give them, even if the actual payment will be many years into the future. The Local Government Pension Scheme, is operated as Strathclyde Pension Fund and administered by Glasgow City Council in accordance with the Local Government Pension Scheme (Scotland) Regulations 1998. This is a funded scheme, which means that the council and employees pay contributions into a fund, calculated at a level intended to balance the pension's liabilities with investment assets.   | Before the financial year end, the of<br>Scheme. A calculation is then mad<br>the Employers Contributions per th<br>further calculation is carried out to<br>current service cost. It is this incre<br>council according to the actual in y |
| 5.3 | Depreciation          | Depreciation appears in financial statements and reports as an expense. Assets wear out over their lifetime and depreciation recognises this, by allocating a portion of the asset value as an expense each year of its useful life. Depreciation is provided on all property and equipment over their useful economic lives, with an exception made for assets without a determinable finite useful life, for example, non depreciating land and assets that are not yet available for use ie new build houses under construction. The useful lives of assets, as estimated and advised by a suitably qualified officer are as follows: Council Dwellings 40 years, Other buildings 20-60 years, Vehicles, Plant and Equipment 5-10 years. | The council maintains a list of asset<br>assets owned by the HRA. It is upo<br>assets are acquired for example ne<br>known as the straight line method,<br>cost of the asset, it's useful life and<br>over it's useful life.                |

## harging Methodology

ve not taken is calculated and charged to HRA. Note ployees, it is an accounting adjustment only.

e council is provided with an actuary report from the ade to determine and allocate the difference between the Actuary report and what has actually been paid. A o determine if there is an increase or decrease in the rease or decrease which is allocated across the whole year spend on superannuation costs.

sets known as the asset register, which lists all of the odated as and when assets are sold or when new new build houses. The depreciation calculation, d, is based on this asset register, which records the nd the value of depreciation to be charged each year

# 6. Methodology for calculating and allocating HRA costs - Central Support Allocation

|     | Description                    | Services provided - Please note this is note an exhaustive list but should cover the large majority of tasks undertaken for the HRA.   | Calculation Methodology   |
|-----|--------------------------------|--|---|
| 6.1 |                                | Internal auditing is an independent, objective assurance and consulting activity designed to add value and improve an organisation's operations. It helps an organisation accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control and governance processes.   | Allocation based on best estimate of where the work of internal audit is focused<br>each year. However, the overall effort of internal audit is intended to provide overall<br>assurance as to the adequacy and effectiveness of the council's systems of<br>governance, risk management and internal control in each year.   |
| 6.2 | Change Support                 | Service provide support to Managers and Staff through changes in processes and structures.   | Prorata according to the number of employees  |
| 6.3 |                                | Provides design and production services for all external correspondence to tenants, including the production of Housing News. The service also manages the council's social media and press releases.  | Based on work as accessed by the Manager of the service   |
| 6.4 | Contact Centre/One stop shop   | The contact centre is a service set up to enable easier access of information for members of the public and tenants. They deal with calls relating to a variety of queries for example: Benefits, Customer Satisfaction, Council Tax, Income Management, Housing Allocations, Pest control, Rents, Rent Refunds, Repairs.  | A record is kept of all the case types received into the Contact Centre and details<br>how they were dealt with ie sent to back office, call transferred or if the case was<br>closed by the contact centre. Case types are for example, Benefits, Housing<br>Allocations, Rents etc. An allocation is then based on the HRA's usage of this<br>service. A record of "quick queries" is also kept where there was general advice<br>given but no case created and this will also be in relation to some HRA activity. An<br>estimate of time spent would be used in this situation. |
| 6.5 | Policy, Planning & Performance | This service provides support to the housing management team in respect of developing and delivering service plans.  | Based on work as accessed by the Manager of the service   |
|     | Corporate Management           | All local authorities incur Corporate and Democratic Core costs. These are made up of 2 elements; first, the costs of Democratic Representation and Management (costs relating to all aspects of members' activities) and second, the costs of Corporate Management (costs of the infrastructure which allows services to be provided and information required for public accountability). Democratic costs are made up of: all members' allowances & expenses; the costs associated with officer time spent on appropriate advice to members and related support activities; subscriptions to local authority associations and provincial councils. Corporate Management costs are made up of: the costs of the head of paid service; the maintenance of statutory registers; the provision of information required by members of the public; the completion of corporate returns and reports; time spent on corporate level resources etc. | % of time spent by relevant staff on the duties as per the definition shown opposite.   |
| 6.7 | Allocation of Strategic Lead   | quality affordable housing in safe and attractive areas. It also includes the Housing Operations service area which delivers the Housing Landlord  | The Strategic Lead for Housing & Employability has a split responsibility to service areas within both the General Service and the HRA. As such, the cost of the Strategic Lead post is split 50:50 between General Services and the HRA.   |
| 6.8 | Central Admin Support          |  | Recharge based on the estimated percentage of time spent on HRA activities per individual employee.   |

# 6. Methodology for calculating and allocating HRA costs - Central Support Allocation

|      | Description                                      | Services provided - Please note this is note an exhaustive list but should cover the large majority of tasks undertaken for the HRA.   | Calculation Methodology  |
|------|--|--|--|
| 6.9  | Risk & Insurance                                 | Processing and arranging insurance cover and claims for the council.   | % of time spent by relevant staff on the duties as per the definition shown opposite.<br>The allocation for the employee insurance charge is based on the number of<br>employees,  |
| 6.10 | IT Services                                      | IT Services have several functions and responsibilities for example: Business Support - this includes the ICT Service desk, system upgrades,<br>electronic service delivery development; IT Connect which includes Desktop Services; Infrastructure Support which includes Telephony Management<br>& Support, Security Support, Communications infrastructure Management & Support.  | It is based on a combination of factors including number of IT user in Housing, the<br>number of devices allocated to Housing, the number of helpdesk incidents logged,<br>the number of service requests raised and any project work eg year end processes,<br>IHMS project, as well as share of corporate upgrades such as security of servers,<br>replacing servers, data migration. In addition there is specific housing related<br>operational tasks eg setting up and monitoring overnight interface files (rent, cash<br>etc ) plus backup and system check processes. |
| 6.11 | Revenue and Exchequer Charges                    | Rent Collection Work including early intervention, including taking payments & making/monitoring payment arrangements, Court work, Visits, Arrange & carry out evictions, Earning arrestments, Manage staff rent mandates, manage direct debits & standing Orders including annual rent increase renewals, arrears direct applications, hardship applications, Rent journals, Income maximization/joint working with housing & other agencies including referral to other agencies, manage lock ups, manage sequestration write offs, manage debt arrangement scheme, manage former tenants including write offs, credit refunds, produce weekly reports for arrears monitoring, manage the rent accounting system including processing swipe care requests and account amendments, year end rent increase and system testing, managing BACS files daily and weekly, warden charges and content insurance. |  |
| 6.12 | Accountancy                                      | Provides all financial services including Budgetary Control Reports, Budgets, Year end Accounts, Support to the Joint Rent Group, Supporting and Managing Finance system, providing Committee/Council reports, Providing Financial advice to Budget Holders, carrying out reconciliations, replying to Freedom of Information requests, completing statutory returns.  | % of staff time spent  |
| 6.13 |  |  | Recharge based on the estimated percentage of time spent on HRA activities per individual employee.  |
| h 14 | Transactional Services (HR Connect<br>& Payroll) |  | Recharge based on the estimated percentage of time spent on HRA activities per individual employee.  |
| 6.15 | Human Resources                                  | Provide eliphont to employee and manadere on all numan recource legite tor example contracte recruitment. Union hedotiatione, rectructure etc.   | Recharge based on the estimated percentage of time spent on HRA activities per<br>HR manager.  |
| 6.16 | Legal Services                                   | Encloyment Law, Contracts and Freedom of Information and Data Protection Law   | An assessment is based on an analysis of past year's work undertaken. This will involve detailed analysis of transactions but also an assessment of general advice and a breakdown of time spent, for example on debt recovery etc.  |