

North Yorkshire Council

Executive

16 September 2025

Brierley Homes Independent Review and Funding Update

Corporate Director Resources

1.0 PURPOSE OF REPORT

- 1.1 To report to Executive the outcome and recommendations of an external independent review carried out in relation to Brierley Homes on behalf of the Shareholder, and
- 1.2 To request additional loan facility headroom approval to Brierley Homes of £2m at the market rate of interest of 6% above base rate, such facility to be reviewed after 6 months to ensure Brierley Homes has appropriate cashflow over the short term. Any draw down on this additional loan facility would be subject to evidence of need and approval of the Corporate Director Resources in consultation with the Leader, Deputy Leader (Executive Member for Finance) and Chief Executive.

2.0 SUMMARY

- 2.1 Following a request by the Shareholder through the Brierley Group meeting, an independent external review of the operating model, structure, financial position and resilience of Brierley Homes has been carried out. This was undertaken by Tony Dodds consulting and the findings were reported to Brierley Group in July 2025 and Executive at this meeting. Tony Dodds is a real estate professional with over 30 years' experience working in the land use sector, with a strong emphasis on residential development. He has set up and led two local authority owned trading companies in the UK engaged in providing new homes both for market sale and for affordable purposes and therefore has the appropriate skills and experience to carry out the review.
- 2.2 It was acknowledged as part of commissioning this review that further work was also required over the next few months to prepare for a possible extension of the loan facility headroom which would be a decision of the Executive.

3.0 BACKGROUND

- 3.1 Brierley Homes was set up in 2017 by the then North Yorkshire County Council to deliver homes for market sale with the profits to be reinvested into frontline services. The company also delivers wider shareholder value for the Council in respect of the profits generated but also loan interest and service level agreements from the Council.
- 3.2 After initially delivering homes only for market sale, Brierley Homes has continued to gain momentum in securing a positive pipeline of over 500 homes with over 200 of them being affordable with estimated delivery for all in the next 4 years. Brierley Homes has enabled the grant of £2.6m for a 49-unit affordable scheme at Broomfields, to be secured with the continuation of working relations with Broadacres and the NYC housing team. The confirmed pipeline is made up from all NYC existing sites. Brierley Homes future development profile includes a shift in strategy for forward profiling to where they are delivering 100% affordable homes under contracts with monthly payments. This will improve their ability to predict income more accurately and will have a positive impact on cashflow once this is in place.

3.3 In terms of the financial performance of the market sale homes, as with any new company it has taken time for Brierley Homes to establish itself. The company has endured a difficult initial trading period with global impacts, some disappointing contractor performance and some cost overruns, project delays and an erosion of profits. Due to this, an independent external review of the company was deemed appropriate and timely by the Shareholder, the outcome of which is detailed below. In parallel to this review, there is now more focus on sites being delivered within timescales with Brierley Homes reviewing and improving structures and systems with more certainty being provided over delivery programmes and costs. On this basis the financial position of the company is projected to improve in 25/26 and beyond.

4.0 DETAILED PRESENTATION OF THE SUBSTANTIVE ISSUE

4.1 Brierley Homes has delivered to date 100 market sale properties and 19 affordable homes. The Company has a business plan which is updated annually with the latest 5 year business plan issued in March 2025 with a further programme of 55 market sale homes and 43 affordable homes delivered in the 2025/26 financial year. The following 4 year life span of the plan relates to a further 124 market sale and 154 affordable homes demonstrating the business plan shift to deliverable cash based projects and a move away from 100% market sales. The current business plan utilises this delivery model to also allow 100% affordable schemes to be delivered, notably sites at Broomfield and Whitby. Brierley Homes involvement in this method of delivery of affordable schemes has allowed grant funding to be secured and planning permission for the delivery of 49 Affordable Eco homes has been secured. The current business plan profile has 3 projects of this type and currently a further 3 in feasibility stage. The business plan states that these cash flow positive projects will become essential in the current market to allow a robust management of Brierley Homes financial position.

4.2 In the current business plan, Brierley Homes have also revised schemes to include only market sales homes of a suitable size that the opportunity would be available for the homes to be sold as affordable homes thereby providing an exit route for any project should there be a downturn in the market. During the current trading year the market has slowed and Brierley Homes consider the current strategy including all the above mentioned strategies will allow effective management of the current financial position and provide a robust pipeline with confirmed sales income dates. The Market will fluctuate over time and this structure will allow Brierley Homes to react accordingly in order to balance cashflow through income from affordable homes sales with profit from market sales as the market strengthens.

4.3 Some uncertainty on timing of sales income has effectively constrained cashflow making short term planning difficult as expenditure is relatively linear and predictable but income from property sales is uneven and not controllable within short time scales. There is therefore an ongoing risk when Brierley Homes is at the ceiling of its loan facility that if delays to sales happen, many of which are outside of the company's control, there could be an adverse impact on the company's ability to pay its supply chain and other invoices due in the short term, hence the requirement for additional loan headroom.

4.4 Brierley Homes core business remains the delivery of homes for market sale. Brierley Homes have plans for a pipeline of sites over the next four years. Given the fluctuating nature of the timing of sales income it is possible that additional funding in the region of £2m is required to deliver these sites. It is proposed that a facility is agreed for up to that sum to be provided to Brierley Homes from NYC at the usual market rate of 6% above base rate. It is proposed that this facility be drawdown upon with the agreement of the Corporate Director Resources in consultation with Leader, Deputy Leader (Executive Member for Finance) and Chief Executive and is reviewed after the initial 6 months. This funding would be in addition to the £25m commercial loan facility currently granted to Brierley Homes and which Brierley Homes have now utilised £24.5m of to deliver its pipeline of schemes, bringing the total commercial loan facility to £27m. It is also in addition to the £1.4m loan facility granted in July 2025 to deliver affordable housing above policy.

4.5 Independent external review

4.5.1 As summarised above, the Shareholder requested an independent external review of the operating model, structure, financial position and resilience of Brierley Homes be carried out. This was undertaken by Tony Dodds consulting and the findings were reported to Brierley Group in July 2025 and Executive at this meeting. Tony Dodds is a real estate professional with over 30 years' experience working in the land use sector, with a strong emphasis on residential development. He has set up and led two local authority owned trading companies in the UK engaged in providing new homes both for market sale and for affordable purposes and therefore has the appropriate skills and experience to carry out the review.

4.5.2 The following areas were covered by the review:

- I. A review of the operating model of the company and its resilience.
- II. A review of the structures and decision making. This should include looking at the permanent establishment and the short term/ agency staff
- III. Its financial position in the short and medium term. So, covering cashflow and profitability of the pipeline and also development margin
- IV. Options going forward: continue to build out the pipeline and wind up, extend the pipeline to pay back the loan and then wind up, continue to develop the company
- V. Is the model of operation of delivering market facing homes for profit the right one, or does the company model change to one of delivering affordable homes / difficult sites given we are now unitary

4.5.3 The review concluded that:

"Brierley Homes is a business that is based on a sound operating model and an achievable goal, that of building new homes for profit. It has diversified and adapted, now building a high proportion of affordable homes and delivering construction in different ways.

It has endured a difficult initial trading period with global impacts, disappointing contractor performance and some poor project management leading to cost overruns, project delays and an erosion of profits. It now faces high debt levels, delays in crystallising Shareholder Value and criticisms for its unpredictable performance.

Despite this the company is delivering high quality projects with a pipeline and forecast to deliver Shareholder Value over the medium term. Structures and systems are being improved, and more certainty is being provided over delivery programmes and costs.

Further efficiencies are required, for example to the delivery team itself, which requires additional support and a clearer structure. Sales strategies need more robustness and improvements to the transparency and accuracy of information being exchanged with the shareholder need to continue. Development margins need reviewing and the way sites and land values are appraised aligned more to the proven methodology of the private sector.

The company also needs flexibility from its shareholder with respect to the development loan used to support its activities. Beneficial changes can help the company return to a more stable and sustainable financial trading position sooner, allowing more new projects to be delivered and greater Shareholder Value to be created.

The shareholder also needs to support the business as publicly owned commercial entity as it interacts with other parts of the Council. Making business decisions in its own interests can lead to conflicts which need careful handling to ensure optimal results for all parties.

The new homes market in North Yorkshire has a positive outlook but remains affected by macro-economic influences. Careful planning is required to achieve sales at acceptable values and rates, with a focus needed on building homes that people want to buy, in good locations, with alternative exit options available as a back-up. Continued investment into delivering affordable homes under contract to third parties should be encouraged as a cash efficient and low risk part of the business model.

Similarly proper project planning and assessment is vital to ensure that unnecessary costs and delays are avoided. Early evidence suggests that the new construction delivery methods are proving successful and with inflation easing the ability of the company to deliver projects to budget and on time looks promising.

The quality and specification of the homes BH is producing is excellent and exceeds the market. Build costs are broadly market comparable and programmes for delivery in line with expected rates of output. Legacy issues on current sites are being reconciled and the lessons learned applied positively to new schemes.

The brief for this report asks if the operational model for BH is still appropriate or are there better alternatives. In answer, there is no reason to cease the trading of BH or change its current operating model, nor are there any other models that better satisfy achieving the goals of the shareholder.

The company has a positive impact on the County in addition to its core aim of generating Shareholder Value. These benefits are varied and tangible and BH can continue to provide a valuable contribution to the economy and environment of the area. “

4.6 Building on these conclusions, the following recommendations were raised:

- **Review of the loan terms** – give some flexibility which will allow the company freedom to trade in a more stable financial environment
- **Use a private sector funding structure** – loan up to 70% of direct costs for projects, cashflow each project separately, pay off debt and interest with initial sales income
- **Change the project appraisals** – increase the KPI development margins and use updated residual land value calculations
- **Support the team** – rationalise the structure and recruit for improved management, resilience, less freelance contracts and to plug the in-house skills gaps
- **Update sales strategies** – plan for an alternative exit, look at sales rates and values, allow for incentives, avoid unpopular house types
- **Review Council / Company interaction** – look at issues that may affect the operation of the business where it interacts with the shareholder
- **Business Continuity Plan** – produce one
- **Update criteria for Shareholder Value** – promote the true and fuller benefits of the company
- **Overheads and administrative costs** – review these including the role of SLA's
- **Accounts** – report balance sheet as well as profit and loss to reflect WIP and stock to give a truer picture of company health
- **Affordable Homes** – develop relationships and encourage delivery of further cashflow friendly build contracts
- **Information production** – continue to improve the detail and accuracy of data to inform all parties of trading position

4.7 These recommendations have been considered by both the Shareholder and the company with the responses and actions from these recommendations set out below:

<p>Use a private sector funding structure – loan up to 70% of direct costs for projects, cashflow each project separately, pay off debt and interest with initial sales income</p>	<p>In principle this is agreed. It is accepted that the current market rate charged of 6% above base rate is an appropriate market rate for market sale houses. It is proposed to review the value of the loan which is attributable to delivering affordable homes above policy and it was agreed as part of the urgent July 2025 decision that this element of the loan would be separate to the main loan for the company and would not attract a commercial rate of interest, instead it would be at base rate to recognise the social benefit of delivering the affordable homes. Loan of £1.4m has been used to date on affordable above policy with plans for additional affordable homes in the pipeline.</p>
<p>Change the project appraisals – increase the KPI development margins and use updated residual land value calculations</p>	<p>This is already in progress. A review of margin is being considered to ensure it is in line with the industry.</p>
<p>Support the team – rationalise the structure and recruit for improved management, resilience, less freelance contracts and to plug the in-house skills gaps</p>	<p>A review of the structure is taking place. This will pick up the split between Brierley Homes staff and freelance staff and make the whole staffing structure less linear. The cost implications of this need to be worked through.</p>
<p>Update sales strategies – plan for an alternative exit, look at sales rates and values, allow for incentives, avoid unpopular house types</p>	<p>Already being progressed. New sales strategy in place with a sales post appointed. Alternative exit route of shared ownership being considered as part of business cases and sales strategy along with work with the councils housing department for any homes that are not successful at market sale. Other incentives also being considered by the company such as stamp duty payment and some research being done as to what the rest of the industry is offering. Unpopular house types have already been identified and company is no longer offering.</p>
<p>Review Council / Company interaction – look at issues that may affect the operation of the business where it interacts with the shareholder</p>	<p>Issues are being addressed particularly with planning and highways departments to understand issues from both Organisations' perspectives.</p>
<p>Business Continuity Plan – produce one</p>	<p>This will be developed to be complete by December 2025.</p>
<p>Update criteria for Shareholder Value – promote the true and fuller benefits of the company</p>	<p>This is currently the loan margin and 10% of the SLAs. The definition of shareholder value and social value will be considered in future.</p>
<p>Overheads and administrative costs – review these including the role of SLAs</p>	<p>This is being addressed as part of the work on structures and margin set out above.</p>
<p>Accounts – report balance sheet as well as profit and loss to reflect WIP and stock to give a truer picture of company health</p>	<p>Agreed this would improve financial reporting and is the direction of travel. Full financial information including P&L, balance Sheet, work in progress and Cashflow are prepared and reconciled at year end and so a full picture of the company is available. The intention is for Brierley Homes to move to a new finance system following NYC go live on 1 April 2026 and so this will be picked up as part of that project.</p>
<p>Affordable Homes – develop relationships and encourage</p>	<p>This is in place and is something Brierley Homes will look to build on in the future. 2 fully affordable schemes</p>

delivery of further cashflow friendly build contracts	commence on site in August with monthly income associated with this and a further 3 fully affordable schemes in the development pipeline. Brierley Homes are working with a registered provider and need to continue developing the conversation with the council's housing team to start developing homes to support the HRA. The availability of additional grant funding to deliver such schemes will also be explored.
Information production – continue to improve the detail and accuracy of data to inform all parties of trading position	Significant progress in this area with the build and sales tracker and weekly cashflow both of which are updated weekly and shared with team members weekly and Board as appropriate. This has greatly increased visibility of what income is to be received and the amounts and timing of payments. The detail included and the accuracy of these documents will continue to be refined. Sales income in year is also now fully detailed with risk included so that this can be tracked and issues highlighted early. Relationships between different teams have also developed with better joint working.

4.8 Based on this review, there is support for the Council to continue with the Company as set out along with ensuring improvements, as per the recommendations, are progressed.

5.0 ALTERNATIVE OPTIONS CONSIDERED

5.1 There is an option not to approve any additional loan, but this runs the risk of some payments being unable to be made if there is any delay in sales income being received and the development pipeline of Brierley Homes being constrained.

6.0 IMPACT ON OTHER SERVICES/ORGANISATIONS

6.1 There was no impact on any other services or organisations.

7.0 FINANCIAL IMPLICATIONS

7.1 The company reported a draft outturn position as at 31 March 2025 of Gross Profit £0.05m and a Net Loss of £3.2m, after taking account of £2.3m financing costs and £1m overheads. This result was driven by delays in receiving sales income for a variety of reasons. Processes have been implemented to ensure stronger more robust procedures and governance is in place to support the development of Brierley Homes going forward. The draft forecast outturn for 25/26 as at quarter one is a profit of £0.3m with this rising to £3.2m in 26/27. Shareholder value in 25/26 is forecast to be £1.9m. The Business Plan provides for gradual repayments to be made on the loan.

7.2 The following statement was included in the independent report in terms of the pipeline and loan repayment: "An assessment of the current pipeline projects suggests that over the next 4 years trading through these schemes can enable BH to repay almost all of the principal debt whilst also covering the company overheads and making the necessary loan interest payments."

7.3 The income from sales forecasts at the time of the 21 July 2025 urgent decision report was for £4.724m to be received by the end of August. At the time of writing, £3.27m of this income has been received. The remaining income is due in during September / October in line with some movement in sales completion dates.

7.4 The Council has an existing loan facility to Brierley Homes of £25m at a commercial rate of interest and, following the urgent decision on 21 July 2025, an additional loan facility of £1.4m to deliver affordable homes above policy. This loan to deliver affordable housing is at base rate of interest to reflect the social benefit to support the delivery of affordable homes.

7.5 The additional loan facility to deliver market housing of £2m is proposed to be at a commercial rate in line with the existing loan and would therefore provide additional shareholder value for the Council. It is proposed that any draw down on this loan facility would be delegated to the approval of the Corporate Director Resources in consultation with the Leader, Deputy Leader (Executive Member for Finance) and Chief Executive.

8.0 LEGAL IMPLICATIONS

8.1 The proposed loan does not meet the criteria for a subsidy because it does not confer an economic advantage, as it aligns with the terms available in the market.

9.0 EQUALITIES IMPLICATIONS

9.1 There are no specific equalities implications arising from this report. See Appendix A

10.0 CLIMATE CHANGE IMPLICATIONS

10.1 There are no specific climate change impacts arising from this report. Brierley Homes houses are built in line or above current policy. See Appendix B

11.0 REASONS FOR RECOMMENDATION

11.1 Additional loan facility is required in order to potentially allow the company time for sales to be received over the next few months and ensure Brierley Homes can continue to make all payments due to suppliers in the event of some delayed sales in the coming months.

12.0 RECOMMENDATIONS

12.1 For the Executive to note the conclusions and recommendations of the independent external review that has been carried out.

12.2 For Executive to approve additional loan facility headroom to Brierley Homes of £2m at the usual commercial rate of interest to be reviewed after 6 months to ensure Brierley Homes has appropriate cashflow over the short term. Approval of draw down on this additional loan facility to be delegated to the Corporate Director Resources in consultation with the Leader, Deputy Leader (Executive Member for Finance) and Chief Executive and is subject to evidence of need being demonstrated.

APPENDIX

Appendix A – EIA

Appendix B – CCIA

BACKGROUND DOCUMENTS: None

Gary Fielding
Corporate Director Resources
County Hall
Northallerton
5 September 2025

Report Author – Vicki Dixon – Assistant Director - Resources, Environment

Note: Members are invited to contact the author in advance of the meeting with any detailed queries or questions.

Initial equality impact assessment screening form			
This form records an equality screening process to determine the relevance of equality to a proposal, and a decision whether or not a full EIA would be appropriate or proportionate.			
Directorate	Resources		
Service area	Finance		
Proposal being screened	Brierley Homes Independent Review and Funding Update		
Officer(s) carrying out screening	Vicki Dixon		
What are you proposing to do?	To report the outcome of an independent review of Brierley Homes and to seek approval for additional loan facility of £2m.		
Why are you proposing this? What are the desired outcomes?	Based on this review, there is support for the Council to continue with the Company and the additional loan headroom will ensure no payments are unable to be made if there is any delay in sales income being received.		
Does the proposal involve a significant commitment or removal of resources? Please give details.	The proposal requests additional loan headroom of £2m from NYC – the report proposes that this is at a commercial rate of interest.		
Impact on people with any of the following protected characteristics as defined by the Equality Act 2010, or NYC's additional agreed characteristics			
As part of this assessment, please consider the following questions:			
<ul style="list-style-type: none"> • To what extent is this service used by particular groups of people with protected characteristics? • Does the proposal relate to functions that previous consultation has identified as important? • Do different groups have different needs or experiences in the area the proposal relates to? 			
If for any characteristic it is considered that there is likely to be an adverse impact or you have ticked 'Don't know/no info available', then a full EIA should be carried out where this is proportionate. You are advised to speak to your directorate representative for advice if you are in any doubt.			
Protected characteristic	Potential for adverse impact		Don't know/No info available
	Yes	No	
Age		X	
Disability		X	
Sex		X	
Race		X	
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage or civil partnership		X	
People in rural areas		X	
People on a low income		X	
Carer (unpaid family or friend)		X	
Are from the Armed Forces Community		X	
Does the proposal relate to an area where there are known inequalities/probable impacts (for	No		

example, disabled people's access to public transport)? Please give details.					
Will the proposal have a significant effect on how other organisations operate? (for example, partners, funding criteria, etc.). Do any of these organisations support people with protected characteristics? Please explain why you have reached this conclusion.	No				
Decision (Please tick one option)	<table border="1"> <tr> <td>EIA not relevant or proportionate:</td> <td style="text-align: center;">✓</td> <td>Continue to full EIA:</td> <td>No</td> </tr> </table>	EIA not relevant or proportionate:	✓	Continue to full EIA:	No
EIA not relevant or proportionate:	✓	Continue to full EIA:	No		
Reason for decision	No adverse impact identified				
Signed (Assistant Director or equivalent)	Vicki Dixon				
Date	04 September 2025				

Climate change impact assessment

The purpose of this assessment is to help us understand the likely impacts of our decisions on the environment of North Yorkshire and on our aspiration to achieve net carbon neutrality by 2030, or as close to that date as possible. The intention is to mitigate negative effects and identify projects which will have positive effects.

This document should be completed in consultation with the supporting guidance. The final document will be published as part of the decision making process and should be written in Plain English.

If you have any additional queries which are not covered by the guidance please email climatechange@northyorks.gov.uk

Version 2: amended 11 August 2021

Please note: You may not need to undertake this assessment if your proposal will be subject to any of the following:

Planning Permission
Environmental Impact Assessment
Strategic Environmental Assessment

However, you will still need to summarise your findings in the summary section of the form below.

Please contact climatechange@northyorks.gov.uk for advice.

Title of proposal	Brierley Homes Independent Review and Funding Update
Brief description of proposal	To report the outcome of an independent review of Brierley Homes and to seek approval for additional loan facility of £2m.
Directorate	Resources
Service area	Finance
Lead officer	Vicki Dixon
Names and roles of other people involved in carrying out the impact assessment	N/A
Date impact assessment started	4 September 2025

Options appraisal

Were any other options considered in trying to achieve the aim of this project? If so, please give brief details and explain why alternative options were not progressed.

An option was considered not to require any additional loan but this runs the risk of some payments being unable to be made if there is any delay in sales income being received and the development pipeline of Brierley Homes being constrained.

What impact will this proposal have on council budgets? Will it be cost neutral, have increased cost or reduce costs?

Please explain briefly why this will be the result, detailing estimated savings or costs where this is possible.

The proposal requests additional loan headroom of £2m from NYC – the report proposes that this is at a commercial rate of interest.

<p>How will this proposal impact on the environment?</p> <p>N.B. There may be short term negative impact and longer term positive impact. Please include all potential impacts over the lifetime of a project and provide an explanation.</p>	<p>Positive impact (Place a X in the box below where relevant)</p>	<p>No impact (Place a X in the box below where relevant)</p>	<p>Negative impact (Place a X in the box below where relevant)</p>	<p>Explain why will it have this effect and over what timescale?</p> <p>Where possible/relevant please include:</p> <ul style="list-style-type: none"> • Changes over and above business as usual • Evidence or measurement of effect • Figures for CO₂e • Links to relevant documents 	<p>Explain how you plan to mitigate any negative impacts.</p>	<p>Explain how you plan to improve any positive outcomes as far as possible.</p>	
<p>Minimise greenhouse gas emissions e.g. reducing emissions from travel, increasing energy efficiencies etc.</p>	Emissions from travel		X				
	Emissions from construction		X				
	Emissions from running of buildings		X				
	Emissions from data storage		X				
	Other		X				
<p>Minimise waste: Reduce, reuse, recycle and compost e.g. reducing use of single use plastic</p>		X					
<p>Reduce water consumption</p>		X					

<p>How will this proposal impact on the environment?</p> <p>N.B. There may be short term negative impact and longer term positive impact. Please include all potential impacts over the lifetime of a project and provide an explanation.</p>	<p>Positive impact (Place a X in the box below where relevant)</p>	<p>No impact (Place a X in the box below where relevant)</p>	<p>Negative impact (Place a X in the box below where relevant)</p>	<p>Explain why will it have this effect and over what timescale?</p> <p>Where possible/relevant please include:</p> <ul style="list-style-type: none"> • Changes over and above business as usual • Evidence or measurement of effect • Figures for CO₂e • Links to relevant documents 	<p>Explain how you plan to mitigate any negative impacts.</p>	<p>Explain how you plan to improve any positive outcomes as far as possible.</p>
Minimise pollution (including air, land, water, light and noise)		X				
Ensure resilience to the effects of climate change e.g. reducing flood risk, mitigating effects of drier, hotter summers		X				
Enhance conservation and wildlife		X				
Safeguard the distinctive characteristics, features and special qualities of North Yorkshire's landscape		X				
Other (please state below)		X				

Are there any recognised good practice environmental standards in relation to this proposal? If so, please detail how this proposal meets those standards.

Brierley Homes houses are built in line or above current policy

Summary Summarise the findings of your impact assessment, including impacts, the recommendation in relation to addressing impacts, including any legal advice, and next steps. This summary should be used as part of the report to the decision maker.

There are no specific climate change impacts arising from this report. Brierley Homes houses are built in line or above current policy

Sign off section

This climate change impact assessment was completed by:

Name	Vicki Dixon
Job title	Assistant Director, Resources (Environment)
Service area	Finance
Directorate	Resources
Signature	Vicki Dixon
Completion date	04 September 2025

Authorised by relevant Assistant Director (signature): Vicki Dixon

Date: 04 September 2025