

Rother District Council

Report to	-	Cabinet
Date	-	2 September 2019
Report of the	-	Executive Director
Subject	-	Provision of Temporary Accommodation

Recommendation to COUNCIL: That:

- 1) the Temporary Accommodation Investment Strategy (Appendix 4) be approved and adopted;
 - 2) the Executive Director be authorised to purchase properties for use as temporary accommodation at a cost of up to £3m funded through borrowing; and
 - 3) the Capital Programme be amended accordingly.
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Head of Service: Joe Powell

Lead Cabinet Member: Councillor Clark

Introduction

1. In July 2018, the Housing Issues Task and Finish Group (HIT&FG) made a series of recommendations to Cabinet (Minute CB18/14 refers). Recommendation 2(a) of the (HIT&FG) was for the Council: “*to acquire emergency and temporary accommodation through the purchase of accommodation for conversion, or delivering new build temporary accommodation; and purchasing accommodation for those in housing need – ‘street purchases’ for market or to meet temporary accommodation needs.*”.
2. As a result of these recommendations full Council approved a key objective within the Council's Housing, Homelessness and Rough Sleeping Strategy 2019-24 (Minute C18/65 refers): to acquire in partnership, or develop where appropriate, council owned temporary accommodation provision to meet the varied needs of homeless households in Rother.
3. The purpose of the report is to recommend to Members options for acquiring property for use as temporary accommodation. The Council has a duty to accommodate homeless households under the Housing Act 1996. The benefits to the Council of investing in property for use as temporary accommodation are that it provides the Council greater control over the quality and quantity of provision, while also reducing the net cost of provision.

Background

4. The proposals within this report are designed to work as part of a package of temporary accommodation solutions which will include the Council continuing to use a number of privately owned and well-managed temporary accommodation establishments. The present number of such properties in

Rother is 15 that includes eight self-contained properties that have been secured by entering into formal agreements with private providers.

5. The budget for 2019/20 is £755,000 offset by £369,500 of income largely recovered through housing benefit. The net cost therefore is budgeted to be £385,500.
6. Members will be aware that the Council continues to experience a significant rise in homelessness and temporary accommodation placements. The number of homeless households using temporary accommodation has risen from 17 to 57 between March 2015 and March 2019. As at August 2019 the number of households in B&B is 66.
7. The use of temporary accommodation has a detrimental impact on the wellbeing of homeless households. The impact is compounded when households are forced to use single room accommodation with shared facilities and more so if they are located outside of the area, away from schools, places of work and support networks.
8. Through the purchase of property for use as temporary accommodation the Council will be able to improve the model of service it provides from one of high cost, single room accommodation – which is sometimes remotely located – to a model which:
 - Provides self-contained accommodation for families with children;
 - Increases the amount of temporary accommodation available locally;
 - Ensures a minimum quality standard of accommodation;
 - Ensures a minimum standard of property management and support for residents; and
 - Reduces costs.

Level and type of demand

9. The table at Appendix 1 illustrates the number and type of households the Council has placed in temporary accommodation during 2018/19. The Council has placed a mix of households with various numbers of children and households without children, whom are typically comprised of single people and childless couples.
10. It is also important to highlight that for single people there is no duty for the Council to provide self-contained accommodation, with single room and shared facility accommodation being seen as reasonable in legislation. The management of single homeless people in a shared-facility living environment is a specialist area of provision as this group tends to have complex and high support needs. The Council is presently reviewing with East Sussex County Council and wider partners the provision of supported accommodation for all groups and, in particular, single people with complex needs.

Cost of Temporary Accommodation

11. The table at Appendix 2 illustrates the average net cost to the Council of temporary accommodation, per size of household.

12. The average length of stay in temporary accommodation across all household types is 77 days. The average net cost to the Council of placing single households or childless couples in temporary accommodation is £1,360 for the entire length of their placement. The average net cost of a placement is significantly more for households with children, with each placement costing the Council £2,900 on average.
13. If the Council were to purchase its own property for the purposes of providing temporary accommodation, each unit of accommodation purchased would accommodate approximately four separate households over a twelve month period – assuming full occupancy. Therefore, over the course of twelve months a unit of accommodation which the Council owns would enable an average cost avoidance of £6,000 for single households and childless couples and £13,000 for households with children.

Financial Assessment

14. A financial assessment of the income and costs associated with the Council purchasing temporary accommodation is included at Appendix 3. The assessment also includes an illustration of the costs which can be avoided by being able to accommodate households in Council owned temporary accommodation rather than in private provision. These projections have been verified in consultation with neighbouring local authorities delivering similar temporary accommodation schemes.
15. The table below illustrates the level of investment required to purchase a range of properties. The table also outlines the revenue income and costs the Council can expect from the investment, as well as the level of costs the Council will avoid by not having to place the households in privately provided temporary accommodation.

Property	Target Price inc. costs of purchase	Annual Operating and financing Costs	Annual Income (based on LHA rates)	Annual Cost Avoidance	Net Annual saving
Room in HMO (based on 7 units in a property)	£535,750	£82,207	£20,570	£64,365	£2,728
1 bed flat	£150,000	£10,468	£4,013	£9,195	£2,740
2 bed flat	£186,000	£12,150	£5,496	£11,791	£5,136
2 bed house	£211,750	£12,058	£5,496	£11,791	£5,228
3 bed flat	£211,750	£13,274	£7,440	£13,763	£7,928
3 bed house	£265,825	£14,347	£7,440	£13,763	£6,856

16. For the purposes of the report an assessment of the overall saving and return on investment for purchasing 12 properties was undertaken (6 two bed houses and 6 three bed houses) with an overall total cost in the order of £3m. This showed an overall net saving to the Council of just over £70,000 per annum. The following table shows a breakdown of this:

	Target Price	Total Cost of Purchase	No	Total Investment	Annual Saving	% return on Capital
2 Bed Houses	£200,000	£211,750	6	£1,270,500	£31,368	
3 Bed Houses	£252,500	£265,825	6	£1,594,950	£41,133	
Total			12	£2,865,450	£72,501	2.53%

Temporary Accommodation Investment Strategy

17. The financial assessment should be read in parallel with the Temporary Accommodation Investment Strategy at Appendix 4 which outlines the type of properties the Council intends to acquire for use as temporary accommodation, alongside how these properties will be purchased, managed, maintained and repaired.
18. The Strategy has been developed following a review of the level and type of demand for temporary accommodation seen in 2018/19, alongside a review of local property prices, ancillary purchase costs, investment risks and property management risks. The risks and mitigations associated with the property investment are described in the risk statement within this report and the Temporary Accommodation Investment Strategy at Appendix 4. The property management risks and how these will be mitigated are included separately at Appendix 5.
19. We have undertaken an audit of the skills and expertise within the Council that might be applicable to property management, repair and refurbishment functions. We have considered which functions might be delivered in-house and which may need to be contracted to third party specialists or partner agencies. In summary, the Council has experience of supporting individuals to sustain temporary accommodation and secure new accommodation. In addition, the Estates Maintenance Team can undertake minor repairs and monitor statutory compliance obligations, as well as coordinate more specialist refurbishment works as required.
20. However, the Council does not presently have the resources, expertise or tools needed to manage the recovery of rental income or to enable it to liaise directly with residents to manage enquiries, particularly outside of normal office hours. Initial enquiries with local estate agents, registered providers and neighbouring local authorities (with the relevant property management expertise) have indicated that this function can be purchased in the short-term while the Council begins to build a portfolio of properties. The Council will need to keep under review developing these management functions in-house in the future.
21. The Government are continuing to increase the level of funding targeted at homelessness prevention services and it is possible that we will experience a reduction in the level of homelessness over time. Therefore, if levels of homelessness reduce the exit strategy from property investments will be to first review whether any property owned by the Council can be put to a different use; for example, in future the Council might consider accommodating households permanently. Any asset under Council ownership can be sold ultimately and the capital receipt reinvested into Council budgets.

Conclusion

22. The purchase of property for use as temporary accommodation will provide the Council with more control over the quality of temporary accommodation available locally as well as being able to achieve greater control of revenue costs. It is estimated that the level of investment recommended of £3m will enable the Council to reduce its costs by approximately £70,000 annually. This cost reduction excludes the impact of any appreciation or depreciation in the value of the purchased properties.
23. The benefits of any investment need to be offset against both the costs (detailed within the Investment Appraisal at Appendix 3) as well as the staffing and resource constraints which exist. The Council has had no direct experience of purchasing or managing temporary accommodation in recent years; therefore, it is desirable to build a portfolio of properties for use as temporary accommodation in a measured way. The approach will allow the Council to develop the skills and expertise required to grow a larger portfolio of properties in the future.

Recommendations

24. It is recommended that the Executive Director be authorised to borrow an initial sum of up to £3m to prioritise the purchase of properties. The properties purchased could include a mixture of both houses and flats. It is recommended that these be purchased and managed in line with the Temporary Accommodation Investment Strategy (Appendix 4).

Malcolm Johnston
Executive Director

Risk Assessment Statement

The Temporary Accommodation Investment Strategy at Appendix 4 describes how the Council will conduct due diligence in order complete the purchase of residential properties to minimise investment risks.

The risks associated with managing temporary accommodation are detailed at Appendix 5. The risks are mitigated by using internal Council resources where these have been assessed as sufficient and recommends the use of specialist contractors or partner agencies where required.

It is possible that we may experience a reduction in the level of homelessness we experience over time. The exit strategy from the investment will be to first review whether any property owned by the Council can be put to a different use; ultimately any asset under Council ownership can be sold and the capital receipt reinvested into Council budgets.

There are also risks associated with choosing not to invest in property for use as temporary accommodation. The Council has had some success in reducing the rate at which the number of households in temporary accommodation rose during 2018/19; however, in addition to minimising demand the Council needs to reduce the amount it spends on providing temporary accommodation.

There is a risk to Council reputation of continuing to use single room accommodation to house families with children which may be seen as compromising the Council's values and ethics.

Appendix 1

Level and Type of Demand

2018/19			
Household size	Bedroom Need (TA)	Number	%
Single / childless couple	Shared Facilities (HMO)	160	59%
Single pregnant	1 bed	4	1%
Family +1	1/2 bed (flat)	46	17%
Family +2	2 bed (flat)	29	11%
Family +3	2/3 bed (flat)	17	6%
Family +4	3 bed (flat)	8	3%
Family +5	3 bed (house)	5	2%
Family +6	3/4 bed (house)	0	0
Family +7	4 bed (house)	2	1%
Total	-	271	

Appendix 2

Average Net Cost of Temporary Accommodation Per Household

AVERAGE TA COSTS								
	Cost Per Night	Days In	Weeks In	Gross	Weekly LHA 90% 2011 Rate	Daily LHA	Total LHA	Average Net Cost to Rother
HMO/ 1 Bed Need	37.06	54	7.71	2,001.24	-83.08	-11.87	-640.90	1,360.34
2 Bed Need	48.63	76	10.86	3,695.88	-114.23	-16.32	-1,240.19	2,455.69
3 Bed Need	59.96	92	13.14	5,516.32	-155.77	-22.25	-2,047.29	3,469.03
4 Bed Need	60.30	86	12.29	5,185.80	-206.66	-29.52	-2,538.94	2,646.86

Financial Assessment of Temporary Accommodation Acquisition

Self contained 1 bed flat	Year 0	Year 1	Year 2	Year 3	Year 4
Income					
LHA rate 2011	4,320	4,320	4,320	4,320	4,320
Voids 10%	(432)	(432)	(432)	(432)	(432)
Recharge of utilities	125	125	125	125	125
Cost avoided on current temp accommodation		9,195	9,195	9,195	9,195
Total Income	0	13,208	13,208	13,208	13,208
Expenditure					
Purchase cost	(140,000)				
Red book valuations	(1,000)				
Building survey	(1,000)				
Legal costs	(750)				
White goods	(3,000)				
Stamp Duty	(4,200)				
MRP - annuity	(1,538)	(1,577)	(1,616)	(1,656)	
Interest	(3,749)	(3,710)	(3,671)	(3,630)	
Management costs	(648)	(648)	(648)	(648)	
Annual repairs	(2,000)	(2,000)	(2,000)	(2,000)	
Utilities - 75% of average annual cost	(1,249)	(1,249)	(1,249)	(1,249)	
Gas Safety	(150)	(150)	(150)	(150)	
Electrical Testing	(150)	(150)	(150)	(150)	
Insurance	(200)	(200)	(200)	(200)	
Service charge	(1,000)	(1,000)	(1,000)	(1,000)	
Total Expenditure	(149,950)	(10,684)	(10,684)	(10,684)	(10,684)
Net Cash Flow	(149,950)	2,524	2,524	2,524	2,524

Self contained 2 bed flat

	Year 0	Year 1	Year 2	Year 3	Year 4
Income					
LHA rate 2011		5,940	5,940	5,940	5,940
Voids 10%		(594)	(594)	(594)	(594)
Recharge of utilities		150	150	150	150
Cost avoided on current temp accommodation		11,791	11,791	11,791	11,791
Total Income	0	17,286	17,286	17,286	17,286
Expenditure					
Purchase cost		(175,000)			
Red book valuations		(1,000)			
Building survey		(1,000)			
Legal costs		(750)			
White goods		(3,000)			
Stamp Duty		(5,250)			
MRP - annuity		(1,908)	(1,956)	(2,005)	(2,055)
Interest		(4,650)	(4,602)	(4,553)	(4,503)
Management costs		(891)	(891)	(891)	(891)
Annual repairs		(2,000)	(2,000)	(2,000)	(2,000)
Utilities		(1,499)	(1,499)	(1,499)	(1,499)
Gas Safety		(150)	(150)	(150)	(150)
Electrical Testing		(150)	(150)	(150)	(150)
Insurance		(200)	(200)	(200)	(200)
Service charge		(1,000)	(1,000)	(1,000)	(1,000)
Total Expenditure	(186,000)	(12,447)	(12,447)	(12,447)	(12,447)
Net Cash Flow	(186,000)	4,839	4,839	4,839	4,839

<u>Self contained 2 bed house</u>	Year 0	Year 1	Year 2	Year 3	Year 4
Income					
LHA rate 2011	5,940	5,940	5,940	5,940	5,940
Voids 10%	(594)	(594)	(594)	(594)	(594)
Recharge of utilities	150	150	150	150	150
Cost avoided on current temp accommodation	11,791	11,791	11,791	11,791	11,791
Total Income	0	17,286	17,286	17,286	17,286
Expenditure					
Purchase cost	(200,000)				
Red book valuations	(1,000)				
Building survey	(1,000)				
Legal costs	(750)				
White goods	(3,000)				
Stamp Duty	(6,000)				
MRP - annuity	(2,172)	(2,226)	(2,282)	(2,339)	
Interest	(5,294)	(5,239)	(5,184)	(5,127)	
Management costs	(891)	(891)	(891)	(891)	
Annual repairs	(2,000)	(2,000)	(2,000)	(2,000)	
Utilities	(1,499)	(1,499)	(1,499)	(1,499)	
Gas Safety	(150)	(150)	(150)	(150)	
Electrical Testing	(150)	(150)	(150)	(150)	
Insurance	(200)	(200)	(200)	(200)	
Service charge	0	0	0	0	
Total Expenditure	(211,750)	(12,355)	(12,355)	(12,355)	(12,355)
Net Cash Flow	(211,750)	4,931	4,931	4,931	4,931

<u>Self contained 3 bed flat</u>	Year 0	Year 1	Year 2	Year 3	Year 4
Income					
LHA rate 2011		8,100	8,100	8,100	8,100
Voids 10%		(810)	(810)	(810)	(810)
Recharge of utilities		150	150	150	150
Cost avoided on current temp accommodation		13,763	13,763	13,763	13,763
Total Income	0	21,203	21,203	21,203	21,203
Expenditure					
Purchase cost	(200,000)				
Red book valuations	(1,000)				
Building survey	(1,000)				
Legal costs	(750)				
White goods	(3,000)				
Stamp Duty	(6,000)				
MRP - annuity		(2,172)	(2,226)	(2,282)	(2,339)
Interest		(5,294)	(5,239)	(5,184)	(5,127)
Management costs		(1,215)	(1,215)	(1,215)	(1,215)
Annual repairs		(2,000)	(2,000)	(2,000)	(2,000)
Utilities		(1,499)	(1,499)	(1,499)	(1,499)
Gas Safety		(150)	(150)	(150)	(150)
Electrical Testing		(150)	(150)	(150)	(150)
Insurance		(200)	(200)	(200)	(200)
Service charge		(1,000)	(1,000)	(1,000)	(1,000)
Total Expenditure	(211,750)	(13,679)	(13,679)	(13,679)	(13,679)
Net Cash Flow	(211,750)	7,523	7,523	7,523	7,523

Self contained 3 bed house

Income

LHA rate 2011	8,100	8,100	8,100	8,100
Voids 10%	(810)	(810)	(810)	(810)
Recharge of utilities - 10% recovery	150	150	150	150
Cost avoided on current temp accommodation		13,763	13,763	13,763
Total Income	0	21,203	21,203	21,203

Expenditure

Purchase cost	(252,500)			
Red book valuations	(1,000)			
Building survey	(1,000)			
Legal costs	(750)			
White goods	(3,000)			
Stamp Duty	(7,575)			
MRP - annuity	(2,727)	(2,795)	(2,865)	(2,937)
Interest	(6,646)	(6,577)	(6,508)	(6,436)
Management costs	(1,215)	(1,215)	(1,215)	(1,215)
Annual repairs	(2,000)	(2,000)	(2,000)	(2,000)
Utilities	(1,665)	(1,665)	(1,665)	(1,665)
Gas Safety	(150)	(150)	(150)	(150)
Electrical Testing	(150)	(150)	(150)	(150)
Insurance	(200)	(200)	(200)	(200)
Service charge	0	0	0	0
Total Expenditure	(265,825)	(14,752)	(14,752)	(14,752)
Net Cash Flow	(265,825)	6,451	6,451	6,451

HMO – based on 7 rooms

Income				
LHA rate 2011	22,856	22,856	22,856	22,856
Voids 10%	(2,286)	(2,286)	(2,286)	(2,286)
Recharge of utilities - 10% recovery	0	0	0	0
Cost avoided on current temp accommodation	64,365	64,365	64,365	64,365
Total Income	84,935	84,935	84,935	84,935
MRP - annuity	(5,496)	(5,633)	(5,774)	(5,918)
Interest	(13,394)	(13,256)	(13,116)	(12,971)
Management costs	(50,000)	(50,000)	(50,000)	(50,000)
Council Tax	(2,690)	(2,690)	(2,690)	(2,690)
Annual repairs	(5,000)	(5,000)	(5,000)	(5,000)
Utilities	(2,927)	(2,927)	(2,927)	(2,927)
Gas Safety	(150)	(150)	(150)	(150)
Electrical Testing	(150)	(150)	(150)	(150)
Insurance	(1,400)	(1,400)	(1,400)	(1,400)
Service charge	(1,000)	(1,000)	(1,000)	(1,000)
Total Expenditure	(82,207)	(82,207)	(82,207)	(82,207)
Net Cash Flow	2,728	2,728	2,728	2,728

Temporary Accommodation Investment Strategy

1. The Temporary Accommodation Investment Strategy will outline the number and type of properties the Council will target for use as temporary accommodation alongside how these properties will be purchased, managed, repaired and maintained.

Property Purchases

2. The risks of each potential investment will be considered by carrying out due diligence to include the following:
 - Valuation.
 - Market Conditions.
 - Building surveys.
 - Funding options.
 - External red book valuations.
 - Future costs: e.g. ground rent, service charges, major works, and maintenance throughout the lifecycle of the property.

3. The Council has many of the expertise to manage and oversee each property transaction in-house. It is proposed that external specialist property investment advisors be retained on each transaction as required, advising on suitability having undertaken detailed pre-purchase due diligence, including valuation and risk analysis.

Property Standards and Management

4. All property purchased will adhere to decent homes standards or be refurbished to meet these standards. Properties will be inspected by the Council Environmental Health team to ensure compliance with the Housing Health and Safety Rating Systems (HHSRS) standards.
5. The cost of repairs, maintenance and refurbishment are detailed within the property investment appraisal at Appendix 3 within the main report. It is proposed that the repairs, maintenance and refurbishment elements of the portfolio be delivered from existing resources within the Council's Housing Needs team with support from the Estates Maintenance and Private Sector Housing teams. We will contract additional specialist services as required.
6. We will also commission a specialist property management service either from market providers or in partnership with neighbouring local authorities - already managing similar accommodation – to manage the rent collection and tenant liaison responsibilities.
7. Households placed in temporary accommodation owned by the Council will not be required to pay utility bills or Council Tax directly as the accommodation is temporary. The Council will meet these costs and recharge the tenant an affordable personal contribution towards the cost; these personal contributions will be standardised across all types of temporary accommodation provision, including private sector provision.

8. Properties will not contain white goods and temporary accommodation residents will be expected to provide their own existing white goods or they will be supported to purchase new white goods. All white goods supplied by the temporary accommodation residents will be PAT tested by the Council and replaced as necessary where existing white goods are faulty.

Property Type, Tenure & Location

9. Freehold tenure is preferred to leasehold. Freehold provides greater levels of security than a leasehold asset that would effectively decrease in value over time. However, the Council will consider leasehold properties where leases are in excess of 100 hundred years and where former local-authority flats – managed by Registered Provider partners – are available for purchase, following a due diligence process.
10. Homeless applicants will be accommodated temporarily under the Council's Housing Act powers, which it is able to do when a household is homeless. This is the practice presently in self-contained temporary accommodation operated by private providers and by neighbouring local authorities already managing their own temporary accommodation.
11. The Council will consider opportunities to purchase property for use as temporary accommodation across the whole of the Rother district with a focus on urban areas which are close to amenities, schools and transport links. The Council will focus on purchasing former local authority housing as these tend to be in urban areas as well as having been built to minimum space and decent homes standards.

Property Price

12. Taking all of the above considerations into account, the following specific criteria are proposed:
 - Up to £3m is set aside to purchase 1, 2 and 3 bedroom houses (preferred) and flats (considered).
 - Freehold preferred and leasehold considered where Registered Provider is the Freeholder.
 - Geographically located within the Rother District.
 - Meets decent homes standards or can be affordably refurbished to meet these standards.
13. Funding for the acquisition of assets should be reviewed on a case-by-case basis.
14. An initial budget of £3m will be set aside to invest, with further tranches subject to approval in due course.
15. The Council will review this strategy as the portfolio develops and as the Council's business needs evolve.
16. It is possible that we will experience a reduction in the level of homelessness we experience over time. The exit strategy from the investment will be to first review whether any property owned by the Council can be put to a different use, for example accommodating households permanently as part of potential

future strategic aims; ultimately any asset under Council ownership can be sold and the capital receipt reinvested into Council budgets.

Appendix 5

Risk	Likelihood	Impact	Mitigation
1. Tenants experience poor property conditions and a risk to their health and safety.	Low	High	<ul style="list-style-type: none"> • All properties will be inspected by the Council under HSSRS before being managed and will receive 6 monthly inspections thereafter. • All properties will be installed with smoke alarms and carbon monoxide detectors (where required) and will be tested every 6 months. • Asbestos surveys. • Gas safety checks. • Electrical safety checks. • Fire risk assessments.
2. Lower than anticipated level of rental income.	Low	High	<ul style="list-style-type: none"> • Secure specialist income recovery service. • Change specialist service if performance does not meet minimum arrears targets (see Appendix 3). • Utilise eviction procedures • All residents of temporary accommodation are exempt from UC.
3. Income reduces as a result of the implementation of benefit reforms or changes in statutory guidance.	Med	High	<ul style="list-style-type: none"> • Regularly review the viability of scheme. • Property can be sold or repurposed if approach becomes unviable. • Tenants can be rehoused by the Housing Needs team where needed.
4. Reputational risk to the Council.	Low	Med	<ul style="list-style-type: none"> • Develop a communication and project plan. • Regular project performance monitoring. • Council corporate scrutiny procedures.
5. Higher than anticipated level of voids.	Low	High	<p>Ensure re-let times are kept to a minimum by:</p> <ul style="list-style-type: none"> • timely repairs and void turnaround. • close housing management to ensure timely rent payments, minimal evictions and minimal absconding.
6. Higher than anticipated levels of eviction and associated legal costs.	Low	Med	<p>Ensure all households are assessed to establish support needs and ensure these are met. Ensure residents are supported to</p>

Risk	Likelihood	Impact	Mitigation
			secure alternative accommodation which is permanent. Move households to alternative private sector temporary accommodation provision as required. Offer households affordable permanent accommodation in the private and social housing sectors.
7. The Council is unable to acquire properties.	Low	High	We have researched property prices and have developed an investment appraisal based on present market prices – see Appendix 3.
8. Homelessness increases and more accommodation is required to reduce costs.	Med	Low	We will continue to monitor the supply of temporary accommodation relative to demand and present to Cabinet new opportunities for further investment as required.