Clifford Hart

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24 July 2008

To: All Members of the Overview and Scrutiny Committee

Dear Member,

Overview and Scrutiny Committee - Tuesday, 29th July, 2008

I attach a copy of the following reports for the above-mentioned meeting which were not available at the time of collation of the agenda:

- 5. CALL-IN OF THE CABINET ITEM REGARDING SERVICE IMPROVEMENT INITIATIVES FOR LEASEHOLDERS (PAGES 1 16)
 - i) Report of the Monitoring Officer
 - ii) Report of the Director of Urban Environment

Yours sincerely

Clifford Hart Committees Manager Non-Cabinet Committees





The Council's Constitution

meeting on 15 July 2008

The Council's Housing Strategy 2003/08

5 (i)
Agenda item: [No.]

Special Overview and Scrutiny Committee on 29 July 2008

Report Title: Monitoring Officer's Report Cabinet on 15 July 2008 recorded at mir	on the Call-In of a Decision taken by The nute CAB 35
Forward Plan reference number (if applical	ole): N/A
Report of: The Monitoring Officer and He	ad of Legal Services
Wards(s) affected: All	Report for: Consideration by Overview and Scrutiny Committee
by the Cabinet on 15 July 2008 on a re	ommittee whether or not the decision, taken sport entitled "Service Improvement Initiatives 35, falls inside the Council's policy or budget
2. Recommendations2.1 That Members note the advice of the Members that the Executive was inside the Council's	onitoring Officer that the decision taken by policy and budget framework.
Report Authorised by: John Suddaby, Me	delay onitoring Officer and Head of Legal Services
Contact Officer: Terence Mitchison, Senior Terence.mitchison@haring	r Project Lawyer, Corporate
3. Local Government (Access to Informa3.1 The following background papers were υ	ation) Act 1985 used in the preparation of this report:

The report on Service Improvement Initiatives for Leaseholders to The Cabinet

4. Background

- 4.1 Under the Call-In Procedure Rules, set out in Part 4, Section H of the Council's Constitution, any 5 Members may request a Call-In even though they do not claim that the original decision was in any way outside the Council's budget/policy framework. Members requesting a Call-In must give reasons for it and outline an alternative course of action. But it is not necessary for a valid Call-In request to claim that The Cabinet acted outside its powers. It is sufficient to allege that the original decision was ill-advised for any reason.
- 4.2 The Call-In Procedure Rules require the Monitoring Officer to rule on the validity of the request at the outset. The Monitoring Officer has ruled that this Call-In request complies with all the 6 essential criteria for validity.
- 4.3 The Monitoring Officer must also submit a report to Overview and Scrutiny Committee (OSC) advising whether each Cabinet decision, subject to Call-In, was inside or outside the Council's policy framework (budget framework advice, when this is relevant, is provided by the Chief Financial Officer). This is still a requirement even when those Members requesting the Call-In do not allege that the Cabinet decision was outside the policy framework. While OSC Members should have regard to the Monitoring Officer's advice, it is a matter for Members' to decide whether the Cabinet decision was inside the policy framework or not.
- 4.4 This decision should be the subject of a separate specific vote and it should be expressly minuted
- 4.5 It is not every Council policy that forms part of the "Budget & Policy Framework". This framework is set out at Part 3 Section B of the Constitution. It contains the most important over-arching strategies, such as the Sustainable Community Strategy, and major service plans including the Housing Strategy. There would have to be a clear contravention or inconsistency with such a Strategy before a Cabinet decision could be ruled to be outside the policy framework.

5. Details of the Call-In and the Monitoring Officer's Response

- 5.1 The Call-In request form states, under the first heading, that the original decision of The Cabinet "is not considered to be outside the budget/policy framework". The Monitoring Officer agrees with this for the reasons set out as follows.
- 5.2 The only strategy of any relevance to this decision in the policy framework is the Council's Housing Strategy 2003-08. This has no specific references to the mechanisms for collecting leasehold service charges or to provision for leaseholders to opt out of estate window and door replacement schemes.
- 5.3 There are several references of a general nature in the Housing Strategy to the involvement of tenants and leaseholders and to consultation with them. The report to the Cabinet recites prior consultation with several bodies representing leaseholders and states that leaseholders' suggestions have been incorporated into the report to address their main concerns. Although the Call-In request form alleges a lack of "full consultation" it is not evident that this is the case or that any shortcomings in the consultation could amount to a clear contravention of the Housing Strategy.

6. Call-In Procedure Rules

- 6.1 Once a Call-In request has been validated and notified to the Chair of OSC, the Committee must meet within the next 10 working days to decide what action to take. In the meantime, all action to implement the original decision is suspended.
- 6.2 If OSC Members determine that the original decision was within the policy framework, the Committee has three options:
 - (i) Not to take any further action, in which case the original decision is implemented immediately
 - (ii) To refer the original decision back to The Cabinet as the original decision taker. If this option is followed, The Cabinet must meet within the next 5 working days to reconsider its decision in the light of the views expressed by OSC.
 - (iii) To refer the original decision on to full Council. If this option is followed, full Council must meet within the next 10 working days to consider the decision. Full Council must either decide, itself, to take no further action and allow the decision to be implemented immediately or it must refer the decision back to The Cabinet for reconsideration.
- 6.3 If OSC Members determine that the original decision was outside the policy framework, the Committee must refer the matter back to The Cabinet with a request to reconsider it on the grounds that it is incompatible with the policy framework.
- 6.4 In that event, The Cabinet would have two options:
 - (i) to amend the decision in line with OSC's determination, in which case the amended decision is implemented immediately
 - (ii) to re-affirm the original decision in which case the matter is referred to a meeting of full Council within the next 10 working days.

7. Recommendations

- 7.1 That Members note the advice of the Monitoring Officer that the decision taken by The Cabinet was inside the Council's policy framework.
 - 8. Use of Appendices / Tables / Photographs
- 8.1 Not applicable.

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Agenda item:

[No.]

Report to Overview and Scrutiny Committee

On 29th July 2008

Report Title: Home Ownership Report on the Call-in of a decision taken by the Cabinet on the 15 July regarding payment options for leaseholders – Minute no and title of item CAB35 (Cabinet Meeting 15 July 2008)

Forward Plan reference number

Report of: Niall Bolger, Director of Urban Environment

Wards(s) affected: All

Report for: Key decision

1. Purpose

1.1 To respond to matters raised in the call-in of the report,

2. Introduction by Cabinet Member (if necessary)

2.1 The Service Improvement Initiatives for Leaseholders presented to Cabinet on 15 July 08 included a raft of improvements to ensure that leaseholders managed by the arms length management organisation would be afforded a high quality leasehold service that is comparable to other 2 and 3 star London ALMO's. The proposals set out in the original report and discussed in this report will support the development of a 3 star leasehold service for Haringey.

3. Recommendations

3.1 That Members note the response to the matters raised in the call-in.

Report Authorised by: Niall Bolger, Director of Urban Environment

MB4

Contact Officer: Nesan Thevanesan, Home Ownership Manager

Tel: 020 8489 4705

Email: Nesan.Thevanesan@HomesforHaringey.org

4. Director of Finance Comments

4.1 The revised payment plans should be advantageous, both to the HRA (by improving the cash flow) and the leaseholders as they an option getting a bigger saving from the increased discount (from 2.5% to 5%) for prompt payment. They also have an option

to repay over a longer instalment period (from 12 to 36 months), in effect getting a interest free loan. (Para 8.17 refers)

4.2 The leaseholders should not be worse off with the revised payment options as detailed in Para 8.11 to 8.15

5. Head of Legal Services Comments

The Head of Legal Services confirms that there are no legal reasons preventing Members from approving the recommendations of this report. Further Legal Comment is provided at paragraph 10 below.

6. Local Government (Access to Information) Act 1985

6.1 No relevant documents

7. Matters raised in the Call-in - Strategic Implications

- 7.1 It is unacceptable that the Council is proposing a fundamental change in leaseholder charging without a full consultation of all leaseholders.
- 7.2 The Council's consultation to date has not fully explained to leaseholder groups the nature of the proposals.
- 7.3 The changes to the payment options will result in leaseholders being worse off than under the current system.
- 7.4 The report focuses solely on the advantageous financial implications to the Council 15.9 shows "The main advantages that these changes will bring are: (i) Maximising cash flow . . . Discount for payment in full will help reduce the Council's borrowing costs . . . "
- 7.5A leaseholder should not be required to pay for work before it has been completed the report gives no detail to the remit of the leaseholder if work is not carried out to a satisfactory level.
- 7.6 Making such a significant change at a time when charges to leaseholders will change significantly due to the Decent Homes Programme is not appropriate.

8. Response to matters raised.

- 8.1 It is unacceptable that the Council is proposing a fundamental change in leaseholder charging without a full consultation of all leaseholders.
- 8.2 The relevant issues have been discussed at the annual Leaseholders' Forum (to which all leaseholders are invited) and at meetings of the Leasehold Panel. The Panel (which usually meets every month) is open to all leaseholders. Regular attendees and those who have expressed an interest (180 approx) receive a formal notice for each meeting and copies of the relevant documents. Copies of the minutes for the last 12 months are provided on the website. It should be noted that the Forum and the Panel are part of Homes for Haringey's resident involvement structures, which have been set up to

- enable the Board to be kept informed of the views of residents. Haringey Leaseholders' Association was also consulted separately please see paragraph 8.9 below.
- 8.3 The Home Ownership Team sent invitations to all 4,500 leaseholders to attend the annual Leaseholders' Forum on the 7 July 2007, the theme of which was preparing for the Decent Homes Programme. A very important part of it was the holding of a workshop to discuss the need for new payment options in respect of major works. It was explained that the introduction of payment in advance would enable the Council to allow longer interest free monthly instalment periods.
- 8.4 The main points raised at the Forum were as follows:
 - The interest free period given by the Council should be increased the larger the amount, the longer people should have to pay. The new policy therefore proposes that people should have up to 36 months (interest free) to pay.
 - The discount for payment in full should be increased. It has therefore been increased from 2½% to 5%.
 - Use of sinking funds. There were mixed views on the use of sinking funds.
 Subsequently the Leasehold Panel decided against in view of the substantial administrative costs involved.
- **8.5** The policy recommendations agreed at the Forum were discussed at meetings of the Leasehold Panel on the 30th July 07, 15th November 07, 6th December 07 and the 10th June 2008. A meeting of the Panel on the 15th November 07 discussed all the main proposals (included in the report to the Council). Mr Martin-Clark (a leading member of Haringey Leaseholders Association and Chair of the Panel) endorsed the proposals from the chair and the Panel voted in favour with a substantial majority.
- **8.6** The period of notice to be given in respect of a bill for major works was discussed at the meeting on the 6 December 07and there was a report back to the Panel on the 28 January 08. The proposals in respect of this matter were accepted by the Panel.
- 8.7 Regular reports on all the main issues have been published in Homes Zone, which is sent to all the Council's leaseholders. A two page report of the proceedings of the Forum was published in the September issue. The June 2008 issue outlined the most important areas where improvements are proposed that is, longer to pay, larger discount and additional options for people on benefits.
- 8.8 The Council's consultation to date has not fully explained to leaseholder groups the nature of the proposals.
- **8.9** The only independent leaseholder group is the Haringey Leaseholders Association (the HLA) and it is recognised by Homes for Haringey. Officers of the HLA attend all the Leasehold Panel meetings. Furthermore Homes for Haringey holds meetings with the HLA when important issues arise. The last one was held on the 19 February 08.
- **8.10** The Home Ownership Team subsequently wrote a letter (9 April 08) to provide additional information in relation to some of the matters raised at the meeting.

Although the HLA raised some questions about other aspects of the proposals, it did not raise any issues relating to the payment options at this meeting. Moreover it has not subsequently made any criticism of them.

- 8.11 The changes to the payment options will result in leaseholders being worse off than under the current system.
- 8.12 The proposed changes have been designed generally to be financially neutral (in comparison with the current policy) and in accordance with the criteria (KLOE 12) published by the Audit Commission, which put the emphasis on advance billing. A number of ALMOs now bill in advance, for instance Ascham (Waltham Forest), CityWest (Westminster), Homes for Hackney, Homes for Islington, and some local authorities such as Greenwich, Kensington and Chelsea and Wandsworth. Advance billing will help to prompt leaseholders to report defects prior to the completion of the work or before the end of the defects liability period.

Its implementation will constitute the adoption of an important criterion of the Audit Commission (as indicated above) which will be very relevant in resspect of the assessment during a future inspection. It will also demonstrate our ability to adapt to changes within the sector in conjunction with the introduction of service improvements for leaseholders.

- 8.13. Under the Decent Homes Programme, average bills will be significantly higher, so the current 12 month period is likely to be much too short for quite a lot of leaseholders. It is proposed that they will have up to 36 months to pay in future.
- 8.14 The proposed new policy will also mean that leaseholders will have up to 6 weeks to arrange payment of their invoice, rather than 14 days at present.
- 8.15 Prior to the Commonhold and Leasehold Reform Act (2002) if a leaseholder paid part or all of their bill the courts considered that this was evidence of leaseholder's consent and would not accept any dispute in relation to it. However the position was changed by section 155(1)(5) of the Act which states that "the tenant is not to be taken to have agreed or admitted any matter by reason only of having made any payment". Hence payment in advance will not cause any disadvantage to a leaseholder.
- 8.16 The report focuses solely on the advantageous financial implications to the Council 15.9 shows "The main advantages that these changes will bring are: (i) Maximising cash flow . . . Discount for payment in full will help reduce the Council's borrowing costs . ."
- **8.17** Although there are clear advantages to the Council in the proposals, there are also definite advantages for leaseholders arising from the proposed changes. Thus leaseholders will derive the following benefits:

- i. <u>Early billing gives longer to pay</u>. Billing in advance will mean that the Council can afford to provide a longer period for payment by instalments. This will mean that leaseholders have longer to pay large bills.
- ii. <u>Discount for immediate payment of the full amount in advance</u> increase from 2½% (at present) to 5%. It will benefit leaseholders who:
 - want to pay in full or
 - have to raise a bank loan over a longer period they can use the discount to reduce their borrowing costs.
- iii. <u>Interest free monthly instalments:</u> Leaseholders will now get up to 36 months to pay their bills instead of the current 12 months.
- iv. <u>Interest only loans.</u> This means that leaseholders on Benefit will often be able to have the interest paid by the Department for Work and Pensions, so they will not have to pay anything (while they are on Benefit).
- v. <u>Voluntary charge</u> on the property (deferred interest loan). it is expected that this will be of considerable help to some elderly people who are unable to pay anything in respect of repayments for a large loan.
- **8.18** If the policy is not changed, all leaseholders will be expected to pay their major works bills in full within 12 months. Given that these bills are likely to rise significantly due to the Decent Homes programme this could have a negative impact on the leaseholders ability to pay. It is expected that major works bills will be between £4,000 and £20,000 per leaseholder dependant on the level of work which is required. The table below shows the monthly repayments each leaseholder would be required to make on a range of charges.

		Мо	nthly Payn	nent - Interest F	ree	
Major Works Charge	12 months	Total Repayment	24 months	Total Repayment	36 months	Total Repayment
4,000	333	4,000	167	4,000	111	4,000
10,000	833	10,000	417	10,000	278	10,000
15,000	1,250	15,000	625	15,000	417	15,000
20,000	1,667	20,000	833	20,000	556	20,000

Advantages - discount on advance payments

If a leaseholder was able to secure a personal loan and pay off the debt immediately the discounts they would receive would be:

- £4,000 discount of £200
- £10,000 discount of £500
- £15,000 discount of £750
- £20,000 discount of £1,000

The two tables in appendices 1 and 2 illustrate that the discount we offer to leaseholders for a full payment will go some way in meeting their borrowing cost, while at the same time they will be able to keep up affordable repayments in accordance with their budgets.

As it is likely that a number of leaseholders would secure loans from personal finance companies, rather than from banking institutions, the likely impact of this has also been exemplified in the table shown bellow. It should be noted that we have not exemplified the impact on leaseholders of loans secured against their properties.

Examples of repayments on this loans offered by high street banks and other personal financial institutions are shown in the appendices 1 and 2.

- 8.19 A leaseholder should not be required to pay for work before it has been completed the report gives no detail to the remit of the leaseholder if work is not carried out to a satisfactory level.
- **8.20** Where work extends over more than one year, leaseholders already have to commence payment before completion of the work (that is at the end of each financial year), since this is normal practice. The proposed system of advance billing will generally give leaseholders a longer period to pay (through interest free instalments) than under the present policy.
- **8.21** Where a leaseholder is dissatisfied with any aspect of the work or the charges made, they can raise the matter through the complaints procedure. If it cannot be resolved by this means then an arrangement has been set up whereby it can be referred to the Mediation Service operated by the Leasehold Advisory Service (LEASE). Finally it is always open to a leaseholder to take the question of a disputed bill to the Leasehold Valuation Tribunal, which now has full authority to issue rulings in all such cases.
- **8.22** With regard to the reporting of faults and making complaints, a booklet has been produced entitled *Decent Homes a Guide for Residents* (copy attached). This contains a lot of information for all residents on reporting faults and how customer care issues are being addressed by the employment of Resident Liaison Officers, who will be responsible for each project.
- 8.23 The Leasehold Panel has appointed the Chair of the Leasehold Panel, Mr Martin-Clark to liaise with Asset Management regarding the use of the schedule of rates in relation to the pricing of individual projects. He will thus be able to provide independent confirmation of the procedures that are being employed by the Constructor Partners and the Compliance Teams with regard to these matters. The view of someone from outside the organisation will provide leaseholders with additional assurance with respect to the methods used in producing the invoice for each scheme of work.
- 8.24 Making such a significant change at a time when charges to leaseholders will change significantly due to the Decent Homes Programme is not appropriate.

- **8.25** In view of the larger bills that a lot of leaseholders will receive, most feel that some changes are necessary to the existing payment options for major works.
- **8.26** The Council has a fiduciary duty to recover all the costs it incurs which relate to leaseholders. Following a review of policies in this area the Government has not given additional powers to social landlords to assist leaseholders facing the large bills arising from the Decent Homes Programme. Thus in a major ministerial statement in March last year Yvette Cooper said that local authorities should "offer the full range of available payment options to help leaseholders pay their bills, and share best practice to ensure that this happens everywhere".
- **8.27** The Home Ownership Team therefore undertook a review of the policies of all local authorities in London and obtained benchmarking information from more than 20 of them (a summary is provided in appendix 3 of this report). The proposed policy options are comprehensive they not only cover people who are able to pay but also the vulnerable people on benefit and the elderly on low pensions. They are representative of current best practice and if adopted will put this borough at the forefront of social housing providers in the country.

9. Financial comments

- 9.1There are no specific financial implications arising from this report. However, implications for the main report are:
- 9.2Income received from leaseholders is accounted for within the Housing Revenue Account Managed Budgets. The introduction of earlier billing of leaseholder contributions for major works will mean that income can be accounted for earlier and will therefore have a favourable impact on the cash flow of the Housing Revenue Account. Although the increase in the discount for payment in full from 2½% to 5% will reduce the sum collectable, the additional interest earned from earlier payment will more than offset the higher discount offered.
- 9.3The extension of the period for interest free instalments may have a favourable impact on cash flow. Although the interest free period is longer, the earlier billing for works will leave the council in a more favourable financial position overall. The precise financial implications of the changes are difficult to accurately forecast as they will be dependent on the sums chargeable to leaseholders and the take up on the discount. However, there will be favourable financial impact overall for the Housing Revenue Account.
- 9.4The introduction of the policy to allow leaseholder to install their own windows and doors may lead to a lower level of recovery than otherwise from leaseholders. Consequently there will be a lower level of income to the Housing Revenue Account as a result. The impact will depend upon the level of take up from leaseholders and some exemplifications of the effect are set out in Appendix 5. The financial impact will be incorporated into the Medium Term Financial Strategy taking account of actual take up if the arrangements are introduced.

9.5However where leaseholders opt out, there would be a clear loss of income on account of the reduced contribution chargeable to the remaining leaseholders (the loss would probably be in the region of 2% to 5% of the total cost of window replacement

10.Legal Implications

- 10.1 The Head of Legal Services confirms that leaseholders will not lose any rights if the proposed repayment options are implemented.
- 10.2 Specifically, as set out in paragraph 8.15 above, payment in advance of works will not preclude leaseholders from disputing the charge in the Leasehold Valuation Tribunal ('LVT'). The jurisdiction of the LVT extends to service charges which have already been paid and to prospective service charges. So if work is not carried out to the satisfaction of a leaseholder who has already paid, that leaseholder will still be able to challenge the cost of the work, the standard of the work and the need for the work in the LVT.
- 10.3 The standard long lease document sets out the mechanics of service charge billing. The terms of the lease allow the Council to demand payment of service charges by leaseholders quarterly in advance (that is, the Council provides leaseholders with an estimated service charge at the beginning of every financial quarter). The Legal Service understands that the proposed requests for payment in advance will be made with the quarterly requests for payment in advance and is therefore satisfied that the proposed changes to leaseholder billing are consistent with the requirements of the standard lease.

11. Recommendation

11.1 That Members note the responses to the matters raised in the Call-in.

Appendix 1

24 Monthly Payment- Interest at 7.7% (offered by High street banks)

•		Current policy				Pro	Proposal	
Major works charges	24 months	Total repayment	Discount @2.5%	Net cost to the leaseholder	24 months	Total repayment	Discount @ 5%	Net cost to the leaseholder
4,000	189	£4,536	100	436	189	£4,536	200	336
10,000	450	£10,800	250	550	450	£10,800	200	300
15,000	675	£16,200	375	825	675	£16,200	750	450
20,000	890	£21,360	200	860	890	£21,360	1000	360

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		Current policy				Pro	Proposal	
Major works charges	36 months	36 months Total repayment	Discount @2.5%	Net cost to the leaseholder	24 months	Total repayment	Discount @ 5%	Net cost to the leaseholder
4,000	133	£4,788	100	688	133	£4,788	200	588
10,000	311	£11,196	250	946	311	£11,196	200	969
15,000	467	£16,812	375	1,437	467	£16,812	750	1,062
20,000	622	£22,392	500	1,892	622	£22,392	1000	1,392

Appendix 2

24 Monthly Payment- Interest at 10.53% (offered by personal finance companies)

		Current policy				Prop	Proposal	
Major works charges	24 months Total	Total repayment	Discount @2.5%	Net cost to the leaseholder	24 months	Total repayment	Discount @ 5%	Net cost to the leaseholder
4,000	189	£4,536	100	436	189	£4,536	200	336
10,000	450	£10,800	250	550	450	£10,800	200	300
15,000	675	£16,200	375	825	675	£16,200	750	450
20,000	890	£21,360	200	860	890	£21,360	1000	360

36 Monthly Payment- Interest at 10.58% (offered by personal finance companies)

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		Current policy				Prop	Proposal	
Major works charges	36 months	Total repayment	Discount @2.5%	Net cost to the leaseholder	24 months	Total repayment	Discount @ 5%	Net cost to the leaseholder
4,000	133	£4,788	100	688	133	£4,788	200	588
10,000	311	£11,196	250	946	311	£11,196	900	969
15,000	467	£16,812	375	1,437	467	£16,812	750	1,062
20,000	622	£22,392	500	1,892	622	£22,392	1000	1,392

Report:- Call-in – Service improvement initiatives for leaseholders

Appendix 3 – payment options of other boroughs

Bo r ough or AL M O	Decent Homes	Billed on estimate or actual	Pay by instalments	Discount	Loans (plus interest)
Ascham Homes	Ongoing	Estimate	Yes	-	Interest only
Barnet Homes	Ongoing	Actual	Yes	-	-
Brent Housing Partnership	Complete		24 months		Yes
Camden Council	-	Actual	10 months	-	-
CityWest	Complete	Estimate /Actual	12/24 months	_	Yes
Ealing Homes	Ongoing	Actual	12 months	-	Yes - current mortgage rate
Greenwich	Ongoing	Estimate	10 months	-	-
Hackney Homes	Ongoing	Estimate	12/24 months	5%	Yes
H&F Homes	Ongoing	-	_	_	-
Homes in Havering	Being planned	Actual	12 months	-	_
Hillingdon Homes	-	-	12 months		Interest only
Homes for Haringey – Current policy	Being planned	Actual	12 months	2.5%	-
Homes for Haringey – Proposed	Being planned	Estimate	36 months	5%	Interest only
Homes for Islington	Ongoing	Estimate	24 months	-	Yes
Hounslow Homes	Complete	Actual	-	_	-
(Continued)					

Borough or AL M O	Decent Homes	Billed on estimate or actual	Pay by instalments	Discount f	Loans (plus interest)
Kensington & Chelsea	2008	Estimate	24/36 months	-	-
Newham Homes	Ongoing	Actual	-	198	-
Redbridge Homes	-	Actual	12 months	-	Secured loan at Council's mortgage rate
Richmond Housing Partnership	-		Yes		
Southwark Councils	-	, -	36 months	•	Yes
Tower Hamlets	-	_	12/24 months	-	-
Wandsworth Council	_	Estimate			Yes (and interest only for benefit claimants)