

Summary of Objection - Housing Transformation

I object to items in the 2024-25 accounts which relate to the council's decision to initiate a Housing Transformation Programme, and to associated expenditure, including specifically, the payment made to Michael Scorer for the production of a Strategic Housing Review report.

This objection concerns the lawfulness of the decision-making process that led to the commissioning and payment for this work. I believe the decision was made without lawful authority and without transparency, and that the payment recorded in the accounts is therefore an unlawful item of account.

I also object to the "Annual Governance Statement": *Good governance is about ensuring that an organisation is effectively and properly run. It is the means by which the council shows it is taking decisions for the good of the people of Bristol, in an inclusive and open way. It requires standards of behaviour that support good decision making, collective responsibility, individual integrity, openness, and honesty.*

It just isn't true that Bristol City Council has good governance.

Grounds for Objection

1. Unlawful decision-making process

According to information disclosed at public meetings and through council documents:

- A decision to commence a Housing Transformation Programme was taken by the Corporate Leadership Team on 9 April 2024, rather than by elected members.
- There is no published record of this decision, and I have not identified any lawful delegation to officers authorising such a significant policy decision.
- Based on the scale of the programme and its implications, this appears to be a key decision, requiring either Committee approval or formal delegated authority - and publication under the 2012 Executive Arrangements regulations.

The decision was referenced in the council's self-referral to the Regulator of Social Housing on 15 April 2024, suggesting it had significant policy consequences.

2. Expenditure associated with an unlawful decision

As part of the work associated with the Housing Transformation Programme, Mr Michael Scorer, a former officer of Southwark Council, was engaged to produce a Strategic Housing Review. This review was presented at the Homes and Housing Delivery Policy Committee on 1 November 2024.

I have requested:

- Copies of invoices paid to Mr Scorer for this work; and
- Details of the budget line or funding stream from which payment was made.

I have not received a response from the Council despite making the request during the statutory inspection period. However, I believe this payment is included in the 2024-25 accounts and that its legality depends on the same unlawful decision-making process described above.

I also requested details of the other spending that the Housing Transformation Programme incurred, which I imagine would include:

- Legal advice including drafting documents and ensuring compliance with the law when creating a new Directorate.
- Hiring an executive director, which would have recruitment costs.
- Programme management.

I have not received any information responsive to that request.

Why this constitutes an unlawful item of account

Under the 2014 Act, expenditure is unlawful if:

- It was made without the authority to do so;
- It was charged to the wrong budget, or
- It was irrational, i.e. based on a process no reasonable authority would follow.

In this case:

- The underlying decision to establish the Housing Transformation Programme was not taken in accordance with statutory requirements or the council's constitution;
- The expenditure on the Strategic Housing Review appears to flow directly from that decision;
- It is currently unclear from which budget line the payment was made, raising potential concerns about misallocation or improper virement.

Action Requested

I respectfully ask you to:

1. Apply to the High Court for a declaration that the payment to Mr Scorer constitutes an unlawful item of account under the Local Audit and Accountability Act 2014.
2. Issue a Public Interest Report, under Schedule 7 of the Act, due to the wider concerns this case raises regarding:
 - Unlawful officer-led policy-making;

- Lack of transparency and record-keeping;
- Use of public money without appropriate governance safeguards.

3. Take steps to ensure that the council provides the information that I requested in the inspection of accounts period.

Supporting Materials

I enclose a copy of an email I sent to the Council's Monitoring Officer on 30 July 2025, which outlines the timeline of events relating to the Housing Transformation Programme and CRR60. That message included specific questions about the lawfulness of the decision-making process. I have not received a response.

I would be happy to supply further evidence or correspondence at your request.

I confirm that I am a registered local government elector within the area of Bristol City Council.

Yours sincerely,
Dan Ackroyd
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Date: 7th August 2025