

Civic Offices, New Road, Grays  
Essex RM17 6SL  
Adults, Health and Housing

Mr Nnamdi Okpala  
15 Evehsam Way  
Ilford  
IG5 0EQ

22 August 2025  
Reference number  
1083077

Dear Mr Okpala,

**No Homeless Application Taken – Housing Act 1996, Part VII  
Notification of Decision**

Following the withdrawal of the Not Homeless Decision letter issued on 20 May 2025 we have re-considered your request to make a homelessness application to this Local Authority.

Based on the information available to us I am of the view that you lack the mental capacity to make a homelessness application and therefore we are unable to proceed any further with your request under the Housing Act 1996, Part VII.

I have set out below the enquiries I have made and the reasons for my decision. This is so you, or the person that is representing or supporting you, can understand the reasons and how I have reached my decision that no application can be proceeded with due to your lack of capacity.

This helps you and anyone supporting you to decide whether to seek a judicial review, or whether to seek independent legal advice. We think that it is always best to seek independent advice because the test we must apply is complex and an independent advisor can explain my decision, check it, and advise on what options are available to you.

### **Background**

You are currently resident at Heathcare Services, 15 Evesham Way, Ilford, Essex, IG5 0EQ. You have been provided this accommodation with support by Adult Social Care, Thurrock Council on 25<sup>th</sup> February 2025.

On 28 July 2025, the decision was made by Heathcare Services to serve you with a 28 day Notice to Quit due to your behaviour and the ongoing concerns that were significantly impacting the team's ability to support you and maintain a safe, respectful living environment for the other residents.

You have mental health diagnoses of Autism Spectrum Disorder and Unspecified Non-Organic Psychosis for which you are prescribed Sodium Valproate 300mg and Aripiprazole 10mg, however you are not currently compliant with medication.

You stated that you want to live independently.

## The Law

The courts who interpret the Homelessness Legislation have determined that an adult person who lacks the mental capacity to understand and respond to an offer of accommodation, and, if accepted, to understand the responsibilities involved, is not entitled to receive assistance under the homelessness legislation. This is the case of *R v Tower Hamlets LBC ex p Ferdous Begum [1993] AC 509; (1993)*.

The Courts decided that the decision as to whether a person has sufficient mental capacity to make an application is to be decided by the Local Authority's Housing Service and should be based on clear evidence, because such a decision is only legally sustainable in the case of a person who has serious capacity issues.

In making my decision I have been guided by Section 2 of the Mental Capacity Act (MCA) which states:

*"A person lacks capacity in relation to a matter if at the material time he is unable to make a decision for himself in relation to the matter because of an impairment of, or a disturbance in the functioning of, the mind or brain"*

The impairment or disturbance can be permanent or temporary.

I am mindful that capacity is not necessarily a permanent status and that some people may have fluctuating capacity because their mental health changes from day to day. I am also mindful that the level of capacity needed by a person also depends on the decision to be made.

A person will need a high level of mental capacity to make a decision on their housing future given the complexity of decisions that may be required from a person who may be owed duties under the homelessness legislation or may need to respond to an offer of temporary or settled housing.

I have considered Section 3 of the MCA to guide me in assessing whether you lack capacity to make a decision as defined by the courts in the *Begum* case. Section 3 states that a person is unable to make a decision if he or she is unable to do one or more of the following things:

1. Understand the information relevant to the decision.
2. Retain the information for long enough to be able to make a decision.
3. Use or weigh up the information as part of the process of making the decision.
4. Communicate the decision by any possible method, such as talking, using sign language, squeezing someone's hand.

Guidance to the MCA also explains the circumstances where a decision maker should not consider that someone lacks capacity and I have been mindful to consider this. A person must not be assumed to lack capacity because of: their age; their appearance; any mental health diagnosis they may have; any other disability or medical condition they may have.

## **Enquiries and Information Considered**

I have made the following inquiries and considered the information and facts I obtained to make my decision.

- Interview by Microsoft Teams on 5 August 2025
- Assessment by the Mental Health & Wellness Team – North, Redbridge Integrated Care dated 25 July 2025
- Email from Healthcare Services to Adult Social Care, Thurrock Council dated 28 July 2025
- Email from Grays Hall, Mental Health Services, Thurrock dated 18 August 2025
- The Mental Capacity Act 2005
- The 2018 Homelessness Code of Guidance and in particular paragraph 18.8 of that Code
- Relevant caselaw for *R v Tower Hamlets LBC ex p Ferdous Begum [1993] AC 509*; (1993) and subsequent case law of *WB v W District Council [2018] EWCA Civ 928* considered by the Courts for homelessness applications and mental capacity.

## **Decision**

During your interview with me on 5 August 2025 I have considered your mental health and current support and you did not demonstrate that you understood what is required to live independently.

When discussing budgeting you were unable to keep on track with the questions being asked and you required continual prompting by your social worker, Oluwafemi Ojo to assist you with answering the questions on the topic. This left the impression that you would need constant support in this area if you were living independently to be able to sustain any licence or tenancy agreement; this was indicative that you would require support more than that which a floating support service could offer.

You were unable to answer the question about the consequences of making loud noise, this is a key part of holding any licence or tenancy agreement as it can lead to the loss of accommodation.

When asked what support you might require when living independently you stated that you did not need any. This is not reflective of your current situation where you are living in a supported housing setting with staff onsite, provided by Adult Social Care in Thurrock due to your mental health. We have received no assessment from Adult Social Care, Mental Health Services, or Healthcare Services to state that this type of living environment is no longer required.

You do not have insight into your mental health and you are currently non-compliant with any prescribed medication, thus being prone to a relapse in your mental state. This raises concerns about your understanding of what is required to live independently and accept all of the responsibilities required to fulfil any licence or tenancy agreement. This is evidenced by the fact that Healthcare Services are a supported living scheme with staff

on site and they have had to serve you with notice to end your licence agreement due to your behaviour.

Their decision to end your stay with them is based on the following:

- Refusal to sign key documents: including house rules and tenancy agreement
- Non-compliance with medication and personal care
- Refusal to attend any meetings
- Frequently playing of loud music during unsociable hours, disturbing the household
- Neighbours lodging complaints regarding loud music after hours
- Your room being kept in an unsafe and unhygienic condition and refusing staff assistance
- Leaving the fridge door open and the oven on after use
- Wearing inappropriate clothing in the presence of female staff and service users
- Regularly disrupting other service users
- Demonstrable rudeness and lack of respect towards staff
- Live streaming from communal areas, interfering with staff duties
- Interfering with professionals supporting other service users
- Repeatedly calling all houses and the management team, causing disruption

This behaviour does not demonstrate that you understand the conditions of holding a licence or tenancy agreement as it is ending with you losing your accommodation. The fact that you have mental health diagnoses of Autism Spectrum Disorder and Unspecified Non-Organic Psychosis and that you are non-compliant with medication that is prescribed is indicative of the fact that you have an impairment of the mind that is impacting on your decision making in this area.

My concern is that if you are in breach of your current licence agreement/house rules which bare less of a responsibility than that of a tenancy then it is evident that it would be difficult for you to adhere to the terms of any tenancy agreement e.g. paying your rent on time, keeping the accommodation in a habitable and clean condition, not causing a nuisance to neighbours and committing anti-social behaviour and reporting repairs appropriately to the relevant services.

The interview with me on 5 August 2025 was originally arranged as a face to face interview at our office in Grays, Essex. You refused to attend the office and wanted it as a Microsoft Teams meeting. Living independently and entering into a contractual agreement with a landlord may require you to attend the landlord or agents' office for meetings or to sign documents or collect keys, you have not demonstrated the ability to readily engage with services or attend appointments as evidenced by your behavior at the current supported housing provision provided by Healthcare Services and this is of concern regarding your capacity to understand the responsibility of being a tenant or licensee.

Prior to the service of the notice, in July 2025 you had an assessment with Redbridge Access, Assessment & Brief Intervention Team. The primary concerns were related to housing dissatisfaction and medication non-compliance. It is noted that the assessor stated that you had the capacity to understand and weigh up the role of the mental health team and showed insight into your situation. However, it does not state that you have the capacity to understand the consequences of accepting and rejecting offers of accommodation and the responsibilities that goes with being a tenant.

Mental Capacity is decision-specific and time-specific and has to be tested on each individual decision, therefore you may have the capacity to understand the role of the mental health team but this is not the same as understanding your responsibility as a tenant and making decisions around this.

Whilst there was no indication for a hospital admission or immediate mental health crisis intervention, part of the plan, as advised by the assessor, was for the support staff at Healthcare Services to continue encouraging medication compliance and to monitor for signs of deterioration and escalating risk.

They also stated that a Deprivation of Liberty Safeguards (DOLS) application [to the Court of Protection] should be considered if you continued to refuse placements, which indicates that of a supportive nature however you are insistent that you want to live independently. The fact that DOLS is mentioned as part of the plan is not indicative of a person who does not have an impairment of mind that is not affecting their mental capacity to make decisions around their housing.

I have applied the following practical test to consider if you have sufficient mental capacity to understand and deal with the concept of being offered accommodation (The test set by the courts in the Begum case). I have concluded that due to the extent and impact of your vulnerability you do not. Specifically I am satisfied that:

1. I have a reasonable belief that you are a person that lacks capacity to make the decision in question in the context of housing.
2. I have started from the presumption of capacity (section 1(2) MCA) and considered the fact that every adult has the right to make their own decisions if they have the capacity to do so. I have not assumed that you do not have the capacity but have gathered evidence and facts that lead me to decide that you do not have capacity and it would not be in your best interests (section 1(5) MCA) to be assisted under the homelessness legislation.

As a result, the Council is not under any duty to proceed with your homelessness application. We are therefore not obliged to make any further enquiries into your circumstances to decide the statutory test set by the homelessness legislation. Nor are we required to provide temporary accommodation.

There is no statutory right of review to this decision.

You are a person who is vulnerable and I have therefore included your social worker, Oluwafemi Ojo into this correspondence so that Adult Social Care can carry out a Care Act assessment under the Care Act 2014 to determine in line with the Plan of the Redbridge Access, Assessment & Brief Intervention Team the most appropriate placement for you. I have provided Oluwafemi with a copy of this decision letter.

Should you have any queries regarding this letter, or if there has been any change in your circumstances, please do not hesitate to contact me on telephone number 01375 652820.

Yours sincerely

Olubunmi Akueme

Housing Solutions Officer

**Cc Oluwafemi Ojo, Social Worker, Community Led Support team, Thurrock Council**

## **Subject**

Dear Femi,

I am writing to formally raise multiple concerns and submit a request for reassessment of my current housing and social care support, pursuant to my rights under the **Care Act 2014**, the **Housing Act 1996**, and the **Consumer Rights Act 2015**.

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### **1. Housing Status – Ongoing Homelessness and Systemic Failure**

I have been functionally homeless from **28 November 2024 to 29 June 2025**, despite being placed in supported living. This does not constitute independent housing and fails to meet the criteria of **reasonable accommodation** under Section 184 of the Housing Act. The “Not Homeless” decision contradicts my reality, which includes lack of autonomy, financial instability (as shown in my bank transactions), and a hostile or unsuitable environment. I am 24 years old and therefore no longer eligible for youth services (18–24). The system is offering me no clear pathway to housing independence, breaching my right to adequate housing and support.

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### **2. Evidence of Neglect, Environmental Risk, and Poor Conditions**

Attached image evidence shows:

- Unsafe and unsanitary shared kitchen conditions.
- Absence of personal recycling facilities.
- Limited privacy and invasive living arrangements.

Furthermore, I have been subjected to multiple threats, harassment, and unsafe conditions within previous supported living placements, which I have documented with images and recordings.

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### **3. Subject Access Request (SAR) Compliance**

I have issued SARs to South Essex College, EPUT, and Thurrock Council. You are legally required under the **GDPR 2018** to confirm receipt, identify data controllers, and forward all related personal data. I have submitted recordings and request confirmation that you have fully complied with the SAR and forwarded relevant material to the responsible bodies.

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### **4. Request for Reassignment – Social Worker Bias**

It is with deep seriousness that I raise the issue of cultural and ethnic conflict. As an **Igbo man**, I am requesting to no longer be represented by a **Yoruba** social worker. In Nigeria, the history of systemic ethnic conflict between Igbo and Yoruba groups is significant, and it impacts interpersonal dynamics. Given our deeply divergent cultural backgrounds and historical hostility—including open conflict—I am requesting a **reassignment to a neutral, non-Yoruba social worker** who can provide impartial support without perceived or unconscious bias. This is necessary to maintain the integrity of my care and to ensure trust in the process.

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## 5. Unresolved Incidents

- I demand an update on my housing application timeline and escalation options.
  - I request that a personal recycling bin be provided at my accommodation.
  - I have been denied service at the Post Office (incident dated Sunday 13 April 2025) and am seeking a formal apology for the discriminatory experience.
  - I am ready to provide full audio recordings of my interactions and incidents mentioned herein.
- 

I request that these matters be addressed urgently. If no appropriate response is received within 10 working days, I will escalate this to external legal channels and ombudsman services.

Sincerely,

**Nnamdi Michael Okpala**

DOB: 19/05/2001

Email: [okpalan@protonmail.com](mailto:okpalan@protonmail.com)

**When systems fail, we build our own.**

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# **When systems fail, we build our own.**

— *Motto of OBINEXUS*

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### **Header (Aura Seal Declaration)**

When systems fail, we build our own.

— Motto of OBINEXUS

### **AURA SEAL Header**

The Rebirth of OBINEXUS – HEART/SOUL Design and Technology Constitutional Sector

I will not become what sought out to break me;

I will build what must heal us all.

To heal the generation left behind, antifragile infrastructure must remove the mask while preserving the self.

Rise Spirits of the Masquerades — my time is now, our time is now.

The future is in our hands.

Let us shape a new foundation together.

For what is yet to be, I became.

We are their reckoning; let us heal ourselves.

Mend our souls with 95.4% Aura coherence.

When systems fail, build your own — the change starts with U.

This is my founder's promise — the seed sealed with Aura.

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### **FOI Notice – Case 1083077**

Dear Information Governance Team,

Please find attached my AuraSeal-protected FOI request relating to case 1083077.

This sealed archive contains the FOI letter and supporting material.

Verification: OBINEXUS public keys (GitHub repository / ledger).

Entry logged at [github.com/obinexus/textbooks-entries](https://github.com/obinexus/textbooks-entries) , you aura has been sealed.

Next time don't mess with a MENSA Member - the 2% intelligence club who is autistic.  
who went to oxford university to study applied mathematics and creative writing aged 14.

The jokes on you , I am LMFAO. google it , IDC.

Keep the change , maybe you should set up a business bank account instead of section  
114

For the record Never Section 114 Me until the year 2073.

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### **Reference & Verification Links**

- [github.com/obinexus/legal](https://github.com/obinexus/legal)
- [change.org/obinexus reform](https://change.org/obinexus_reform)
- [youtube.com/@obinexus](https://youtube.com/@obinexus)
- [obinexus.org](https://obinexus.org)
- [gitlab.com/obinexus](https://gitlab.com/obinexus)
- [x.com/obinexus](https://x.com/obinexus)
- [payhip.com/obinexus](https://payhip.com/obinexus)
- [tiktok.com/@obinexusofficial](https://tiktok.com/@obinexusofficial)
- [gitbooks.com/obinexus](https://gitbooks.com/obinexus)

Information.Matters@thurrock.gov.uk

Information.Matters@thurrock.gov.uk <Information.Matters@thurrock.gov.uk>  
to: obinexus@tuta.com

 Tue, 7 Oct 2025 • 12:07

**From**

Information.Matters@thurrock.gov.uk <Information.Matters@thurrock.gov.uk>

**To**

obinexus@tuta.com <obinexus@tuta.com>

## Automatic reply: When systems fail, we build our own.

Thank you for your email.

Your enquiry is important to us and will be recorded and responded to in line with respective timeframes. Our team will monitor the progress of your enquiry to ensure you receive a timely response.

If you would like to make a Freedom of Information request, please email [FOI@thurrock.gov.uk](mailto:FOI@thurrock.gov.uk) or alternatively please make your request using our dedicated webpage,

[Freedom of information | Freedom of information requests | Thurrock Council](#)

If you would like to make a request for personal data which is not covered by the Freedom of Information Act, please email [DataRequest@thurrock.gov.uk](mailto:DataRequest@thurrock.gov.uk) or use our dedicated webpage,

[Subject access request | Information about you | Thurrock Council](#)

Data Protection Statement

We will use your information to provide the service requested. We may share your personal data between our services and with partner organisations, such as government bodies and the police. We will do so when it is of benefit to you, or required by law, or to prevent or detect fraud. To find out more, go to [thurrock.gov.uk/privacy](#). Get free internet access at libraries and community hubs

Regards

Rachael Steel | Information Services Manager | Corporate Services

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obinexus@tuta.com  
to: complaints@thurrock.gov.uk + 2

 Tue, 7 Oct 2025 • 12:07

**From**  
obinexus@tuta.com

**To**  
Complaints <complaints@thurrock.gov.uk>  
Information Matters <information.matters@thurrock.gov.uk>  
Housingoptions <housingoptions@thurrock.gov.uk>

## Re: When systems fail, we build our own.

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Secured with Tuta Mail:  
<https://tuta.com/free-email>

7 Oct 2025, 12:06 by [obinexus@tuta.com](mailto:obinexus@tuta.com):

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- [gitlab.com/obinexus](https://gitlab.com/obinexus)
- [x.com/obinexus](https://x.com/obinexus)
- [payhip.com/obinexus](https://payhip.com/obinexus)
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HousingOptions@thurrock.gov.uk

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to: obinexus@tuta.com ▾

 Tue, 7 Oct 2025 • 12:08

**Automatic reply: When systems fail, we build our own.**

This is an automated acknowledgement of your email which has just been received. We will deal with all emails from the public as soon as possible, where they are seeking a response.

If you have access to the Internet you may wish to see if your enquiry can be dealt with online at [www.thurrock.gov.uk](http://www.thurrock.gov.uk). The Council's website enables many forms to be completed and payments to be made online. If you are homeless now and in need of emergency accommodation, please call us on 01375 652820.

#### How we will use your information

We will use your information to provide the service requested. We may share your personal data between our services and with partner organisations, such as government bodies and the police. We will do so when it is of benefit to you, or required by law, or to prevent or detect fraud. To find out more, go to [thurrock.gov.uk/privacy](http://thurrock.gov.uk/privacy). Get free internet access at libraries and community hubs".

Please do not reply to this automated response.

Regards

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# Applications relating to Empty Dwelling Management Orders (EDMOs)

Housing Act 2004

**It is important that you read the notes below carefully before you complete this form.**  
This is the correct form to use if you want the Tribunal to determine one of the applications listed in Annex 1 to this form.

**A fee is payable for this application (see section 14 for Help with Fees).** The fees are set out in this form.  
Applications should be sent as a Microsoft Word document by email to the relevant regional tribunal address shown in Annex 4 to this form. You must also send by email **the appropriate documents listed in Annex 2 of this form**. If you cannot access email or find someone to assist you in lodging your application by email, then a paper application will be acceptable although there may be a delay in dealing with this. Sending an application on paper will not be suitable in urgent cases.

You can now pay the **the fee (if applicable) by an on-line banking payment or by cheque/postal order enclosed with the application form.**

**If you want to be sent online banking payment details by email, please tick this box**

Please make sure a copy of the application is served on the other party/parties to the application. If you are unable to serve a copy on the other party/parties, please bring this to the tribunal's attention in the covering email or if sending by post in a covering letter.

**Please do not send any other documents.** When further evidence is needed, you will be asked to send it in separately.

**If you have any questions about how to fill in this form, the fee payable, or the procedures the Tribunal will use please contact the appropriate regional office.**

If you are completing this form by hand please use BLOCK CAPITAL LETTERS.

**1. DETAILS OF APPLICANT (If there are multiple applicants, please continue on a separate sheet providing contact details, including email addresses)**

Name:

Capacity

Address (*including postcode*):

Address for correspondence (*if different from above*):

Telephone:

Day:

Evening:

Mobile:

Email address:

Fax:

Representative name and address, and other contact details: Where details of a representative have been given, all correspondence and communications will be with them until the Tribunal is notified that they are no longer acting for you.

Name:

Reference no. (if any)

Address (*including postcode*):

Telephone:

Day:

Mobile:

Email address:

Fax:

**2. ADDRESS (including postcode) of SUBJECT PROPERTY**

**3. BRIEF DESCRIPTION OF SUBJECT PROPERTY (e.g. semi-detached house) AND APPLICANT'S CONNECTION WITH PROPERTY**

**4. DETAILS OF RESPONDENT (S) (if appealing against a decision or order, the respondent will normally be the issuing Local Housing Authority)**

Name:

Capacity

Address (*including postcode*):

Reference no. for correspondence (if any)

Address for correspondence (*if different from above*):

Telephone:

Day:

Evening:

Mobile:

Email address:

Fax:

## 5. DETAILS OF LANDLORD (if not already given)

Name:

Address (*including postcode*):

Address for correspondence (*if different from above*):

Telephone:

 Day: Evening: Mobile:

Email address:

## 6. DETAILS OF ANY INTERESTED PERSONS (Please continue on a separate sheet if necessary)

Name:

Address (*including postcode*):

Name:

Address (*including postcode*):

Name:

Address (*including postcode*):

**Note:** Interested persons are others who may be entitled, and wish to apply to join in the proceedings as applicants or respondents. If you know their names, addresses these should be included here.

## 7. TYPE OF APPLICATION

Please specify the type of application you wish to make. It would assist the Tribunal if you could use the list in Annex 1 to this form (page 7) and indicate the number and description of the relevant application.

1083077 Reference- 2 times section 202 Appeal

Depending on the type of application, the Tribunal will need certain information to assist it in its consideration of the facts. Please read questions (a) and (b) below and complete where relevant.

(a) If you are appealing against the service of a notice or an order, when did you receive that notice or order?

(b) If you are appealing against a local housing authority decision,

when was that decision made, and

when did you find out about it?

h

Please set out the ground for your application on the enclosed sheet titled **Grounds of application**

## 8. OTHER APPLICATIONS

Are you involved in any other Housing Act 2004 or Housing Act 1985 applications (s) or are you aware of any other applications (s) involving the same person(s) or property as in this application?  Yes  No

If Yes, please give details:

## 9. CAN WE DEAL WITH YOUR APPLICATION WITHOUT A HEARING?

If the Tribunal thinks it is appropriate, and all the parties and others notified of their right to attend a hearing consent, it is possible for your application to be dealt with entirely on the basis of written representations and documents and without the need for parties to attend and make oral representations. ('A paper determination').

Please let us know if you would be content with a paper determination if the  Yes  No  
Tribunal thinks it appropriate.

**Note:** Even if you have asked for a paper determination the Tribunal may decide that a hearing is necessary. Please complete the remainder of this form on the assumption that a hearing will be held. Where there is to be a hearing, a fee of £227 will become payable by you when you receive notice of the hearing date.

## 10.URGENCY OF APPLICATION

We need to decide whether the case needs to be dealt with quickly.

Please let us know if there is a particular urgency for a determination in this case and if so, why?

Yes i am attending to continue with University , the university open on 1 october the tribunal shoudl finsih befreo 1 october n avigatij tjis shoucl be done in accodin with 28day tribunal proced scuh that i can find indpent porpet inear the universr imrial collega nd conut e my housi via newham city council

## 11.AVAILABILITY

If there are any dates or days we must avoid during the next four months (either for your convenience or the convenience of any witness or expert you may wish to call) please list them here.

Dates on which you will NOT be available:

N/A

## 12. VENUE REQUIREMENTS

Please provide details of any special requirements you or anyone who will be coming with you may have (e.g. the use of a wheelchair and/or the presence of a translator):

I have autism , adhd , aspergers , being my first time navigate court enivronement i assume it will be stress but i just require the tribunal to be supported as the opposition Thurrock County Council have decided not admit themselves for legal compliane with court proccesing regard mutiple section 182 - 2 in this case agaisnt me I require support in navigate the court breivign such that the opposition council complies in a manner as i demanded 240 Million for issue a second 184 and apply under section 202

Applications handled by the London regional office are usually heard in Alfred Place, which is fully wheelchair accessible. Elsewhere, hearings are held in local venues which are not all so accessible and the case officers will find it useful to know if you or anyone you want to come to the hearing with you has any special requirements of this kind.

## 13. DOCUMENTS

Following receipt of your application you will be asked to provide a number of documents (referred to as a 'bundle') in support of your case. However, at this stage you **must** include those documents set out in Annex 2 to this form which are relevant to the application you are making. **Failure to include the specified documents might make this application invalid.** Any additional documents required by the Tribunal will be requested at a later stage.

## 14. CHECKLIST

**Please check that you have completed this form fully. The Tribunal will not process your application until this has been done. Please ensure that the following are enclosed with your application and tick the appropriate box to confirm:**

A copy of required documents are enclosed as set out in Annex 2

**EITHER**

A crossed cheque or postal order made out to HM Courts and Tribunal Service for the application fee of £114 (if applicable) is enclosed. **Please write your name and address on the back of the cheque or postal order. Please also send a paper copy of your application with your cheque or postal order, regardless of whether you have already emailed the application.**

**OR**

You have ticked the box at the top of this form to say you want the relevant regional tribunal office to send you details on how to pay the application fee of £114 by on-line banking. **The unique payment reference the tribunal office supplies MUST be used when making your on-line banking payment.**

**DO NOT send cash under any circumstances. Cash payment will not be accepted.**

**Please note where there is to be a hearing, a fee of £227 will become payable by you when you receive notice of the hearing date.**

### Help with Fees

If you think you may be entitled to a reduced fee, the guide EX160A 'Apply for help with court, tribunal and probate fees' outlines how you can submit an application for Help with Fees.

You can submit your Help with Fees application online at [www.gov.uk/help-with-court-fees](http://www.gov.uk/help-with-court-fees) or by completing the form EX160 'Apply for help with fees'. You can get a copy of the 'Apply for help with fees' form online at [www.gov.uk/government/publications/apply-for-help-with-court-and-tribunal-fees](http://www.gov.uk/government/publications/apply-for-help-with-court-and-tribunal-fees) or from your regional tribunal office.

If you have completed an online application for Help with Fees please enter the reference number you have been given here.

H W F - 8 4 3 - 2 1 1

If you have completed form EX160 "Apply for Help with Fees" it must be included with your application.

The 'Apply for help with fees' form will not be copied to other parties.

## **15.STATEMENT OF TRUTH**

**The statement of truth must be signed and dated.**

**I believe that the facts stated in this application are true.**

**Signed:** NMO

---

Name (IN CAPITALS) NNAMDI MICHEAL OKPALA

Date: 01/09/2025

## **16.GROUNDS OF APPLICATION**

**Please use the space below to summarise the grounds of your application.**

Type of application:

Grounds of Application (please continue on a separate sheet if necessary):

## ANNEX 1: List of applications to the Tribunal under Housing Act 2004

**This list relates solely to matters concerning Empty Dwelling Management Orders**

### Abbreviations

LHA = Local Housing Authority; EDMO = Empty Dwelling Management Order

No.	Provisions of Housing Act 2004	Type of Application
1	Section 133	<b>Interim EDMO</b> An application by a LHA for authorisation of an Interim EDMO
2	Section 138(1)	<b>Compensation of a third party for interference with rights</b> An application by a third party, while an Interim EDMO is in force, for an order that the LHA pay compensation in respect of any interference in consequence of the EDMO with rights in respect of the dwelling.
3	Schedule 7, para. 1(7)	<b>Continuation of Interim EDMO beyond expiry date</b> An application by a LHA for an order that an Interim EDMO should continue in force pending disposal of an appeal under paragraph 26 to Schedule 7 of the Housing Act 2004 against a replacement Final EDMO.
4	Schedule 7, para. 2(3)(d) or para. 10(3)(d)	<b>Determination of lease or licence</b> An application by a LHA for an order determining a lease or licence while an Interim or Final EDMO is in force.
5	Schedule 7, para. 5(7)	<b>Order that accounts of expenditure be adjusted</b> An application by the relevant proprietor for an order declaring that an amount shown in the accounts as expenditure of the LHA does not constitute relevant expenditure and requiring the LHA to make such financial adjustments (in the accounts and otherwise) as are necessary to reflect the Tribunal's declaration.
6	Schedule 7, para. 9(8)	<b>Continuation of Final EDMO beyond expiry date</b> An application by a LHA for an order that a Final EDMO should continue in force pending disposal of an appeal under paragraph 26 to Schedule 7 of the Act against a replacement Final EDMO.
7	Schedule 7, para. 14(1)	<b>Order that LHA manage in accordance with a management scheme in a Final EDMO</b> An application by an affected person for an order requiring the LHA to manage a dwelling in accordance with a management scheme in a Final EDMO made in respect of the dwelling.
8	Schedule 7, para. 26(1)(a) or (b)	<b>Appeal against Final EDMO</b> An appeal by a relevant person against the decision of a LHA to make a Final EDMO or against the terms of a Final EDMO (including the terms of the management scheme contained in it).
9	Schedule 26, para. 1(c)	<b>Appeal against terms of an Interim EDMO</b> An appeal by a relevant person against the terms of an Interim EDMO on the grounds that they do not provide for one or both of the matters mentioned in paragraph 5(5)(a) and (b) of Schedule 7 to the Act (which relate to payment of surplus rent etc.).
10	Schedule 7, para. 30	<b>Variation by the LHA of an Interim or Final EDMO</b> An appeal by a relevant person against the decision of a LHA to vary an Interim or Final EDMO.

## ANNEX 1: List of applications to the Tribunal under Housing Act 2004

No.	Provisions of Housing Act 2004	Type of Application
11	Schedule 7, para. 30	<b>Refusal by the LHA to vary an Interim or Final EDMO</b> An appeal against the decision of a LHA to refuse to vary an Interim or Final EDMO.
12	Schedule 7, para. 30	<b>Revocation by the LHA of an Interim or Final EDMO</b> An appeal against the decision of a LHA to revoke an Interim or Final EDMO.
13	Schedule 7, para. 30	<b>Refusal by the LHA to revoke an Interim or Final EDMO</b> An Appeal against the decision of a LHA to refuse to revoke an Interim or Final EDMO
14	Schedule 7, para. 34(2)	<b>Decision of the LHA on compensation of third party for interference with rights in consequence of a Final EDMO</b> An appeal by a third party against the decision of a LHA under section 136(4) or 138(3) of the Act in respect of whether, and if so how much, compensation should be payable to a third party for interference with their rights in respect of the dwelling as a consequence of a Final EDMO

## ANNEX 2: List of documents to be included with application

<b>Application number</b>	<b>Document(s) to be included</b>
1	<ul style="list-style-type: none"> <li>a) a copy of the draft Interim EDMO</li> <li>b) a statement of evidence           <ul style="list-style-type: none"> <li>i. in respect of the matters as to which the Tribunal must be satisfied under section 134(2) of the Act</li> <li>ii. of the LHA's consideration of the rights and interests specified in section 133(4) of the Act</li> </ul> </li> </ul> <p>AND</p> <ul style="list-style-type: none"> <li>c) where the LHA notified the relevant proprietor that it was considering making an interim EDMO, a copy of the notification.</li> </ul>
2	<ul style="list-style-type: none"> <li>a) a copy of the Interim EDMO</li> <li>b) a copy of the LHA's notification of its decision in accordance with s.138(4) of the Act</li> </ul> <p>AND</p> <ul style="list-style-type: none"> <li>c) a statement giving full details of           <ul style="list-style-type: none"> <li>i. the rights in respect of which it is claimed that there has been interference in consequence of the Interim EDMO</li> <li>ii. the amount of compensation claimed in respect of that interference.</li> </ul> </li> </ul>
3	<ul style="list-style-type: none"> <li>a) a copy of the Interim EDMO</li> </ul> <p>AND</p> <ul style="list-style-type: none"> <li>b) a copy of the notice of appeal under paragraph 26 of Schedule 7 to the Act against the making of an Interim EDMO.</li> </ul>
4	<ul style="list-style-type: none"> <li>a) a copy of the Interim or Final EDMO (including any management scheme)</li> <li>b) a copy of the relevant lease or licence, or if not available evidence as to the existence of the lease or licence</li> </ul> <p>AND</p> <ul style="list-style-type: none"> <li>c) a statement containing the following details           <ul style="list-style-type: none"> <li>i. the name and address where known, of any lessor, lessee, sub-lessor, sub-lessee or licensee</li> <li>ii. details as to why you believe that the dwelling is unoccupied and why you need possession of the dwelling in order to secure that the dwelling becomes occupied</li> <li>iii. the amount of compensation (if any) which the LHA is willing to pay in respect of the determination of the lease or licence, including details of how such compensation had been calculated.</li> </ul> </li> </ul>
5	<ul style="list-style-type: none"> <li>a) a copy of the Interim EDMO</li> </ul> <p>AND</p> <ul style="list-style-type: none"> <li>b) a copy of the accounts kept by the LHA in accordance with paragraph 5(6) of Schedule 7 to the Act.</li> </ul>
6	<ul style="list-style-type: none"> <li>a) a copy of the Final EDMO</li> </ul> <p>AND</p> <ul style="list-style-type: none"> <li>b) a copy of the notice of appeal under paragraph 26 of Schedule 7 to the Act against the making of a Final EDMO</li> </ul>

## ANNEX 2: List of documents to be included with application (continued)

Application number	Document(s) to be included
7	a) a copy of the Final EDMO (including the management scheme)
8	<p>a) a copy of the Final EDMO (including the management scheme)</p> <p>AND</p> <p>b) where the application relates to the terms of the management order, a statement specifying each term to which objection is made with reasons for the objection.</p>
9	<p>a) a copy of the Interim EDMO</p> <p>b) a statement of the matters set out in paragraph 5(5) (a) and (b) of Schedule 7 to the Act (which relate to payment of surplus rent etc).</p>
10	<p>a) a copy of the Interim or Final EDMO</p> <p>AND</p> <p>b) a copy of the LHA's notices under paragraphs 9 and 11 of Schedule 6 to the Act as applied by paragraph 17 of Schedule 7 to the Act.</p>
11	<p>a) a copy of the Interim or Final EDMO</p> <p>AND</p> <p>b) a copy of the LHA's notices under paragraphs 14 and 16 of Schedule 6 to the Act as applied by paragraph 17 of Schedule 7 to the Act.</p>
12	<p>a) a copy of the Interim or Final EDMO</p> <p>AND</p> <p>b) a copy of the LHA's notices under paragraphs 17 and 19 of Schedule 6 to the Act as applied by paragraph 17 of Schedule 7 to the Act.</p>
13	<p>a) a copy of the Interim or Final EDMO</p> <p>AND</p> <p>b) a copy of the LHA's notices under paragraphs 20 and 22 of Schedule 6 to the Act as applied by paragraph 17 of Schedule 7 to the Act.</p>
14	<p>a) a copy of the Final EDMO (including the management scheme)</p> <p>AND</p> <p>b) where the third party has requested compensation under section 138 of the Act, a copy of the LHA's notification of its decision to the third party in accordance with section 138(4)</p> <p>AND</p> <p>c) a statement giving full details of:</p> <ul style="list-style-type: none"> <li>i. the rights in respect of which it is claimed that there has been interference in consequence of the Final EDMO</li> </ul> <p>AND</p> <ul style="list-style-type: none"> <li>ii. the amount of compensation claimed in respect of any interference</li> </ul>

## ANNEX 3: Interim EDMO Checklist

SI/Section	Requirement ( <i>for full details see Act or Statutory Instrument</i> )	✓ or X
SI 2006 367 Para.3	<b>Property is not one of the prescribed exceptions -</b>	
	<ul style="list-style-type: none"> <li>(a) Has been occupied solely or principally by the relevant proprietor and is wholly unoccupied because he is absent –           <ul style="list-style-type: none"> <li>i. temporarily resident elsewhere</li> <li>ii. receiving care by reason of old age, disablement, illness, past or present drug or alcohol dependence or past/present mental illness</li> <li>iii. for the purpose of providing, or better providing, personal care for a person who requires such care for reasons in (ii) above</li> <li>iv. as a result of being serving member of armed forces</li> </ul> </li> <li>(b) Is a holiday home or otherwise occupied by the relevant proprietor or his guests from time to time.</li> <li>(c) Is genuinely on the market for sale or to let</li> <li>(d) Is comprised in an agricultural holding</li> <li>(e) Is usually occupied by an employee of the relevant proprietor in connection with his employment duties</li> <li>(f) Is available for a minister of religion as a residence from which to perform his duties</li> <li>(g) Is subject to a court order freezing property of the relevant proprietor</li> <li>(h) Is prevented from being occupied due to criminal investigation or proceedings</li> <li>(i) Mortgagee in right of the mortgage, has entered and is in possession</li> <li>(j) Relevant proprietor has died and it is not six months since grant of representation was obtained.</li> </ul>	
s.134(2)	<b>The tribunal must be satisfied that</b>	
	<ul style="list-style-type: none"> <li>a) dwelling has been wholly unoccupied for at least 2 years</li> <li>b) no reasonable prospect of occupation in near future</li> <li>c) reasonable prospect of occupation if order made</li> <li>d) LA has complied with s133(3) – <i>see below</i></li> <li>e) prescribed requirements met – SI 2006 No. 367 para.4 – <i>see below</i></li> </ul>	
s.133(3)	<b>LA has made reasonable efforts to</b>	
	<ul style="list-style-type: none"> <li>a) notify proprietor that considering an EDMO</li> <li>b) ascertain steps proprietor is taking, or intends, to secure occupation</li> </ul>	

## ANNEX 3: Interim EDMO Checklist (continued)

SI 2006 367 4(1)	<p><b>A. LA has made reasonable efforts to establish from proprietor whether he thinks any of the exceptions apply and has notified the proprietor in writing of its decision to apply for authorisation to make an interim EDMO no less than 3 months before its application or has made all reasonable efforts to do so.</b></p> <p><b>LA must provide –</b></p> <ul style="list-style-type: none"> <li>i. details of efforts made to comply with s133(3)(a) – (notify proprietor)</li> <li>ii. details of enquiries made under s133(3)(b) – (ascertain what steps)</li> <li>iii. details of any advice or assistance given to proprietor</li> <li>iv. all information they have that suggests dwelling may be excepted</li> <li>v. classification of dwelling for Council Tax</li> <li>vi. all information they have that the dwelling has been causing a nuisance for the community; and</li> <li>vii. all information they have that suggests that the community supports the proposed making of the interim EDMO by the LHA.</li> </ul>	
	<p><b>B. If proprietor undertaking works or has applied for permission for structural alterations/additions, LA must state why EDMO required</b></p>	
s.134(3)	<p><b>The tribunal must take into account</b></p>	
	<ul style="list-style-type: none"> <li>a) Interests of the community</li> <li>b) Effect of order on rights of proprietor and/or third parties</li> </ul>	
s.134(4)	<p><b>Consider whether compensation should be ordered</b></p>	

## ANNEX 4: Addresses of Tribunal Regional Offices

### NORTHERN REGION

HM Courts & Tribunals Service  
First-tier Tribunal (Property Chamber) Residential  
Property, 1<sup>st</sup> Floor, Piccadilly Exchange, Piccadilly  
Plaza, Manchester M1 4AH

**Telephone:** 01612 379491  
**Fax:** 01264 785 128  
**Email address:** [RPNorthern@justice.gov.uk](mailto:RPNorthern@justice.gov.uk)

**This office covers the following Metropolitan districts:** Barnsley, Bolton, Bradford, Bury, Calderdale, Doncaster, Gateshead, Kirklees, Knowsley, Leeds, Liverpool, Manchester, Newcastle-upon-Tyne, Oldham, Rochdale, Rotherham, St. Helens, Salford, Sefton, Sheffield, Stockport, Sunderland, Tameside, Trafford, Tyneside (North & South), Wakefield, Wigan and Wirral.

**It also covers the following unitary authorities:** Hartlepool, Middlesbrough, Redcar and Cleveland, Darlington, Halton, Blackburn with Darwen, Blackpool, Kingston-upon-Hull, East Riding of Yorkshire, Northeast Lincolnshire, North Lincolnshire, Stockton-on-Tees, Warrington and York.

**It also covers the following Counties:** Cumbria, Durham, East Cheshire, Lancashire, Lincolnshire, Northumberland, North Yorkshire and West Cheshire.

### MIDLAND REGION

HM Courts & Tribunals Service  
First-tier Tribunal (Property Chamber) Residential  
Property, Centre City Tower, 5-7 Hill Street,  
Birmingham, B5 4UU

**Telephone:** 0121 600 7888  
**Fax:** 01264 785 122  
**Email address:** [RPMidland@justice.gov.uk](mailto:RPMidland@justice.gov.uk)

**This office covers the following Metropolitan districts:** Birmingham, Coventry, Dudley, Sandwell, Solihull, Walsall and Wolverhampton.

**It also covers the following unitary authorities:** Derby, Leicester, Rutland, Nottingham, Herefordshire, Telford and Wrekin and Stoke-on-Trent.

**It also covers the following Counties:** Derbyshire, Leicestershire, Nottinghamshire, Shropshire, Staffordshire, Warwickshire and Worcestershire.

### EASTERN REGION

HM Courts & Tribunals Service  
First-tier Tribunal (Property Chamber) Residential  
Property, Cambridge County Court, 197 East Road  
Cambridge, CB1 1BA  
  
DX 97650 Cambridge 3

**Telephone:** 01223 841 524  
**Fax:** 01264 785 129  
**Email address:** [RPEastern@justice.gov.uk](mailto:RPEastern@justice.gov.uk)

**This office covers the following unitary authorities:** Bracknell Forest, West Berkshire, Reading, Slough, Windsor and Maidenhead, Wokingham, Luton, Peterborough, Milton Keynes, Southend-on-Sea and Thurrock.

**It also covers the following Counties:** Bedfordshire, Berkshire, Buckinghamshire, Cambridgeshire, Essex, Hertfordshire, Norfolk, Northamptonshire, Oxfordshire and Suffolk.

### SOUTHERN REGION

HM Courts & Tribunals Service  
First-tier Tribunal (Property Chamber) Residential  
Property, Havant Justice Centre, The Court House,  
Elmleigh Road, Havant, Hants, PO9 2AL

**Telephone:** 01243 779 394  
**Fax:** 0870 7395 900  
**Email address:** [RPSouthern@justice.gov.uk](mailto:RPSouthern@justice.gov.uk)

**This office covers the following unitary authorities:** Bath and Northeast Somerset, Bristol, North Somerset, South Gloucestershire, Bournemouth, Plymouth, Torbay, Poole, Swindon, Medway, Brighton and Hove, Portsmouth, Southampton and the Isle of Wight.

**It also covers the following Counties:** Cornwall and the Isles of Scilly, Devon, Dorset, East Sussex, Gloucestershire, Hampshire, Kent, Somerset, Surrey, West Sussex and Wiltshire.

## LONDON REGION

HM Courts & Tribunals Service  
First-tier Tribunal (Property Chamber) Residential  
Property, 10 Alfred Place, London WC1E 7LR  
  
DX 134205 Tottenham Court Road 2

**Telephone:** 020 7446 7700  
**Fax:** 01264 785 060  
**Email address:** [London.RAP@justice.gov.uk](mailto:London.RAP@justice.gov.uk)

**This office covers all the London boroughs.**

The Ministry of Justice and HM Courts and Tribunals Service processes personal information about you in the context of tribunal proceedings.

For details of the standards we follow when processing your data, please visit the following address <https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>

To receive a paper copy of this privacy notice, please call 0300 123 1024/ Textphone 18001 0300 123 1024.

**To:** Housing Solutions Team

**Email:** [homelessreviews@thurrock.gov.uk](mailto:homelessreviews@thurrock.gov.uk)

**Subject:** Section 202 Review Request – Case Ref: 1083077

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Dear Reviews Manager,

I am writing to formally request a review under **Section 202 of the Housing Act 1996**, following your decision dated **20 May 2025** that I am “not homeless.” I strongly disagree with this conclusion and am submitting this request within the statutory 21-day period.

 **Summary of My Challenge:**

**1. Functional Homelessness (Contrary to Section 175 of the Act):**

Although I currently reside at **15 Evesham Way, IG5 0EQ**, this is a **supported living facility**, not a permanent or independent accommodation. I am **functionally homeless**, due to:

- Lack of control over my living environment
- Absence of secure tenancy rights
- Ongoing exposure to psychological distress, hostility, and environmental unsuitability
- Inability to transition to true housing independence

The conditions violate the legal definition of “reasonable to continue to occupy,” especially as I have made clear my **intent and readiness for independent living**.

**2. Evidence of Unsuitability:**

I have **documented incidents** and conditions demonstrating that the accommodation is unsuitable, including:

- Harassment and abuse within past supported placements
- Unsafe or unsanitary conditions (photographic evidence provided)
- Neglect in care and support
- Cultural and social worker bias affecting my mental well-being

**3. Social Care Involvement Does Not Equal Secure Housing:**

Being “placed” by Adult Social Care does not guarantee permanent accommodation or autonomy. There is no secure tenancy, and my status remains unstable. This placement is temporary, and I have not been given a pathway toward independence or permanent housing. The Council is **mistaking provision with adequacy**.

**4. Disregard for My Vulnerabilities and Legal Rights:**

I am an adult with diagnosed disabilities (Autism, ADHD, and a mild learning disability). Your

decision fails to account for the impact of these vulnerabilities on my housing needs and mental health under the **Care Act 2014** and the **Equality Act 2010**.

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 **What I Am Requesting:**

- A **full review** of the decision under **Section 202 of the Housing Act 1996**
  - A reassessment of the **suitability of my accommodation**
  - Recognition that I am **effectively homeless** and in need of independent, secure housing
  - Assignment of a **new social worker** due to cultural bias and breakdown in trust
  - Confirmation of all correspondence and SAR disclosures as per **GDPR compliance**
- 

Please confirm receipt of this review request and advise me of the next steps, including the name of the officer handling my case.

Sincerely,

**Nnamdi Michael Okpala**

DOB: 19/05/2001

Email: [okpalan@protonmail.com](mailto:okpalan@protonmail.com)

Case Ref: **1083077**

Current Address: 15 Evesham Way, IG5 0EQ

Your reference number is IAG-758197266.

Thank you for submitting Inspire CEIAG Referral Form

**subThurrockDP:**

**Data protection and fair processing**

I have read and understood the data protection and fair processing statement, above

**subContactDetails:**

First name or given name	Last name or family name	Phone number	Email address
Nnamdi	Okpala	07488229054	obinexus@tuta.com

**Service currently engaging with::** Housing

**Support required (tick all that apply):** CV Writing / Updating, Job Searching, Career Progression, Other

**Please specify the support you require:** I am autism adhd with mild learnign disablity and aspergers Under the Housing Act 1996 I need an urgetn migraion to delaget my to and indpendetn three bedroom probet in thucok palce here under the thucok cunty conil whien i was homeless under act soicla care in 29 november to 28 januray

**First name:** Nnamdi

**Surname:** Okpala

**Referred by service area::** Special Educational Needs (SEND)

# Legal Case Summary: Nnamdi Okpala v Thurrock Council

**Client:** Nnamdi Michael Okpala

**DOB:** 19 May 2001 (Age 24)

**Address:** 15 Eversham Way, Ilford, IG5 0EQ

**Contact:** [okpalan@protonmail.com](mailto:okpalan@protonmail.com)

**Date Prepared:** August 2025

## Protected Characteristics & Vulnerabilities

- **Diagnosed Conditions:** Autism, ADHD, Asperger's Syndrome
- **Care Leaver Status:** Former looked-after child
- **Hospital History:** Ellingham Hospital admission (2016-2017, aged 15-16)
- **Qualifications:** Independent Living Certificate (Kent-based charity trust)

## Core Legal Claims

### 1. Human Rights Act 1998 Violations

- **Article 8:** Right to Private and Family Life - failure to provide adequate housing
- **Article 3:** Prohibition of Torture/Inhuman Treatment - psychological harm from institutional neglect

### 2. Equality Act 2010 Breaches

- Failure to make reasonable adjustments for neurodivergent needs
- Disability discrimination in housing provision

### 3. Children Leaving Care Duties

- Breach of statutory duties under Children Act 1989
- Failure to provide pathway planning and accommodation support

### 4. Housing Act 1996 Failures

- Incorrect Section 184 "not homeless" decision (20/05/2025)
- Failure to properly assess vulnerability and priority need

## Financial Claims

**Total Compensation Sought:** £270 million

- Health & Social Care failures: £120 million
- Housing failures (6+ years delay): £30 million
- Adult services failures: £120 million

## Current Housing Crisis

- **Illegal Eviction:** AKSupport Housing Service (November 2024 - January 2025)
- **Financial Loss:** £372 hotel costs at Best Western
- **Current Status:** Inappropriate supported accommodation despite independent living certification

## Key Evidence

1. Independent Living Certificate proving capability
2. Thurrock Council Section 184 decision letter
3. Medical records from Ellingham Hospital
4. Timeline of placement breakdowns (2016-2025)
5. Evidence of benefit and housing denial cycles

## Immediate Relief Sought

1. **Emergency accommodation** near Cambridge for PhD completion
2. **Section 202 Review** expedited conclusion
3. **Acknowledgment** of systemic failures
4. **Legal proceedings** initiation for compensation

## Legal Grounds for Challenge

- **Procedural failures** in homeless assessment
- **Failure to consider vulnerability** under s.189 Housing Act 1996
- **Breach of public sector equality duty**
- **Maladministration** causing injustice

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*This summary prepared for legal representatives to assess viability of judicial review, human rights claims, and compensation proceedings.*

Mr Nnamdi Okpala  
15 Eversham Way  
Ilford  
IG5 0EQ

20/05/2025  
Reference number  
1083077

Sent by email  
okpalan@protonmail.com

Dear Mr Nnamdi Okpala

**RE: The Housing Act 1996 (as amended) - Section 184 not homeless decision**

Your request for assistance under the above Act has been considered. Following careful and extensive enquiries based upon the information you have given us, I am writing to inform you of our decision.

- 1) You are an eligible person
- 2) You are not homeless

The reasons for this decision are as follows:

You approached the Council on 30/12/2024 seeking assistance in obtaining accommodation.

In all cases where a person has approached the Council seeking accommodation or assistance in obtaining it the Council is obliged to consider whether it has reason to believe that he is or may be homeless or threatened with homelessness within the next 56 days. The council accepted that it had reason to believe that you may be homeless or threatened with homelessness and as such is under a duty to carry out enquiries to establish what duty, if any, it may owe you.

After conducting inquiries, I am satisfied that you are eligible for assistance. The conclusion I have reached, however, is that I am satisfied that you are not homeless or threatened with homelessness within the next 56 days because you have

accommodation which you are entitled to occupy and is available to you and any other members of your household that currently reside or might reasonably be expected to reside with you.

I have undertaken the following enquiries into your case:

- *During the telephone conversation on the 15th May 2025, you explained that you would like to move out of your current accommodation (Heathcare Service, 15 Evesham Way, Redbridge, IG5 0EQ) because your friends are living in their own accommodation. You stated further that you have lived in a supported accommodation for a long time and would prefer to live independently. I asked if you have been asked to leave the property, but you stated no. You mentioned that there is no issue with your tenancy.*
- *On 16<sup>th</sup> May, I phoned Thurrock Council Adult Social Services. Oluwafemi Ojo (your social worker) advised me that you were placed in your current accommodation by their service. They are still responsible for your accommodation and you are still receiving ongoing support.*
- *On the 16th May, I contacted Heathcare Services. Amenah explained that you have not been asked to leave the property. She explained that you requested to leave the property to live independently because your friends are living in their own accommodation. She stated further that you stopped taking your medication because you believe they are not working.*

Having considered all of the above, I am satisfied that you have accommodation at **Heathcare Service, 15 Evesham Way, Redbridge, IG5 0EQ** which is available to you. This is because you have been provided this placement by Adult Social Care in Thurrock on an ongoing basis.

I have also considered whether the accommodation is reasonable for you to continue to occupy and have made the decision that it is taking into account the following factors:

#### **Size**

*The property is a five-bedroom property. You are living in a room which is an ensuite, suitable for you.*

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## **Affordability**

*I am satisfied that the property is affordable, and as the placement is being paid for by Adult Social Care. The Adult Social Care pays £916.72 weekly, and your rent is £975 monthly.*

*You are in receipt of universal credit and personal independence payment, £232 and £732 monthly, respectively.*

## **Risk of Violence**

*There are no risk issues to consider in terms of your safety residing at the property or in the borough of Redbridge.*

## **Location**

### *Your GP Surgery*

- *Heathcote Primary Care Centre - 13 minutes' walk (0.6 mile from your accommodation)*

### *Hospital*

- *King George Hospital – 37 minutes on the bus (bus time is every 15 minutes)*

### *Local shops*

- *Co-op Food Ilford – 2 minutes' walk (0.1 mile from your accommodation)*
- *Judiya Enterprise Off licence – 2 minutes' walk (440 feet from your accommodation)*
- *Nisa Local – 10 minutes' walk (0.4 mile from your accommodation)*
- *Exchange Ilford Shopping Mall – 25 minutes' on the bus (bus time is every 15 minutes)*
- *Savers Health and Beauty – 16 minutes' walk (0.7 mile)*
- *Pound Plus World Ltd – 18 minutes' walk / 9 minutes' on the bus – (0.8 mile) – bus time is every 15 minutes.*

### **Accessibility**

**15 Evesham Way, Redbridge, IG5 0EQ** is a five bedrooomed house which means that it would have internal stairs. **There are no accessibility issues to consider as you have stated there is no mobility issue.**

### **Condition**

You have stated there are no other issues with the property.

### **Conclusion**

Having considered all of the information on your case I am satisfied that the accommodation at **Heathcare Service, 15 Evesham Way, Redbridge, IG5 0EQ** is available for your occupation, you have the legal right to occupy the accommodation and is suitable for you. Your case is closed on this basis.

We advise you to remain at your accommodation at **Heathcare Service, 15 Evesham Way, Redbridge, IG5 0EQ**. Should you fail to follow this advice and as a consequence lose this accommodation, if you subsequently approach for assistance again we may deem you to be homeless, but intentionally so.

### **RIGHT TO REVIEW - HOUSING ACT 1996, PART 7, SECTION 202**

In reaching my decision I have had regard to the Homelessness Code of Guidance for Local Authorities and I am satisfied that the decision I have reached is not at odds with the guidance in the code.

### **RIGHT TO REVIEW - HOUSING ACT 1996 S.202**

Thurrock Council's Privacy Notice can be found on our website [Data Protection](#), which outlines your rights and how we collect, use, store, delete and protect your personal data

You have a right to a review of this decision. If you are unhappy with this decision you should tell us why within 21 days of receipt of the decision. We would prefer you to tell us in writing, either in your own words or by completing the attached form.

Please give us all your reasons and any information that you think should be taken into account. Any such request must be made within 21 days of receipt of this notice and should be sent to :-

The Reviews Manager, Housing Solutions Team, 2nd Floor, Civic Offices, New Road, Grays, RM17 6SL or email [homelessreviews@thurrock.gov.uk](mailto:homelessreviews@thurrock.gov.uk)

Should you have any queries regarding this letter, or if there has been any change in your circumstances, please do not hesitate to contact me on telephone number 01375 652186.

Yours sincerely



Olubunmi Akueme  
Housing Solutions Officer

Civic Offices, New Road, Grays  
Essex RM17 6SL  
Adults, Health and Housing

Mr Nnamdi Okpala  
15 Evehsam Way  
Ilford  
IG5 0EQ

22 August 2025  
Reference number  
1083077

Dear Mr Okpala,

**No Homeless Application Taken – Housing Act 1996, Part VII  
Notification of Decision**

Following the withdrawal of the Not Homeless Decision letter issued on 20 May 2025 we have re-considered your request to make a homelessness application to this Local Authority.

Based on the information available to us I am of the view that you lack the mental capacity to make a homelessness application and therefore we are unable to proceed any further with your request under the Housing Act 1996, Part VII.

I have set out below the enquiries I have made and the reasons for my decision. This is so you, or the person that is representing or supporting you, can understand the reasons and how I have reached my decision that no application can be proceeded with due to your lack of capacity.

This helps you and anyone supporting you to decide whether to seek a judicial review, or whether to seek independent legal advice. We think that it is always best to seek independent advice because the test we must apply is complex and an independent advisor can explain my decision, check it, and advise on what options are available to you.

### **Background**

You are currently resident at Heathcare Services, 15 Evesham Way, Ilford, Essex, IG5 0EQ. You have been provided this accommodation with support by Adult Social Care, Thurrock Council on 25<sup>th</sup> February 2025.

On 28 July 2025, the decision was made by Heathcare Services to serve you with a 28 day Notice to Quit due to your behaviour and the ongoing concerns that were significantly impacting the team's ability to support you and maintain a safe, respectful living environment for the other residents.

You have mental health diagnoses of Autism Spectrum Disorder and Unspecified Non-Organic Psychosis for which you are prescribed Sodium Valproate 300mg and Aripiprazole 10mg, however you are not currently compliant with medication.

You stated that you want to live independently.

## The Law

The courts who interpret the Homelessness Legislation have determined that an adult person who lacks the mental capacity to understand and respond to an offer of accommodation, and, if accepted, to understand the responsibilities involved, is not entitled to receive assistance under the homelessness legislation. This is the case of *R v Tower Hamlets LBC ex p Ferdous Begum [1993] AC 509; (1993)*.

The Courts decided that the decision as to whether a person has sufficient mental capacity to make an application is to be decided by the Local Authority's Housing Service and should be based on clear evidence, because such a decision is only legally sustainable in the case of a person who has serious capacity issues.

In making my decision I have been guided by Section 2 of the Mental Capacity Act (MCA) which states:

*"A person lacks capacity in relation to a matter if at the material time he is unable to make a decision for himself in relation to the matter because of an impairment of, or a disturbance in the functioning of, the mind or brain"*

The impairment or disturbance can be permanent or temporary.

I am mindful that capacity is not necessarily a permanent status and that some people may have fluctuating capacity because their mental health changes from day to day. I am also mindful that the level of capacity needed by a person also depends on the decision to be made.

A person will need a high level of mental capacity to make a decision on their housing future given the complexity of decisions that may be required from a person who may be owed duties under the homelessness legislation or may need to respond to an offer of temporary or settled housing.

I have considered Section 3 of the MCA to guide me in assessing whether you lack capacity to make a decision as defined by the courts in the *Begum* case. Section 3 states that a person is unable to make a decision if he or she is unable to do one or more of the following things:

1. Understand the information relevant to the decision.
2. Retain the information for long enough to be able to make a decision.
3. Use or weigh up the information as part of the process of making the decision.
4. Communicate the decision by any possible method, such as talking, using sign language, squeezing someone's hand.

Guidance to the MCA also explains the circumstances where a decision maker should not consider that someone lacks capacity and I have been mindful to consider this. A person must not be assumed to lack capacity because of: their age; their appearance; any mental health diagnosis they may have; any other disability or medical condition they may have.

## **Enquiries and Information Considered**

I have made the following inquiries and considered the information and facts I obtained to make my decision.

- Interview by Microsoft Teams on 5 August 2025
- Assessment by the Mental Health & Wellness Team – North, Redbridge Integrated Care dated 25 July 2025
- Email from Healthcare Services to Adult Social Care, Thurrock Council dated 28 July 2025
- Email from Grays Hall, Mental Health Services, Thurrock dated 18 August 2025
- The Mental Capacity Act 2005
- The 2018 Homelessness Code of Guidance and in particular paragraph 18.8 of that Code
- Relevant caselaw for *R v Tower Hamlets LBC ex p Ferdous Begum [1993] AC 509*; (1993) and subsequent case law of *WB v W District Council [2018] EWCA Civ 928* considered by the Courts for homelessness applications and mental capacity.

## **Decision**

During your interview with me on 5 August 2025 I have considered your mental health and current support and you did not demonstrate that you understood what is required to live independently.

When discussing budgeting you were unable to keep on track with the questions being asked and you required continual prompting by your social worker, Oluwafemi Ojo to assist you with answering the questions on the topic. This left the impression that you would need constant support in this area if you were living independently to be able to sustain any licence or tenancy agreement; this was indicative that you would require support more than that which a floating support service could offer.

You were unable to answer the question about the consequences of making loud noise, this is a key part of holding any licence or tenancy agreement as it can lead to the loss of accommodation.

When asked what support you might require when living independently you stated that you did not need any. This is not reflective of your current situation where you are living in a supported housing setting with staff onsite, provided by Adult Social Care in Thurrock due to your mental health. We have received no assessment from Adult Social Care, Mental Health Services, or Healthcare Services to state that this type of living environment is no longer required.

You do not have insight into your mental health and you are currently non-compliant with any prescribed medication, thus being prone to a relapse in your mental state. This raises concerns about your understanding of what is required to live independently and accept all of the responsibilities required to fulfil any licence or tenancy agreement. This is evidenced by the fact that Healthcare Services are a supported living scheme with staff

on site and they have had to serve you with notice to end your licence agreement due to your behaviour.

Their decision to end your stay with them is based on the following:

- Refusal to sign key documents: including house rules and tenancy agreement
- Non-compliance with medication and personal care
- Refusal to attend any meetings
- Frequently playing of loud music during unsociable hours, disturbing the household
- Neighbours lodging complaints regarding loud music after hours
- Your room being kept in an unsafe and unhygienic condition and refusing staff assistance
- Leaving the fridge door open and the oven on after use
- Wearing inappropriate clothing in the presence of female staff and service users
- Regularly disrupting other service users
- Demonstrable rudeness and lack of respect towards staff
- Live streaming from communal areas, interfering with staff duties
- Interfering with professionals supporting other service users
- Repeatedly calling all houses and the management team, causing disruption

This behaviour does not demonstrate that you understand the conditions of holding a licence or tenancy agreement as it is ending with you losing your accommodation. The fact that you have mental health diagnoses of Autism Spectrum Disorder and Unspecified Non-Organic Psychosis and that you are non-compliant with medication that is prescribed is indicative of the fact that you have an impairment of the mind that is impacting on your decision making in this area.

My concern is that if you are in breach of your current licence agreement/house rules which bare less of a responsibility than that of a tenancy then it is evident that it would be difficult for you to adhere to the terms of any tenancy agreement e.g. paying your rent on time, keeping the accommodation in a habitable and clean condition, not causing a nuisance to neighbours and committing anti-social behaviour and reporting repairs appropriately to the relevant services.

The interview with me on 5 August 2025 was originally arranged as a face to face interview at our office in Grays, Essex. You refused to attend the office and wanted it as a Microsoft Teams meeting. Living independently and entering into a contractual agreement with a landlord may require you to attend the landlord or agents' office for meetings or to sign documents or collect keys, you have not demonstrated the ability to readily engage with services or attend appointments as evidenced by your behavior at the current supported housing provision provided by Healthcare Services and this is of concern regarding your capacity to understand the responsibility of being a tenant or licensee.

Prior to the service of the notice, in July 2025 you had an assessment with Redbridge Access, Assessment & Brief Intervention Team. The primary concerns were related to housing dissatisfaction and medication non-compliance. It is noted that the assessor stated that you had the capacity to understand and weigh up the role of the mental health team and showed insight into your situation. However, it does not state that you have the capacity to understand the consequences of accepting and rejecting offers of accommodation and the responsibilities that goes with being a tenant.

Mental Capacity is decision-specific and time-specific and has to be tested on each individual decision, therefore you may have the capacity to understand the role of the mental health team but this is not the same as understanding your responsibility as a tenant and making decisions around this.

Whilst there was no indication for a hospital admission or immediate mental health crisis intervention, part of the plan, as advised by the assessor, was for the support staff at Healthcare Services to continue encouraging medication compliance and to monitor for signs of deterioration and escalating risk.

They also stated that a Deprivation of Liberty Safeguards (DOLS) application [to the Court of Protection] should be considered if you continued to refuse placements, which indicates that of a supportive nature however you are insistent that you want to live independently. The fact that DOLS is mentioned as part of the plan is not indicative of a person who does not have an impairment of mind that is not affecting their mental capacity to make decisions around their housing.

I have applied the following practical test to consider if you have sufficient mental capacity to understand and deal with the concept of being offered accommodation (The test set by the courts in the Begum case). I have concluded that due to the extent and impact of your vulnerability you do not. Specifically I am satisfied that:

1. I have a reasonable belief that you are a person that lacks capacity to make the decision in question in the context of housing.
2. I have started from the presumption of capacity (section 1(2) MCA) and considered the fact that every adult has the right to make their own decisions if they have the capacity to do so. I have not assumed that you do not have the capacity but have gathered evidence and facts that lead me to decide that you do not have capacity and it would not be in your best interests (section 1(5) MCA) to be assisted under the homelessness legislation.

As a result, the Council is not under any duty to proceed with your homelessness application. We are therefore not obliged to make any further enquiries into your circumstances to decide the statutory test set by the homelessness legislation. Nor are we required to provide temporary accommodation.

There is no statutory right of review to this decision.

You are a person who is vulnerable and I have therefore included your social worker, Oluwafemi Ojo into this correspondence so that Adult Social Care can carry out a Care Act assessment under the Care Act 2014 to determine in line with the Plan of the Redbridge Access, Assessment & Brief Intervention Team the most appropriate placement for you. I have provided Oluwafemi with a copy of this decision letter.

Should you have any queries regarding this letter, or if there has been any change in your circumstances, please do not hesitate to contact me on telephone number 01375 652820.

Yours sincerely

Olubunmi Akueme

Housing Solutions Officer

**Cc Oluwafemi Ojo, Social Worker, Community Led Support team, Thurrock Council**

# OBINexus Reform Proposal: Greater Essex Smart Infrastructure Framework

## Executive Summary: Thurrock Transformation Through Constitutional Innovation

Submission Date: September 17, 2025

Framework Version: OBINexus Constitutional Framework v2.0

Consultation Response: Greater Essex Mayoral Combined County Authority

Primary Focus: Thurrock Section 114 Recovery Through Smart Infrastructure

---

## PART I: CONSTITUTIONAL MANDATE FOR REFORM

### Article 1: Right to Act Under Crisis Conditions

Per the OBINexus Constitutional Framework and the documented Civil Collapse Event Report, this proposal invokes the **Right to Act Policy** in response to:

1. Thurrock Council's Section 114 Notice (December 19, 2022)
2. £700,000,000 Solar Investment Failure resulting in bankruptcy
3. Systematic Housing Crisis affecting vulnerable populations
4. Constitutional Violations of human rights and disability protections

Legal Authority: OBINexus Constitutional Engine v1.0 with machine-verifiable policy enforcement

---

## PART II: SMART HOMES INFRASTRUCTURE PROPOSAL

### Section 2.1: Technical Architecture for Housing Revolution

Build Orchestration Stack Implementation:

```
yaml
```

**smart\_homes\_framework:**

**toolchain:**

primary: riftlang.exe → .so.a → rift.exe → gosilang

**build\_system:** nlink → polybuild

**dependency\_manager:** github.com/obinexus/rust-semverx

**infrastructure:**

- Robotic Ontologic Bayesian AI Integration
- Thread-Safe Housing Allocation Algorithms
- Quantum Cryptography for Resident Security
- NFC/RFID Sovereignty Systems

**compliance:**

- 99%+ Quality Assurance Standards
- Zero-Trust Architecture
- Constitutional Compliance Engine
- Real-time Telemetry Monitoring

## Section 2.2: Milestone-Based Investment Protocol (#NoGhosting)

### Investment Framework for Smart Homes Development:

Milestone	Deliverable	Timeline	Investment Required
M1: Land Acquisition	Secure 500+ acres in Thurrock	90 days	£30,000,000
M2: Infrastructure Design	Complete architectural plans	180 days	£15,000,000
M3: Prototype Development	Build 10 demonstration units	365 days	£50,000,000
M4: Mass Production	1,000 smart homes operational	730 days	£200,000,000
M5: Full Deployment	5,000 units with AI integration	1095 days	£405,000,000

**Total Investment:** £700,000,000 (matching failed solar investment)

**ROI Timeline:** 5 years with 15% annual returns

**Anti-Ghosting Protection:** Automatic breach consequences for non-delivery

## PART III: INTEGRATION WITH GREATER ESSEX DEVOLUTION

### Section 3.1: Mayoral Combined County Authority Alignment

#### OBINexus Proposal for Devolved Powers Utilization:

##### 1. Housing and Regeneration (Foundation Level Powers)

- Deploy smart homes framework across Essex, Thurrock, Southend-on-Sea
- Integrate with Local Growth Fund for infrastructure financing

- Establish Affordable Housing Programme with AI-driven allocation

## 2. Transport Infrastructure (Detail Level Powers)

- Implement smart transport hubs connecting housing developments
- Deploy autonomous vehicle corridors
- Create integrated ticketing with NFC/RFID sovereignty

## 3. Skills and Education (Established Level Powers)

- OBINexus Education division partnership with Cambridge Regional College
- Level 3 Design and Technology certification for smart home technicians
- Neurodivergent-inclusive training programs

## 4. Economic Development (Mayoral Powers)

- Transform Thurrock from bankruptcy to innovation hub
- Create 10,000+ jobs in smart infrastructure sector
- Establish Greater Essex as global smart cities leader

## Section 3.2: Constitutional Governance Structure

### Proposed OBINexus Integration:

#### Greater Essex Combined County Authority

- Mayor (Directly Elected, May 2026)
- Essex County Council (3 representatives)
- Southend-on-Sea City Council (2 representatives)
- Thurrock Council (2 representatives)
- OBINexus Constitutional Advisory Board
  - Technical Architecture Committee
  - Human Rights & Disability Protection Unit
  - Investment Oversight Division
  - Quality Assurance Enforcement

## PART IV: THURROCK RECOVERY STRATEGY

### Section 4.1: From Section 114 to Smart City Leadership

#### Phase 1: Emergency Stabilization (0-6 months)

- Deploy OBINexus Constitutional Compliance Engine
- Establish emergency housing allocation system
- Implement financial recovery through asset optimization

#### Phase 2: Infrastructure Development (6-18 months)

- Begin smart homes construction with modular design
- Deploy IoT sensors and AI management systems
- Create digital twin of Thurrock for planning optimization

### Phase 3: Economic Transformation (18-36 months)

- Launch OBINexus Computing division headquarters in Thurrock
- Establish smart manufacturing facilities
- Create innovation district with 50+ tech startups

### Phase 4: Global Leadership (36+ months)

- Export smart city technology globally
- Establish Thurrock as case study for urban transformation
- Generate £1B+ annual revenue from technology licensing

## Section 4.2: Quantitative Recovery Metrics

Metric	Current State	3-Year Target	Constitutional Mandate
Housing Units Built	0	5,000	Right to adequate housing
Employment Rate	65%	85%	Economic inclusion
Digital Connectivity	23%	99%	Universal access
Disability Accommodation	12%	100%	Full accessibility
Council Solvency	-£470M	+£200M	Financial sustainability

## PART V: HUMAN RIGHTS & DISABILITY FRAMEWORK

### Section 5.1: Neurodivergent-First Design Principles

#### Smart Homes Accessibility Features:

- Voice-activated controls with multiple language support
- Sensory regulation systems (lighting, sound, temperature)
- Predictive assistance AI for daily living activities
- Emergency response systems with autism-friendly protocols
- Visual scheduling and reminder systems

### Section 5.2: Dark Psychology Mitigation

#### Constitutional Protections Embedded in Infrastructure:

```
python
```

```
class SmartHomeProtection:  
    def __init__(self):  
        self.monitoring = "Machine-learning pattern recognition"  
        self.enforcement = "Zero-tolerance violation response"  
        self.compensation = "Universal Pension Allocation"  
        self.telemetry = "Real-time GUID/UID tracking"  
  
    def detectViolation(self, severity):  
        if severity >= 9: # Critical violation  
            return "Immediate constitutional enforcement"  
        elif severity >= 6: # Danger level  
            return "PID fork spawn for investigation"  
        else:  
            return "Log and monitor with A* scoring"
```

## PART VI: TECHNICAL SPECIFICATIONS

### Section 6.1: OBINexus Toolchain Implementation

#### Core Components for Smart Infrastructure:

##### 1. RIFT Architecture (Polyglot Compilation System)

- rift\_core: Constitutional compilation framework
- rift-cli: Command interface governance
- riftcall.exe: Binding driver authority
- riftest.exe: Quality assurance mandate

##### 2. GosiLang Integration (Multi-Language Support)

- Four taxonomy layers: RTP/TN/FP/FN
- Isolated polyglot mode verification
- PHP/Python/Core language bindings
- Thread safety compliance

##### 3. SemVerX Dependency Management

- Eulerian cycle → DAG → Hamiltonian graph resolution
- Hot-swap architecture for zero-downtime updates
- Registry schema: \*.\*.obinexus.org.<->.<-->.org

### Section 6.2: Quality Assurance Standards

#### Mandatory Compliance Metrics:

- **Performance:** 99%+ accuracy across all systems
  - **Security:** Full cryptographic verification
  - **Accessibility:** WCAG AAA compliance
  - **Sustainability:** Carbon-negative by design
  - **Scalability:** Support for 1M+ concurrent users
- 

## PART VII: CONSULTATION RESPONSE SPECIFICS

### Addressing Greater Essex Consultation Questions:

#### Q1: Geography Coverage

- Full support for Essex, Thurrock, Southend-on-Sea combined authority
- OBINexus infrastructure spans entire region with distributed nodes

#### Q2: Governance Arrangements

- Integration with proposed mayoral structure
- Constitutional Advisory Board for technical oversight
- Machine-verifiable policy enforcement

#### Q3: Powers Utilization

- Maximum utilization of all devolved powers
- Focus on housing, transport, skills, economic development
- Innovation in public service reform through AI

#### Q4: Consultation Process

- Full transparency through open-source documentation
  - Community engagement via OBINexus Publishing division
  - Real-time feedback integration through digital platforms
- 

## PART VIII: IMPLEMENTATION TIMELINE

### Critical Path to Smart Infrastructure:

#### 2025 Q4 (October - December)

- Submit formal proposal to consultation
- Establish OBINexus Greater Essex entity

- Begin land acquisition negotiations

## 2026 Q1 (January - March)

- Secure initial £50M investment tranche
- Complete architectural designs
- Launch pilot program (10 units)

## 2026 Q2 (April - June)

- Mayoral election integration
- Scale to 100 demonstration units
- Deploy Constitutional Compliance Engine

## 2026 Q3-Q4

- Mass production commencement
- 1,000 units under construction
- AI systems fully operational

## 2027-2028

- Complete 5,000 smart homes
  - Achieve financial recovery
  - Export technology globally
- 

## CERTIFICATION & AUTHORITY

This proposal is submitted under the authority of:

### OBINexus Constitutional Framework v2.0

**Legal Architect:** Nnamdi Michael Okpala

**Technical Certification:** NCFE Level 3 Certificate in Coding Practices

**Cultural Authority:** Prince of Nnewi, Biafra

**Constitutional Compliance:**  Verified

**Machine Verification:**  Ready for Implementation

**Human Rights Assessment:**  Full Protection Guaranteed

**Investment Readiness:**  Milestone Framework Active

---

## CALL TO ACTION

Thurrock has everything needed to build smart homes and lead the Greater Essex transformation. The OBINexus framework provides:

1. **Proven technical architecture** with thread-safe implementation
2. **Constitutional protection** against exploitation
3. **Milestone-based investment** preventing ghosting
4. **Human rights framework** ensuring inclusion
5. **Machine-verifiable compliance** for transparency

Let's reform Thurrock. We have everything to build smart homes.

---

*Submission prepared in accordance with Greater Essex Devolution Consultation requirements*

*Deadline: April 13, 2025*

*Distribution: Public Record under CC0 License*

# SECTION 202 REVIEW DEMAND - REVISED

## IWU Live-Work Constitutional Community Proposal

To: Thurrock Council Housing Solutions & Economic Development Teams

From: Nnamdi Michael Okpala, CEO/Founder OBINexus IWU

Date: September 18, 2025

Reference: Section 202 Review - Live-Work Solution Partnership

Deadline: 7 Days from Service

---

## FORMAL NOTICE: TRANSFORMING HOUSING NEED INTO ECONOMIC OPPORTUNITY

Under Housing Act 1996, Part VII, Section 202, I request review of your Section 184 decision and propose the **IWU Live-Work Constitutional Community** - a self-sustaining solution to Thurrock's housing crisis that generates economic value.

---

### 1. THE IWU SOLUTION: LIVE + WORK INTEGRATION

IWU (Igbo: "Law") is the world's first constitutional technology company where:

- Residents **live and work** in the same integrated community
- Housing crisis becomes economic opportunity
- Zero commute = increased productivity
- Design & technology business generates revenue
- Neurodivergent-first environment enables overlooked talent

Current Status:

- Active YouTube channel documenting constitution
- Published Persona Development Framework (Medium)
- Cambridge PhD candidate (starting October 1, 2025)
- Proven framework ready for deployment

Not asking for charity - offering partnership.

---

## 2. WHY THURROCK NEEDS THIS NOW

### Your Problems:

- £700M lost - need new revenue streams
- **Housing crisis** - zero new homes built
- 47 violations - facing legal challenges
- **Neurodivergent gaps** - equality act breaches

### IWU Solutions:

- **Revenue Generation:** Tech/design business rates & employment
- **Housing Provision:** 15 homes without council funding needed
- **Employment Creation:** Live-work residents = instant jobs
- **Compliance:** Solves Equality Act obligations innovatively

---

## 3. THE LIVE-WORK MODEL

### How It Works:

Traditional Model:      IWU Model:

House → Commute → Work   =   Live-Work Same Location  
(3 separate problems)      (1 integrated solution)

- |                            |                             |
|----------------------------|-----------------------------|
| - Housing benefit cost     | - Self-sustaining community |
| - Unemployment support     | - Immediate employment      |
| - Transport infrastructure | - Zero commute needed       |
| - Mental health crisis     | - Built-in support system   |

### Resident Journey:

1. Wake up in IWU housing
2. Walk downstairs to design/tech workspace
3. Contribute to constitutional business
4. Support fellow neurodivergent residents
5. Earn through meaningful work
6. Live in culturally-aware environment (Nsibidi integration)

## 4. PROVEN FRAMEWORK COMPONENTS

### Already Developed:

- **Persona Development Framework:** Published methodology for neurodivergent work-life balance
- **Two-Track System:**
  - Foundation Track: Housing, food, mental health (Maslow base)
  - Aspiration Track: Career growth, personal development
  - If-Then Policy: Dynamic support adjustment
- **Seven Senses Design:** Neurodivergent-optimized spaces
- **Constitutional Structure:** Complete governance model
- **Tech Stack:** RIFT toolchain, GosiLang integration ready

### Business Divisions Ready:

- **IWU Computing:** Tech infrastructure services
  - **IWU Design:** Accessible design solutions
  - **IWU Uche:** Knowledge/wisdom education services
  - **IWU Archive:** Blockchain identity solutions
- 

## 5. FINANCIAL PROPOSITION

### Council Investment:

- **Land:** 25 acres allocation
- **Planning:** Fast-track permission
- **Initial Capital:** £2M (recoverable via business rates)

### Return to Thurrock:

- **Year 1:** 15 jobs created, £200K business rates
- **Year 2:** 30 jobs, £400K rates, reduced benefit claims
- **Year 3:** Tech hub status, 50+ jobs, £750K+ revenue
- **Year 5:** Self-sustaining community, innovation center

### Cost Savings:

- **Housing benefit:** -£180K/year (15 units)
- **Unemployment support:** -£150K/year
- **Mental health services:** -£200K/year

- **Total Savings:** £530K+ annually
- 

## 6. IMMEDIATE PARTNERSHIP TERMS

### Phase 1 (Months 1-6):

- Allocate 25 acres for development
- Fast-track planning for live-work community
- I continue Cambridge PhD while establishing site

### Phase 2 (Months 6-12):

- Construct first 5 live-work units
- Establish IWU Computing division
- Generate first revenue/employment

### Phase 3 (Year 2):

- Full 15-unit community operational
  - All divisions active
  - Net positive contribution to Thurrock
- 

## 7. ACCOUNTABILITY & GOVERNANCE

### Smart Contract Implementation:

```
javascript
```

```

const IWULiveWork = {
  residents: {
    housing: "guaranteed",
    employment: "integrated",
    support: "built-in"
  },
  thurrock_benefits: {
    business_rates: "increasing",
    employment_stats: "improving",
    cost_savings: "substantial"
  },
  performance: {
    ooas_tracking: true,
    blockchain_logged: true,
    transparent_reporting: "quarterly"
  }
};

```

## Success Metrics:

- Employment rate: 80%+ of residents working
  - Revenue generation: £200K+ Year 1
  - Neurodivergent support: 100% accommodation
  - Cultural integration: Nsibidi UI throughout
- 

## 8. EVIDENCE OF CAPABILITY

### Public Documentation:

- **YouTube:** OBINexus IWU Constitution channel (active)
- **Medium:** @obinexus - Persona Development Framework published
- **GitHub:** [github.com/obinexus/iwu](https://github.com/obinexus/iwu) (ready for deployment)
- **Academic:** Cambridge PhD position secured (October 2025)

### Track Record:

- Survived civil collapse through innovation
- Built constitutional framework from scratch
- Created two-track support system
- Documented everything transparently

"When systems fail, build your own - and we did just that"

---

## 9. YOUR CHOICE

### Option A: Continue Current Path

- £700M losses compound
- Housing crisis worsens
- More legal challenges
- Reputation continues declining

### Option B: Partner with IWU

- Transform crisis into opportunity
  - Become UK's first live-work council partner
  - Generate revenue vs. paying benefits
  - Lead neurodivergent employment innovation
- 

## 10. SPECIFIC DEMANDS (7-DAY RESPONSE)

1. **ACKNOWLEDGE** IWU live-work model as viable solution
2. **COMMIT** to partnership exploration meeting
3. **ALLOCATE** project team for feasibility study
4. **PROVIDE** interim accommodation while developing site
5. **FAST-TRACK** planning discussions for 25-acre site

If no constructive response:

- Section 203 proceedings
  - Public campaign highlighting £700M waste vs. IWU opportunity
  - National media: "Council rejects self-sustaining housing solution"
  - Direct approach to central government for override
- 

## 11. WIN-WIN NARRATIVE

Your Story Could Be:

*"Thurrock Council, despite financial challenges, pioneered UK's first live-work neurodivergent community, transforming welfare recipients into tech workers, solving housing crisis through innovation not expense."*

## Not:

"Council that lost £700M also rejected profitable housing solution from disabled resident, faces further legal action."

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## DECLARATION

I, Nnamdi Michael Okpala, offer Thurrock Council not a burden but an opportunity. IWU represents innovation from adversity, value from vulnerability, solutions from struggle.

This isn't about what you owe me - it's about what we can build together.

The seven days isn't just a legal deadline - it's your window to transform failure into innovation.

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## SERVICE

Primary: [housing.solutions@thurrock.gov.uk](mailto:housing.solutions@thurrock.gov.uk)

CC:

- [economic.development@thurrock.gov.uk](mailto:economic.development@thurrock.gov.uk)
- [legal.services@thurrock.gov.uk](mailto:legal.services@thurrock.gov.uk)
- [monitoring.officer@thurrock.gov.uk](mailto:monitoring.officer@thurrock.gov.uk)
- [planning@thurrock.gov.uk](mailto:planning@thurrock.gov.uk)
- [Local MP]@parliament.uk

Documentation: [github.com/obinexus/iwu](https://github.com/obinexus/iwu)

Evidence: [YouTube.com/OBINexusIWU](https://YouTube.com/OBINexusIWU)

Framework: [Medium.com/@obinexus](https://Medium.com/@obinexus)

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Signed with Nsibidi seal:  (Bent Heart - Resilience through Unity)

Nnamdi Michael Okpala

CEO/Founder, OBINexus IWU

World's First Constitutional Technology Company

Cambridge PhD Candidate (October 2025)

Author: "CIVIL COLLAPSE: A Generation Left Behind"

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## OFFICER TRACKING

Response Required By: \_\_\_\_\_

Officer Assigned: \_\_\_\_\_

OOAS Score: \_\_\_\_\_

Partnership Decision: \_\_\_\_\_

obinexus@tuta.com

⌚️ 📈 Sun, 14 Sept • 23:29

corporationsecretary

⌚️ 📈 Sun, 14 Sept • 23:29

postmaster@thurrock.gov.uk

⌚️ 📈 Sun, 14 Sept • 23:29

postmaster@thurrock.gov.uk

⌚️ 📈 Sun, 14 Sept • 23:30

**Location** 📈 Sent

obinexus@tuta.com

to: adultsocialcare@thurrock.gov.uk + 8

薿️ Mon, 15 Sept 2025 • 23:24

## : Disabled Care Leaver Declares £240M Override Against Thurrock Council – DHSC Accountability Required



I am Nnamdi Michael Okpala, a 24-year-old disabled care leaver (autism/ADHD) who entered care at age 9 and was discharged without support at 24.

Today, I lawfully override Thurrock Council under:

**Section 203, Housing and Planning Act 2016**

Human Rights Act 1998 (Articles 3, 8, 14)

Equality Act 2010

You have 14 days to:

Provide deconstructive proof that I was not homeless, not denied care, and not discriminated against;

Or pay £240 million as lawful recompense for 8 human rights violations.

This is not a request. This is a legal override.

Evidence attached.

This email is timestamped and legally archived.

If you fail to respond, I will:

File judicial review

Submit to UN Special Rapporteur

Publish this scandal nationally

Regards,

Nnamdi Michael Okpala

Imperial College MSc Offer | Mensa Member

[obinexus@tuta.com](mailto:obinexus@tuta.com) | 15 Evesham Way, IG5 0EQ

Campaign: #CivilCollapse

LBTW,EARN TO DO YOU JOB.

—  
"I require every Incident Report Form 18 (or equivalent) completed in relation to at age 18 entering adult society care to now till date 15/09/2025 so September 2025, including:

All versions (draft, final, amended, unsigned)

All attachments (CCTV stills, photos, witness statements)

All risk assessments referenced therein

All subsequent reviews (IRR, safeguarding, MHA panels)

These documents contain evidence of coercion, false allegations, and fabricated behaviour logs used to incriminate me and justify institutionalisation.

Failure to provide complete, unredacted copies within 7 days will result in:

ICO complaint (Data Protection Act 2018, s.45)

Additional £180 million penalty (now £420 million total)

Criminal complaint for malfeasance in public office

Do not test me."



postmaster@thurrock.gov.uk

✉️ 📱 Mon, 15 Sept • 23:24

Thurrock.First

📱 Mon, 15 Sept • 23:25

HousingOptions@thurrock.gov.uk

📱 Mon, 15 Sept • 23:25

postmaster@thurrock.gov.uk

✉️ 📱 Mon, 15 Sept • 23:26



## Online Debt Solutions

**BETA** This is a new service - your [feedback](#)

(<https://www.smartsurvey.co.uk/s/Bankruptcyapplication/>) will help us improve it

[Help with this page](#) (<https://www.gov.uk/home/contact-us>)

[Save and logout](#) (<https://www.gov.uk/base/save-and-logout2>)

# Thank you

## Your payment was successful.

Your transaction number is:

**ADJ0230496**

Transaction number	ADJ0230496
Payment amount	£680
Worldpay Transaction ID	ADJ0230496-0001



**Once you've paid the full £680 fee, don't forget to return to the Overview page and submit your application**

[Return to my application](#) (<https://www.gov.uk/payments/continue>)



[Print confirmation](#)

[View my payment history](#) (<https://www.gov.uk/payments/history>)

# Thurrock Council Commissioners

Thurrock Council, Civic Offices, New Road, Grays, Essex RM17 6SL  
commissioners@thurrock.gov.uk

Deputy Prime Minister and Minister of State  
Ministry of Housing, Communities & Local Government  
Fry Building  
2 Marsham Street  
London  
SW1P 4DF

1 May 2025

Dear Deputy Prime Minister and Minister of State,

Thank you for the response to our previous report, and for confirming the appointment of Denise Murray as Finance Commissioner. In your response, you requested that our next report provides an assessment with evidence of the extent to which Thurrock Council is meeting the Best Value Duty. The statutory intervention in Thurrock Council is due to end on 1 September 2025. With this in mind, this report provides our view as Commissioners on the Council's current position and what further support may be required beyond this date.

Our recent reports have outlined the significant progress the Council has made to date. Taking into account the further improvements since our last report was submitted in November 2024, this report uses the *Best value standards and intervention: a statutory guide for best value authorities* published in May 2024 to assess whether and in which areas Thurrock Council is now meeting its Best Value Duty or still failing to do so.

Since our last report was submitted, the Government has published the *English Devolution White Paper* and the Greater Essex area, including Thurrock Council, has subsequently been confirmed on the Devolution Priority Programme and invited to submit proposals for local government reorganisation (LGR). Both of these major transformation programmes provide significant opportunities for Thurrock Council and its residents. However, we would highlight that it is vital that the Council retains its focus and commitment to improvement despite these other pressures, and ensures it has the leadership vision and capacity in place to drive forward all three of these significant programmes simultaneously. Furthermore, it is important that any LGR proposals that come forward will be able to demonstrate that they contribute positively to the future financial sustainability of any new unitary authority that includes the existing Thurrock Council.

## **Executive Summary**

Since the beginning of the intervention in September 2022, the Council has engaged positively with Commissioners and taken seriously its commitment to recovery and improvement. Progress within the first year was limited, due primarily to a long period of financial discovery with regular movements in the Council's understanding of its true financial position. This was combined with a significant limitation in organisational capacity impacting its ability to move at pace in terms of organisational improvement.

The Administration continues to own the recovery agenda and is taking steps to reengage with its communities through a series of initiatives including open "town hall" style events, campaigns such as "A fresh start for Thurrock" and "Thurrock Cares," as well as community

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Gavin Jones, Lead Commissioner  
Dr Dave Smith, Chief Executive and Managing Director Commissioner  
Denise Murray, Finance Commissioner

action at Coalhouse Fort and a localisation pilot. Whilst this is welcomed and is encouraged, there is still a lot of work to do to rebuild trust between the Council and its communities. This is set against a backdrop of further years of very difficult political decisions that will need to be taken to reduce the structural debt that the Council has.

The additional pressure of LGR could distract politicians from focussing on the necessary recovery work, but to date they have stood firm on their recovery efforts; this is despite considerable broader political pressure surrounding LGR within Greater Essex. To support the continuous development of the Council's political leadership, LGA-supported political mentoring for Cabinet is underway, both for individual Portfolio Holders and for Cabinet as a collective group, and Commissioners would encourage Members to fully embrace this opportunity.

With enhanced financial leadership capacity, much good work has been done to address historic financial accounts and governance issues. However, there are still a number of open posts across finance and the system of internal controls that have proven difficult to fill, and inevitably this could hamper further progress.

The Council was able to set a balanced budget for the 2025/26 fiscal year, but it could not have done so without Exceptional Financial Support (EFS) facilitated by government. The 2025/26 Budget highlighted that there remains a structural deficit of £8 million and that the overall debt position is estimated to rise to over £ 1.1billion by the end of 2025/26. Tackling this financial problem will require tough political decisions in the future over service choices and an ambitious but well considered and resourced transformation plan.

There remains a weakness in the authority's approach to risk management and it has not yet been embraced across the Council as an essential organisational capability. Additionally, the capacity pressures across Internal Audit means that this is an area that remains underdeveloped, with a limitation of audit scope for 2024/25, although a 3-year Internal Audit plan has now been produced.

Capacity remains a significant issue for Thurrock Council. Whilst some progress has been made around efficiency, this will not be enough to strategically reshape the Council to ensure it becomes fit for the future, whether it continues to stand alone or is merged into a larger unitary through LGR. In part, this could be achieved through implementing in full its proposed operating model, although this is still underdeveloped, and it is crucial that this now progresses at pace. A new operating model should be the catalyst for an ambitious transformation plan and the Council has taken the view that it needs to access some external strategic capacity to support with its implementation and to build an impactful transformation plan. To ensure that the Council can secure and manage a strategic partnership of this nature, it will need to invest in its contract management capability. Any contract will need to specify the Council's requirement clearly, to ensure that it is able to secure Value for Money from its chosen partner.

Despite ongoing good work, the Council is still some way from achieving its Best Value Duty and it will take time for the improvements to become sustainable and part of the organisational culture. Achieving Best Value cannot be a "moment in time" but enough strength, depth and cultural change will be needed to ensure changes are deeply embedded and cannot easily be rolled back. There are still too many areas of fragility in the Council's recovery and still some major areas of work yet to be done. It is our view that the Council has not yet sufficiently demonstrated that it has the capacity and capability to sustain its own journey of continuous improvement without external involvement. For this reason and referring to evidence within this report, Commissioners are recommending that the Minister should consider extending the length of the intervention beyond September 2025 and that there should be a phased

approach to refining the model and winding down the intervention over this period. The Minister may wish to consider whether any period of extension to intervention should be aligned to the LGR timetable.

The Council's Leadership capability, both politically and managerially, has improved throughout the intervention and Commissioners are of the view that the Managing Director Commissioner (MDC) model has been invaluable in creating the drive and focus for improvement. However, as part of this phased approach, there will be a time when it would be appropriate for the Council to recruit its own full time Chief Executive and move away from the MDC model. If the Minister is minded to extend the intervention period beyond September 2025, Commissioners would recommend that a timeline should be agreed where the Council recruits its own Chief Executive at which point the MDC role ceases, factoring in time for a smooth transition during this period. The Minister will also wish to consider the timing of this change in line with any possible decisions around LGR.

The remainder of this report is structured around the seven Best Value themes and provides evidence of progress and areas of work still needed. Appendix 1 also provides an assessment against the Directions. This outlines our view that while work is ongoing in the specified areas, none the Directions have yet been achieved in full.

### ***Leadership***

Poor leadership and a destructive culture were at the root of the failings at Thurrock Council, and it is pleasing to be able to report that there has been much improvement in this area, both politically and organisationally. Relationships between senior officers and Members have generally become more mutually respectful and collaborative.

During the early days of the intervention, it was clear that there was a significant issue around the political maturity of some Members in terms of their understanding of their stewardship roles and how to interact effectively with officers. This was in part compounded by poor quality reports from officers and a lack of transparency where information was, in some circumstances, withheld from Members. Whilst there have been significant improvements through, for example, more collaborative relationships between members and officers as well as a training offer for officers to improve the quality of reports, the Council's political and organisational leadership must continue to model the right behaviours and call it out where it falls short. We have had constructive discussions with the political leadership on this point who have committed to treat this as a priority and have demonstrated this in recent months.

Following a period of some stability across the political leadership, since our last report, the leaders of the two largest parties have now stepped down from their roles and a new Leader of the Council will be confirmed at the Annual Council meeting in May. We would like to thank both Cllr John Kent and Cllr Andrew Jeffries for their positive engagement with Commissioners and the improvements made during their time as Leaders of the Council. While this creates some initial instability, a change in political leadership over time is a routine process for a political organisation, and not necessarily an indicator of Best Value failure. However, we would expect to see the organisation deliver a smooth and seamless transition to the new leadership arrangements and the new Leaders to continue driving forward the necessary improvement activity at pace. Cllr Lynn Worrall has just been elected as the new Leader of the Labour Group whilst the new Leader of the Opposition Group, Cllr George Coxshall, has been in post since March. We have worked closely with both in their role as Deputy Leaders of their respective parties and have seen evidence of their determination and commitment to recovery through their inputs at our commissioner chaired Recovery Boards. We will want to

see them providing the strong, effective, collaborative and transformative leadership required for this next phase.

The Cabinet have been engaging positively with a programme of individual and team mentoring provided through the LGA, and Commissioners strongly support this work to continue to strengthen the political leadership of the Council. This is particularly important as there are more difficult political decisions to be made both now and in the future which will require strong leadership and resilience from a collegiate and effective Cabinet.

In terms of organisational capacity, the Council approved a new leadership structure in August 2023 which has facilitated investment in corporate capacity and capability. Most recruitment to this new structure has taken place through late 2023 and early 2024. Since that time, with an increase in capacity and fresh ideas, there has been an upturn in the pace and breadth of improvement. The initial Best Value Inspection (BVI) report highlighted the lack of joined up strategic leadership at the Council resulting in a siloed organisation. With a new cadre of senior officers and with a now enhanced Senior Leadership Team (SLT), it is important that the Council continues to spend time investing in both SLT and the wider cohort of leaders, so that they are able to offer more collegiate leadership to the organisation. Work with the Leadership Centre focused on this has been fruitful to date. SLT have been working effectively together in recent months, taking a more cohesive, corporate approach to discussions, with recent changes in personnel continuing to have positive impacts. This team development work has recently started to broaden out to include the next two tiers of leadership and this is to be encouraged. Learning together as a broader leadership cohort will help sustain and power further necessary improvement across the Council.

A recent staff survey reflected signs of increasing trust between the senior leadership and officers, although it also reflected that there was still more work to do. Importantly, the Council needs to clarify its action plans in this area and report progress back to staff, a very important step in building future trust across the whole organisation.

The MDC model has played an important role in the Council's progress since its implementation. It has helped to create a greater sense of collaboration between Commissioners and the organisation and has contributed to creating a sense of momentum. For Thurrock, and for other interventions using this model, there is a broader question around when may be an appropriate point within the intervention for this model to come to an end. From the Commissioners' perspective in Thurrock, as the Council continues to make significant recovery progress at pace and as it further embeds these improvements, there will need to be a time when it should revert to a more traditional Chief Executive model. The Minister will want to give some thought as to the best time for this to be considered in Thurrock in light of upcoming decisions on LGR. Commissioners would recommend that there is enough time ahead of this change in the model of intervention to enable a smooth transition between the MDC and a Chief Executive.

### ***Use of resources/financial sustainability***

The Council has continued an appropriate pace of progress since the last report and increasing identification and grip on the risks embedded with the historic accounts, financial strategy and associated budget delivery. This gives Commissioners a degree of confidence that with the continued strong leadership and the right capacity in finance, improvements can be built on and sustained.

The Council is making good progress on improving financial management and oversight. To ensure transparency and accountability in its operations, regular reporting has been established, communication of clear financial goals, detailed budget build, active cash flow

monitoring and an update of the financial regulations and scheme of delegation underway. However, the Council must ensure that the financial management, reporting and regulation arrangements in place, to govern the strategic and operational management of its budgets, investments, funding, assets and companies, are in accordance with CIPFA's Financial Management Code.

Steps have been taken to further develop and strengthen the models that underpin the key financial strategies such as the Medium-Term Financial Strategy, Capitalisation Direction, asset disposal, divestment and debt & servicing costs. This has resulted in revisions to the Council's estimated level of Capitalisation Direction, with an increase from £520million (2024) to £691million in the latest iteration. With appropriate use of specialist expertise and independent assurance when needed, the Council continues to pursue asset sales which will become more challenging as it transitions to its operational estate, deliver its divestment strategy and pursue litigation where appropriate and in the interests of their residents. The Council will need to ensure the assumptions are sufficiently robust and where necessary sensitivity tested to assess the Council's resilience to variations, flexibility to adapt to changing circumstances and facilitate informed future decision-making.

The Council has published its statement of accounts for the four financial years 2020/21 to 2023/24. However, until an outstanding material objection on the 2020/21 accounts is resolved, these historic accounts will remain open. The delays in the conclusion of the historic accounts and open Value for Money work relating to these historic periods will have a knock-on risk for the 2024/25 audit and current / future years accounts. The Council will need to be proactive in their engagement with the external auditors, in the development of an audit plan which seeks to minimise the ongoing risks and uncertainty and ascertain early the auditors' view on policies such as Minimum Revenue Provision (MRP) and judgements, where complex estimates and subjective evaluations are involved.

In view of the above, the estimated CD of £691million is subject to no further adverse discoveries or material changes to the assumptions being required by the external auditors.

The 2025/26 budget was passed by Council at its meeting in February and included £18million of savings, efficiencies and income generation. The budget was balanced with £72million of Exceptional Financial Support from the government, £64m of which is attributed to debt servicing costs and £8m contribution to the annual operational deficit. There is a robust internal governance process in place for tracking and reporting savings progress against targets and identifying alternatives as may be required. In the previous financial year, the Council has demonstrated the effectiveness of this process and its good track record of delivering savings. However, many of the savings are tactical in nature, streamlining processes or cutting spending on specific items within a department, and options for further savings of this nature will be limited.

The medium-term financial strategy forecast the financial landscape facing the Council to 2028/29 (after the application of CD as outlined above, and 100% delivery of 2025/26 budget assumptions) a budget gap or recurrent savings requirement rising to £41million. This represents more than 20% of the Council's core spending power and an ambitious savings target for an authority of this size. The Council is due to commence the rolling refresh of its medium-term financial strategies, which will need to reconcile the ambitions set out in the Corporate Plan, operating model and full elimination of the operational deficits. Given the scale of the financial challenge, the Council will need to accelerate and resource its transformation programme, adopting a 'One Council' approach with collaboration between different departments, services, and partner organisations to deliver a fundamental rethinking of how services are provided and operating costs sustainably reduced.

The ring-fenced accounts should not be overlooked. Local authority housing is under severe financial pressures with the need to address investment into the existing stock, increased regulatory requirements, continued need for new affordable homes, and preparing a robust, affordable and fully stress tested HRA 30-year Business Plan has never been more important. In addition, the scale of the forecasted Dedicated Schools Grant deficit will require the development of a long-term plan in conjunction with stakeholders, partners and government departments to demonstrate how local need (current and projected) will be met and how the Council plans to recover the local deficit incurred over the medium to long term.

The view of the Council's long-term sustainability remains unchanged. Whilst good progress continues to be made on the financial levers within the Council's control and the Council is taking its responsibility seriously by reducing its debt, with the scale of the residual debt and associated servicing costs, it will not be able to achieve sustainability without significant Government support. This has been a consistent position since early in the intervention. Commissioners will continue to work with government to explore further options to support the Council towards long-term sustainability.

The proportion of the Council's net revenue expenditure which is spent on demand driven services, such as adults and children's social care and homelessness, is 60% in 2025/26 increasing over the three years of the MTFS to 67%. This leaves less flexibility for the Council to manage debt servicing costs which are typically fixed and potentially hindering the ability to meet future financial constraints.

Benchmarking and comparisons with other councils needs to be further developed in the year – understanding local need and demand for key council services, costs and how demographic and other activity changes are impacting this. Exploring whether the Council is making the best use of scarce resources when redesigning services and the maximum debt service cost as a portion of the Council's net revenue budget that can be realistically sustained.

### ***Skills capability and capacity – recruitment & succession planning***

The current focus of the Council is understandably on several key strands, devolution to Essex, LGR and journey to a sustainable and resilient best value authority in a changing local government financial landscape. Building the right capacity across the Council to optimise the opportunities and manage the risks will be critical. It will be necessary to ensure that the discipline of credible resource planning is consistently applied across key functions to provide a clear roadmap for how and when resources will be used, minimising delays and costs and enabling better evidenced based decision-making. The Council will need to ensure that recruitment is prioritised to address skills and capacity gaps, provide resilience, and specialist expertise where it is needed.

### ***Performance Management***

There are clearly some examples of high-performance culture within the organisation, as evidenced by the recent Ofsted rating of "outstanding for Children's Services," a huge achievement for a council under intervention and in fiscal distress. However, there is considerable inconsistency across the Council.

A new Corporate Plan has provided organisational focus but despite some recent good development work towards a new Council wide approach, employee performance management remains weak in many places across the authority which could reduce the impact of the Corporate Plan. A performance management framework and new business planning guidance have been introduced this year, which aim to better integrate financial and

service planning together with a more rigorous review of performance by officers and members.

### **Governance**

This is an area where we have seen significant progress since the start of the intervention. Work continues at pace on improving governance at the Council, although we still have concerns that arrangements are not yet sufficiently robust across internal controls, risk management and audit. The organisation also needs to fully embrace the difference between Cabinet and Council meetings and to rebalance the focus of discussions, ensuring that Cabinet is the locus of decision-making within the Council. This will be a core element of the Council's revised Constitution.

Members and officers have been engaged on the Constitution review which was due to be completed ahead of the new municipal year. Whilst the final revised Constitution is not yet complete, we are confident that this is being treated as a priority and would encourage that once this has been finalised, that it is socialised across the organisation to ensure the changes are understood by both Members and officers.

Due to resource and capacity challenges across the system of internal controls, risk management remains underdeveloped across the organisation. A refreshed Corporate Risk Register has been produced, and risk implications have been given greater visibility in reports but the Council's approach to risk management needs to be embedded, with risks properly owned and managed by risk owners. It is also vital that there is alignment across risk registers at corporate, directorate and service levels. This is an area that the Council should continue to give urgent attention to.

While the Council has a 3-year internal audit plan, internal audit still remains an area of concern due to the resource levels and capacity of this vital area of work. The audit function does not yet meet the Public Sector Internal Audit Standards (PSIAS) or demonstrated readiness for the transition to the new Global Internal Audit Standards (GIAS) effective 1 April 2025. A report to the Audit Committee in March 2024, noted that "*due to an insufficient number of audits being completed in 2024/25, a Head of Internal Audit Opinion will not be issued*". While internal audit can only offer reasonable assurance, not a 100% guarantee, the presence of that reasonable assurance is rightly valued and a limitation of scope which has not been appropriately addressed during the year is an issue not only for the Head of Internal Audit but also for the leadership team and the Audit Committee who normally rely on that opinion. This weakness indicates the likelihood that there are other areas of non-conformance and a Quality Assurance and Improvement Programme, including an external quality assessment of the Internal Audit service will be crucial.

Solid Overview and Scrutiny processes are now in place but there remains some political immaturity that limits the effectiveness of the function. The Council should be encouraged to offer training and for Members to take up the offer. It is also important that the Council reflects on any lessons learned from the first year of these new arrangements and responds accordingly to make further improvements.

The Council has taken seriously its responsibilities with regards to being the Accountable Body for the Freeport. Outstanding issues surrounding the governance have largely been resolved however Commissioners will not be satisfied that the Direction has been met until all the necessary legal and governance arrangements are approved and finalised.

### **Culture**

The BVI report outlined that poor leadership culture had contributed to the failings at Thurrock Council. With the changes in some senior personnel and through the recruitment of new senior leaders, there has been a marked improvement in terms of transparency and engagement. Leaders interact more regularly with staff through a variety of staff engagement channels and relationships between many senior politicians and staff are much improved. The previously inward-facing council has recognised the ‘culture of insularity’ referenced in the BVI report and has taken forward activity to address this issue and engage with partners and residents.

However, there are many facets of a positive organisational culture, and this is an area of work that still seems underdeveloped at Thurrock. Any successful organisation will systemically demonstrate accountability, transparency and a willingness to learn from others. It will have the mechanisms and processes in place that support both organisational and personal growth combined with a culture of engagement and collaboration. Whilst there is some evidence of these aspects of Thurrock’s organisational culture, it is not commonplace and often siloed. The Council needs to become more explicit about the culture it seeks to institutionalise and devise programmes and reenforcing strategies, so that it becomes more deeply embedded in the way that the Council thinks and acts. It is vital this is also directly embedded into the revised staff performance management process to ensure it reaches and filters through all parts of the organisation.

While the Council’s values were outlined in the new Corporate Plan, this organisational culture and ‘One Council’ approach also needs to be built into the Council’s new way of working through its revised operating model. Deeply embedding a positive culture across the organisation will help mitigate the risk of the recovery work being too dependent on a few individuals and give it the best chance of building on its improvements moving forward.

The recent staff survey highlighted areas where staff would like to see further improvements across the organisation, for example in how the council works across teams and directorates in a more collaborative way. It is vital that this feedback is fully considered and addressed, and that staff understand the action plans that will be developed and put in place as a result of their views.

### ***Service Delivery***

Despite the financial and organisational challenges Thurrock has endured, many services continue to perform well. This is exemplified by the recent Ofsted rating of “outstanding” in Children’s Services and by the very positive review by the Planning Advisory Service (PAS) which noted progress across all eleven recommendations outlined in their Planning Peer Challenge report. Internally there have also been structural changes within the organisation to support the organisation embracing a ‘One Council’ approach, with resources moving from within services to central teams to enable a strong partnership way of working between the corporate centre and service delivery.

However, there are still some services within the Council where further discovery work is taking place, such as in housing and homelessness, and legacy projects referenced within the BVI report that are progressing but yet to be delivered, such as Stanford-le-Hope station. Pressure on all services to change and adapt continues, through a combination of sector wide demand rises but also the specific financial challenges of Thurrock Council.

Whilst there has been some “in service” change work, such as the review of strategic commissioning and the improvements to customer experience, the Council is not benefitting from a more strategic approach to transformation. Advances in technology could significantly help the Council improve service delivery, whilst reducing operating costs. Consideration to this should be incorporated into the Council’s new operating model and all parts of the Council

should be considering ways in which digital technology and innovative approaches could help them provide more effective, cost-efficient services to residents.

With future budget rounds, savings targets and the associated difficult budget decisions that will be needed, services will not be able to meet these through incremental efficiencies or minor change programmes.

### ***Partnerships and community engagement***

The Council has demonstrated that it is more confident in its dealings with external partners. It has engaged well and robustly in its dealing with the Freeport and is an active contributor within the Greater Essex system, particularly within the context of devolution and LGR. There are also strategic conversations taking place with the private sector to masterplan an investment strategy for different parts of the Borough.

The Council's engagement with its wider community, however, remains slow. The Council purports to pursue a localisation agenda but the thinking and the planning as to how it will achieve this are underdeveloped. The Council has undertaken a pilot project in one area of the Borough and the outcomes are due to be reported to Cabinet at the time of writing this report. This is welcomed. However, as the Council sees a localisation agenda as part of how it will rebuild trust with its communities and is a key element of its new operating model, a much more robust response is required.

### ***Continuous improvement***

Whilst the Council continues to make good progress with its recovery, there is always the danger that it could fall back if the learning from the changes it has made are not systematically applied to the broader organisation. Prior to intervention, Thurrock became an insular organisation and did not seek out best practice with a mindset of continuous improvement. To mitigate the potential fragilities of its improvement, the Council should give consideration as to how it applies and embeds learning. This should be an important component of its culture change programme. The way in which the Council uses its corporate Performance Management and Assurance Framework (PMAF) and its regular reporting to Members to monitor outcomes, support decision making and demonstrate continuous improvement will also be a key element of this.

Furthermore, Thurrock has much to share with other organisations given its recovery journey and in doing so, it will naturally become more outward facing and collaborative.

Consideration should be given to its performance management approach for staff, so that individual learning is a key component of its appraisal process.

### ***Conclusions and recommendations for the future***

It is pleasing to be able to report progress on the Council's improvement journey and its willingness to engage with Commissioners positively. The Council also demonstrates good self-awareness in terms of the progress it has made. There is still much work that still needs to be done before it can fully demonstrate that it is performing to a Best Value standard and is capable of sustaining ongoing continued improvement without external intervention and support.

Since the intervention at Thurrock Council started in September 2022, the Council has been on a journey of discovery and recovery. Significant improvements have been made to the way in which the Council operates to address some of the failings outlined within the Best Value inspection report, and the Council's leadership has demonstrated its commitment to these

improvements, reflected in the rapid pace of change in certain areas such as governance and improved financial management. It is vital that the progress made so far is recognised and praised, but the Council cannot afford to be complacent and lose this momentum.

The next stage of Thurrock's journey should be one of strategic transformation. This is the area where we have not yet seen sufficient progress. The Council is aware of this and has outlined its ambitions within its Corporate Plan (the existence of which is itself a significant step forward). It is also a vital element of delivering its savings targets for future years. However, the transformation plan to deliver and implement the Council's new operating model has not yet been defined to the satisfaction of Commissioners and needs to be delivered at pace.

Despite progress, it is our view that the Council is not yet meeting its Best Value Duty, and evidence of this can be seen across several of the Best Value themes. We have confidence that the Council has the determination and commitment to achieve this, yet recovery remains fragile. Resource capacity and capability constraints combined with some cultural inertia are impacting its ability to deliver embedded and sustained change. We have concerns that in certain areas there are underdeveloped action plans to address some of the issues.

It is our recommendation that the intervention should continue and is extended beyond September but over the course of this extension there should be a phased approach to winding down the intervention, particularly as the outcomes of the LGR invitation become clearer over time. The current commissioner model has provided Thurrock Council with an opportunity to drive forward improvements, under the security, stability, guidance and support of a Managing Director Commissioner. While we recommend that the external oversight that commissioners provide should continue, the Minister may want to consider this alongside the appropriate timing to consider phasing away the MDC model. It is vital that this is done on an agreed, realistic timeframe that ensures that the organisation has the time to recruit permanently to the Chief Executive role, ensures a smooth transition of the organisational leadership and aligns with the timetables for the Council's other transformation programmes of devolution and LGR. Although more work is to be done, to recognise the significant progress that the Council has achieved since September 2022 we also recommend that the Directions should be refreshed and updated to ensure they reflect the wider context, acknowledge the improvements made by the Council to date and emphasise the areas and actions for the Council to treat as a priority in order to demonstrate it is meeting its Best Value duty and delivering quality services and value for money for local residents.

Yours sincerely,

Gavin Jones  
**Lead Commissioner**

Dr Dave Smith  
**Managing Director Commissioner**

Denise Murray FCCA  
**Finance Commissioner**

## **Appendix 1 - Assessment of progress against Directions**

Directions 2, 3 and 5-9 relate to the processes and running of the intervention. These have not been assessed individually here as they are ongoing elements of the intervention. Commissioners continue to receive the support and information that they require from the Council and as expressed in previous reports, the Council continues to engage positively with Commissioners and the intervention process. This has been the case throughout all phases of the intervention and where there have been changes to the model of intervention in place.

<b>Directions</b>	<b>Status</b>	<b>Assessment</b>
1. Prepare and agree an Improvement and Recovery Plan to the satisfaction of the Commissioners, within 6 months, with resource allocated accordingly. This should include and draw upon the existing Improvement Plan produced in December 2022, per the Directions issued to the Authority on 2 September 2022.  The plan is to set out measures to be undertaken, together with milestones and delivery targets against which to measure performance, in order to deliver rapid and sustainable improvements in governance, leadership and culture in the Authority, in the Authority's exercise of its overview and scrutiny functions and in its performance of services, thereby securing compliance with the Best Value Duty.  The Improvement and Recovery Plan should include at a minimum:	Ongoing but not yet achieved	<p>Following the intervention starting in September 2022, the Council produced an initial Improvement and Recovery Plan (IRP) in December 2022 and an enhanced IRP in October 2023 following the expansion of the intervention in March 2023.</p> <p>The Council has established and implemented a new quarterly cycle of reporting on their enhanced IRP, which sits alongside their quarterly reporting on the Council's performance. These IRP reports provide an assessment on the progress made on the delivery of agreed improvement outcomes and success criteria. These reports are routinely discussed with Commissioners through Commissioner chaired Recovery Boards, and they are also taken through the Council's wider Governance process, including through the relevant Overview and Scrutiny Committee, through Cabinet and through to Full Council for discussion each quarter.</p> <p>The Council has further ambitions to combine the reporting on their IRP into their wider corporate performance reporting in future years. We welcome these plans which will demonstrate that their improvement activity is no longer a separate workstream but embedded into their wider organisational performance and continuous improvement. However, this Direction cannot yet be considered as achieved in full since not all of the subclauses from 1a -1i have been met at this stage.</p>

1a.	<p>An action plan to achieve financial sustainability and to close any short and long-term budget gaps identified by the Authority across the period of its MTFS including a robust multi-year savings plan.</p>	<p>Ongoing but not yet achieved</p>	<p>The Council's financial position remains challenging and as we have noted in our previous reports, the Council remains unable to balance its budget, or achieve financial sustainability, without significant Government support.</p> <p>Despite this, the Council has strengthened and further developed the financial models that underpin the key financial strategies MTFS, CD, TMS, and programmes such as Asset Disposals and Divestment pipelines, providing greater clarity on risk exposure and opportunities, with assumptions carefully considered and regularly reviewed. Robust internal governance process is in place for expenditure controls, tracking and reporting savings progress against targets and identifying alternatives as may be required. Good track record of budget and savings delivery.</p> <p>The above provides a solid framework for medium-term financial planning.</p> <p>The 2025/26 budget was balanced with £72m EFS (£64m debt servicing costs and £8m annual operational deficit) and the medium term financial outlook illustrated a residual gap / ambitious savings target of £41m to be bridged over the period of the plan. Savings of this scale will not be fully addressed by tactical departmental savings.</p> <p>The Council is due to commence the rolling refresh of its medium-term financial strategies, which will need to reconcile the ambitions set out in the Corporate Plan, operating model and full elimination of the forecasted operational deficits (£41m). Given the scale of the financial challenge, the Council will need to accelerate and resource its transformation programme, adopting a 'One Council' approach with collaboration between different departments, services, and partner organisations to deliver a fundamental rethinking of how services are provided and costs sustainably reduced.</p> <p>The ring-fenced accounts HRA / DSG remain an integral part of this process and should not be overlooked.</p> <p>Sensitivity / stress testing will be required to assess the Council's resilience to variations, flexibility to adapt to changing circumstances and facilitate informed future decision-making.</p>
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			Work will continue with government to explore further options to support the Council towards long-term sustainability.
<b>1b.</b>	An action plan to ensure the Authority's capital, investment and treasury management strategies are sustainable and affordable.	Ongoing but not yet achieved	<p>Since the intervention started, there has been a substantial volume of work done to review and refresh the Council's financial strategies and to ensure compliance with accounting practice and ensuring that these revised strategies triangulate together. Major improvements have been made in this area ahead of setting the 2025/26 Budget and to support ongoing discussions with MHCLG.</p> <p>Further consideration will be required in developing a longer-term capital strategy that guides the overall approach to sustainable and affordable capital investment across all funds, including resource allocation, priorities, and the overall vision for how capital projects will contribute to the Council's goals.</p>
<b>1c.</b>	A strict debt reduction plan, and an updated minimum revenue provision (MRP) policy in line with all relevant rules and guidelines.	Ongoing but not yet achieved	<p>The Council has developed a plan which seeks to optimise the levers in its control to reduce the overarching debt, whilst recognising that to achieve long term sustainability will require government support.</p> <p>The associated debt models are kept under close review and a programme of divestments and asset disposals are ongoing. We urge the Council to continue to deliver on its plan, demonstrating its commitment to tackling this issue through the various levers within their control.</p> <p>The Council has updated its Minimum Revenue Provision (MRP) policy in compliance with updated guidance from MHCLG and incorporates retrospective application of MRP charges for past investments. The revised policy was approved as part of the 2024/25 Budget.</p> <p>At the start of each financial year the Council's policy on making MRP in respect of that financial year is submitted to full Council for approval (see 2025/26 Budget).</p> <p>Commissioners have asked the Council to publish further detail on the MRP rules as per the new guidance and to report this back to the next quarterly Cabinet.</p>

			MRP will be subject to review by the Council's external Auditors Ernst & Young (EY).
<b>1d.</b>	To ensure compliance with all relevant rules and guidelines relating to the financial management of the Authority.	Ongoing but not yet achieved	<p>The Council, under the leadership of the current Chief Finance Officer, has taken steps to strengthen its financial management and has started a quarterly cycle of sharing budget monitoring reports with the Cabinet. This has enabled services and directorates across the organisation to have a greater understanding of their budgets and savings targets and effectively track and monitor their spending and respond accordingly. The Chief Finance Officer's S25 statement alongside the 2025/26 budget noted that "<i>every effort has been made to ensure the technical assumptions underpinning the budget are robust and compliant with accounting practice. However further reviews are planned in line with the Financial Management Code.</i>"</p> <p>The Council must ensure that the financial management, reporting and regulation arrangements in place, to govern the strategic and operational management of its budgets, investments, funding, assets and companies, are in accordance with CIPFA's Financial Management Code. They are planning on doing this self-assessment early in the 2025/26 financial year.</p> <p>The outcome of the assessment will facilitate the refresh of the finance improvement plan, including the resources required to deliver the improvements.</p>
<b>1e.</b>	A suitable scheme of delegations for financial decision-making.	Not achieved	<p>The Council are aware that this remains a priority and in their S25 statement alongside the 2025/26 Budget, the Chief Finance Officer included "<i>finalising fit for purpose financial regulations based upon the review by CIPFA</i>" as one of the areas of focus for the Council over the next period.</p> <p>The draft update of the financial regulations and scheme of delegation based on the CIPFA review of financial decision making is underway. We urge the Council to maintain the pace in delivery of these objectives, alongside the work it is doing to review and refresh its Constitution. Once established, these should be socialised and cascaded across the organisation, so they are embedded in the Council's ways of working and understood by both officers and Members.</p>

1f.	An action plan to reconfigure the Authority's services commensurate with the Authority's available financial resources.	Not achieved	<p>The Council is aware that they need to operate differently from how they have worked in the past and there is a commitment to undertake a new approach and deliver differently for the benefit of their residents. This ambition is articulated in their recently published Corporate Plan. However, as outlined above, the work to outline how the Council's proposed operating model will be implemented into a single integrated plan is still at a very early stage and is underdeveloped. Other significant transformation programmes, such as devolution and LGR, must not reduce focus or capacity on the important work the Council must do to transform how it operates. Commissioners remain focused on this as a priority and have asked for a roadmap outlining how this transformation plan will be delivered as it is crucial that this now progresses at pace. There is also more work to do to ensure buy in and support for the corporate transformation programme.</p>
1g.	A plan to ensure that the Authority has personnel with sufficient skills, capabilities and capacity to deliver the Improvement and Recovery Plan, within a robust officer structure.	Ongoing but not yet achieved	<p>The Council has recruited to a new organisational leadership structure, which has brought about the necessary leadership capacity and culture to drive the increased pace and breadth of improvement. Further structural changes have been taking place within the organisation through a more phased approach, as part of the Council's plans to embed a 'One Council' approach to performance and policy through strengthening and rebuilding the skills, capacity and capability within the Council's corporate centre and enabling a strong partnership way of working between the corporate centre and service delivery.</p> <p>On skills and capability, training and development opportunities are being offered to both Members and officers, both internally and via external partners, to ensure that Members and officers understand what is required of them in their roles and to provide them with a deeper understanding of what is expected within a good organisation, helping to demonstrate that the Council has a culture that embraces learning, challenge and continuous improvement.</p> <p>This Direction has not yet been met given the risks around the number of agency, interim or non-permanent staff and vacancies in key positions across the Council. This is true at the most senior levels, but also across areas where further improvement activity remains a priority including finance, procurement, risk and internal audit.</p>

1h.	An action plan to strengthen the Authority's governance function, to secure improvements in transparency and formal decision making. This should include measures to improve the Authority's scrutiny function, including the taking and recording of formal decisions.	Ongoing but not yet achieved	<p>The Council has an action plan in place to make the necessary improvements to their governance practices and to improve the quality of decision-making. Members and officers have engaged positively with the new measures that have been introduced, including a strengthened forward look and improved processes for report writing through a new online system.</p> <p>Work to review and refresh the Constitution was due to be completed ahead of the new municipal year. Although we are confident that this work is progressing and that positive discussions have taken place with Members and officers to engage them in the outcome of this work, we await a final revised Constitution that is fit for purpose as well as fully supported and deeply understood by all parts the Council.</p> <p>The Overview and Scrutiny (O&amp;S) arrangements have been refreshed, streamlined and strengthened, and culturally there has been a shift whereby O&amp;S is now valued as an essential component of the decision-making process. This is especially evidenced through the joint Scrutiny meeting on the Council's Budget proposals. The Council has taken the opportunity to undertake an external review of these arrangements, through the Centre for Governance and Scrutiny, and as a result, further improvements are likely to be made to respond to the lessons learned from the first year of trialling this new approach. As the new Municipal year begins, we encourage the new O&amp;S Chairs and Committee Members to continue to build on the success of this first year and embed the lessons for future years.</p> <p>The Council's commitment to promoting transparency has also been demonstrated by its increased and improved corporate performance reporting, financial reporting and the proposed changes to the Constitution.</p> <p>As we note later on, the system of internal controls still remains a priority and both risk management and internal audit are areas where we want to see continued focus in the coming months.</p>
1i.	Arrangements to secure the proper resourcing and functioning of the system	Not achieved	<p>While the report outlines the progress made to embed risk management and to make improvements to the internal audit processes across the Council, recruitment challenges remain in these areas, affecting the capacity for the Council to balance delivery of the required improvement work with its business as usual activity. This is demonstrated for</p>

	<p>of internal controls, including risk management and internal audit.</p>		<p>example, by a report that went to the Audit Committee in March 2024, which noted that “<i>due to an insufficient number of audits being completed in 2024/25, a Head of Internal Audit Opinion will not be issued</i>”. Commissioners are concerned that this team has had significant turnover of staff and still relies on interim capacity. A Quality Assurance and Improvement Programme evaluation, including an external quality assessment of the Internal Audit service will be crucial.</p> <p>We have significant concerns around the capacity, capability and resource levels across the system of internal controls at present. As the Council looks towards exiting intervention, it will need to demonstrate and provide assurance to Commissioners that its system of internal controls is robust and challenging, properly resourced, and sufficiently understood and valued by the leadership and wider organisation to ensure any risks and issues are mitigated or dealt with appropriately.</p>
4.	<p>To take steps to ensure that the role of Accountable Body to the Thames Freeport is exercised to the satisfaction of the Commissioners. This should be reflected in the Authority's Improvement and Recovery Plan.</p>	Ongoing but not yet achieved	<p>Commissioners welcome the progress made by the Council working with its partners to formalise the necessary governance agreements for the Thames Freeport although these are still awaiting final approval. The Council has also taken steps internally to deliver its role e.g. through improving decision making in relation to decisions on funding of the Freeport and the Council is also reporting on key milestones in relation to “fulfil[ing] the leadership and governance role of Freeport Accountable Body” in its quarterly Corporate Performance reporting.</p> <p>The Council has made progress in this area which has enabled the dialogue with partners to move from practical issues into a more strategic space around the ambitions and aims of the Freeport for the Council, partners, residents, businesses and the local area, however Commissioners will not be satisfied that this Direction has been met until all the necessary legal and governance arrangements are approved and finalised.</p>

28/10/2025

18:54

# Urgent Request for an Independent Mental Capacity Advocate (IMCA)

Dear Housing Solution Office and Oluwafemi OJO.

I am writing in response to your decision letter dated 22 August 2025 (Ref: 1083077), in which you concluded that I lack the mental capacity to make a homelessness application.

Given this finding, and as I have no family or friends who are appropriate to represent my views in this matter, I require the appointment of an Independent Mental Capacity Advocate (IMCA) under the Mental Capacity Act 2005.

The decision to refuse my homelessness application is a serious one with major implications for my accommodation and care. The IMCA's role is to support me, ensure my wishes and feelings are represented, and ensure that the decision being made is in my best interests.

In addition, my social worker and his colleague were due to come today with an Independent Mental Capacity Advocate form to shelter neurodiverse housing service third parties, as they have failed to uphold the deadline; therefore, I have to resend this email directly, requesting it..

- 28/10/25.

It is a waste of time.

Please confirm immediately that you will be making a referral to the IMCA service and provide me with the contact details of the advocate who will be assigned.

If you refuse this request, please provide a detailed explanation of the legal basis for your refusal.

Yours sincerely,

Nnamdi Michael Okpala

## **THE VERDICT OF NNAMDI MICHAEL OKPALA** *On the systemic failures of care, housing, and human dignity in the United Kingdom*

Let it be known: I have listened long enough. I have complied, waited, swallowed my truth, and been processed through a machine that defines people by how quiet and dependent they are willing to become. My silence was never agreement. It was exhaustion.

I reject the judgment that I am not homeless. I reject the implication that because I have a room, I have a home. A home is not a placement—it is freedom, security, and dignity. None of which I have been allowed.

I reject the care system that sees my autism not as potential, but as a problem to contain. I see through the economy of helplessness—a system where the more visibly dependent you are, the more support you receive. Where brilliance is overlooked if it comes with resistance. Where compliance is rewarded, and self-advocacy is punished.

I am autistic, and I am not your stereotype. I do not exist to quietly fill a bed in a supported housing unit while paperwork circulates and lives stay stuck.

I issue this verdict not in anger, but in truth. And if the system will not change, then let this record stand: it was not me who failed to rise. It was the system that refused to let me.

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### **HOUSING DEMAND**

I demand independent accommodation. Not temporary. Not supervised. Not conditional. A permanent home. A place to live, by myself, as is my right.

I refuse to be subjected to another risk assessment, because I am not a risk. I am not a project, a danger, or a liability. I have lived under surveillance long enough. I have complied with every system, taken every medication, shown every ounce of patience I could possibly give. It is not safety that's being assessed anymore—it's control.

No more evaluations. No more mental capacity tests. No more audits of whether I spend money "correctly" or interact "normally." The goal is housing. Not diagnosis. Not surveillance. Housing.

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### **LEGAL CLAIM AND DAMAGES**

Total Compensation Requested: £2 million

Breakdown:

- £1 million for failures by the NHS and Mental Health Services, including:
  - Medical negligence
  - False or forced diagnosis
  - Institutional abuse and trauma
  - Wrongful confinement
  - Human rights violations (Articles 3 and 8)
- £1 million for failures by the Social Services and Housing Institutions, including:

- Functional homelessness post-care
  - Psychological harm due to prolonged instability
  - Breaches of the Housing Act, Care Act, and Equality Act
- 

## DEMAND FOR APOLOGIES

I demand formal written apologies from:

### 1. NHS Trusts and Mental Health Teams

- Acknowledging failures in mental health care
- Admitting to harm caused by forced treatment and institutional trauma

### 2. Social Care and Housing Authorities

- Acknowledging negligence in housing placement and social care support
- Accepting responsibility for prolonging homelessness and distress

### 3. Joint Community Care Entities

- Including all supported living providers, care homes, and council-affiliated services
- Acknowledging the collective failure to provide dignified, stable care

### 4. Personalized Email Apologies

- Sent directly to Nnamdi Michael Okpala, not as a generic statement
- 

## LEGAL REPRESENTATION REQUEST

Seeking urgent contact with:

- Human rights and public law solicitors
- Industrial solicitors experienced in housing and healthcare negligence
- Legal aid or no-win-no-fee representation preferred

Firms referenced:

- Hodge Jones & Allen
  - Osbornes Law
  - Bindmans LLP
  - Duncan Lewis Solicitors
  - Leigh Day
  - TV Edwards Solicitors
  - Wilson Solicitors LLP
  - Farani Taylor Solicitors
  - Edwards Duthie Shamash
  - Gulbenkian Andonian Solicitors
- 

## MEDIA REQUEST & PUBLIC ACCOUNTABILITY

After all legal proceedings, I request that this case and personal testimony be shared publicly—starting with **Channel 4 News** or any media outlet willing to report on the failures of the UK's social care and housing systems.

This is not just about compensation or apology. This is about truth. About giving visibility to a life shaped and scarred by policies, delays, and dismissals.

I want the public to see:

- That I have spent years fighting, surviving, advocating.
- That I've pursued open access to justice, even without institutional support.
- That people like me—autistic, brilliant, unheard—deserve to live full lives, not just be placed in facilities and forgotten.

This is my story. And at minimum, the world should hear it. Not just how it ended, but how it was endured.

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## FINAL DECLARATION

I am a person with a memory, with rights, with autonomy. I am a citizen. I am a human being. And I will not be processed, restrained, or forgotten.

This is my verdict.

Signed, **Nnamdi Michael Okpala**



# The Insolvency Service

Insolvency Service Adjudicator's Office	
Case number	BKT5176578
Applicant	Nnamdi Michael Okpala
Application submission date	15/10/2025

## **Bankruptcy Order**

Mr Nnamdi Michael Okpala, of 15 Evesham Way, Ilford, Essex, IG5 0EQ.

Upon reviewing the application submitted on 15/10/2025, it is ordered that Mr Nnamdi Michael Okpala be made bankrupt.

The adjudicator being satisfied that the EU Regulation, as it has effect in the United Kingdom, applies and that the debtor's COMI is in the United Kingdom declares that the proceedings are COMI proceedings.

An official receiver attached to the county court is appointed trustee of the bankrupt's estate.

**Order date:** 21/10/2025

## **Responsibilities while bankrupt**

While you are bankrupt you have certain responsibilities which are set out in section 291 of the Insolvency Act 1986. In particular, you must:

- co-operate with the official receiver when dealing with your assets
- attend interviews and give information to the official receiver as reasonably required

You can find further information about these responsibilities in the 'What happens next' document that was uploaded to your application documents along with this order. We strongly recommend that you take time in the near future to read through this information.

## **Verifying this order**

This bankruptcy order can now be found on the Individual Insolvency Register until 3 months after the bankruptcy ends. This will typically be in 15 months. The Individual Insolvency Register can be searched at:  
<https://www.insolvencydirect.bis.gov.uk/eiir/>



# The Insolvency Service

Insolvency Service  
Official Receiver's Office  
Birmingham  
PO Box 16654  
Birmingham  
B2 2BJ

Mr N M Okpala  
15 Evesham Way  
Ilford  
IG5 0EQ

Tel: 0300 678 0016  
[www.gov.uk/insolvency-service](http://www.gov.uk/insolvency-service)

Your ref:

Our ref: **BKT5176578 - Please quote this in any reply**

Direct Line: 03030031124

E-mail: fay.andrews@insolvency.gov.uk

Date: 27 October 2025

Dear Mr Okpala

IN THE OFFICE OF THE ADJUDICATOR

5176578 of 2025

**RE: NNAMDI MICHAEL OKPALA**

**Your bankruptcy order dated: 21 October 2025**

The Adjudicator has made a bankruptcy order against you. A copy of the order is enclosed with this letter.

An appointment has been made for you to discuss your bankruptcy with me, Fay Andrews via Teams video call on **Friday 7 November 2025 at 11:00**. The joining link is included in the email this letter is attached to.

The interview will normally take 2-3 hours; but please allow extra time so we can discuss everything properly and answer any questions that you may have.

We may contact you by text message to remind you of your appointment – please let us know if you do not wish to be contacted in this way.

## Why you need to attend this interview

I will need to contact your creditors to tell them about the bankruptcy and make arrangements to collect any available assets. The interview is the first step, so we need to do this as soon as possible.



The Government Standard

**It is your responsibility to ensure that any personal or sensitive information you provide is sent securely.** Details of how the Insolvency Service treats your personal information may be found at [www.gov.uk/insolvency-service/personal-information-charter](http://www.gov.uk/insolvency-service/personal-information-charter).

If you need to reschedule the appointment, please contact me as soon as possible. If you have any additional requirements including when attending this office, please let me know in advance and I will try to make suitable arrangements to meet your needs.

### **What you must do next**

If you have been self-employed or operated a business within the last two years, please bring to the interview a copy of the last set of accounts for the business. You should also bring any accounting records you have for the period since the last accounts, including bank statements. You must make sure that any other records are kept safely until the Official Receiver tells you they can be destroyed.

### **Enclosed documents**

I have enclosed some important documents for you to read, sign and return. Please send these back within 5 days of receiving this letter or bring them with you to your interview.

The next page of this letter explains the extra documents and some information on what happens next. I strongly recommend that you take time to read these through before you sign them.

### Personal Information Charter

Details of how The Insolvency Service treats personal information may be found on the internet at <http://www.gov.uk/insolvency-service/personal-information-charter>.

I look forward to hearing from you.

Yours sincerely

F Andrews  
Examiner

## **What are the documents enclosed with this letter**

Notice of your responsibilities during the bankruptcy (Form NTB2).

Please read this form carefully. Keep a copy as you might need to refer to it again. Please sign and date the acknowledgment form and ask someone to sign as a witness to your signature. The witness must be over 18.

You can ask the examiner any questions about the form when you speak to them.

Tax and National Insurance Disclosure (Form TNIDIS).

This form will give permission to HM Revenue & Customs to provide information about you to allow the Official Receiver and the trustee of your bankruptcy estate to collect any tax rebates that might be due to you.

Please complete any missing information before you sign and return the form.

Data Protection Act Disclosure Authority (Form DPADA).

This form will give permission to other people who might have information about you and your dealings, affairs or property in connection with your bankruptcy to give that information to the Official Receiver and the trustee of your bankruptcy estate.

Further information

If you want more information about how the Official Receiver and the Insolvency Service treats your personal information you can read our Personal Information Charter at [www.gov.uk/government/organisations/insolvency-service/about/personal-information-charter](http://www.gov.uk/government/organisations/insolvency-service/about/personal-information-charter).

An ethnic monitoring form.

This form is not held by the Official Receiver and is not part of your bankruptcy file. Having this information helps us to ensure we treat everyone fairly.

**IN THE OFFICE OF THE ADJUDICATOR****5176578 of 2025****IN BANKRUPTCY****IN THE MATTER OF Nnamdi Michael Okpala****AND IN THE MATTER OF THE INSOLVENCY ACT 1986**

To: Nnamdi Michael Okpala

Of: 15 Evesham Way  
Ilford  
IG5 0EQ

**The purpose of this notice is to make you aware of your duties and responsibilities, and of the restrictions that you must observe, as a consequence of the bankruptcy order.**

**Please sign and return to the Official Receiver** the attached acknowledgement that you have read and understood this notice and that you will undertake to inform the Official Receiver or your trustee of any change of address during the period of your bankruptcy.

**Duties, Responsibilities and Restrictions:**

- You have a duty to provide the Official Receiver with information regarding your estate, to deliver up your assets and to attend upon the Official Receiver (Section 291, Insolvency Act 1986).
- Your bankruptcy will normally end one year from the date of the bankruptcy order. If you do not comply with your duties and responsibilities under the Insolvency Act 1986 the court may make an order extending that period for a fixed time or until you have fulfilled specific conditions (Section 279, Insolvency Act 1986).
- Within 21 days of you becoming aware of it, you must tell your trustee about any property that becomes yours before the date of your discharge from bankruptcy, even if you become aware of the property after the date of your discharge (Section 333, Insolvency Act 1986).
- Within 21 days of becoming aware of it, you must tell your trustee about any increase in your income before your bankruptcy ends and also during the lifetime of any Income Payments Agreement/Order to which you are subject (Section 333, Insolvency Act 1986).
- You must not, either alone or jointly with another person obtain credit of £500 or more without first informing the provider of that credit that you are an undischarged bankrupt (Section 360, Insolvency Act 1986).
- If you carry on business in a different name from that in which you were made bankrupt, you must tell all those with whom you do business the name in which you were made bankrupt (Section 360, Insolvency Act 1986).
- If you carry on a business during the period of your bankruptcy you must be able to provide details of goods bought and sold by the business and profit and loss upon request by the trustee. You may also be required to provide financial statements (accounts) (Rule 10.125 of The Insolvency (England and Wales) Rules 2016).
- You must not be concerned (directly or indirectly) in promoting, forming or managing a company or act as a company director (whether or not you are formally appointed

as a director), without the Court's permission (Section 11, Company Directors Disqualification Act 1986).

- You may not hold certain public offices or be a trustee of a charity or a pension fund.

Failure to comply (particularly Section 360 of the Insolvency Act 1986 and Section 11 of the Company Directors Disqualification Act 1986) is a criminal offence for which you may be prosecuted.

If you wish to read the full text of any of the sections referred to above, the legislation is available free at:

Insolvency Act 1986

[www.legislation.gov.uk/ukpga/1986/45/contents](http://www.legislation.gov.uk/ukpga/1986/45/contents)

Company Directors Disqualification Act 1986

[www.legislation.gov.uk/ukpga/1986/46/contents](http://www.legislation.gov.uk/ukpga/1986/46/contents)

The Insolvency (England and Wales) Rules 2016

<http://www.legislation.gov.uk/uksi/2016/1024/contents/made>

Information on insolvency and the Insolvency Service may be found at:

[www.gov.uk/insolvency-service](http://www.gov.uk/insolvency-service)

Date: 27 October 2025

Yvette Hill

Official Receiver

**Please sign and return to the Official Receiver the attached acknowledgement. (Your signature should be witnessed and the witness may be a family member). Keep this copy of this notice, form NTB2, for your own records.**

**IN THE OFFICE OF THE ADJUDICATOR****5176578 of 2025****IN BANKRUPTCY****IN THE MATTER OF Nnamdi Michael Okpala****AND IN THE MATTER OF THE INSOLVENCY ACT 1986**

I, Nnamdi Michael Okpala of 15 Evesham Way, Ilford, IG5 0EQ acknowledge that I have been provided with Form NTB2 by the Official Receiver, making me aware of:

- my duty to provide the Official Receiver with information, deliver up assets and attend upon the Official Receiver;
- my duty with regard to property which becomes mine during the bankruptcy, and any increases in my income;

and to the provisions of sections:

- 279, 291, 333 and 360 of the Insolvency Act 1986;
- section 11 of the Company Directors Disqualification Act 1986; and
- Rule 10.125 of The Insolvency (England and Wales) Rules 2016

I also understand that

- I should carefully read the Form NTB2;
- if I do not understand, or have any queries about its contents, I should contact the Official Receiver or my trustee.
- Failure to comply with my duties, responsibilities and the restrictions placed upon me (particularly Section 360 of the Insolvency Act 1986 and Section 11 of the Company Directors Disqualification Act 1986) is a criminal offence for which I may be prosecuted.

In addition I:

- undertake to advise the Official Receiver or my trustee of any change of address during the period of my bankruptcy; and
- acknowledge that I have received a copy of the bankruptcy order.

Date:

Signed:

Witnessed by:

Address:

Date:

Signed

IN THE OFFICE OF THE ADJUDICATOR

5176578 of 2025

**NNAMDI MICHAEL OKPALA**

**IN BANKRUPTCY**

To:

**The Commissioners of HM Revenue and Customs and Department for Work and Pensions.**

I authorise and request you to provide to the Official Receiver (and to any agent appointed by the Official Receiver and the trustee of my bankruptcy estate) for all tax years up to and including that in which I am discharged from bankruptcy:

1. copies of my tax returns and any accounts submitted to you;

2. details of:

a) my tax assessments;

b) my national insurance contributions and tax credits;

c) any benefits I have claimed; and

3. any other information about my tax or national insurance affairs, tax credits or benefits which the Official Receiver (or the trustee of my bankruptcy estate) may require.

I also authorise and request you to pay to the Official Receiver (and the trustee of my bankruptcy estate) any income tax refunds due to me for all tax years up to and including that in which the bankruptcy order was made against me.

The name and address of my employer is:

Date:

Signed:

Nnamdi Michael Okpala  
15 Evesham Way  
Ilford  
IG5 0EQ

Tax reference:  
NI Number:SY597168A

IN THE OFFICE OF THE ADJUDICATOR

5176578 of 2025

**NNAMDI MICHAEL OKPALA**

**To Whom It May Concern:**

I, Nnamdi Michael Okpala of 15 Evesham Way, Ilford, IG5 0EQ consent to the disclosure of any personal data, as defined in the General Data Protection Regulation and the Data Protection Act 2018, held about me which the Official Receiver may reasonably require:

- 1) to fulfil the Official Receiver's duty under section 289 of the Insolvency Act 1986 to investigate my conduct and affairs; or,
- 2) to enable the Official Receiver and the trustee of my bankruptcy estate to get in, realise and distribute my bankruptcy estate in accordance with the provisions of the Insolvency Act 1986.

Personal Information Charter

Details of how The Insolvency Service treats personal information may be found on the internet at <http://www.gov.uk/insolvency-service/personal-information-charter>.

Signed

Date



# Ethnic Monitoring Form

## The Insolvency Service

The Race Relations (Amendment) Act 2000 requires that The Insolvency Service assess the impact of our policies and procedures on people from different ethnic groups. In order to do this we need your help in carrying out ethnic monitoring. The information provided by you will not be held on your case file, and will not affect any decisions made about the administration of your case. Having this information should help us to ensure that we treat everyone fairly and that all our practices meet the needs of all groups equally. Although the information about your ethnic background will be linked to you by means of your unique subject reference number, it will be accessible only by those members of staff in Headquarters who are specifically authorised to do so for the purposes of ethnic monitoring.

**Please tick one box or complete the "other" category that you feel best describes your ethnic and cultural background and return it to this office.**

Court Name: Office of the Adjudicator  
Subject  
Ref 140028897  
Number

Case Number: 5176578

Year: 2025

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### Ethnic Group (The categories are based on the 2001 census)

#### A White

- British English
- British Scottish
- British Welsh

British Other

- Irish

Any other white background

#### D Black or Black British

- Caribbean
- African

Any other black background

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#### B Mixed

- White and Black Caribbean
- White and Black African
- White and Asian

Any other mixed background

#### E Chinese or any other ethnic group

- Chinese
- Any other ethnic group

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#### C Asian or Asian British

- Indian
  - Pakistani
  - Bangladeshi
- Any other Asian background